

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

**APPLICATION OF CHISHOLM ENERGY
OPERATING, LLC FOR COMPULSORY
POOLING, LEA COUNTY, NEW MEXICO.**

CASE NOS. 20520 AND 20521

MARATHON OIL PERMIAN LLC'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Chisholm Energy Operating, LLC

ATTORNEY

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OPPONENT

Marathon Oil Permian LLC

ATTORNEY

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OTHER PARTY

ConcoPhillips Company

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MARATHON'S STATEMENT OF CASE

Marathon files this Pre-Hearing Statement out of an abundance of caution because Marathon has requested a continuance of these cases due to a scheduling conflict with Marathon's counsel, who has a required hearing in federal court in Montana on August 22, 2019, and so cannot be available for this hearing. As Marathon explained in its Motion for Continuance, Marathon is a working interest in the proposed unit yet Chisholm Energy Operating, LLC did not send Marathon a proposal letter nor did it seek to pool Marathon's working interest ownership. Marathon intends to appear at the hearing in these cases to present evidence of Marathon's working interest ownership. Marathon has requested a continuance through October 17, 2019 to give Marathon and Chisholm more time to engage in discussions and potentially resolve the issue as to Marathon's working interest.

PROPOSED EVIDENCE

Marathon:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Travis Prewett	Approx. 30 minutes	Approx. 8

PROCEDURAL ISSUES

Marathon requests a prehearing conference on its Motion for Continuance be held prior to the August 22, 2019 hearing.

Respectfully submitted,

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

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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 August 15, 2019:

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