

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

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

**Case No. 20470**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted on behalf of Sandra M. Sawyer and/or the Estate of Edward A. Sawyer, Deceased by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPLICANT:

Marathon Oil Permian, LLC

ATTORNEY:

Deana M. Bennett  
PO Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, NM 87103-2168  
(505)-848-1800

OPPOSITION OR OTHER PARTY:

Sandra M. Sawyer and/or the  
Estate of Edward A. Sawyer, Deceased

ATTORNEY:

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577

OPPOSITION OR OTHER PARTY:

MRC Permian LLC

ATTORNEY:

Michael H. Feldewert  
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Julie Broggi  
Kaitlyn A. Luck  
PO Box 2208  
Santa Fe, NM 87504  
(505)-988-4421

**STATEMENT OF CASE**

OPPOSITION:

The Sawyer interests having been ready and willing to enter into an oil and gas lease as previously proposed by Marathon Oil Permian. Marathon Oil Permian has not responded with acceptance of the Sawyer offer.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

None

**PROCEDURAL MATTERS**

This case should be dismissed as to the Sawyer interests since these interests are ready and willing to enter into an oil and gas lease.

Respectfully submitted,

PADILLA LAW FIRM, P.A.

By: /s/ ERNEST L. PADILLA

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**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the foregoing pleading to be sent via e-mail on this 19th day of June, 2019 to:

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**/s/ ERNEST L. PADILLA**  
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