# Received by OCD: 4/24/2020 11:13:25 AM

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

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

Case No. 20865 Order No. R-21251

### BTA OIL PRODUCERS, LLC'S APPLICATION FOR HEARING DE NOVO

Pursuant to NMSA 1978, Section 70-2-13 and 19.15.4.23(A) NMAC, BTA Oil Producers, LLC, a party of record adversely affected by Order No. R-21251 (issued April 13, 2020), requests that this matter be heard *de novo* before the Oil Conservation Commission.

Respectfully submitted,

HINKLE SHANOR LLP

Dana S. Hardy

Dioscoro "Andy" Blanco

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com dblanco@hinklelawfirm.com

Counsel for BTA Oil Producers, LLC

# Received by OCD: 4/24/2020 11:13:25 AM

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of April, 2020 I served a true and correct copy of the foregoing *BTA Oil Producers*, *LLC's Application for Hearing De Novo* on the following counsel of record by electronic mail.

Deana Bennett 500 Fourth St. NW, Suite 1000 Albuquerque, New Mexico 87102 (505) 848-1834 deanna.bennett@modrall.com Counsel for Marathon Oil Permian LLC

Jennifer Bradfute
Senior Attorney
Marathon Oil Company
5555 San Felipe Street
Houston, TX 77056
(713) 296 2027
jbradfute@marathonoil.com
Counsel for Marathon Oil Permian LLC

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart LLP
Post Office Box 2208
Santa Fe, NM 87504-2208
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com
Counsel for OXY USA Inc.

Dana S. Hardy