

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

**APPLICATIONS OF 3R OPERATING, LLC
FOR APPROVAL OF STANDARD
HORIZONTAL SPACING UNIT AND
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO**

CASE NOS. 25123 & 25124

**APPLICATIONS OF WPX ENERGY
PERMIAN, LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**


CASE NOS. 25204 & 25205

**3R OPERATING, LLC'S RESPONSE TO WPX'S MOTION TO REOPEN THE
RECORD AND CONSIDERATION**

3R Operating, LLC ("3R"), through its undersigned attorneys, hereby respectfully submits to the Oil Conservation Division ("Division") 3R's response to WPX's Motion ("Motion") to Reopen the Record and Reconsider the Ruling on Post-Hearing Filings and Request for Sanctions in the above referenced cases. To effectuate timely decisions on these matters and avoid further delays, 3R takes no position on the Motion in question.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.,

By: 
Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Beatty & Wozniak, P.C.
500 Don Gaspar Ave.
Santa Fe, NM 87505
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
Attorneys for 3R Operating, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 17th day of June 2025, as follows:

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street Santa Fe, NM 87501
(970) 385-4401
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com
Attorneys for WPX Energy Permian, LLC

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta Santa Fe, New Mexico 87501
(505)780-8000
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com
Attorneys for Marathon Oil Permian, LLC



Rachael Ketchledge