

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

2013 SEP 12 F 3:22

IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:

APPLICATION OF WPX ENERGY PRODUCTION  
LLC FOR A 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 Encana Oil & Gas (USA), Inc. as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

WPX Energy Production, LLC

**APPLICANT'S ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin

**OPPONENT**

Encana Oil & Gas (USA), Inc.

**OPPONENT'S ATTORNEY**

Stephen M. Domas  
Will Reese

**STATEMENT OF THE CASE**

**APPLICANT**

**OPPONENT**

WPX Energy Production, LLC ("WPX") seeks an order authorizing an unorthodox well location in the SW/4NW/4 of Section 15, Township 23 North, Range 8 West, N.M.P.M. for its proposed Chaco 2308-14E 152H Well that will have a bottom hole location 230 feet from the West line of Section 15 encroaching on the spacing unit to the West (Unit H, Section 16, T23N, R8W). Furthermore, WPX's application does not describe a point of penetration of its proposed well

into the Mancos formation, Nageezi Gallup Oil Pool. Encana Oil & Gas (USA), Inc. ("Encana") owns 50% of the working interest in the N/2 of Section 16 and Encana opposes WPX's application for the following reasons:

1. WPX's proposed Chaco 2308-14E 152H Well will encroach on and drain from Encana's acreage in Section 16, Township 23 North, Range 8 West, infringing on Encana's correlative rights.

#### **PROPOSED EVIDENCE**

##### APPLICANT

###### WITNESSES

###### EST. TIME

###### EXHIBITS

##### OPPONENT

###### WITNESSES

###### EST. TIME

###### EXHIBITS

Wade McCool  
(landman)

10 min.

Approx. 1

Respectfully submitted,

Beatty & Wozniak, P. C.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 12th day of December, 2013 by facsimile transmission:

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