

**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 NOS. 20374-20375**

**APPLICATION OF MARATHON OIL PERMIAN LLC  
FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO**

**CASE NO. 20165**

**WPX's CONSOLIDATED PRE-HEARING STATEMENT**

WPX Energy Permian, LLC, ("WPX") submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANTS**

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Marathon Oil Permian LLC

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### STATEMENT OF CASE

These competing pooling applications involve the E/2 of Section 35, T-22-S, R-28-E, wherein *WPX owns 100% of the working interest*. WPX has proposed two laydown horizontal spacing units in the Wolfcamp formation (Purpose Sage Wolfcamp Gas Pool) incorporating the E/2 of Section 35 as follows:

- In **Case No. 20374**, WPX seeks to pool a 636.35-acre standard horizontal spacing unit comprised of the *NE/4 of Section 35* and the N/2 of Section 36 in T-22-S, R-28-E, along with Lot 1, Lot 2 and the E/2 NW/4 of Section 31, T-22-S, R-29-E for its proposed **Golden 35-22-28 Fed Com 401H and 402H** wells.
- In **Case No. 20375**, WPX seeks to pool a 633.85-acre standard horizontal spacing unit comprised of *SE/4 of Section 35* and the S/2 of Section 36, T-22-S, R-28-E, along with Lot 3, Lot 4 and E/2 SW/4 of Section 31, T-22-S, R-29 for its proposed **Retriever 35-22-28 Fed Com 401H and 402H** wells.

Even though WPX owns 100% of the working interest in the E/2 of Section 35 and has proposed the above development plan incorporating its acreage, Marathon seeks in **Case 20165** to bring the E/2 of Section 35 into a laydown spacing unit comprised of Sections 35 and 36 for Marathon's proposed **Cerberus wells** in the Wolfcamp formation. WPX objects to Marathon's attempt to grab WPX's acreage for an adjacent, laydown horizontal development plan. Marathon's proposed spacing unit is not necessary to prevent waste, and is not in the best interests of the protection of correlative rights.

#### **WPX'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brennan West, Landman	20 minutes	Approx. 7
Kasmira Workman, Geologist	15 minutes	Approx. 5
Justin Stolworthy, Engineer	30 minutes	Approx. 10

#### **PROCEDURAL MATTERS**

These cases have been consolidated for hearing purposes with Case Nos. 20105-20107 & 20717-20718 (Ridge Runner Gladiator/Warrier wells) and Case No. 20170 (Marathon Trojan Horse wells). These other cases involve acreage different from that involved in WPX's Cases 20374-20375.

Respectfully submitted,

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By: 

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**ATTORNEY FOR WPX ENERGY PERMIAN, LLC**

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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