

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

2015 DEC 12 P 3:22

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. 15068

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 the NW/4NW/4 of Section 15, Township 23 North, Range 8 West, N.M.P.M. for its proposed Chaco 2308-14E 151H Well that will have a bottom hole location 230 feet from the West line of Section 15 encroaching on the spacing unit to the West (Unit A, Section 16, T23N, R8W). Furthermore, 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 50% of the working interest in the N/2 of Section 16 and Encana opposes WPX's application for the following reasons:

1. WPX's proposed Chaco 2308-14E 151H Well will encroach on and drain from Encana's acreage in Section 16, 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.



Stephen M. Domas

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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:

Michael H. Feldewert
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A handwritten signature in black ink, appearing to read "S.M. D.", with a long horizontal flourish extending to the right.

Stephen M. Domas