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

APPLICATIONS OF TUMBLER OPERATING PARTNERS, LLC, FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case Nos. 25462-25465

APPLICATION OF TUMBLER OPERATING PARTNERS, LLC, FOR APPROVAL OF NON-STANDARD SPACING UNIT AND FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 25466

APPLICATIONS OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING AND APPROVAL OF NON-STANDARD SPACING UNITS, LEA COUNTY, NEW MEXICO.

Case Nos. 25541-25542

## TUMBLER OPERATING PARTNER LLC'S REVISED REBUTTAL EXHIBIT INDEX

Exhibit A-7 Rebuttal to MRO Ex. A #39, 40

Exhibit A-8 Rebuttal to MRO Ex. A #44

Exhibit B-6 Rebuttal to MRO Ex. B-5

Exhibit B-7 Rebuttal to MRO Ex. B-6

Exhibit B-8 Rebuttal to MRO Ex. B-7

Exhibit C-5 Rebuttal to MRO Ex. A #41

Exhibit D-15 Rebuttal to MRO Ex. A #12 – REVISED

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on October 7, 2025:

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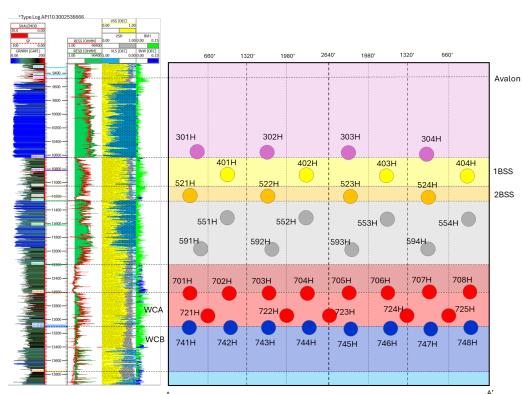
/s/ Sharon S. Shaheen
Sharon T. Shaheen

D-15

Rebuttal to MRO Ex. A #12 – MRO's full development plan fails to develop viable targets and prevent waste

Well proposals received from EOG Resources (32% WI owner in David/Goliath) from July of 2025, indicate a plan to develop the Avalon, 3<sup>rd</sup> Bone Carb, and 3<sup>rd</sup> Bone Spring Sand. EOG later withdrew its well proposals.

See MRO's Chronology of Contacts, ex. A-11.



underlying Sections 24, 25, and irregular Section 36, Township 26 South, Range 34 East, Lea County, New Mexico. Marathon is a wholly owned subsidiary of ConocoPhillips Company ("ConocoPhillips") and will operate the proposed spacing unit and wells included in these applications. Marathon's proposal fully develops two formations underlying three sections of land and is the best plan to prevent waste and protect correlative rights, including Marathon's ownership

Total wells per section comparison

Marathon Goliath Tumbler David EOG Ringo

July '25 April '25 July '25

17 31 41

Marathon pre-hearing statement