

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

**APPLICATION OF TAP ROCK OPERATING, LLC FOR A STANDARD
HORIZONTAL SPACING AND PRORATION UNIT, NON-STANDARD WELL-
LOCATION, AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 20118

**APPLICATION OF TAP ROCK OPERATING, LLC FOR A STANDARD
HORIZONTAL SPACING AND PRORATION UNIT, NON-STANDARD WELL
LOCATION, AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 20119

MARATHON OIL COMPANY'S PRE-HEARING STATEMENT

Marathon Oil Company ("Marathon"), submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Tap Rock Operating, LLC

ATTORNEY

Seth C. McMillan
Kaitlyn A. Luck
Montgomery & Andrews, P.A.
325 Paseo de Peralta
Santa Fe, NM 87501
P.O. Box 2307
Santa Fe, NM 87504-2307
T: (505) 986-2519

OPPONENT/INTERVENOR:

Marathon Oil Company

Deana M. Bennett
Zoë E. Lees
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

STATEMENT OF CASE

APPLICANT:

Applicant in Case No. 20118 seeks an order creating a standard 480-acre, more or less, spacing and proration unit comprised of the W/2 of Section 10 and the SW/4 of Section 3, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico and pooling all uncommitted interests in the Wolfcamp formation (Purple Sage-Wolfcamp; Pool code 98220) underlying the standard unit.

Applicant in Case No. 20119 seeks an order creating a standard 480-acre, more or less, spacing and proration unit comprised of the E/2 of Section 10 and the E/2 of Section 3, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico and pooling all uncommitted interests in the Wolfcamp formation (Purple Sage-Wolfcamp; Pool code 98220) underlying the standard unit..

OPPONENT/INTERVENOR:

Marathon opposes this application to protect its correlative rights and to present arguments to demonstrate that granting the application will not promote the prevention of waste.

PROPOSED EVIDENCE

APPLICANT:

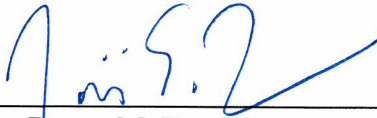
<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
TBD– Landman	Approx. 15	Approx. 5
TBD – Geologist	Approx. 10	Approx. 4

PROCEDURAL MATTERS

Marathon respectfully requests a continuance to February 7, 2019, so that it can fully consider the well proposal submitted by the applicant.

Respectfully submitted,

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

By:  _____

Deana M. Bennett

Zoë E. Lees

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

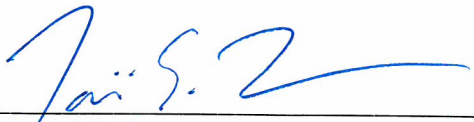
Telephone: 505.848.1800

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 January 3, 2019:

Seth C. McMillan
Kaitlyn A. Luck
Montgomery & Andrews, P.A.
325 Paseo de Peralta
Santa Fe, NM 87501
P.O. Box 2307
Santa Fe, NM 87504-2307
smcmillan@montand.com

By: _____


Deana M. Bennett
Zoë E. Lees
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800