



MODRALL SPERLING

L A W Y E R S

June 22, 2018

Florene Davidson
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Jennifer L. Bradfute
505.848.1845
Fax: 505.848.1882
jlb@modrall.com

**Re: No. 16234 - APPLICATION OF MEWBOURNE OIL
COMPANY FOR A NON-STANDARD GAS SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

**No. 16235 - APPLICATION OF MEWBOURNE OIL
COMPANY FOR A NON-STANDARD GAS SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

**No. 16301 – APPLICATION OF MARATHON OIL
PERMIAN LLC FOR A NON-STANDARD SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

**No. 16302 - APPLICATION OF MARATHON OIL
PERMIAN LLC FOR A NON-STANDARD SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

**No. 16303 - APPLICATION OF MARATHON OIL
PERMIAN LLC FOR A NON-STANDARD SPACING
AND PRORATION UNIT AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. Marathon's Motion for Continuance

Modrall Sperling
Roehl Harris & Sisk
P.A.

Bank of America
Centre
500 Fourth Street
NW
Suite 1000
Albuquerque,
New Mexico 87102

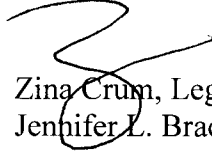
PO Box 2168
Albuquerque,
New Mexico
87103-2168

Tel: 505 848 1800

Page 2

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Zina Crum', written over the printed name.

Zina Crum, Legal Assistant to
Jennifer L. Bradfute

JLB/zc
Enclosure W3208479.DOC

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

**APPLICATION OF MEWBOURNE OIL
COMPANY FOR A NON-STANDARD GAS
SPACING AND PRORATION UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16234

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SPACING AND PRORATION UNIT
AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16303

MOTION FOR CONTINUANCE

Marathon Oil Permian LLC (“Marathon”) moves the Division to continue Case Nos. 16234 and 16235, which are currently scheduled for the June 28, 2018 Examiner Hearing Docket to the July 26, 2018 docket. Marathon also asks that competing application in Case Nos. 16301, 16302 and 16303 be continued to the July 26, 2018 docket. In support of this motion, Marathon states as follows:

1. Mewbourne’s applications seek to develop the Wolfcamp formation in: (1) the NE/4 of Section 21 and the E/2 of Section 16, Township 24 South, Range 28 East, NMPM; and (2) the NW/4 of Section 21 and the W/2 of Section 16, Township 24 South, Range 28 East, NMPM.

2. Marathon is an interest owner within this proposed development plan and will be adversely impacted by Mewbourne’s development plans.

3. Marathon has submitted competing development proposals and applications in Case Nos. 16301, 16302, and 16303. In these applications, Marathon seeks to develop the Bone Spring and the Wolfcamp formations in the E/2 of Sections 16 and 21, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. These applications are currently scheduled on the July 12, 2018 docket.

4. Marathon opposes Mewbourne’s development plans within the NE/4 of Section 21 and E/2 of Section 16 because it believes that Mewbourne’s plan of development will result in waste and unrecovered reserves.

5. Marathon has recently discovered that it will need additional time to locate contact information and addresses for certain affected parties and asks that Case Nos. 16301, 1603, and 16303 be continued to the July 26, 2018 docket.

6. Marathon asks that Case Nos. 16234 and 16235 be continued to the July 12, 2018 docket.

7. Mewbourne opposes this motion.

WHEREFORE, Marathon Oil Permian LLC respectfully requests that the Division continue the hearing in 16234 16235, 16301, 16302 and 16303 to the July 26, 2018 docket.

Respectfully submitted,

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

By: 

Earl E. DeBrine, Jr.
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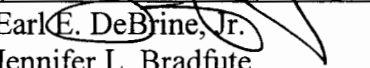
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 22, 2018:

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7. Mewbourne opposes this motion.

WHEREFORE, Marathon Oil Permian LLC respectfully requests that the Division continue the hearing in 16234 16235, 16301, 16302 and 16303 to the July 26, 2018 docket.

Respectfully submitted,

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

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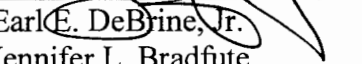
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I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 22, 2018:

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7. Mewbourne opposes this motion.

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Respectfully submitted,

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