

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

**APPLICATION OF MATADOR PRODUCTION
COMPANY FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 20324

ENTRY OF APPEARANCE

Modrall Sperling, Roehl, Harris & Sisk, P.A., (Deana M. Bennett), hereby enters its appearance on behalf of Marathon Oil Permian LLC (“Marathon”) in the above-referenced matter.

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 March 28, 2019:

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
(505) 982-2043
jamesbruc@aol.com

By: Deana M. Bennett
Deana M. Bennett
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MARATHON OIL COMPANY'S PRE-HEARING STATEMENT

Marathon Oil Company ("Marathon"), submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Matador Production Company

ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, NM 87504
(505) 982-2043
jamesbruc@aol.com

OPPONENT/INTERVENOR:

Marathon Oil Company

Deana M. Bennett
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
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2168
(505) 848-1800

STATEMENT OF CASE

APPLICANT:

Applicant in Case No. 20324 seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the N/2 of Sections 35 and N/2 of

Section 36, Township 22 South, Range 27 East, N.M.P.M., Lea County, New Mexico.

OPPONENT/INTERVENOR:

Marathon opposes this application to protect its correlative rights and to present arguments to demonstrate that granting the application will not promote the prevention of waste.

PROPOSED EVIDENCE

APPLICANT:

| <u>WITNESS</u> | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|-----------------|-----------------------|-----------------|
| TBD– Landman | Approx. 45 | Approx. 5 |
| TBD – Geologist | Approx. 45 | Approx. 4 |
| TBD- Engineer | Approx. 45 | Approx. 4 |

PROCEDURAL MATTERS

Marathon is an interest owner in the proposed unit, yet did not receive notice of the hearing or AFEs from Matador. Marathon only became aware of this application when the docket was posted. For this reason, Marathon respectfully requests a continuance to May 16, 2019, so that Matador can provide information to Marathon to allow Marathon to fully consider the well proposal submitted by the applicant.

Respectfully submitted,

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

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