

NSL

PROTEST

**Garcia, John A, EMNRD**

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**From:** Garcia, John A, EMNRD  
**Sent:** Wednesday, March 18, 2020 3:44 PM  
**To:** 'Deana M. Bennett'  
**Cc:** 'Kaitlyn A. Luck'; Simmons, Kurt, EMNRD; Lowe, Leonard, EMNRD; Cox, Scott, EMNRD  
**Subject:** Protest of Marathon NSL Applications - Shake-N-Bake  
**Attachments:** Shake N Bake Protest.pdf

Deana,

Applicant	OGRID	WELL NAME	POOL
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WXY Fed Com 1H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WXY Fed Com 2H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WXY Fed Com 3H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WD Fed Com 4H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WD Fed Com 5H	Purple Sage; Wolfcamp
Marathon Oil Permian, LLC	372098	Shake-N-Bake 34 WD Fed Com 6H	Purple Sage; Wolfcamp

The OCD was notified that **MRC Permian Company** and **Matador Production Company** have 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these applications to be considered, it must either go to hearing or may be reviewed administratively if the protest is withdrawn as a result of a negotiated resolution with this party.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:

Kaitlyn Luck

E-mail: [kaluck@hollandhart.com](mailto:kaluck@hollandhart.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**

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**From:** Kaitlyn A. Luck <KALuck@hollandhart.com>  
**Sent:** Wednesday, March 18, 2020 10:32 AM  
**To:** Engineer, OCD, EMNRD; Lowe, Leonard, EMNRD  
**Cc:** Adam Rankin; Michael Feldewert; 'Deana M. Bennett'  
**Subject:** [EXT] Protest of Marathon Oil Permian's NSL Applications for the Shake-N-Bake 34 WXY Fed Com # 1H-#3H wells & Shake-N-Bake 34 WD Fed Com #4H-#6H wells, Sections 27 & 34, T22S, R28E, Eddy County, NM  
**Attachments:** Protested NSL Applications - Marathon's Shake-N-Bake wells.pdf

OCD:

Please be advised that *MRC Permian Company* and *Matador Production Company* protest the following administrative applications filed by **Marathon Oil Permian LLC** for approval of unorthodox well locations:

- **Shake-N-Bake 34 WXY Fed Com #1H, #2H, #3H wells**, Sections 27 & 34, T22S, R28E, NMPM, Eddy County, NM
- **Shake-N-Bake 34 WD Fed Com #4H, #5H, #6H wells**, Sections 27 & 34, T22S, R28E, NMPM, Eddy County, NM

Copies of the NSL applications and notice letters are attached. If you have any questions, please let us know. We appreciate your time.

Thanks,

Kaitlyn

---

**Kaitlyn A. Luck**

Associate, Holland & Hart LLP

110 N. Guadalupe Street, Suite 1, Santa Fe, New Mexico 87501

T 505.954.7286 F 505.819.5579



CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this e-mail.

Karlene Schuman  
Modrall Sperling Roehl Harris & Sisk P.A.  
500 Fourth Street, Suite 1000  
Albuquerque, NM 87102

MAR 05 2020



9314 8699 0430 0069 4099 78

RETURN RECEIPT (ELECTRONIC)



Total Postage: \$7.65

Foran Oil Company  
One Lincoln Center  
5400 LBJ Freeway, Suite 1500  
Dallas, TX 75240

Reference Number: 81363.203 SnB





MODRALL SPERLING  
L A W Y E R S

MAR 05 2020

March 2, 2020

VIA CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

TO AFFECTED PARTIES

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 2H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 6H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Ladies and Gentlemen:

Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Modrall Sperring  
Roehl Harris & Sisk P.A.  
500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,



Deana M. Bennett

***Attorney for Marathon Oil  
Permian LLC***

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 1H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature \_\_\_\_\_

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 2H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_

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Signature \_\_\_\_\_

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Dated: \_\_\_\_\_  
Signature \_\_\_\_\_

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Dated: \_\_\_\_\_

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Dated: \_\_\_\_\_  
Signature

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

<b>Applicant:</b> <u>Marathon Oil Permian LLC</u>	<b>OGRID Number:</b> <u>372098</u>
<b>Well Name:</b> <u>Shake-N-Bake 34 WD Fed Com 6H</u>	<b>API:</b> <u>Pending</u>
<b>Pool:</b> <u>Purple Sage; Wolfcamp</u>	<b>Pool Code:</b> <u>98220</u>

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
- A. Location – Spacing Unit – Simultaneous Dedication
- NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD

- B. Check one only for [ I ] or [ II ]
- [ I ] Commingling – Storage – Measurement
- DHC     CTB     PLC     PC     OLS     OLM
- [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery
- WFX     PMX     SWD     IPI     EOR     PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
- A.  Offset operators or lease holders
- B.  Royalty, overriding royalty owners, revenue owners
- C.  Application requires published notice
- D.  Notification and/or concurrent approval by SLO
- E.  Notification and/or concurrent approval by BLM
- F.  Surface owner
- G.  For all of the above, proof of notification or publication is attached, and/or,
- H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett

Print or Type Name

*Deana M Bennett*

Signature

March 2, 2020  
Date

505-848-1800  
Phone Number

deana.bennett@modrall.com  
e-mail Address



MODRALL SPERLING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 6H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC ("Marathon"), OGRID Number 372098, is seeking administrative approval of an unorthodox well location ("NSL") for the **Shake-N-Bake 34 WD Fed Com 6H well**, (the "Well") to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- First Take Point: 100' from the South line and 2,178' from the West line of Section 34;
- Last Take Point: 100' from the North line and 2,178' from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330' foot setback requirements. The completed interval for the proposed well is closer than 330' from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett". The signature is written in black ink and is positioned above a solid horizontal line.

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720  
District III  
1000 Rio Brazos Road, Artesia, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Name PURPLE SAGE; WOLFCAMP (GAS)
<sup>4</sup> Property Code	<sup>5</sup> Property Name SHAKE-N-BAKE 34 WD FED COM	<sup>6</sup> Well Number 6H
<sup>7</sup> OGRID No. 372098	<sup>8</sup> Operator Name MARATHON OIL PERMIAN LLC	<sup>9</sup> Elevation 3038'

<sup>10</sup> Surface Location

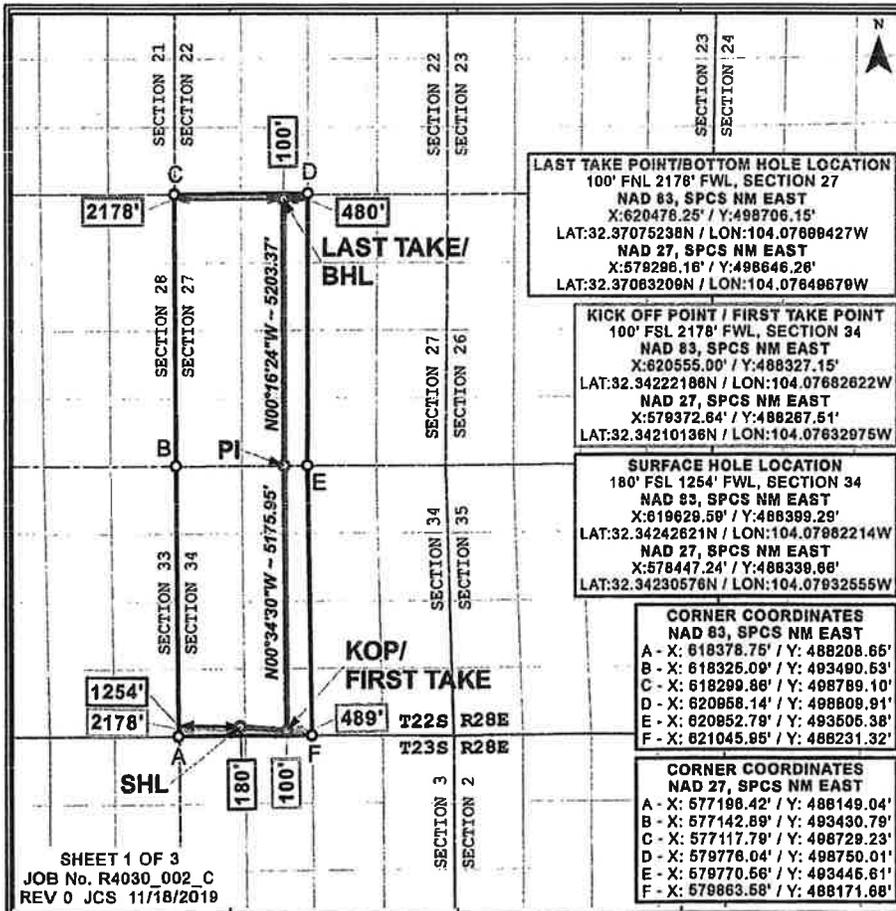
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	34	22S	28E		180	SOUTH	1254	WEST	EDDY

<sup>10</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	27	22S	28E		100	NORTH	2178	WEST	EDDY

<sup>11</sup> Dedicated Acres 640.0	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
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No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



**<sup>17</sup> OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name \_\_\_\_\_

E-mail Address \_\_\_\_\_

**<sup>18</sup> SURVEYOR CERTIFICATION**  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey \_\_\_\_\_  
Signature of Professional Surveyor \_\_\_\_\_

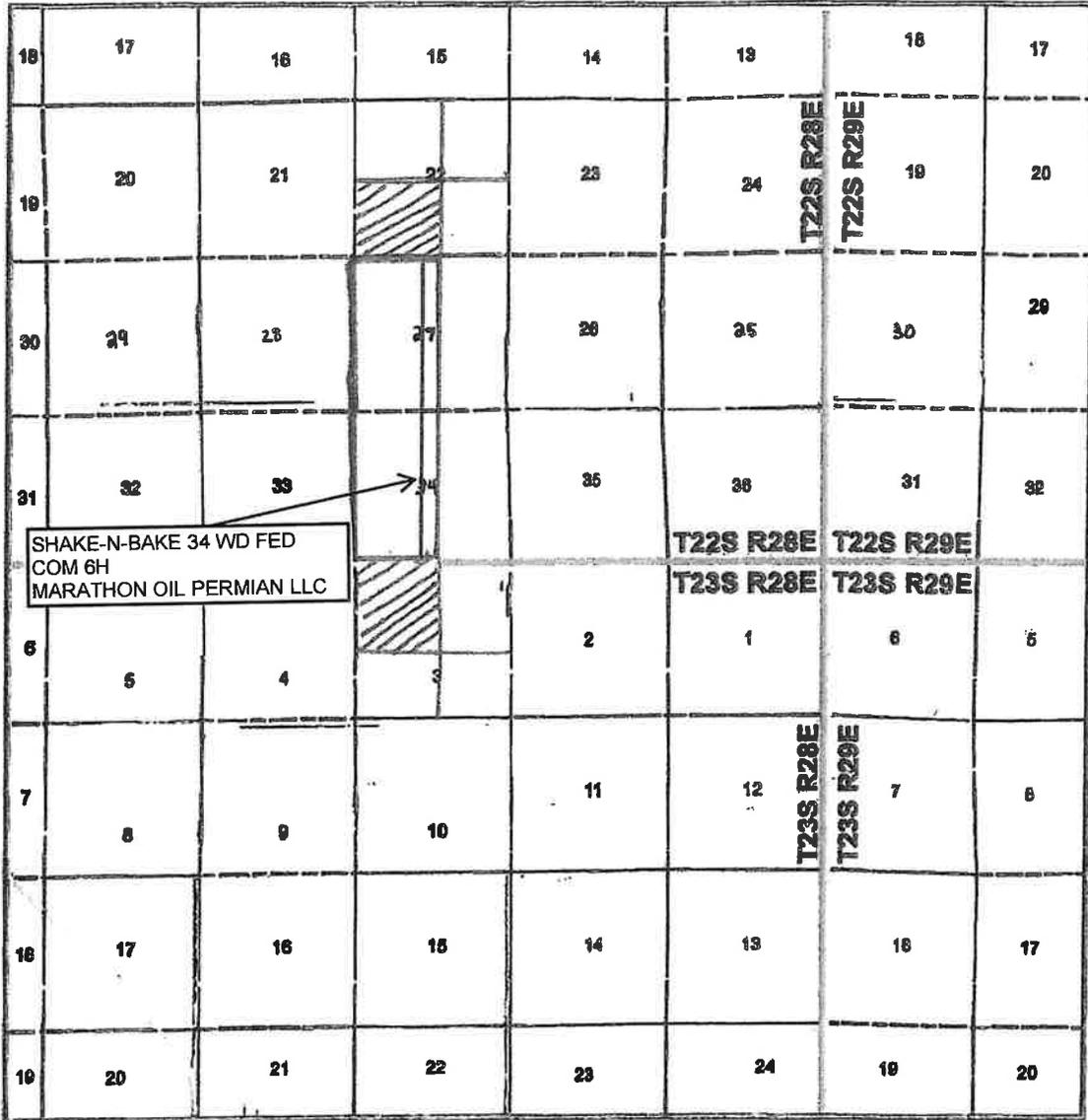
**PRELIMINARY**  
THIS DOCUMENT IS NOT TO BE USED FOR CONSTRUCTION, BIDDING, RECORDATION, SALE OF THE BASIS FOR THE ISSUANCE OF A PERMIT.

