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

APPLICATION OF WPX ENERGY PERMIAN, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

**CASE NO. 20376** 

## APPLICANT'S PRE-HEARING STATEMENT

WPX Energy Permian, LLC, formerly known as RKI Exploration & Production, LLC (collectively "WPX"), submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

## **APPLICANT**

WPX Energy Permian, LLC 3500 One Williams Center, MD 35 Tulsa, OK 74172

## <u>ATTORNEY</u>

Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

## APPLICANT'S STATEMENT OF CASE

WPX seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage Wolfcamp Gas Pool (98220)) underlying a 638.4-acre standard horizontal spacing unit comprised of N/2 of Sections 2 and 3, Township 23 South, Range 27 East, NMPM, Eddy County, New Mexico. This spacing unit will be dedicated to the proposed **Shepherd 3-2-23-27 Fee 401H** well to be drilled from a surface hole location in NW/4 SW/4 (Unit L) of Section 3 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 2. The completed interval for the proposed

well will comply with the setback requirements imposed by the Special Rules for the Purple Sage Wolfcamp Gas Pool set forth in Order No. R-14262.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Aaron Young—Landman	Via Affidavit	Approx. 5
Kasmira Workman—Geologist	Via Affidavit	Approx. 3

## PROCEDURAL MATTERS

Since WPX is not aware of any opposition to this pooling application, this matter will be presented by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

y . \_\_\_\_

Michael H. Feldewert Adam G. Rankin Julia Broggi Post Office Box 2208

Post Office Box 2208 Santa Fe, NM 87504

505-998-4421

mfeldewert@hollandhart.com arankin@hollandhart.com jbroggi@hollandhart.com

ATTORNEYS FOR WPX ENERGY PERMIAN, LLC