

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

**APPLICATION OF WPX ENERGY PRODUCTION, LLC FOR APPROVAL OF A  
NON-STANDARD SPACING AND PRORATION UNIT IN THE BASIN MANCOS  
GAS POOL, CREATION OF A NON-STANDARD SPACING UNIT FOR  
COMPULSORY POOLING, APPROVAL OF AN UNORTHODOX WELL  
LOCATION, AND APPROVAL OF DOWNHOLE COMMINGLING, SAN JUAN  
AND RIO ARriba COUNTIES, NEW MEXICO.**

**CASE NOS. 15385 and 15386**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by WPX ENERGY PRODUCTION, LLC  
("WPX"), as required by NMAC 19.15.4.13.B.

**APPEARANCES**

**APPLICANT**

WPX Energy Production, LLC  
P.O. Box 3102  
Tulsa, Oklahoma 74101

**ATTORNEY**

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**STATEMENT OF THE CASE**

In Case No. 15385, WPX seeks an order (1) approving a 120-acre non-standard spacing and proration unit in the Basin Mancos Gas Pool comprised of the N/2 SW/4 and NW/4 SE/4 of Section 12; (2) creating a 240-acre non-standard spacing unit comprised of the N/2 S/2 of Section 12 and the N/2 SW/4 of Section 7, and pooling all mineral interest owners in the Mancos formation underlying said spacing unit; (3) approving WPX's request to downhole commingle production from the Basin Mancos

Gas Pool (97232) and the Lybrook Gallup Pool (42289); and (4) approving an unorthodox well location for the proposed **Chaco 2307-07N 409H Well**, which will be horizontally drilled from a surface location in the SE/4 SW/4 (Unit N) of Section 7 to a non-standard bottom hole location in the NW/4 SW/4 (Unit L) of Section 12. The completed interval will commence 1680 feet from the South line, 2114 feet from the West line (Unit K) to a location 2326 feet from the South line, 390 feet from the West line (Unit L).

In Case No. 15386, WPX seeks an order (1) approving a 120-acre non-standard spacing unit in the Basin Mancos Gas Pool; (2) pooling all mineral interests in the Mancos formation (Basin Mancos Gas Pool (97232) and Lybrook Gallup Pool (42289)) underlying a 240-acre non-standard spacing unit comprised of the S/2 S/2 of Section 12, Township 23 North, Range 8 West, San Juan County, and the S/2 SW/4 of Section 7, Township 23 North, Range 7 West, NMPM, Rio Arriba County, New Mexico; (3) approving an unorthodox well location for the proposed well; and (4) approving WPX's request to downhole commingle production from the Basin Mancos Gas Pool (97232) and the Lybrook Gallup Pool (42289).

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

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Chuck Bassett, Landman	Approx. 15 minutes	Approx. 10
Sam Shiverick, Geologist	Approx. 15 minutes	Approx. 7

**PROCEDURAL MATTERS**

WPX requests that Cases 15385 and 15386 be consolidated for hearing.

Respectfully submitted,

HOLLAND & HART, LLP



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**ATTORNEYS FOR**

**WPX ENERGY PRODUCTION, LLC**