

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

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

Case No. 20401

UNOPPOSED MOTION FOR CONTINUANCE

Tap Rock Resources, LLC (“Tap Rock”) requests that hearing on the above-referenced application be continued to **September 19, 2019**. Contemporaneously with this Motion, Tap Rock is also filing motions for continuance in the related cases Application of Marathon Oil Permian LLC for Compulsory Pooling, No. 20402, and Application of Marathon Oil Permian LLC for Compulsory Pooling, No. 20403. Tap Rock has competing development proposals with the proposals at issue in this matter and the related applications and will be filing applications for its competing proposals shortly. Undersigned counsel has conferred with counsel for Marathon Oil Permian LLC, who agrees that the competing proposals should be heard together and therefore does not oppose this request. Tap Rock has also conferred with counsel for Helms Oil & Gas, LLC; Patrick K. Worrell and Shelly R. Worrell; COG Operating LLC; and Chevron U.S.A. None of these parties opposes the request.

WHEREFORE, Tap Rock requests that hearing on this matter be continued to September 19, 2019.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen
John F. McIntyre
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@montand.com
jmcintyre@montand.com

Attorneys for Tap Rock Resources, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel by electronic mail on July 19, 2019:

Jennifer L. Bradfute
Marathon Oil Company
5555 San Felipe St. Bsmt B114
Houston, TX 77056-2799
(713) 296-3566
jbradfute@marathonoil.com

*Attorney for Applicant Marathon Oil Permian,
LLC*

Ocean Munds-Dry
William F. Carr
Elizabeth A. Ryan
1048 Paseo de Peralta
Santa Fe, NM 87501
(505) 780-8000
omundsdry@concho.com
wcarr@concho.com
eryan@concho.com

Attorneys for COG Operating, LLC

J.E. Gallegos
Michael J. Condon
GALLEGOS LAW FIRM, P.C.
460 St. Michael's Drive, Bldg. 300
Santa Fe, New Mexico 87505
(505) 983-6686
jeg@gallegoslawfirm.net
mjc@gallegoslawfirm.net

*Attorneys for Helms Oil & Gas, LLC and
Patrick K. and Shelly R. Worrell*

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
HOLLAND & HART, LLP
P.O. Box 2208
Santa Fe, NM 87504
(505) 998-4421
mfeldewert@hollandhart.com
arankin@hollandhart.com
jbroggi@hollandhart.com

Attorneys for Chevron U.S.A., Inc.

/s/ Sharon T Shaheen