

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 No. 20865

**BTA OIL PRODUCERS, LLC'S  
PRE-HEARING STATEMENT**

BTA Oil Producers, LLC ("BTA") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Marathon Oil Permian LLC

**APPLICANT'S ATTORNEYS**

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**OPPONENT**

BTA Oil Producers, LLC

**OPPONENT'S ATTORNEYS**

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## **STATEMENT OF THE CASE**

Applicant Marathon Oil Permian LLC ("Marathon") requests an order pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the S/2 N/2 of Section 12, Township 23 South, Range 28 East and Section 7, Township 23 South, Range 29 East in Eddy County. Marathon proposes to dedicate the 320-acre horizontal spacing unit to the Valkyrie 12 SB Federal Com 13H well.

Pursuant to a Joint Operating Agreement, BTA is the operator of the acreage comprising the N/2 of Section 7 and the NW/4 of Section 8, Township 23 South, Range 29 East. Because Marathon's proposed well location directly conflicts with BTA's ongoing development plan for that acreage, the granting of Marathon's application would result in an impairment of BTA's correlative rights.

## **PROPOSED EVIDENCE**

<b><u>WITNESSES</u></b>	<b><u>EST. TIME</u></b>	<b><u>EXHIBITS</u></b>
Willis Price (landman)	15 minutes	Approximately 5
Britton McQuien (engineer)	15 minutes	Approximately 4
Nick Eaton (engineer)	15 minutes	Approximately 2

BTA reserves its right to call a rebuttal witness(es) if appropriate.

## **PROCEDURAL MATTERS**

BTA is not aware of any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HINKLE SHANOR LLP



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*Counsel for BTA Oil Producers, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of November, 2019 I served a true and correct copy of the foregoing ***Entry of Appearance*** via email to:

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*Counsel for Marathon Oil Permian LLC*

  
Gary W. Larson