Certificate Number \_\_\_\_\_

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"



# VICINITY MAP



SEC. 26 TWP. 22-S RGE. 28-E  
 SURVEY: N.M.P.M.  
 COUNTY: EDDY  
 OPERATOR: MARATHON OIL PERMIAN LLC  
 DESCRIPTION: 233' FSL & 1272' FWL  
 ELEVATION: 3090'  
 LEASE: TROJAN HORSE 35 WB FED COM  
 U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.

1" = 1 MILE

-  = AFFECTED TRACT
-  = HSU



SHEET 3 OF 3

PREPARED BY:  
 R-SQUARED GLOBAL, LLC  
 1306 LOUISVILLE AVENUE, MONROE, LA 71201  
 510-323-6800 OFFICE  
 JOB No. R3071\_008\_0



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Shake-N-Bake 34 WD Fed Com 6H  
Eddy County, New Mexico

Dear Ms. Sandoval,

Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Shake-N-Bake 34 WD Fed Com 6H well, to be drilled in Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 100' FSL and 2,178' FWL of Section 34, and last take point at 100' FNL and 2,178' FWL of Section 27, which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section. This spacing best fits into the spacing for the other wells in the development plan of the entire section and we believe that it will result in the greatest recovery of reserves.

Thank you for your consideration. Should you have any questions please contact me at (713) 296-1883.

Sincerely,

A handwritten signature in black ink that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset







MODRALL SPERLING

L A W Y E R S

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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Ladies and Gentlemen:

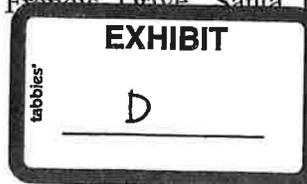
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Modrall Sperling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
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Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

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Dated: \_\_\_\_\_  
Signature

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Dated: \_\_\_\_\_  
Signature

Karlene Schuman  
 Modrall Sperlberg Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 03/02/2020

Firm Mailing Book ID: 185719

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
1	9314 8699 0430 0069 4099 54	RKC, Inc. 7500 Arapahoe Road, Ste. 380 Centennial CO 80112	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
2	9314 8699 0430 0069 4099 61	Matador E&P Co., Inc. One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
3	9314 8699 0430 0069 4099 78	Foran Oil Company One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
4	9314 8699 0430 0069 4099 85	Nadel & Gussman, LLC 3300 1st Place Tower 15 E. 5th St. Tulsa OK 74103	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
5	9314 8699 0430 0069 4099 92	The Eastland Oil Company PO Box 3488 Midland TX 79702	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
6	9314 8699 0430 0069 4100 04	BHP Billiton BXP Energy Inc., Div. of Interest PO Box 696505 San Antonio TX 78269	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
7	9314 8699 0430 0069 4100 11	Ridge Runner Operating, LLC 1004 N. Big Spring Street Midland TX 79701	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
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Karlene Schuman  
 Modrall Sperling Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 03/02/2020

Firm Mailing Book ID: 185719

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
15	9314 8699 0430 0069 4100 97	Chevron USA, Inc. 1400 Smith St. Houston TX 77002	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
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<b>Totals:</b>			<b>\$38.40</b>	<b>\$56.80</b>	<b>\$27.20</b>	<b>\$0.00</b>	
						<b>Grand Total:</b>	<b>\$122.40</b>

List Number of Pieces Received at Post Office      Postmaster:      Dated:  
 Listed by Sender      Name of receiving employee

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** Marathon Oil Permian LLC **OGRID Number:** 372098  
**Well Name:** Shake-N-Bake 34 WD Fed Com 5H **API:** Pending  
**Pool:** Purple Sage; Wolfcamp **Pool Code:** 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]  
 A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]  
 [ I ] Commingling – Storage – Measurement  
 DHC    CTB    PLC    PC    OLS    OLM  
 [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.  
 A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

FOR OCD ONLY	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett

Print or Type Name

*Deana M Bennett*

Signature

March 2, 2020  
Date

505-848-1800  
Phone Number

deana.bennett@modrall.com  
e-mail Address



MODRALL SPERLING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 5H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC (“Marathon”), OGRID Number 372098, is seeking administrative approval of an unorthodox well location (“NSL”) for the **Shake-N-Bake 34 WD Fed Com 5H well**, (the “Well”) to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- First Take Point: 100’ from the South line and 1,254’ from the West line of Section 34;
- Last Take Point: 100’ from the North line and 1,254’ from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330’ foot setback requirements. The completed interval for the proposed well is closer than 330’ from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett". The signature is written in black ink and is positioned above a horizontal line.

Deana M. Bennett  
***Attorney for Marathon Oil  
Permian LLC***

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720

District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720

District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170

District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
 AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number		<sup>2</sup> Pool Code 98220		<sup>3</sup> Pool Name PURPLE SAGE; WOLFCAMP (GAS)	
<sup>4</sup> Property Code		<sup>5</sup> Property Name SHAKE-N-BAKE 34 WD FED COM			<sup>6</sup> Well Number 5H
<sup>7</sup> OGRID No. 372098		<sup>8</sup> Operator Name MARATHON OIL PERMIAN LLC			<sup>9</sup> Elevation 3038'

<sup>10</sup> Surface Location

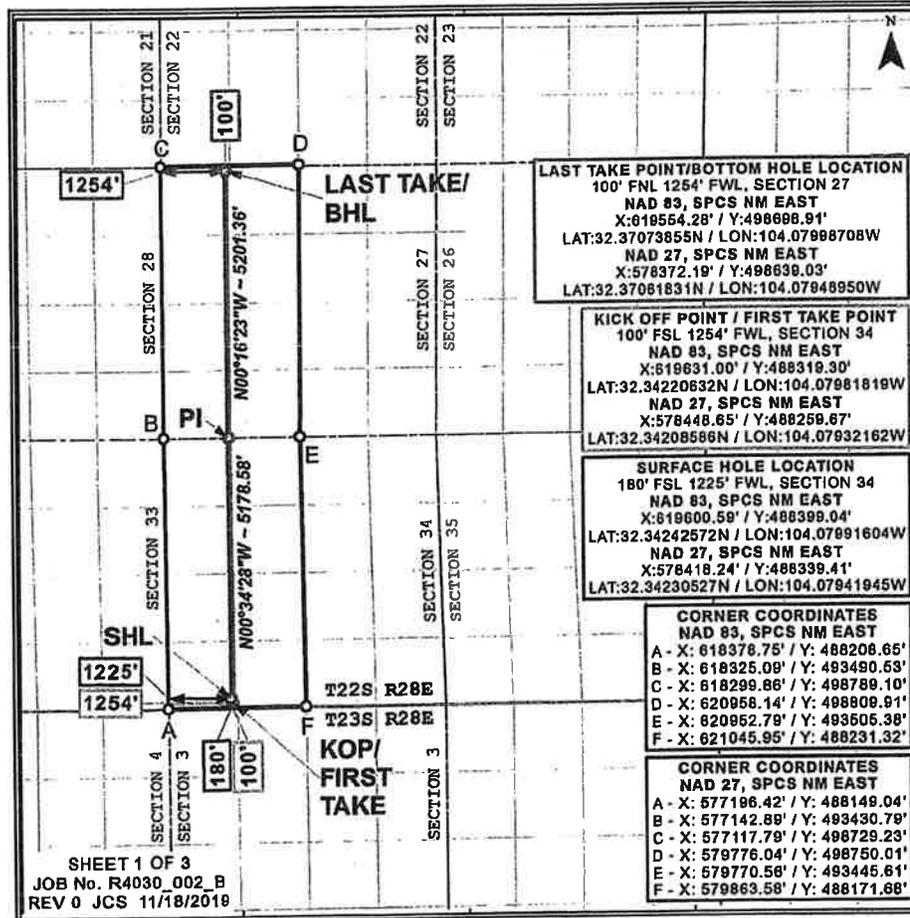
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	34	22S	28E		180	SOUTH	1225	WEST	EDDY

<sup>11</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	27	22S	28E		100	NORTH	1254	WEST	EDDY

<sup>12</sup> Dedicated Acres 640.0	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
--	-------------------------------	----------------------------------	-------------------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



**<sup>17</sup> OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name \_\_\_\_\_

E-mail Address \_\_\_\_\_

**<sup>18</sup> SURVEYOR CERTIFICATION**  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey \_\_\_\_\_  
Signature \_\_\_\_\_  
Professional Surveyor

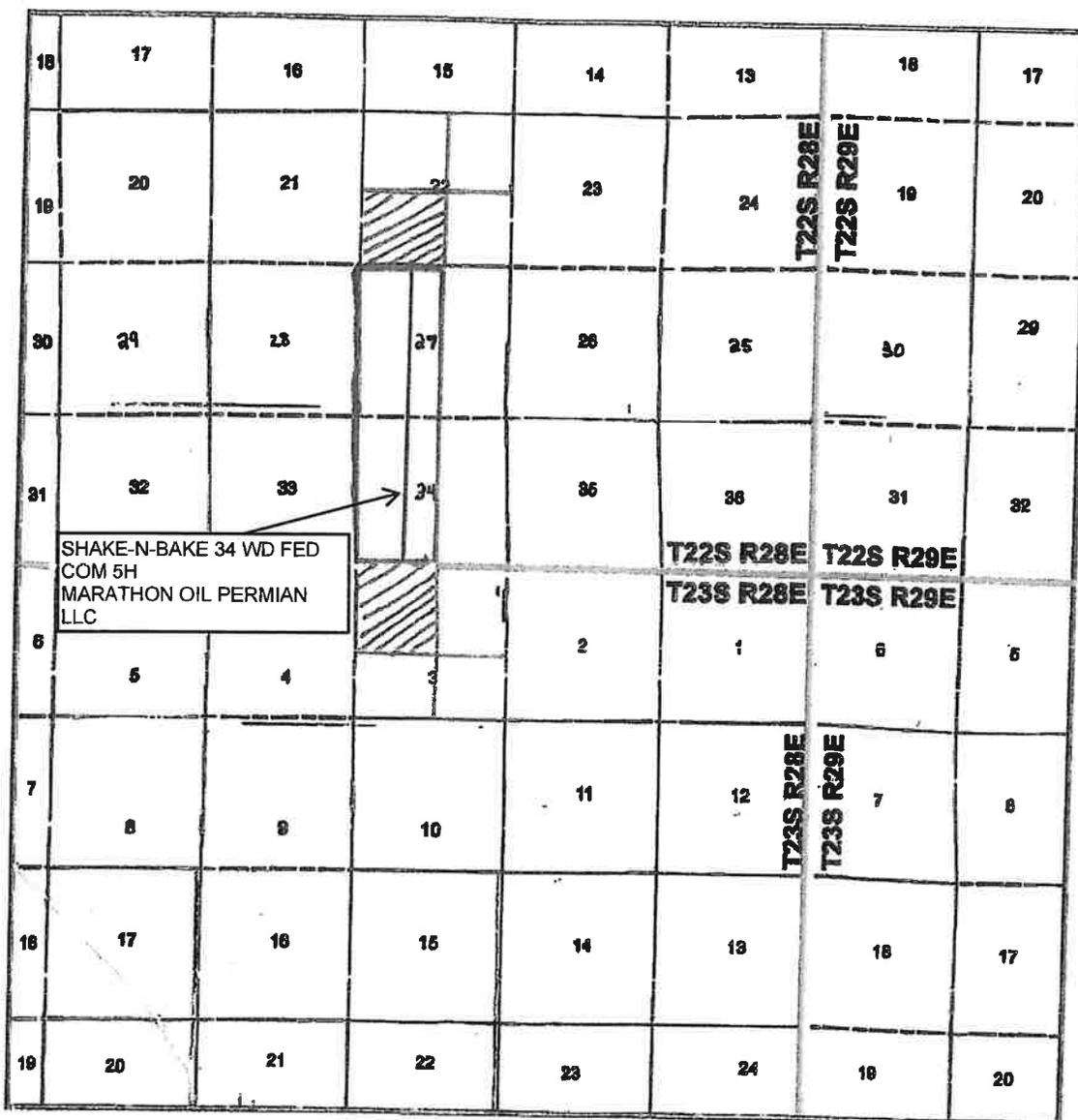
**PRELIMINARY**  
THIS DOCUMENT IS NOT TO BE USED FOR CONSTRUCTION, BIDDING, RECORDATION, COVENANCE, SALE OR THE BASIS FOR THE ISSUANCE OF A PERMIT.

