

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**APPLICATIONS OF MARATHON  
OIL PERMIAN LLC FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO**

**CASE NOS. 21169-21172 &  
22330-22332**

**APPLICATION OF TITUS OIL & GAS  
PRODUCTION, LLC FOR COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO**

**CASE NOS. 21197-21199**

**JOINT MOTION TO VACATE THE DECEMBER 16, 2021 HEARING, TO VACATE  
THE AMENDED PRE-HEARING ORDER AND DEADLINES, AND TO SET A STATUS  
CONFERENCE**

Marathon Oil Permian LLC and Titus Oil & Gas Production, LLC (the “Parties”) submit this joint motion to (1) vacate the contested hearing currently set for the December 16, 2021, (2) vacate the Amended Pre-hearing order and deadlines, and (3) set these cases for a status conference on December 16, 2021.

1. The above-referenced cases are set for hearing on December 16, 2021 pursuant to an Amended Pre-Hearing Order issued on November 8, 2021.
2. The parties are in discussions, which are progressing and a December 16, 2021 hearing may be premature.
3. To allow the negotiations to continue, the Parties request the December 16, 2021 hearing be vacated along with all associated deadlines.
4. The Parties further request that these cases be set for a status conference on December 16, 2021, at which time the Parties will discuss the available dates for the contested hearings.

5. The Parties have initially agreed on January 20, 2022 as the hearing date but understand that date may not be available for contested hearings, which is why the Parties are, at this time, requesting a status conference on December 16, 2021.

6. Chevron U.S.A., Inc., the other party of record in these cases, has been notified regarding this motion and does not oppose this request.

For the foregoing reasons, the Parties respectfully requests the Division (1) vacate the contested hearing currently set for the December 16, 2021 docket, (2) vacate the associated pre-hearing order and deadlines, and (3) set these cases for a status conference on December 16, 2021.

Jointly submitted,

By: /s/Deana M. Bennett  
Deana M. Bennett  
Modrall, Sperling, Roehl, Harris, & Sisk P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
*Attorney for Marathon Oil Permian LLC*

And

By: electronically approved 12/1/2021 by Sharon Shaheen  
Sharon T. Shaheen  
Ricardo S. Gonzales  
Montgomery & Andrews, P.A.  
P. O. Box 2307  
Santa Fe, NM 87504-2307  
325 Paseo de Peralta  
Santa Fe, NM 87501  
sshahen@montand.com  
[rgonzales@montand.com](mailto:rgonzales@montand.com)  
*Attorneys for Titus Oil & Gas Production, LLC*

### CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December 2021, I served a true and correct copy of the foregoing on the following counsel of record by electronic mail:

Sharon T. Shaheen  
Ricardo S. Gonzales  
Montgomery & Andrews, P.A.  
P. O. Box 2307  
Santa Fe, NM 87504-2307  
325 Paseo de Peralta  
Santa Fe, NM 87501  
sshahen@montand.com  
rgonzales@montand.com

Candace Callahan  
Beatty & Wozniak PC  
500 Don Gaspar Ave.  
Santa Fe, NM 87505-2626  
ccallahan@bwenergyllaw.com

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: /s/Deana M. Bennett  
Deana M. Bennett