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

APPLICATION OF MARATHON OIL PERMIAN LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO Case No. 20165

## RIDGE RUNNER RESOURCES OPERATING, LLC'S PRE-HEARING STATEMENT

Ridge Runner Resources Operating, LLC ("Ridge Runner") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

### **APPEARANCES**

APPLICANT

APPLICANT'S ATTORNEYS

Marathon Oil Permian, LLC

Deana M. Bennett

Modrall Sperling Roehl Harris & Sisk P.A.

P.O. Box 2168

500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168

Phone: (505) 848-1800 Facsimile: (505) 848-9710 Deana.bennett@modrall.com

**OPPONENTS** 

**OPPONENTS' ATTORNEYS** 

Ridge Runner Resources Operating, LLC

Gary W. Larson Dana S. Hardy P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com dhardy@hinklelawfirm.com

Fortson Oil Company and Burnett Oil Co., Inc.

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043

Fax: (505) 982-2151 jamesbruc@aol.com

Robert C. Grable Kelly Hart & Hallman LLC 201 Main Street, Suite 2500

Fort Worth, TX 76102 Phone: (817) 332-2500 Bob.grable@kellyhart.com

Novo Oil & Gas Northern Delaware, LLC James Bruce P.O. Box 1056

Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

WPX Energy Permian, LLC and RKI Exploration and Production, LLC

Michael H. Feldewert Adam G. Rankin Kaitlyn A. Luck P.O. Box 2208

Santa Fe, NM 87504-2208 Phone: (505) 988-4421 Facsimile: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com kaluck@hollandhart.com

#### STATEMENT OF THE CASE

Marathon Oil Permian, LLC ("Marathon") seeks an order pooling all uncommitted mineral interests within a 1280-acre Wolfcamp horizontal spacing unit ("HSU") underlying Sections 34 and 35, Township 22 South, Range 28 East in Eddy County. Marathon proposes to dedicate the HSU to the Cerberus 34 WXY Fed Com 1H, Cerberus 34 WD Fed Com 2H, Cerberus 34 WA Fed Com 3H, Cerberus 34 WXY Fed Com 5H, Cerberus 34 WA Fed Com 7H, Cerberus 34 WXY Fed Com 8H, Cerberus 34 WA Fed Com 10H, Cerberus 34 WXY Fed Com 12H, and Cerberus 34 WA Fed Com 13H wells, which will be horizontally drilled. The producing area for the wells will be orthodox.

Ridge Runner opposes Marathon's application because its proposed HSU conflicts with the HSUs proposed by Ridge Runner in Case Nos. 20105, 20106, 20107, 20717, and 20718.

#### PROPOSED EVIDENCE

WITNESSES	EST. TIME	<b>EXHIBITS</b>
Robert Shelton (Landman)	10 minutes	Approximately 3
Michael Burke (Geologist)	15 minutes	Approximately 5
Scott Germann (Geologist)	15 minutes	Approximately 3
Kelvin Fisher (Engineer)	15 minutes	Approximately 5

Ridge Runner reserves its right to call a rebuttal witness(es) if appropriate.

### PROCEDURAL MATTERS

Ridge Runner is not aware of any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HANKLE SHANOR LLP

Gary W. Larson Dana S. Hardy P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 glarson@hinklelawfirm.com dhardy@hinklelawfirm.com

Counsel for Ridge Runner Resources Operating, LLC

#### CERTIFICATE OF SERVICE

I hereby certify that on this 20<sup>th</sup> day of August 2019, I sent a true and correct copy of Ridge Runner Resources, Operating LLC's Pre-Hearing Statement via email to:

Deana M. Bennett Modrall Sperling Roehl Harris & Sisk P.A. P.O. Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, NM 87103-2168 Phone: (505) 848-1800

Facsimile: (505) 848-9710 Deana.bennett@modrall.com

Attorneys for Marathon Oil Permian, LLC

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

Robert C. Grable Kelly Hart & Hallman LLC 201 Main Street, Suite 2500 Fort Worth, TX 76102 Phone: (817) 332-2500 Bob.grable@kellyhart.com

Attorneys for Fortson Oil Company and Burnett Oil Co., Inc.

James Bruce P.O. Box 1056 Santa Fe, NM 87504 Phone: (505) 982-2043 Fax: (505) 982-2151 jamesbruc@aol.com

Attorney for Novo Oil & Gas Northern Delaware, LLC

Michael H. Feldewert Adam G. Rankin Kaitlyn A. Luck P.O. Box 2208 Santa Fe, NM 87504-2208 Phone: (505) 988-4421 Facsimile: (505) 983-6043

mfeldewert@hollandhart.com agrankin@hollandhart.com kaluck@hollandhart.com

Attorneys for WPX Energy Permian, LLC and RKI Exploration and Production, LLC

Gary W. Larson