Certificate Number \_\_\_\_\_

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"



# VICINITY MAP



**SEC. 26 TWP. 22-S RGE. 28-E**  
**SURVEY: N.M.P.M.**  
**COUNTY: EDDY**  
**OPERATOR: MARATHON OIL PERMIAN LLC**  
**DESCRIPTION: 233' FSL & 1272' FWL**  
**ELEVATION: 3090'**  
**LEASE: TROJAN HORSE 35 WB FED COM**  
**U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.**

1" = 1 MILE

-  = AFFECTED TRACT
-  = HSU



**SHEET 3 OF 3**

PREPARED BY:  
**R-SQUARED GLOBAL, LLC**  
 1300 LOUISVILLE AVENUE, MONROE, LA 71201  
 318-325-6900 OFFICE  
 JOB No. R2071\_003\_C



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Shake-N-Bake 34 WD Fed Com 5H  
Eddy County, New Mexico

Dear Ms. Sandoval,

Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Shake-N-Bake 34 WD Fed Com 5H well, to be drilled in Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 100' FSL and 1,254' FWL of Section 34, and last take point at 100' FNL and 1,254' FWL of Section 27, which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section. This spacing best fits into the spacing for the other wells in the development plan of the entire section and we believe that it will result in the greatest recovery of reserves.

Thank you for your consideration. Should you have any questions please contact me at (713) 296-1883.

Sincerely,

A handwritten signature in cursive script that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset



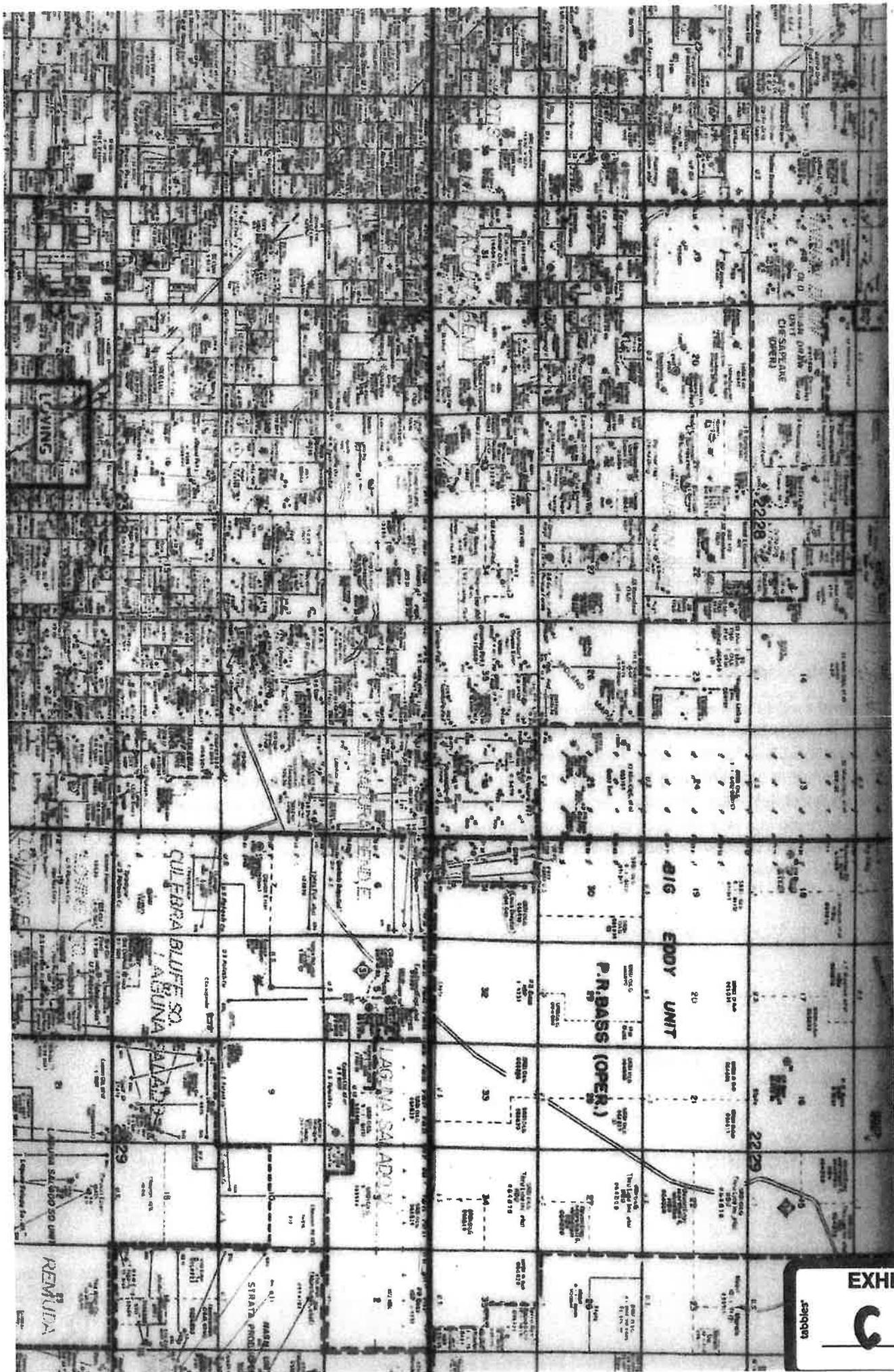


EXHIBIT  
C  
abbott



MODRALL SPERLING  
LAWYERS

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 2H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 3H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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Ladies and Gentlemen:

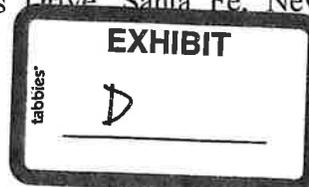
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com



Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 1H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 2H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_

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Signature

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Dated: \_\_\_\_\_  
Signature \_\_\_\_\_

Karlene Schuman  
 Modrall Sperlberg Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

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2	9314 8699 0430 0069 4099 61	Matador E&P Co., Inc. One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
3	9314 8699 0430 0069 4099 78	Foran Oil Company One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
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Karlene Schuman  
 Modrall Sperling Roehl Harris & Sisk P.A.  
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						<b>Grand Total:</b>	<b>\$122.40</b>

List Number of Pieces Received at Post Office      Postmaster:      Dated:  
 Listed by Sender      Name of receiving employee

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

<b>Applicant:</b> Marathon Oil Permian LLC	<b>OGRID Number:</b> 372098
<b>Well Name:</b> Shake-N-Bake 34 WD Fed Com 4H	<b>API:</b> Pending
<b>Pool:</b> Purple Sage; Wolfcamp	<b>Pool Code:</b> 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
- A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]
- [ I ] Commingling – Storage – Measurement  
 DHC    CTB    PLC    PC    OLS    OLM
- [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

2) **NOTIFICATION REQUIRED TO:** Check those which apply.

- A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett

Print or Type Name

Signature

March 2, 2020  
 Date

505-848-1800  
 Phone Number

deana.bennett@modrall.com  
 e-mail Address



MODRALL SPERLING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 4H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC (“Marathon”), OGRID Number 372098, is seeking administrative approval of an unorthodox well location (“NSL”) for the **Shake-N-Bake 34 WD Fed Com 4H well**, (the “Well”) to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- First Take Point: 100’ from the South line and 330’ from the West line of Section 34;
- Last Take Point: 100’ from the North line and 330’ from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330’ foot setback requirements. The completed interval for the proposed well is closer than 330’ from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett". The signature is written in black ink and is positioned above a horizontal line.

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
 AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number	<sup>2</sup> Pool Code	<sup>3</sup> Pool Name
	98220	PURPLE SAGE; WOLFCAMP (GAS)
<sup>4</sup> Property Code	<sup>5</sup> Property Name	
	SHAKE-N-BAKE 34 WD FED COM	
<sup>7</sup> OGRID No.	<sup>8</sup> Operator Name	<sup>6</sup> Well Number
372098	MARATHON OIL PERMIAN LLC	4H
		<sup>9</sup> Elevation
		3038'

<sup>10</sup> Surface Location

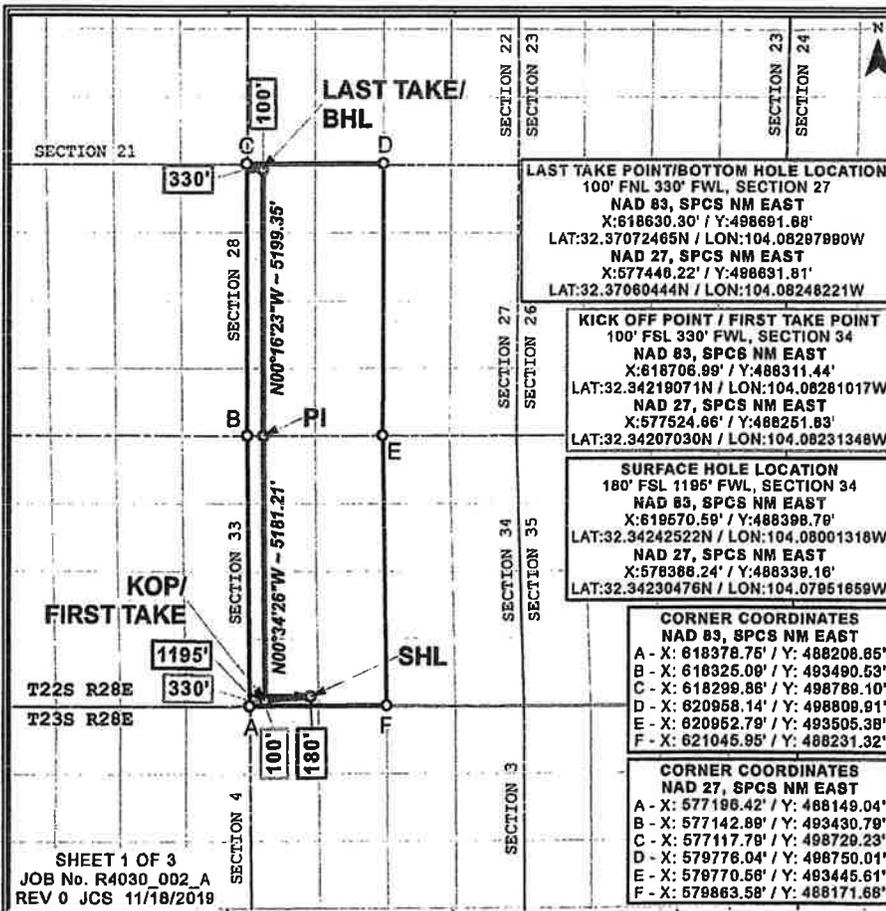
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	34	22S	28E		180	SOUTH	1195	WEST	EDDY

<sup>11</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	27	22S	28E		100	NORTH	330	WEST	EDDY

