

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

2013 OCT 12 P 2:22

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF WPX ENERGY PRODUCTION
LLC FOR A FOR A NON-STANDARD SPACING
AND PRORATION UNIT, COMPULSORY
POOLING, AND UNORTHODOX WELL LOCATION,
SAN JUAN COUNTY, NEW MEXICO

CASE NO. 15067

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Encana Oil & Gas (USA), Inc. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

WPX Energy Production, LLC

APPLICANT'S ATTORNEY

Michael H. Feldewert
Adam G. Rankin

OPPONENT

Encana Oil & Gas (USA), Inc.

OPPONENT'S ATTORNEY

Stephen M. Domas
Will Reese

STATEMENT OF THE CASE

APPLICANT

OPPONENT

WPX Energy Production, LLC ("WPX") seeks an order authorizing an unorthodox well location in Unit A of Section 9, Township 23 North, Range 8 West, N.M.P.M. for its proposed Chaco 2308-09A 146H Well that will have a surface location 222 feet from the East line of Section 9, potentially encroaching on the acreage to the East in Section 10, T23N, R8W. WPX's application does not describe a point of penetration of its proposed well into the Mancos formation,

Nageezi Gallup Oil Pool. Encana Oil & Gas (USA), Inc. ("Encana") owns 100% of the working interest in Section 10, T23N, R8W and Encana opposes WPX's application for the following reasons:

1. If WPX's proposed Chaco 2308-09A 146H Well penetrates the Mancos formation, Nageezi Gallup Oil Pool within 330 feet of the East line of Section 9, it will encroach on and drain from Encana's acreage in Section 10, Township 23 North, Range 8 West, infringing on Encana's correlative rights.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Wade McCool
(landman)

10 min.

Approx. 1

Respectfully submitted,

Beatty & Wozniak, P. C.



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 12th day of December, 2013 by facsimile transmission:

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