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

APPLICATION OF WPX ENERGY PRODUCTION, LLC FOR APPROVAL OF THE WEST LYBROOK UNIT, CREATION OF A NEW POOL WITHIN THE UNIT, AND FOR ALLOWANCE OF 330 FOOT SETBACKS FROM THE EXTERIOR OF THE UNIT AREA, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 1534

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by WPX Energy Production, LLC ("WPX") as required by the Oil Conservation Division.

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<u>APPLICANT</u>

ATTORNEY

WPX Energy Production, LLC One Williams Center Tulsa, OK 74172

2015 JUL 30 P 3: Michael H. Feldewert Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421

STATEMENT OF THE CASE

WPX seeks an order 1) approving it's West Lybrook Exploratory Unit pursuant to 19.15.20.14 NMAC; (2) creating a new pool for horizontal wells within the Unit Area; and (3) allowing for 330 foot setbacks from the exterior of the proposed Unit. The proposed Unit Area is comprised of approximately 12,807.24 acres of Federal and Allotted Indian lands situated in San Juan County, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brennan West Landman	Approx. 15 minutes	Approx. 7
Amy Richardson	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP

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