<sup>12</sup> Dedicated Acres	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
640.0			

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



**<sup>17</sup> OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

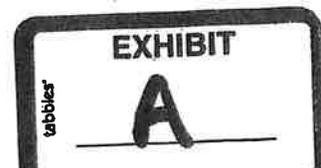
Signature \_\_\_\_\_ Date \_\_\_\_\_  
Printed Name \_\_\_\_\_  
E-mail Address \_\_\_\_\_

**<sup>18</sup> SURVEYOR CERTIFICATION**  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

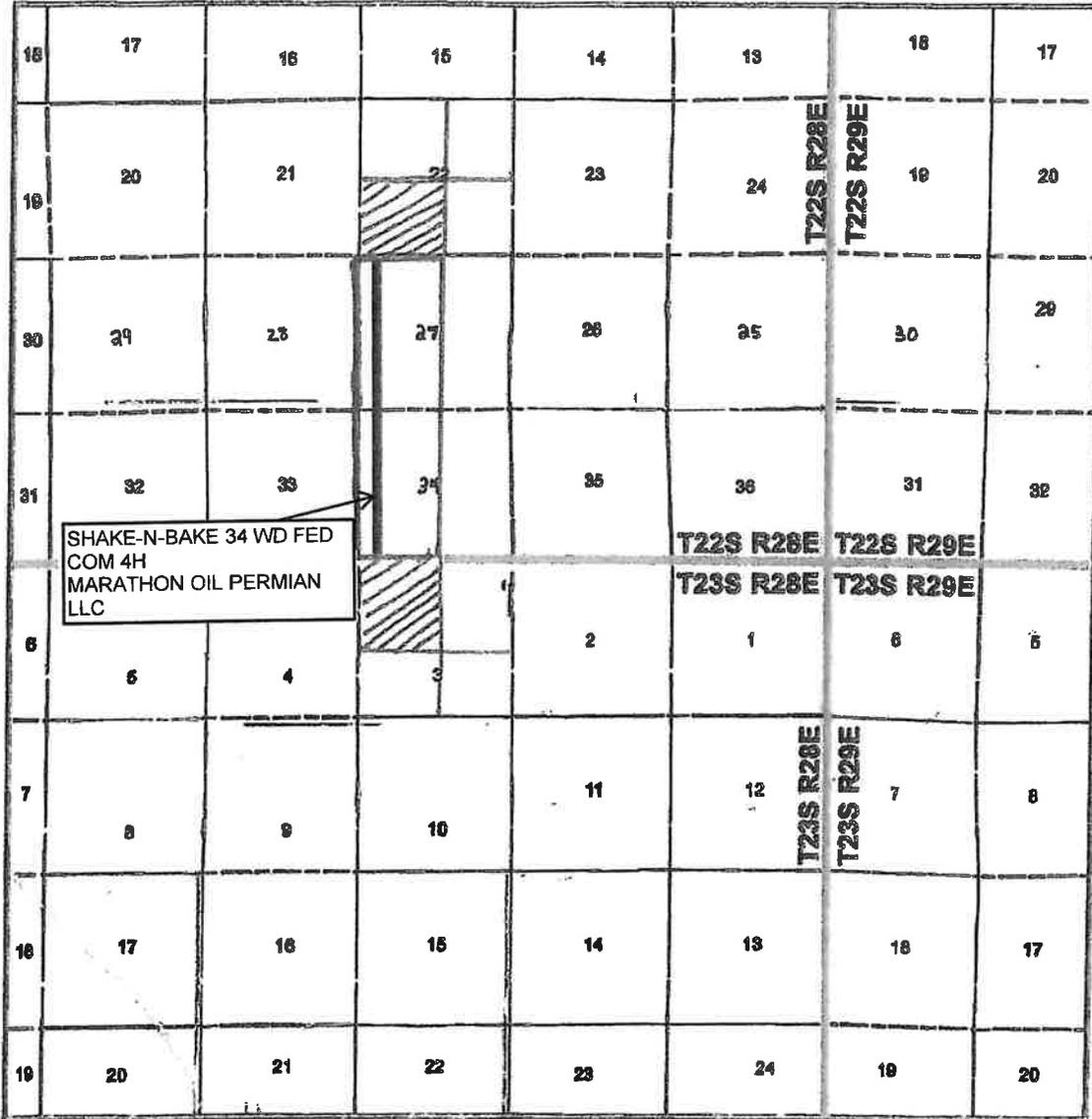
Date of Survey \_\_\_\_\_  
Signature of Professional Surveyor \_\_\_\_\_  
Certificate Number \_\_\_\_\_

**PRELIMINARY**  
THIS DOCUMENT IS NOT TO BE USED FOR CONSTRUCTION, BIDDING, RECORDATION, COINCIDENT, SALE OR THE BASIS FOR THE ISSUANCE OF A PERMIT.

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"



# VICINITY MAP



**SEC. 28 TWP. 22-S RGE. 28-E**  
**SURVEY: N.M.P.M.**  
**COUNTY: EDDY**  
**OPERATOR: MARATHON OIL PERMIAN LLC**  
**DESCRIPTION: 233' FSL & 1272' FWL**  
**ELEVATION: 3090'**  
**LEASE: TROJAN HORSE 35 WB FED COM**  
**U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.**

1" = 1 MILE

-  = AFFECTED TRACT
-  = HSU



SHEET 3 OF 3

**PREPARED BY:**  
**R-SQUARED GLOBAL, LLC**  
**1309 LOUISVILLE AVENUE, MONROE, LA 71201**  
**312-323-8800 OFFICE**  
**JOB No. R2971\_008\_C**



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Shake-N-Bake 34 WD Fed Com 4H  
Eddy County, New Mexico

Dear Ms. Sandoval,

Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Shake-N-Bake 34 WD Fed Com 4H well, to be drilled in Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 100' FSL and 330' FWL of Section 34, and last take point at 100' FNL and 330' FWL of Section 27, which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section. This spacing best fits into the spacing for the other wells in the development plan of the entire section and we believe that it will result in the greatest recovery of reserves.

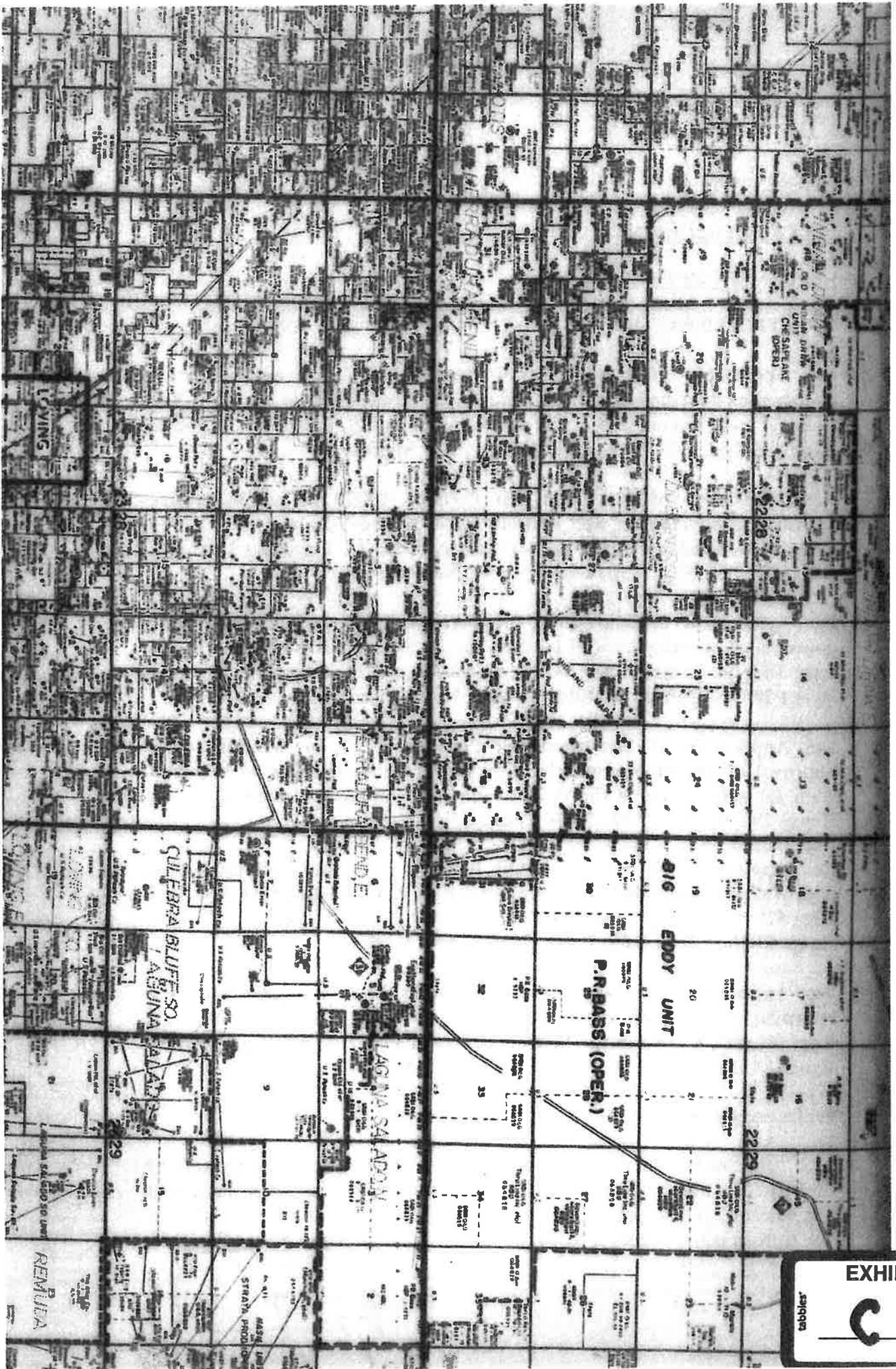
Thank you for your consideration. Should you have any questions please contact me at (713) 296-1883.

Sincerely,

A handwritten signature in black ink that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset





EXHIBIT

tabbles



MODRALL SPERLING

L A W Y E R S

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 2H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 3H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 5H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WD Fed Com 6H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Ladies and Gentlemen:

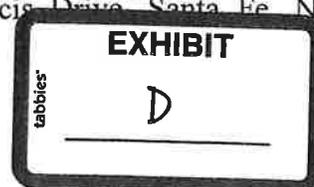
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com



Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 1H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 2H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_

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Dated: \_\_\_\_\_  
Signature

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Dated: \_\_\_\_\_  
Signature

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Dated: \_\_\_\_\_  
Signature

**Karlene Schuman**  
**Modrall Sperling Roehl Harris & Sisk P.A.**  
**500 Fourth Street, Suite 1000**  
**Albuquerque NM 87102**

**PS Form 3877**

**Type of Mailing: CERTIFIED MAIL**  
**03/02/2020**

**Firm Mailing Book ID: 185719**

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
1	9314 8699 0430 0069 4099 54	RKC, Inc. 7500 Arapahoe Road, Ste. 380 Centennial CO 80112	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
2	9314 8699 0430 0069 4099 61	Mataador E&P Co., Inc. One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
3	9314 8699 0430 0069 4099 78	Foran Oil Company One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
4	9314 8699 0430 0069 4099 85	Nadel & Gussman, LLC 3300 1st Place Tower 15 E. 5th St Tulsa OK 74103	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
5	9314 8699 0430 0069 4099 92	The Eastland Oil Company PO Box 3488 Midland TX 79702	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
6	9314 8699 0430 0069 4100 04	BHP Billiton BPX Energy Inc., Div. of Interest PO Box 696505 San Antonio TX 78269	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
7	9314 8699 0430 0069 4100 11	Ridge Runner Operating, LLC 1004 N. Big Spring Street Midland TX 79701	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
8	9314 8699 0430 0069 4100 28	Grainne, LLC PO Box 2206 Midland TX 79702	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
9	9314 8699 0430 0069 4100 35	Novo Oil & Gas Northern Delaware, LLC 105 N. Hudson Avenue, Ste 500 Oklahoma City OK 73102	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
10	9314 8699 0430 0069 4100 42	Marathon Oil Permian, LLC 5555 San Felipe Street Houston TX 77056	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
11	9314 8699 0430 0069 4100 59	CBR Oil Properties, LLC PO Box 1518 Roswell NM 88202	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
12	9314 8699 0430 0069 4100 66	Crump Energy Partners II, LLC 4000 North Big Spring, Ste 310 Midland TX 79705	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
13	9314 8699 0430 0069 4100 73	Crown Oil Partners V, LP 4000 North Big Spring, Ste 310 Midland TX 79705	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
14	9314 8699 0430 0069 4100 80	Nadel and Gussman Delaware, LLC 15 East Fifth Street, Ste 3300 Tulsa OK 74103	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice

