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

APPLICATION OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 24182

MARATHON OIL PERMIAN LLC'S PRE-HEARING STATEMENT

Marathon Oil Permian LLC ("Marathon") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

<u>APPLICANT</u> ATTORNEY

Marathon Oil Permian LLC Deana M. Bennett

Earl E. DeBrine Yarithza Peña

MODRALL, SPERLING, ROEHL,

HARRIS & SISK, P.A.

P. O. Box 2168

Albuquerque, New Mexico 87103-2168

(505) 848-1800

OTHER PARTIES ATTORNEY

None.

STATEMENT OF CASE

APPLICANT:

In Case No. 24182, Marathon seeks an order from the Division pooling all uncommitted mineral interests within a standard 960-acre, more or less, Bone Spring horizontal spacing unit underlying the N/2 of Section 36, Township 22 South, Range 27 East, and the N/2 of Sections 31 and 32, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico. This spacing unit will be dedicated to the **Red Jaguar Federal Com 301H** and **Red Jaguar Federal Com 501H** wells with first takes points in the SW/4 NW/4 (Unit E) of Section 36 and last take points in the SE/4 NE/4 (Unit H) of Section 32; and the **Red Jaguar Federal Com 302H** and **Red Jaguar Federal Com 502H** wells with first take points in the NW/4 NW/4 (Unit D) of Section 36 and last

take points in the NE/4 NE/4 (Unit A) of Section 32. The wells will be horizontally drilled, and the producing area for the wells is expected to be orthodox. The completed intervals for the Red Jaguar Federal Com 302H and Red Jaguar Federal Com 501H are expected to be less than 330 feet from the adjoining tracts thereby allowing for the inclusion of the proximity tracts within the proposed spacing unit. Also to be considered will be the cost of drilling and completing said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Marathon as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 5.45 miles northwest of Loving, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS	
Landman: Samuel Cox	Approx. 15 minutes	Approx. 8	
Geologist: Matthew Baker	Approx. 15 minutes	Approx. 8	

PROCEDURAL ISSUES

If there are no objections to this matter, Marathon intends to present this case by affidavit.

Respectfully submitted,

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

By: /s/ Deana M. Bennett

Deana M. Bennett Earl E. DeBrine Yarithza Peña Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800 Deana.Bennett@modrall.com edebrine@modrall.com Yarithza.pena@modrall.com

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

QUESTIONS

Action 342522

QUESTIONS

Operator:	OGRID:
MARATHON OIL PERMIAN LLC	372098
990 Town & Country Blvd.	Action Number:
Houston, TX 77024	342522
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	