

2017 NOV -1 P 3: 50

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

**IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSES OF CONSIDERING:**

**APPLICATION OF BLACK MOUNTAIN OPERATING LLC  
FOR A NON-STANDARD OIL SPACING AND PRORATION  
UNIT, COMPULSORY POOLING, AND AN UNORTHODOX  
WELL LOCATION, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15655**

**APPLICATION OF BLACK MOUNTAIN OPERATING LLC  
FOR A NON-STANDARD OIL SPACING AND PRORATION  
UNIT, COMPULSORY POOLING, AND AN UNORTHODOX  
WELL LOCATION, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15656**

**APPLICATION OF GMT EXPLORATION COMPANY LLC  
FOR A NON-STANDARD OIL SPACING AND PRORATION  
UNIT AND COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 15659**

**APPLICATION OF GMT EXPLORATION COMPANY LLC  
FOR A NON-STANDARD OIL SPACING AND PRORATION  
UNIT AND COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 15660**

**MARATHON OIL PERMIAN LLC'S RESPONSE TO JOINT MOTION TO STAY  
ORDERS NOS. R-1442 AND R-1443**

Marathon Oil Permian LLC, as successor-in-interest to Black Mountain Operating, LLC, ("Appellee") hereby responds to the Joint Motion to Stay Orders Nos. R-14442 and R-14443 filed by Centennial Resources Production, LLC the successor-in-interest to GMT Exploration, LLC, and BTA Oil Producers, LLC (collectively, "Appellants") as follows:

1. Appellee agrees to defer the commencement of its Grama Ridge State Com. Well No. 1H and Grama Ridge State Com. Well No. 3H wells ("subject wells") pending the outcome of the de novo appeal in these cases. As a consequence, the Joint Motion to Stay is rendered moot.

2. Orders Nos. R-14442 and R-14443 provide that Appellee shall commence drilling the subject wells on or before on or before September 30, 2018. Order No. R-14442, p. 8 at ¶ 4 and Order No. R-14443, p. 8 at ¶ 4.

3. Should Appellee prevail on appeal, the September 30, 2018 drilling deadline set forth in Orders Nos. R-14442 and R-14443 should therefore be extended by the number of days it takes for a decision to issue from de novo appeal.

4. It is Appellee's position that Orders Nos. R-14442 and R-14443 should otherwise remain in effect pending appeal.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

By: 

J. Scott Hall

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

(505) 982-4289 fax

[shall@montand.com](mailto:shall@montand.com)

[smcmillan@montand.com](mailto:smcmillan@montand.com)

*Attorneys 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 November 1, 2017:

James Bruce  
Post Office Box 1056  
Santa Fe, NM 87504  
[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

Michael H. Feldewert  
Jordan L. Kessler  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

  
\_\_\_\_\_  
J. Scott Hall