Karlene Schuman  
 Modrall Spering Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 03/02/2020

Firm Mailing Book ID: 185719

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
15	9314 8699 0430 0069 4100 97	Chevron USA, Inc. 1400 Smith St. Houston TX 77002	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
16	9314 8699 0430 0069 4101 03	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
<b>Totals:</b>			<b>\$38.40</b>	<b>\$56.80</b>	<b>\$27.20</b>	<b>\$0.00</b>	
			<b>Grand Total:</b>		<b>\$122.40</b>		

List Number of Pieces Received at Post Office      Postmaster:      Dated:  
 Listed by Sender      Name of receiving employee

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** Marathon Oil Permian LLC **OGRID Number:** 372098  
**Well Name:** Shake-N-Bake 34 WXY Fed Com 3H **API:** Pending  
**Pool:** Purple Sage; Wolfcamp **Pool Code:** 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]  
 A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]  
 [ I ] Commingling – Storage – Measurement  
 DHC    CTB    PLC    PC    OLS    OLM  
 [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.  
 A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett  
 Print or Type Name

*Deana M. Bennett*  
 Signature

March 2, 2020  
 Date

505-848-1800  
 Phone Number

deana.bennett@modrall.com  
 e-mail Address



MODRALL SPERRING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 3H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC (“Marathon”), OGRID Number 372098, is seeking administrative approval of an unorthodox well location (“NSL”) for the **Shake-N-Bake 34 WXY Fed Com 3H well**, (the “Well”) to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- **First Take Point:** 100’ from the South line and 2,178’ from the West line of Section 34;
- **Last Take Point:** 100’ from the North line and 2,178’ from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330’ foot setback requirements. The completed interval for the proposed well is closer than 330’ from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Sperring  
Roehl Harris & Sisk P.A.  
500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett". The signature is written in black ink and is positioned above a solid horizontal line.

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Name PURPLE SAGE; WOLFCAMP (GAS)
<sup>4</sup> Property Code	<sup>5</sup> Property Name SHAKE-N-BAKE 34 WXY FED COM	<sup>6</sup> Well Number 3H
<sup>7</sup> OGRID No. 372098	<sup>8</sup> Operator Name MARATHON OIL PERMIAN LLC	<sup>9</sup> Elevation 3041'

<sup>10</sup> Surface Location

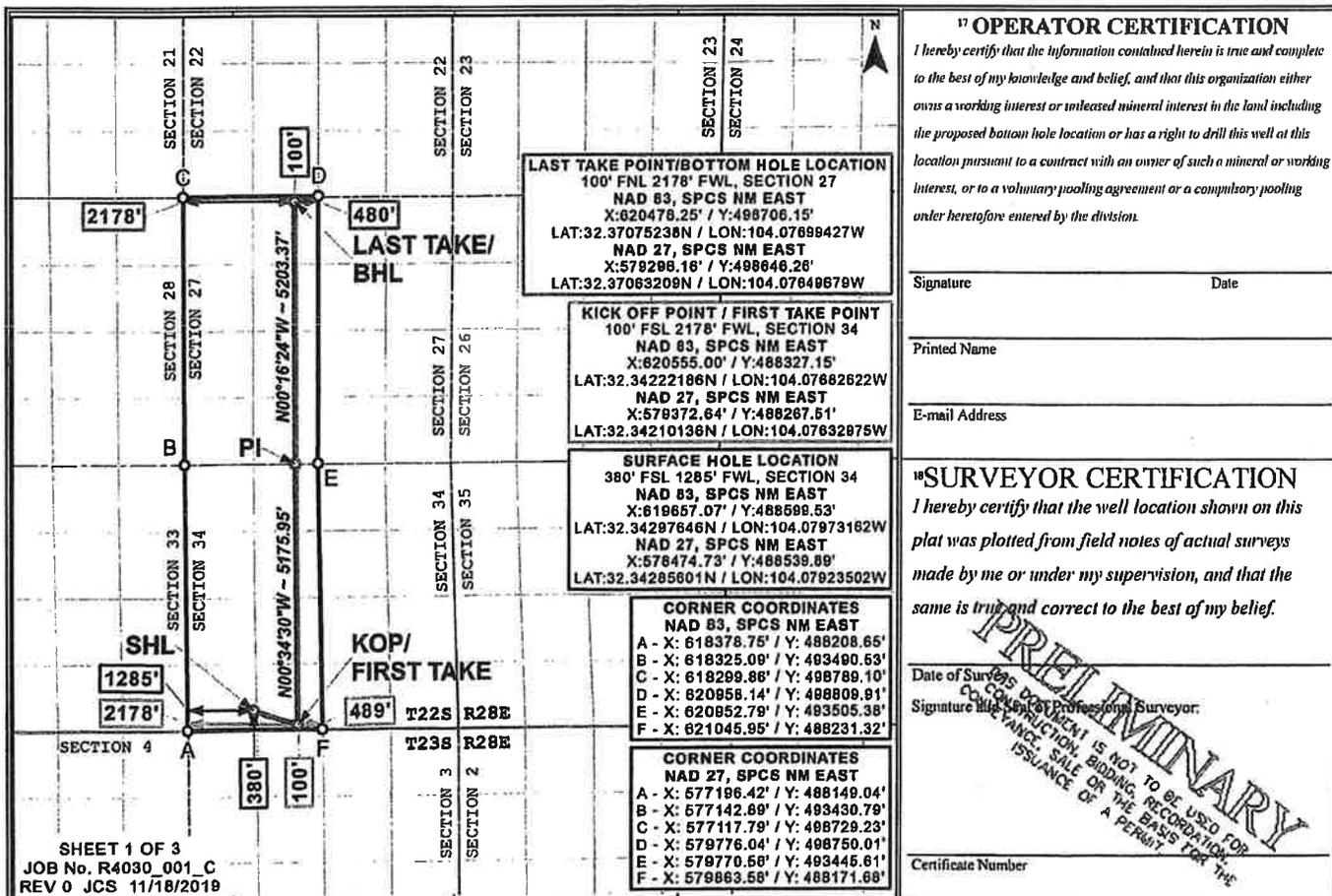
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	34	22S	28E		380	SOUTH	1285	WEST	EDDY

<sup>11</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	27	22S	28E		100	NORTH	2178	WEST	EDDY

<sup>12</sup> Dedicated Acres 640.0	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
--	-------------------------------	----------------------------------	-------------------------

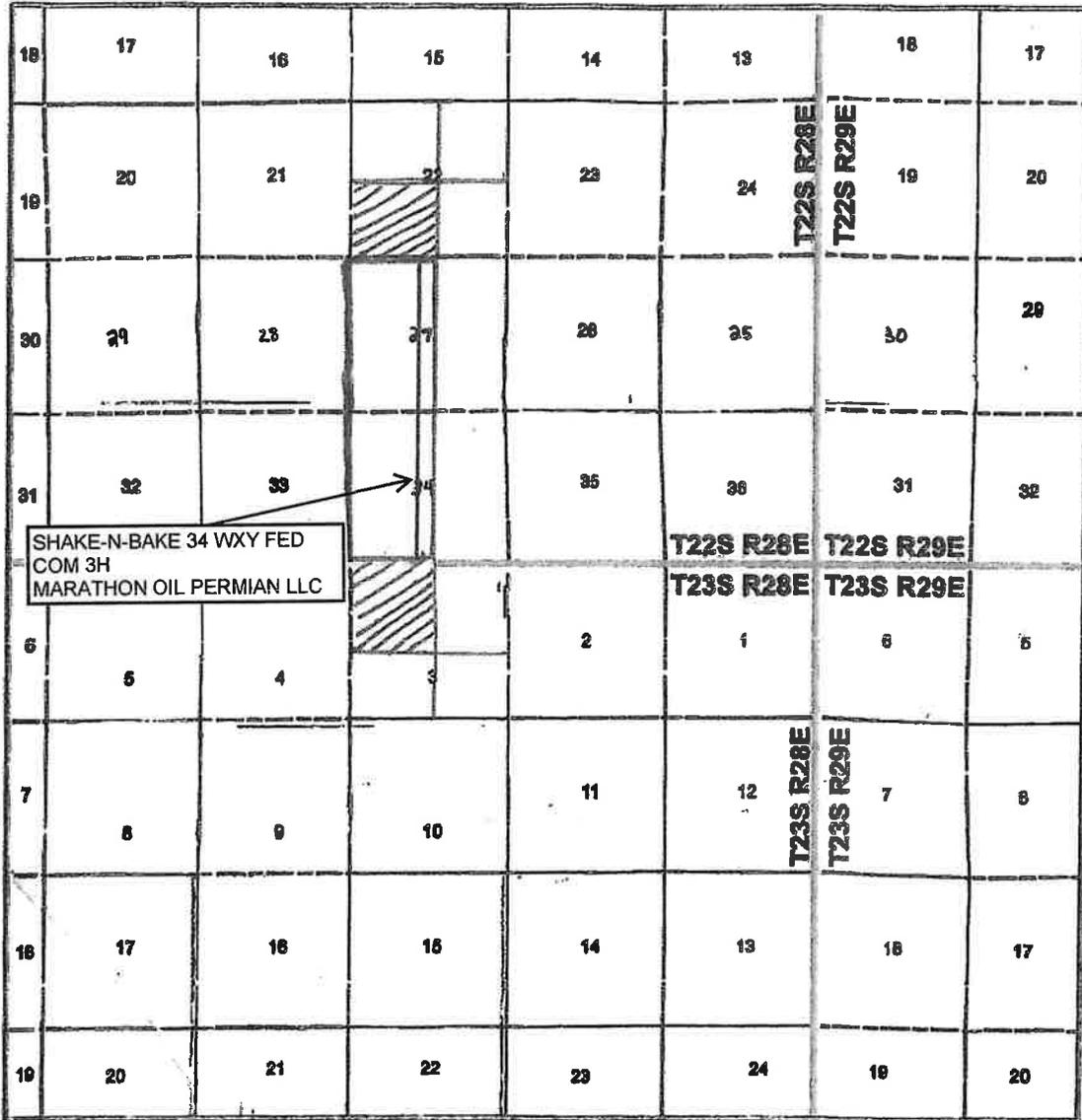
No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"



# VICINITY MAP



**SEC. 26 TWP. 22-S RGE. 28-E**  
**SURVEY: N.M.P.M.**  
**COUNTY: EDDY**  
**OPERATOR: MARATHON OIL PERMIAN LLC**  
**DESCRIPTION: 233' FSL & 1272' FWL**  
**ELEVATION: 3090'**  
**LEASE: TROJAN HORSE 36 WB FED COM**  
**U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.**

1" = 1 MILE



-  = AFFECTED TRACT
-  = HSU



SHEET 3 OF 3

**PREPARED BY:**  
**R-SQUARED GLOBAL, LLC**  
**1906 LOUISVILLE AVENUE, MONROE, LA 71301**  
**318-323-6900 OFFICE**  
**JOB No. R2771\_008\_C**



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Shake-N-Bake 34 WXY Fed Com 3H  
Eddy County, New Mexico

Dear Ms. Sandoval,

Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Shake-N-Bake 34 WXY Fed Com 3H well, to be drilled in Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 100' FSL and 2,178' FWL of Section 34, and last take point at 100' FNL and 2,178' FWL of Section 27, which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section. This spacing best fits into the spacing for the other wells in the development plan of the entire section and we believe that it will result in the greatest recovery of reserves.

