

NSL

PROTEST

Garcia, John A, EMNRD

From: Garcia, John A, EMNRD
Sent: Wednesday, March 18, 2020 4:21 PM
To: 'Deana M. Bennett'
Cc: 'Willeto, Lisa'; Cox, Scott, EMNRD; Lowe, Leonard, EMNRD; Simmons, Kurt, EMNRD
Subject: Protest of Marathon NSL Applications - Trojan Horse Wells
Attachments: FOC Protestpdf.pdf

Deana,

Applicant	OGRID	WELL NAME	POOL
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WB Fed Com 1H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WXY Fed Com 2H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WB Fed Com 3H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WXY Fed Com 4H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WD Fed Com 5H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WD Fed Com 6H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Trojan Horse 35 WD Fed Com 7H	Purple Sage; Wolfcamp

The OCD was notified that **Foran Oil Company** has protested your applications for approval of a Non Standard Location of the above subject wells. This party have been identified as an affected person for their specific locations.

Therefore, you are being notified that if **Marathon Oil Permian, LLC** wishes for these applications to be considered, it must either go to hearing or may be reviewed administratively if the protest is withdrawn as a result of a negotiated resolution with this party.

The NSL application will be retained by OCD, but suspended from further administrative review.

Please contact the OCD once a decision regarding this application is determined within the next 30 days

03/18/20, Noticed date

04/17/20, 30 day ends

Protestant contact information:

Lisa Willeto: lisa.willeto@gknet.com

Dal Moellenberg: d1m@gknet.com

Thank you,

John Garcia

Petroleum Specialist

Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3441



Garcia, John A, EMNRD

From: Wade, Gabriel, EMNRD
Sent: Wednesday, March 18, 2020 3:36 PM
To: EMNRD-OCD-Engineering
Subject: FW: Marathon Oil Permian LLC Applications--Trojan Horse Wells

Just so everyone has this

Gabriel Wade
Deputy Director, Oil Conservation Division
Energy, Minerals, and Natural Resources Department
1220 S. St. Francis Dr.
Santa Fe, NM 87505
(505) 476-3451
gabriel.wade@state.nm.us

From: Willeto, Lisa <lisa.willeto@gknet.com>
Sent: Wednesday, March 18, 2020 3:34 PM
To: Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>
Cc: Wade, Gabriel, EMNRD <Gabriel.Wade@state.nm.us>; Moellenberg, Dalva L. <DLM@gknet.com>
Subject: [EXT] FW: Marathon Oil Permian LLC Applications--Trojan Horse Wells

Mr. Lowe,

Below is 1 of 2 protest that I am trying to submit electronically. Both of the previous emails to OCD.Engineering@state.nm.us have bounced back. Could you please confirm OCD has received these? I will also be faxing both protests to (505)476-3462. Please let me know if you have any questions.

Thank you,
Lisa

Gallagher&Kennedy

1239 Paseo de Peralta
Santa Fe, New Mexico 87501-2758
505-982-9523 | www.gknet.com

Lisa Willeto
Assistant to
Dalva Moellenberg and Gene Creely
lisa.willeto@gknet.com
505-989-7365

From: Willeto, Lisa
Sent: Wednesday, March 18, 2020 3:09 PM
To: 'OCD.Engineering@state.nm.us' <OCD.Engineering@state.nm.us>
Cc: Moellenberg, Dalva L. <DLM@gknet.com>
Subject: Marathon Oil Permian LLC Applications--Trojan Horse Wells

Good afternoon,

Please see the protest below.

Re: Applications of Marathon Oil Permian LLC for Administrative Approvals of Unorthodox Well Locations for Trojan Horse 35 WB Fed Com 1H, Trojan Horse 35 WXY Fed Com 2H, Trojan Horse 35 WB Fed Com 3H, Trojan Horse 35 WXY Fed Com 4H, Trojan Horse 35 WD Fed Com 5H, Trojan Horse 35 WD Fed Com 6H, and Trojan Horse 35 WD Fed Com 7HWells, all in the W2 of Section 35, Township 22 South, Range 28 East, and W2 Section 2, Township 23 South, Range 28 East, Eddy County, New Mexico.

On behalf of Foran Oil Company ("FOC"), FOC hereby protests and objects to the applications listed above as filed with OCD by Billy Moore, Reservoir Engineer, Marathon Oil Permian LLC ("Marathon"), (713) 296-1883 and/or Deana Barrett of Modrall Sperling, Counsel for Marathon on or about February 27, 2020. Marathon counsel is Deana M. Bennett, who listed as a contact Jeffrey Broussard, Land Professional, Marathon Oil Permian LLC, (713) 296-3159, jbroussard1@marathonoil.com. As a result of this protest, FOC requests that these applications not be processed administratively and that if the applicant wishes to proceed with the applications, it should request a hearing before the Division. Related cases already have been consolidated and set for hearing.

Best Regards,

Dal Moellenberg, Counsel for FOC
Dalva L. Moellenberg
1239 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 982-9523 (Telephone)
(505) 983-8160 (Fax)
dln@gknet.com

This message and any of the attached documents contain information from the law firm of Gallagher & Kennedy, P.A. that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information, and no privilege has been waived by your inadvertent receipt. If you have received this transmission in error, please notify the sender by reply e-mail and then delete this message. Thank you.