

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

**APPLICATION OF MARATHON OIL
PERMIAN LLC. FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NOS. 20166, 20167, 20168, 20201

**APPLICATIONS OF MEWBOURNE OIL COMPANY
FOR COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO.**

CASE NOS. 20249, 20250, 20251

MARATHON OIL PERMIAN LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Marathon Oil Permian LLC ("Marathon") submits this consolidated Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANTS

Marathon Oil Permian LLC

Mewbourne Oil Company
Suite 1020
500 West Texas
Midland, Texas 79701

ATTORNEY

Deana M. Bennett

MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-
2168
(505) 848-1800

James Bruce
PO Box 1506
Santa Fe, NM 87504
505-982-2043

STATEMENT OF CASE

In Case Nos. 20166, 20167, 20168, and 20201, Marathon seeks an order from the Division pooling all uncommitted mineral interests in the Bone Spring and Wolfcamp formations underlying Sections 17 and 20, Township 22 South, Range 28 East, NMPM, Eddy County, New Mexico.

In Case Nos. 16492, 16493, 16494, and 16495, Mewbourne Oil Company seeks an order pooling all mineral interests in several horizontal spacing units in Section 20 and Section 19 and in Case Nos. 20249, 20250, 20251 Mewbourne Oil Company seeks an order pooling all mineral interests in several horizontal spacing units in Sections 17 and 18.

PROPOSED EVIDENCE (IF NECESSARY)

APPLICANT:

| WITNESS | ESTIMATED TIME | EXHIBITS |
|----------------|-----------------------|-----------------|
| Landman: TBD | Approx. 30 minutes | Approx. 8 |
| Geologist: TBD | Approx. 30 minutes | Approx. 6 |

PROCEDURAL ISSUES

Marathon is currently in discussions with Mewbourne. Depending on the outcome of those discussions, Marathon may move to continue the Mewbourne cases. If these cases are not continued, Marathon reserves the right to either move for a continuance or present witnesses at the October 17, 2019 hearing in opposition to Mewbourne’s cases and in support of Marathon’s cases.

Respectfully submitted,

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

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
Deana.bennett@modrall.com

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 October 10, 2019:

James Bruce
PO Box 1056
Santa Fe, NM 87504
505-982-2043

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

Ernie Padilla
PADILLA LAW FIRM, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504-2523
T: 505-988-7577
F: 505-988-7592
E: epadillapl@qwestoffice.net

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