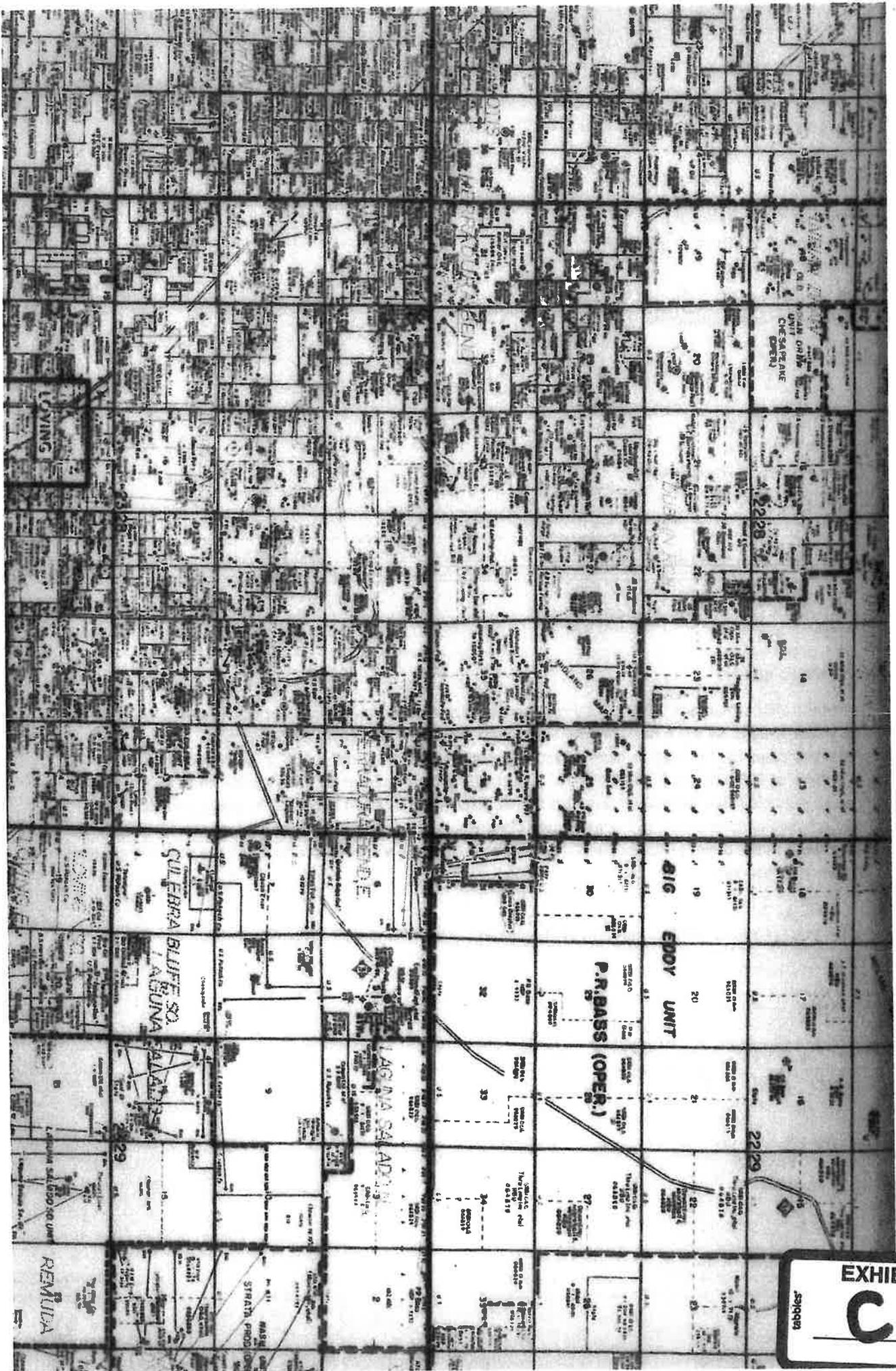
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Sincerely,

A handwritten signature in black ink that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset





tabbot  
**EXHIBIT**  
**C**



MODRALL SPERLING  
LAWYERS

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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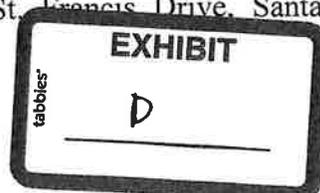
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com



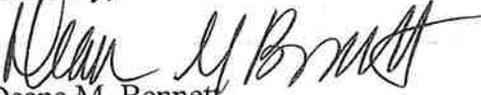
Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,



Deana M. Bennett

***Attorney for Marathon Oil  
Permian LLC***

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 1H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature

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Dated: \_\_\_\_\_

Signature

Karlene Schuman  
 Modrall Spering Roshl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 03/02/2020

Firm Mailing Book ID: 185719

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
1	9314 8699 0430 0069 4099 54	RKC, Inc. 7500 Arapahoe Road, Ste. 380 Centennial CO 80112	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
2	9314 8699 0430 0069 4099 61	Mataador E&P Co., Inc. One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
3	9314 8699 0430 0069 4099 78	Foran Oil Company One Lincoln Center 5400 LBJ Freeway, Suite 1500 Dallas TX 75240	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
4	9314 8699 0430 0069 4099 85	Nadel & Gussman, LLC 3300 1st Place Tower 15 E. 5th St. Tulsa OK 74103	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
5	9314 8699 0430 0069 4099 92	The Eastland Oil Company PO Box 3488 Midland TX 79702	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
6	9314 8699 0430 0069 4100 04	BHP Billiton BPX Energy Inc., Div. of Interest PO Box 696505 San Antonio TX 78269	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
7	9314 8699 0430 0069 4100 11	Ridge Runner Operating, LLC 1004 N. Big Spring Street Midland TX 79701	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
8	9314 8699 0430 0069 4100 28	Grainne, LLC PO Box 2206 Midland TX 79702	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
9	9314 8699 0430 0069 4100 35	Novo Oil & Gas Northern Delaware, LLC 105 N. Hudson Avenue, Ste 500 Oklahoma City OK 73102	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
10	9314 8699 0430 0069 4100 42	Marathon Oil Permian, LLC 5555 San Felipe Street Houston TX 77056	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
11	9314 8699 0430 0069 4100 59	CBR Oil Properties, LLC PO Box 1518 Roswell NM 88202	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
12	9314 8699 0430 0069 4100 66	Crump Energy Partners II, LLC 4000 North Big Spring, Ste 310 Midland TX 79705	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
13	9314 8699 0430 0069 4100 73	Crown Oil Partners V, LP 4000 North Big Spring, Ste 310 Midland TX 79705	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
14	9314 8699 0430 0069 4100 80	Nadel and Gussman Delaware, LLC 15 East Fifth Street, Ste 3300 Tulsa OK 74103	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice

Karlene Schuman  
 Modrall Sperling Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
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15	9314 8699 0430 0069 4100 97	Chevron USA, Inc. 1400 Smith St. Houston TX 77002	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
16	9314 8699 0430 0069 4101 03	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
<b>Totals:</b>			<b>\$38.40</b>	<b>\$56.80</b>	<b>\$27.20</b>	<b>\$0.00</b>	
			<b>Grand Total:</b>		<b>\$122.40</b>		

List Number of Pieces Received at Post Office      Total Number of Pieces Received at Post Office      Postmaster: Name of receiving employee      Dated:

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

<b>Applicant:</b> Marathon Oil Permian LLC	<b>OGRID Number:</b> 372098
<b>Well Name:</b> Shake-N-Bake 34 WXY Fed Com 2H	<b>API:</b> Pending
<b>Pool:</b> Purple Sage; Wolfcamp	<b>Pool Code:</b> 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
- A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]
- [ I ] Commingling – Storage – Measurement  
 DHC    CTB    PLC    PC    OLS    OLM
- [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
- A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett

Print or Type Name

*Deana M. Bennett*

Signature

March 2, 2020  
 Date

505-848-1800  
 Phone Number

deana.bennett@modrall.com  
 e-mail Address



MODRALL SPERLING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 2H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC ("Marathon"), OGRID Number 372098, is seeking administrative approval of an unorthodox well location ("NSL") for the **Shake-N-Bake 34 WXY Fed Com 2H well**, (the "Well") to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- First Take Point: 100' from the South line and 1254' from the West line of Section 34;
- Last Take Point: 100' from the North line and 1254' from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330' foot setback requirements. The completed interval for the proposed well is closer than 330' from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

Deana M. Bennett

Deana M. Bennett  
*Attorney for Marathon Oil  
Permian LLC*

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number		<sup>2</sup> Pool Code 98220		<sup>3</sup> Pool Name PURPLE SAGE; WOLFCAMP (GAS)					
<sup>4</sup> Property Code		<sup>5</sup> Property Name SHAKE-N-BAKE 34 WXY FED COM						<sup>6</sup> Well Number 2H	
<sup>7</sup> OGRID No. 372098		<sup>8</sup> Operator Name MARATHON OIL PERMIAN LLC						<sup>9</sup> Elevation 3041'	
<sup>10</sup> Surface Location									
UL or lot no. M	Section 34	Township 22S	Range 28E	Lot Idn	Feet from the 380	North/South line SOUTH	Feet from the 1255	East/West line WEST	County EDDY
<sup>11</sup> Bottom Hole Location If Different From Surface									
UL or lot no. D	Section 27	Township 22S	Range 28E	Lot Idn	Feet from the 100	North/South line NORTH	Feet from the 1254	East/West line WEST	County EDDY
<sup>12</sup> Dedicated Acres 640.0	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.						

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

**<sup>17</sup> OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or released mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name \_\_\_\_\_

E-mail Address \_\_\_\_\_

**<sup>18</sup> SURVEYOR CERTIFICATION**  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey \_\_\_\_\_  
Signature of Registered Professional Surveyor: \_\_\_\_\_

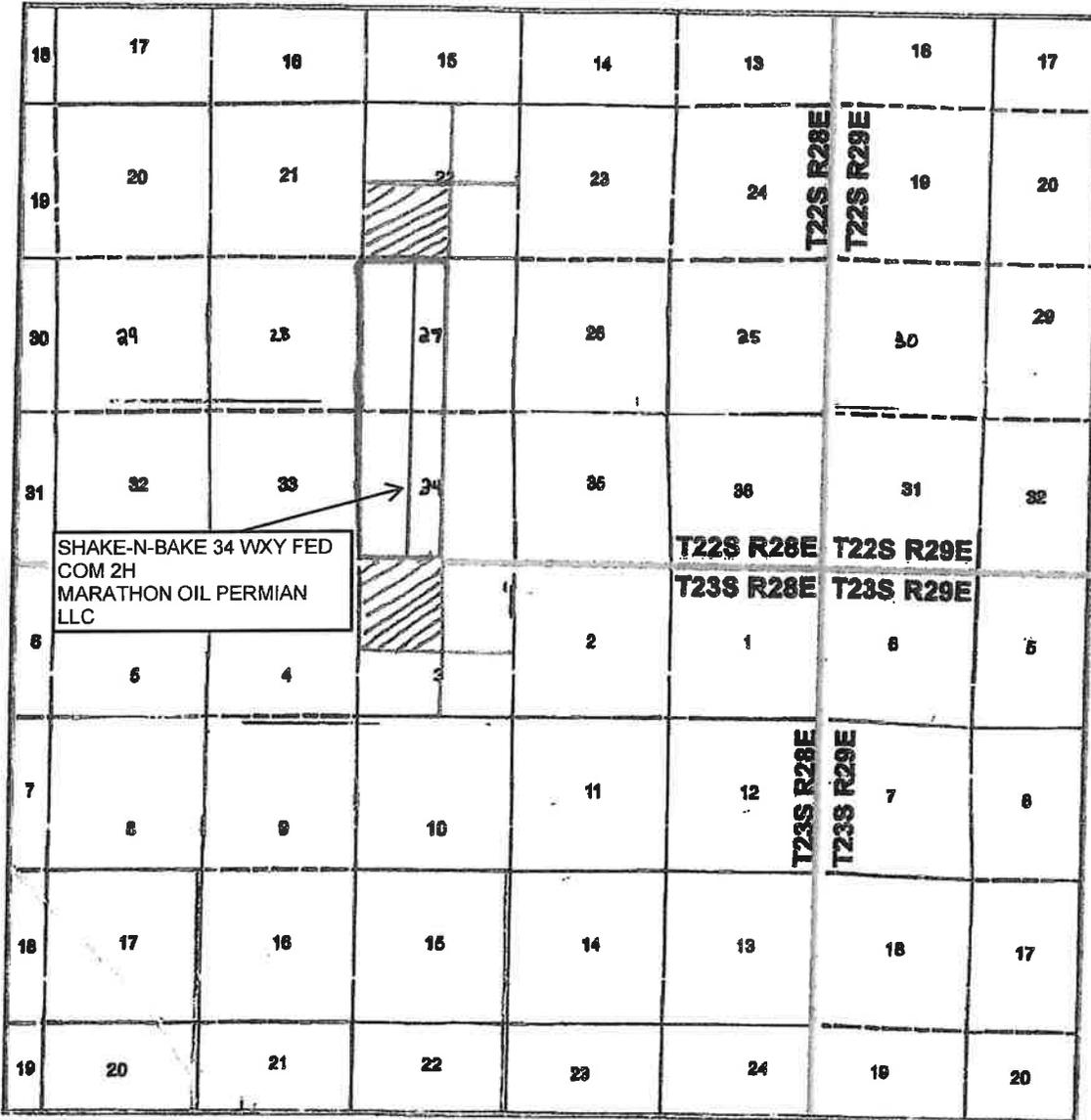
**PRELIMINARY**  
NO CONSTRUCTION, BIDDING, RECORDATION, SALE OR THE BASIS FOR THE ISSUANCE OF A PERMIT.

