



MODRALL SPERLING

L A W Y E R S

April 28, 2020

Via E-mail

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Energy, Minerals and Natural Resources Department  
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**Re: Completion Extension Request for:**

**APPLICATION OF MARATHON OIL PERMIAN LLC  
FOR APPROVAL OF A SPACING UNIT AND COMPULSORY  
POOLING, LEA COUNTY, NEW MEXICO.**

**CASE NOS. 20128  
20129  
20131**

**ORDER NOS. R-20460  
R-20461  
R-20462**

Dear OCD:

Marathon Oil Permian, LLC ("Marathon") respectfully requests a one (1) year extension to complete the wells under the above-referenced orders. This extension is being requested because there have been changes in Marathon's drilling schedule due to COVID-19 and current market conditions. The wells and lands impacted by this extension are the following:

**CASE NO. 20128  
ORDER NO. R-20460**

**WELLS:** Battle 34 SB Fee Well No. 15H, API No. 30-025-45355  
**LANDS:** W/2E/2 of Section 34, Township 21 South, Range 33 East,  
NMPM, Lea County, New Mexico

**CASE NO. 20129  
ORDER NO. R-20461**

**WELLS:** Battle 34 AV Fee Well No. 17H, API No. 30-025-45356;

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Battle 34 AV Fee Well No. 25H. API No. 30-025-Pending  
**LANDS:** E/2 E/2 of Section 34. Township 21 South, Range 33 East,  
NMPM, Lea County, New Mexico

**CASE NO. 20131**  
**ORDER NO. R-20462**

**WELLS:** Battle 34 WC Fee Well No. 20H, API No. 30-025-45358  
**LANDS:** E/2 E/2 of Section 34, Township 21 South. Range 33 East.  
NMPM, Lea County, New Mexico

All three orders were issued on April 30, 2019, and require Marathon to commence completion operations within one year after commencement of drilling operations. Orders, p. 3, ¶ 7. Marathon timely commenced drilling operations but requires additional time to commence completion operations. Marathon asks that the deadline to complete these wells be extended to April 30, 2021. Each of the orders states Marathon may request a written extension of time from the Division Director “pursuant to a written request stating its reasons for such extension and attaching satisfactory evidence.” *See* Orders, p. 3, ¶ 7. Each order also states that Marathon “shall provide a copy of any request for extension of time to drill or complete any well filed with the Director pursuant to this order to each pooled working interest owner who has elected to participate in the drilling of any well that is the subject of the request.” *See* Orders, p. 3-4, ¶ 8. Marathon attaches an affidavit of a Land Professional confirming that there are no parties entitled to notice under this requirement, under all three orders, and that Marathon’s extension request is made in good faith and warranted. *See* Prewett Affidavit, attached as Exhibit A to this request.

Sincerely,



Deana M. Bennett  
*Attorney for Marathon Oil Permian LLC*

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

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

**CASE NOS.   20128  
                  20129  
                  20131**

**ORDER NOS. R-20460  
                  R-20461  
                  R-20462**

**AFFIDAVIT**

STATE OF NEW MEXICO            )  
  ) ss.  
COUNTY OF BERNALILLO        )

Travis Prewett, being duly sworn, deposes and states:

1.       I am over the age of 18, I am a landman for Marathon Oil Permian LLC and have personal knowledge of the matters stated herein. I have been qualified by the Oil Conservation Division ("Division") as an expert petroleum landman.

2.       I submit the following information in support receiving extensions for the above referenced compulsory pooling orders.

3.       My area of responsibility at Marathon includes the area of Lea County in New Mexico.

4.       I am familiar with the applications filed by Marathon in these cases.



5. I am familiar with the status of the lands that are subject to these compulsory pooling orders and with the status of Marathon's operations on the spacing units approved by each order.

6. Due to the recent COVID-19 pandemic and downturn in the oil and gas market, Marathon is not able to complete the wells within the timeline outlined in the orders.

7. I have reviewed each compulsory pooling order and confirmed that no notification is required to be sent to working interest owners at this point in time.

8. It is my opinion that the granting of these extensions is reasonable and in the interests of conservation and the prevention of waste.

*Travis Prewett*

Travis Prewett

SUBSCRIBED AND SWORN to before me this 28th day of April, 2020  
by Travis Prewett on behalf of Marathon Oil Permian LLC.

*Karlene Schuman*

Notary Public

My commission expires: 02-27-21

