

**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, COMPULSORY POOLING, AND  
UNORTHODOX WELL LOCATION,  
SAN JUAN COUNTY, NEW MEXICO.**

**CASE NO. 15069**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by WPX Energy Production LLC ("WPX") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

WPX Energy Production LLC  
One Williams Center  
Tulsa, OK 74172

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

**OPPONENT**

None

**ATTORNEY**

None

**STATEMENT OF THE CASE**

WPX seeks an order (1) creating a non-standard 160-acre spacing and proration unit comprised of the S/2 N/2 of Section 15, 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 2308-14E 152H well.

### **APPLICANT'S PROPOSED EVIDENCE**

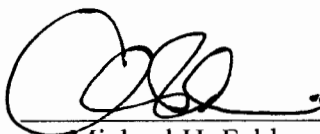
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Chuck Bassett, Landman	Approx. 10 minutes	Approx. 3
Amy Richardson, Geologist OR	Approx. 20 minutes	Approx. 4
Barbara Pickup, Geologist	Approx. 20 minutes	Approx. 4

### **PROCEDURAL MATTERS**

The application for an unorthodox well location will be dismissed from the case, as the entire completed interval for this well will be within the setbacks required by Division rules. For administrative efficiency, WPX proposes to present this case concurrently with Case No. 15068 for hearing purposes only.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert  
Adam G. Rankin  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

**ATTORNEYS FOR WPX ENERGY PRODUCTION, LLC**