

STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
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. 12068

RECEIVED  
OCD  
2013 NOV 19 PM 5:00

APPLICATION

WPX ENERGY PRODUCTION, LLC, ("WPX") through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order (1) creating a non-standard 160-acre spacing and proration unit comprised of the N/2 N/2 of Section 15, Township 23 North, Range 8 West, NMPM, San Juan County, New Mexico; (2) pooling all mineral interests in the Mancos formation, Nageezi Gallup Oil Pool, underlying this acreage; and (3) authorizing an unorthodox well location in the NW/4 NW/4 of said Section. In support of its application, WPX states:

1. WPX (OGRID No. 120782) is a working interest owner in the N/2 N/2 of Section 15 and has the right to drill thereon.
2. WPX proposes to dedicate the above-referenced spacing and proration unit as the project area for its proposed **Chaco 2308-14E 151H Well**, which will be horizontally drilled from a surface location 1419 feet from the North Line and 299 feet from the West line in Section 14, Township 23 North, Range 8 West (Unit E) to an unorthodox bottom hole location 380 feet from the North line and 230 feet from the West line (Unit D) of Section 15.
3. The Nageezi Gallup Oil Pool is governed by the state-wide rules for Oil Well Spacing and Location which require a well to be no closer than 330 feet to the outer boundary of

the spacing unit. Rules 19.15.15.13(B) and 19.15.4.12(A)2 NMAC allow the director to grant an exception to the well location requirements.

4. The proposed **Chaco 2308-14E 151H Well** will be unorthodox because it encroaches on the spacing units to the West (Unit A, Sec. 16 23N 8W) and Northwest (Unit P, Sec. 9 23N 8W). The bottom hole location is closer than 330 feet to the West and the hypotenuse is only 444 feet from the Northwest which is less than the required distance of 467 feet.

5. WPX has sought and been unable to obtain voluntary agreement for the development of these lands from all of the working interest owners in the subject spacing unit.

6. The pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

7. In order to permit WPX to obtain its just and fair share of the oil and gas underlying the subject lands, *all mineral interests in this non-standard spacing unit should be pooled* and WPX Energy Production, LLC should be designated the operator of this proposed horizontal well and spacing unit.

WHEREFORE, WPX Energy Production, LLC requests that this application be set for hearing before an Examiner of the Oil Conservation Division on December 19, 2013, and, after notice and hearing as required by law, the Division enter an order:

- A. Creating a 160-acre non-standard spacing and proration unit in the Mancos formation, Nageezi Gallup Oil Pool, comprised of the N/2 N/2 of Section 15, Township 23 North, Range 8 West, NMPM;
- B. Pooling all mineral interests in the non-standard spacing and proration unit;

- C. Designating WPX Energy Production, LLC operator of this non-standard spacing unit and the horizontal well to be drilled thereon;
- D. Authorizing WPX Energy Production, LLC to recover its costs of drilling, equipping and completing the well;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% penalty for the risk assumed by WPX Energy Production, LLC in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.
- G. Approving an unorthodox well location that encroaches on the spacing and proration units to the West and Northwest.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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

**ATTORNEYS FOR  
WPX ENERGY PRODUCTION, LLC**

CASE 15068:

Application of WPX Energy Production, LLC for a non-standard spacing and proration unit, compulsory pooling and an unorthodox well location, San Juan County, New Mexico. Applicant in the above-styled cause seeks an order (1) creating a non-standard, 160-acre spacing and proration unit comprised of the N/2 N/2 of Section 15, Township 23 North, Range 8 West, NMPM, San Juan County; (2) pooling all mineral interests in the Mancos formation, Nageezi Gallup Oil Pool, underlying this acreage; and (3) authorizing an unorthodox bottom hole location. Said non-standard unit is to be dedicated to applicant's proposed **Chaco 2308-14E 151H Well**, which will be horizontally drilled from a surface location in the SW/4 NW/4 (Unit E) in Section 14, Township 23 North, Range 8 West to a non-standard bottom hole location in the NW/4 NW/4 (Unit D) of Section 15. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of WPX Energy Production, LLC as operator of the well and a 200% charge for risk involved in drilling said well. Said area is located approximately 4 miles southeast of Nageezi, New Mexico.