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

APPLICATION OF WPX ENERGY PRODUCTION, LLC FOR A NON-STANDARD SPACING AND **PRORATION UNIT, AND COMPULSORY POOLING,** SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 15066

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by WPX Energy Production LLC ("WPX") as

required by the Oil Conservation Division.

APPEARANCES

APPLICANT

OPPONENT

WPX Energy Production LLC One Williams Center Tulsa, OK 74172

Michael H. Feldewert Adam G. Rankin Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 c i ATTORNEY Ū •jene 1. . . . 1. . . .

ATTORNEY

None

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None

STATEMENT OF THE CASE

WPX seeks an order (1) creating a non-standard 160-acre spacing and proration unit comprised of the N/2 N/2 of Section 9, Township 23 North, Range 8 West, NMPM, San Juan County, New Mexico; and (2) pooling all mineral interests in the Mancos formation, Nageezi Gallup Oil Pool, underlying this acreage. WPX proposes to dedicate the above-referenced spacing and proration unit as the project area for its Chaco 2308-09A 145H well.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Chuck Bassett, Landman	Approx. 10 minutes	Approx. 3
Amy Richardson, Geologist OR	Approx. 20 minutes	Approx. 4
Barbara Pickup, Geologist	Approx. 20 minutes	Approx. 4

PROCEDURAL MATTERS

For administrative efficiency, WPX proposes to present this case concurrently with Case

No. 15067 for hearing purposes only.

1.

Respectfully submitted,

HOLLAND & HART, LLP

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ATTORNEYS FOR WPX ENERGY PRODUCTION, LLC