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

IN THE MATTER OF THE APPLICATION OF WPX ENERGY PRODUCTION, LLC FOR APPROVAL OF THE NORTHWEST LYBROOK UNIT; CREATION OF A NEW POOL FOR HORIZONTAL DEVELOPMENT WITHIN THE UNIT AREA, AND FOR ALLOWANCE OF 330 FOOT SETBACKS FROM THE EXTERIOR OF THE PROPOSED UNIT, RIO ARRIBA AND SAN JUAN COUNTIES, NEW MEXICO

**CASE NO. 15201** 

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## **PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Montgomery and Andrews, P.A. (J. Scott Hall and Seth C. McMillan) on behalf of DJ Simmons Company Limited Partnership, as required by the Oil Conservation Division's rules.

#### **APPEARANCES**

# <u>APPLICANT'S ATTORNEYS</u> <u>APPLICANT</u>

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#### STATEMENT OF THE CASE

## APPLICANT:

#### WPX ENERGY PRODUCTION, LLC

Applicant seeks approval of its Northwest Lybrook Unit consisting of approximately 2,322 acres of Federal, State and Allotted Indian lands situated in all or parts of the S/2 of Section 25, the S/2 of Section 26, Sections 35 and 36 of Township 24 North, Range 8 West and the E/2 SW/4 of Section 30 and the N/2 of Section 31 of Township 24 North, Range 7 West, N.M.P.M., Rio Arriba and San Juan Counties, New Mexico. The unitized interval is from the top of the Mancos formation at a measured depth of 4,349' down to the stratigraphic equivalent of the top of the Greenhorn Limestone formation at a measured depth of 6,098' as encountered in the Federal 34-43 well in Section 34, Township 24 North, Range 8 West, N.M.P.M. (API No. 30-045-24521).

In addition, Applicant seeks an order creating a new pool within the unitized interval that will allow for wells to be located anywhere within the proposed Unit Area so long as the completed interval is no closer than 330 feet from the outer boundary of the proposed Unit.

## OPPONENT:

#### DJ SIMMONS COMPANY LIMITED PARTNERSHIP

DJ Simmons Company Limited Partnership is a working interest owner in the proposed unit and would be adversely affected by the creation of the proposed Northwest Lybrook Unit. DJ Simmons Company Limited Partnership therefore opposes the approval of the Northwest Lybrook Unit.

## PROPOSED EVIDENCE

WITNESSES: Est. Time No. of Exhibits

## DJ SIMMONS COMPANY LIMITED PARTNERSHIP

Peter Kondrat, Geologist 25 mins. 6
Rodney Seale, Petroleum Engineer 25 mins. 6

## PROCEDURAL MATTERS

None at this time.

MONTGOMERY & ANDREWS, P.A.

By: /s/ Seth C. McMillan

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# **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by U.S. Mail, postage prepaid, and by e-mail on September 11, 2014, as follows:

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/s/ Seth C. McMillan
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