

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

RECEIVED OCD
SEP 26 P 2:00

APPLICATION OF ENCANA OIL & GAS (USA)
FOR APPROVAL OF UNORTHODOX
OIL WELL LOCATIONS SANDOVAL
COUNTY, NEW MEXICO.

Case No. 15046

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Parko, Inc, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT:

Encana Oil & Gas (USA) Inc.
370 17th Street, Suite 1700
Denver, CO 80202

ATTORNEY:

Michael H. Feldewert
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
mfeldewert@hollandhart.com

OPPOSITION OR OTHER PARTY:

Parko Inc.
812 Paseo de las Golondrinas
Bernalillo, New Mexico 87004

ATTORNEY:

Ernest L. Padilla
Padilla Law Firm, P.A.
PO Box 2523
Santa Fe, New Mexico 87504
505-988-7577

STATEMENT OF CASE

APPLICANT:

OPPOSITION OR OTHER PARTY:

Parko Inc., due to drilling and completion of similar horizontal wells drilled by Encana Oil & Gas, in Sections 31 and 32, Township 23 North, Range 6 West, have caused production problems in Parko Inc's. vertical wells producing from the Gallup formation in Section 29, Township 23 North, Range 6 West. As a result, Parko Inc's. correlative rights, have been impaired and, upon information and belief, applicant's proposed wells in Section 28 will create similar problems.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

Floyd Parker, President

15 minutes

Naomi Parker, Vice-President

15 minutes

Johnny Aragon, Pumper

15 minutes

Land Status Map, C-115
Reports and Summaries
Produced Water Analyses

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.



ERNEST L. PADILLA

Attorney for Parko Inc.

PO Box 2523

Santa Fe, New Mexico 87504

505-988-7577

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Pre-Hearing Statement was sent by electronic transmission to Michael H. Feldewert, mfeldewert@hollandhart.com on this 26th day of September, 2013.

A handwritten signature in black ink, appearing to read "Ernest L. Padilla", written over a horizontal line.

ERNEST L. PADILLA