

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

**APPLICATION OF MEWBOURNE OIL COMPANY  
FOR APPROVAL OF EXPANSION OF A UNIT AREA,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 21418**

**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**

**APPLICANT**

Mewbourne Oil Company

**ATTORNEY**

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**OTHER PARTIES**

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Devon Energy Production, Co. LP  
ConocoPhillips  
Chisholm Energy Operating, LLC  
Chevron U.S.A. Inc.

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Marathon Oil Permian LLC

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**STATEMENT OF CASE**

In Case No. 21418, Mewbourne Oil Company proposes to expand an existing Unit, the North Wilson Deep Unit (“Unit”). Marathon is an interest owner with mineral interests within the proposed expanded Unit area. Marathon is not willing to voluntarily commit its interests to the expanded Unit at this time. Marathon and Mewbourne have been in discussions regarding a commercial resolution but, to date, have not been able to come to mutually agreeable terms. Marathon believes that the Unit should not be approved until Mewbourne and Marathon have concluded negotiations.

Marathon does not intend to introduce any affirmative testimony or exhibits at the January 21, 2021 hearing but reserves its right to cross-examine Mewbourne’s witnesses; object to Mewbourne’s exhibits; and, after review of Mewbourne’s testimony and evidence, to the extent necessary, submit rebuttal testimony and/or exhibits limited to rebutting Mewbourne’s testimony and exhibits.

Respectfully submitted,

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

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 14, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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