

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

**APPLICATION OF CHISHOLM ENERGY
OPERATING, LLC FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

CASE NO. 20521

OPPOSED MOTION FOR CONTINUANCE

Marathon Oil Permian LLC (“Marathon”) moves to continue the above-referenced case to **September 19, 2019**. As grounds for this Motion, Marathon states that Marathon is a working interest in the proposed unit yet Chisholm Energy Operating, LLC did not send Marathon a proposal letter nor did it seek to pool Marathon’s working interest ownership. Marathon requests the continuance to allow Marathon and Chisholm to engage in discussions. Counsel for Marathon contacted Chisholm’s counsel and Chisholm does not agree to the continuance. Counsel for Marathon contacted ConocoPhillips Company’s counsel, who has entered an appearance in this case, and ConocoPhillips Company’s counsel agrees to the relief Marathon requests in this Motion.

Respectfully submitted,

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

By: 

Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
Attorney for Marathon Oil Permian LLC

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 July 23, 2019:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn Luck
Holland & Hart LLP
110 N Guadalupe St, Suite A,
Santa Fe, NM 87501
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com
Attorneys for Chisholm Energy Operating, LLC

James Bruce
PO Box 1056
Santa Fe, NM 87504
505-982-2043
Attorney for ConocoPhillips Company

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