Certificate Number \_\_\_\_\_

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"

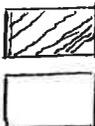


# VICINITY MAP



**SEC. 26 TWP. 22-S RGE. 28-E**  
**SURVEY: N.M.P.M.**  
**COUNTY: EDDY**  
**OPERATOR: MARATHON OIL PERMIAN LLC**  
**DESCRIPTION: 233' FSL & 1272' FWL**  
**ELEVATION: 3090'**  
**LEASE: TROJAN HORSE 35 WB FED COM**  
**U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.**

1" = 1 MILE



= AFFECTED TRACT  
 = HSU



SHEET 3 OF 3

PREPARED BY:  
**R-SQUARED GLOBAL, LLC**  
 1508 LOUISVILLE AVENUE, MONROE, LA 71201  
 310-323-6300 OFFICE  
 JOB No. R2071\_000\_C



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
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Eddy County, New Mexico

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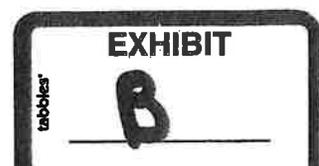
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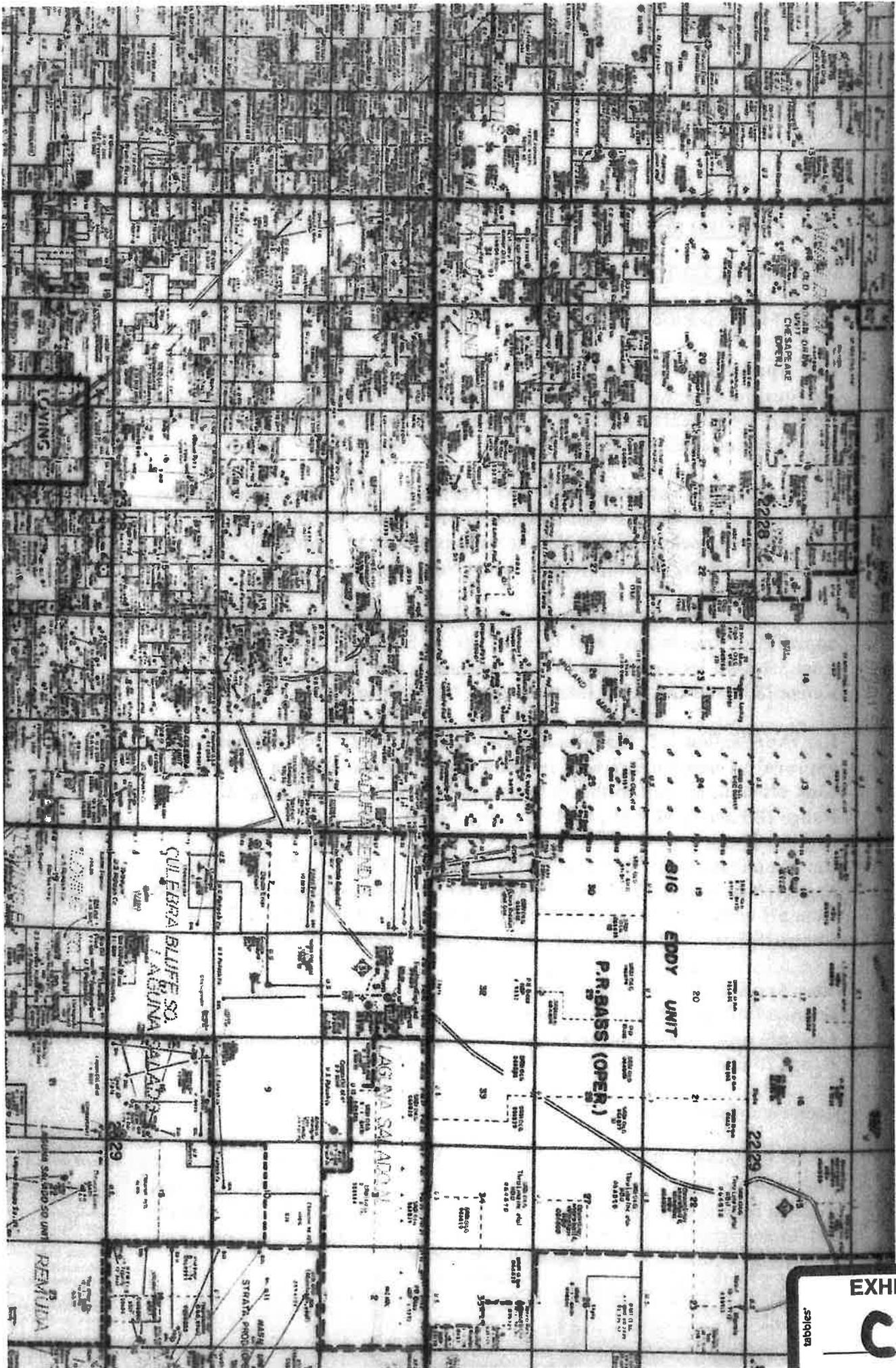
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Sincerely,

A handwritten signature in cursive script that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset





EXHIBIT

C

abbey



MODRALL SPERLING

L A W Y E R S

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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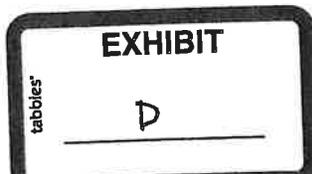
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

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Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

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Deana M. Bennett

*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

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Dated: \_\_\_\_\_  
Signature \_\_\_\_\_

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Dated: \_\_\_\_\_

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Dated: \_\_\_\_\_  
Signature \_\_\_\_\_

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Dated: \_\_\_\_\_  
Signature

Karlene Schuman  
 Modrall Spering Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 03/02/2020

Firm Mailing Book ID: 185719

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
1	9314 8699 0430 0069 4099 54	RKC, Inc. 7500 Arapahoe Road, Ste. 380 Centennial CO 80112	\$2.40	\$3.55	\$1.70	\$0.00	81363.203 SnB Notice
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<b>Totals:</b>			<b>\$38.40</b>	<b>\$56.80</b>	<b>\$27.20</b>	<b>\$0.00</b>	
						<b>Grand Total:</b>	<b>\$122.40</b>

List Number of Pieces Received at Post Office      Total Number of Pieces Received at Post Office      Postmaster: Name of receiving employee      Dated:

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

<b>Applicant:</b> Marathon Oil Permian LLC	<b>OGRID Number:</b> 372098
<b>Well Name:</b> Shake-N-Bake 34 WXY Fed Com 1H	<b>API:</b> Pending
<b>Pool:</b> Purple Sage; Wolfcamp	<b>Pool Code:</b> 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
- A. Location – Spacing Unit – Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]
- [ I ] Commingling – Storage – Measurement  
 DHC    CTB    PLC    PC    OLS    OLM
- [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
- A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

FOR OCD ONLY	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Deana M. Bennett

March 2, 2020  
 Date

Print or Type Name

505-848-1800  
 Phone Number

*Deana M. Bennett*

deana.bennett@modrall.com  
 e-mail Address

Signature



MODRALL SPERLING

L A W Y E R S

March 2, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC (“Marathon”), OGRID Number 372098, is seeking administrative approval of an unorthodox well location (“NSL”) for the **Shake-N-Bake 34 WXY Fed Com 1H well**, (the “Well”) to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- First Take Point: 100’ from the South line and 330’ from the West line of Section 34;
- Last Take Point: 100’ from the North line and 330’ from the West line of Section 27.

Marathon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330’ foot setback requirements. The completed interval for the proposed well is closer than 330’ from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East.

Modrall Spierling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com

Marathon is providing notice to the working interest owners in the (1) SW/4 of Section 22 Township 22 South, Range 28 East; and (2) the NW/4 of Section 3, Township 23 South, Range 28 East. Marathon is also providing notice to the Bureau of Land Management as the owner of the mineral estate with respect to offsetting areas. Marathon also provides a midland map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

Handwritten signature of Deana M. Bennett in cursive script, underlined.

Deana M. Bennett  
*Attorney for Marathon Oil*  
*Permian LLC*

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
District II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number		<sup>2</sup> Pool Code 98220		<sup>3</sup> Pool Name PURPLE SAGE; WOLFCAMP (GAS)	
<sup>4</sup> Property Code		<sup>5</sup> Property Name SHAKE-N-BAKE 34 WXY FED COM			<sup>6</sup> Well Number 1H
<sup>7</sup> OGRID No. 372098		<sup>8</sup> Operator Name MARATHON OIL PERMIAN LLC			<sup>9</sup> Elevation 3041'

<sup>10</sup> Surface Location

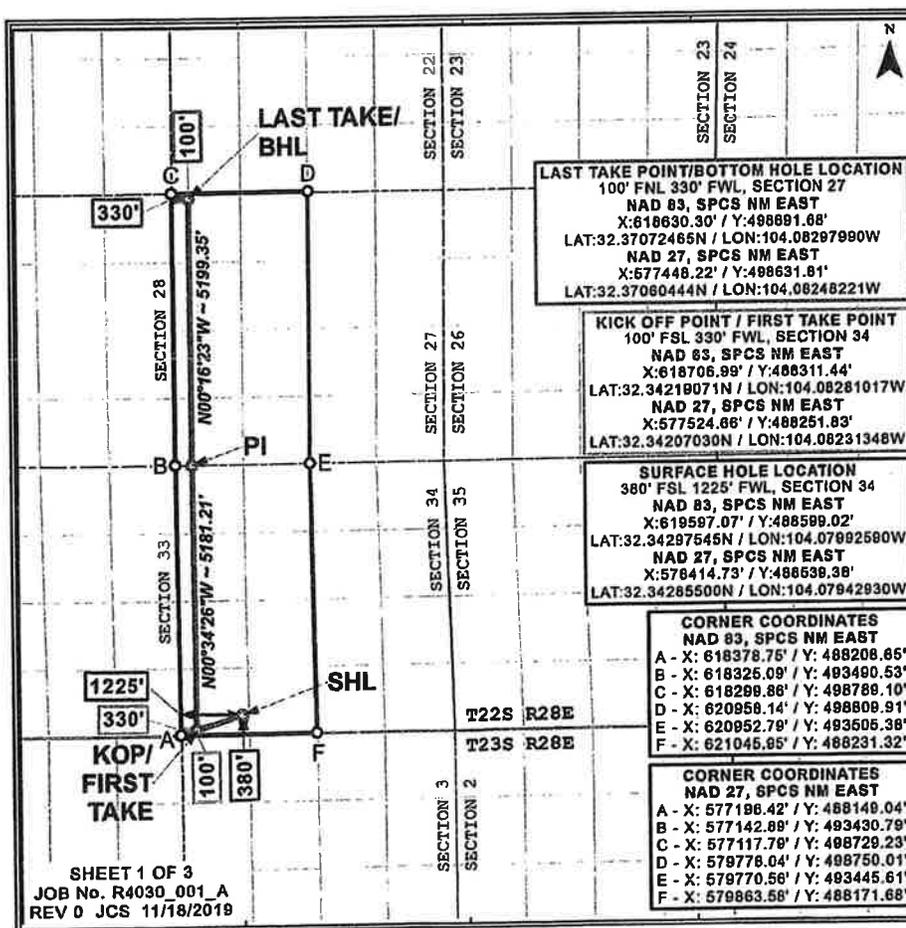
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	34	22S	28E		380	SOUTH	1225	WEST	EDDY

