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

APPLICATION OF ENCANA OIL & GAS (USA) INC. TO AMEND ORDER R-14081 TO EXPAND THE NORTH ALAMITO UNIT AND THE CORRESPONDING NORTH ALAMITO UNIT; MANCOS POOL, SAN JUAN AND SANDOVAL COUNTIES, NEW MEXICO.

CASE NO. 15367 (re-opened)

#### AMENDED PRE-HEARING STATEMENT

This amended pre-hearing statement is submitted by Encana Oil & Gas (USA) Inc. ("Encana"), as required by NMAC 19.15.4.13.B.

#### **APPEARANCES**

### **APPLICANT**

### **ATTORNEY**

Encana Oil & Gas (USA) Inc.

Michael H. Feldewert Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com ilkessler@hollandhart.com

# **ATTORNEY**

INTERESTED PARTY

WPX Energy Production, LLC

J. Scott Hall, Esq. Seth C. McMillan, Esq. MONTGOMERY & ANDREWS, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307

Tele (505) 982-3873 shall@montand.com smcmillan@montand.com

#### STATEMENT OF THE CASE

This case was previously presented by Encana Oil & Gas (USA) Inc. ("Encana"), at the Division Examiner Hearing on June 9, 2016. Encana sought to amend Order R-14081 to (1) expand the geographic area of the North Alamito Unit by 1,282.40 acres of Federal and Fee land; and (2) expand the corresponding North Alamito Unit; Mancos Pool created by that Order to allow horizontal wells to be located anywhere within the Unit so long as the completed interval is no closer than 330 feet from the outer boundary of the expanded North Alamito Unit.

Since the Division hearing in this matter on June 9, 2016, Encana has conferred with the Bureau of Land Management and the New Mexico State Land Office regarding removal of 160-acres of unleased Federal land from the North Alamito Unit boundaries. The proposed Unit Area now consists of approximately 14,262.78 acres comprised of the following Federal, Indian Allotted, State, and Fee lands located in:

# TOWNSHIP 23 NORTH, RANGE 7 WEST, SANDOVAL COUNTY

Section 19: All

Section 20: All

Section 21: All

Section 22: All

Section 23: All

Section 25: All

Section 26: All

Section 27: All

Section 28: All

Section 29: All

Section 30: All

Section 31: All

Section 32: All

Section 32: All

G 4 2 34 41

Section 34: All

Section 35: NW/4

### TOWNSHIP 23 NORTH, RANGE 8 WEST, SAN JUAN COUNTY

Section 25: All

Section 26: All

# **TOWNSHIP 22 NORTH, RANGE 7 WEST, SANDOVAL COUNTY**

Section 3: N/2

Section 4: N/2

Section 5: N/2, SW/4

Section 6: All

Section 7: N/2

## TOWNSHIP 22 NORTH, RANGE 8 WEST, SAN JUAN COUNTY

Section 1: All Section 12: N/2

Encana will also provide an update regarding the status of lands in the proposed Unit Area.

#### APPLICANT'S PROPOSED EVIDENCE

WITNESS
Name and Expertise

ESTIMATED TIME

**EXHIBITS** 

Mona Binion,

Approx. 15 minutes

Approx. 4 Exhibits

Petroleum Land Negotiator, Encana

### PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

**HOLLAND & HART LLP** 

Michael H. Feldewert

Jordan L. Kessler

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

ATTORNEYS FOR ENCANA OIL & GAS (USA) INC.

# **CERTIFICATE OF SERVICE**

The hereby certify that on August 11, 2016, I served a copy of the foregoing document to the following counsel of record via electronic mail:

Scott Hall
Seth McMillan
Montgomery & Andrews
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
(505) 982-4289 Facsimile
Shall@montand.com
smcmillan@montand.com

Jordan L. Kessle