<sup>11</sup> Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	27	22S	28E		100	NORTH	330	WEST	EDDY

<sup>12</sup> Dedicated Acres 640.0	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
--	-------------------------------	----------------------------------	-------------------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



**<sup>17</sup> OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_  
Printed Name \_\_\_\_\_  
E-mail Address \_\_\_\_\_

**<sup>18</sup> SURVEYOR CERTIFICATION**  
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

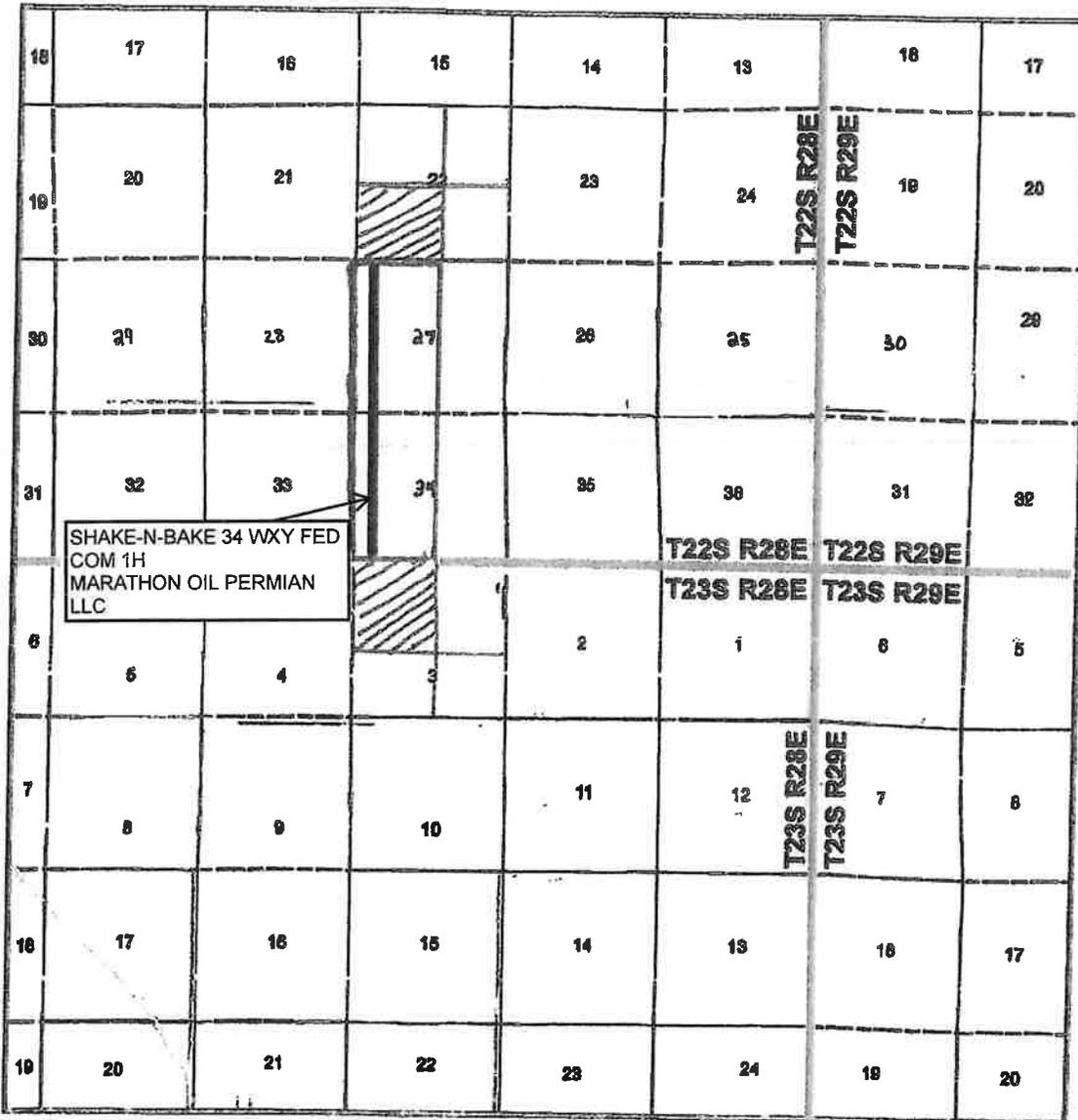
Date of Survey \_\_\_\_\_  
Signature of Professional Surveyor \_\_\_\_\_  
I HEREBY CERTIFY THAT THIS DOCUMENT IS NOT TO BE USED FOR CONSTRUCTION, BIDDING, RECORDATION, OR ANY OTHER PURPOSE WITHOUT THE ISSUANCE OF A PERMIT.

Certificate Number \_\_\_\_\_

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977431 Convergence: 00°08'50.610012"



# VICINITY MAP



**SEC. 26 TWP. 22-S RGE. 28-E**  
**SURVEY: N.M.P.M.**  
**COUNTY: EDDY**  
**OPERATOR: MARATHON OIL PERMIAN LLC**  
**DESCRIPTION: 233' FSL & 1272' FWL**  
**ELEVATION: 3090'**  
**LEASE: TROJAN HORSE 35 WB FED COM**  
**U.S.G.S. TOPOGRAPHIC MAP: LOVING, NM.**

1" = 1 MILE

-  = AFFECTED TRACTS
-  = HSU



SHEET 3 OF 3

PREPARED BY:  
 R-SQUARED GLOBAL, LLC  
 1308 LOUISVILLE AVENUE, MONROE, LA 71201  
 318-323-8800 OFFICE  
 JOB No. R3971\_000\_C



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

Adrienne Sandoval  
Director - NMOCD  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Shake-N-Bake 34 WXY Fed Com 1H  
Eddy County, New Mexico

Dear Ms. Sandoval,

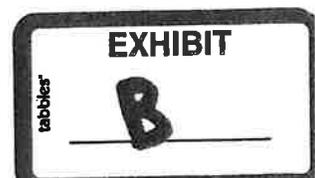
Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Shake-N-Bake 34 WXY Fed Com 1H well, to be drilled in Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 100' FSL and 330' FWL of Section 34, and last take point at 100' FNL and 330' FWL of Section 27, which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section. This spacing best fits into the spacing for the other wells in the development plan of the entire section and we believe that it will result in the greatest recovery of reserves.

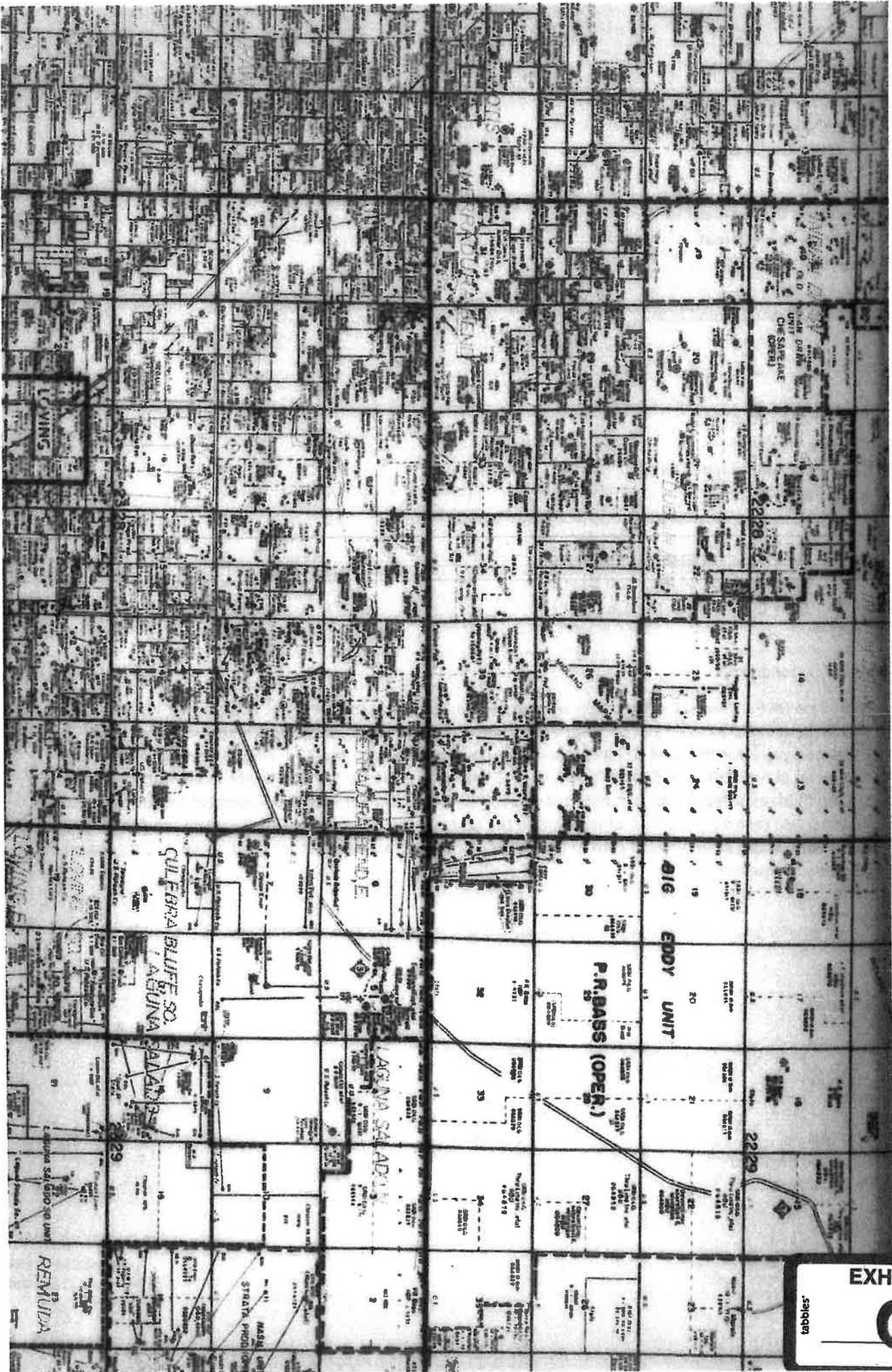
Thank you for your consideration. Should you have any questions please contact me at (713) 296-1883.

Sincerely,

A handwritten signature in black ink that reads 'Billy S. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset





EXHIBIT

C

tabbles



MODRALL SPERLING  
LAWYERS

March 2, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 1H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for its Shake-N-Bake 34 WXY Fed Com 2H well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.**

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Ladies and Gentlemen:

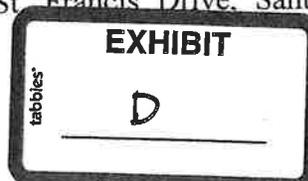
Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

Modrall Spierling  
Roehl Harris & Sisk P.A.  
500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
www.modrall.com



Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Jeffrey Broussard  
Land Professional  
Marathon Oil Permian LLC  
713.296.3159 (Office)  
[jbroussard1@marathonoil.com](mailto:jbroussard1@marathonoil.com)

If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Deana M. Bennett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Deana M. Bennett

*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Shake-N-Bake 34 WXY Fed Com 1H** well, located in the W/2 of Sections 34 and 27, Township 22 South, Range 28 East, N.M.P.M., Eddy County, New Mexico.

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				<b>Grand Total:</b>		<b>\$122.40</b>	

List Number of Pieces Received at Post Office      Postmaster:      Dated:  
 Name of receiving employee