

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

**APPLICATION OF ENCANA OIL & GAS (USA) FOR  
APPROVAL OF UNORTHODOX WELL LOCATIONS,  
SANDOVAL COUNTY, NEW MEXICO.**

**CASE NO. 15046**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Encana Oil & Gas (USA) ("Encana"), as required by NMAC 19.15.4.13.B.

**APPEARANCES**

**APPLICANT**

Encana Oil & Gas (USA)  
370 17th Street, Suite 1700  
Denver, Colorado 80202

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

**OPPONENT**

Parko, Inc.

**ATTORNEY**

Ernest L. Padilla  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577

**STATEMENT OF THE CASE**

Encana seeks an order approving unorthodox well locations for its proposed Lybrook E27-2306 01H well and Lybrook E27-2306 03H well, located in the N/2 of Section 28, Township 23 North, Range 6 West, N.M.P.M., Sandoval County, New Mexico. The subject wells will be completed within 2 miles of the Counselors Gallup-Dakota Pool, which is governed

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by the Special Rules and Regulations adopted under Division Order R-7034. These Special Rules provide for 160-acre spacing units, require wells to be located no closer than 660 feet to the outer boundary of the spacing unit, and require a well to be no nearer than 1320 feet to the nearest well drilling to or capable of producing from the same pool. Accordingly, the completed interval for Encana's proposed wells will be unorthodox because (a) they are 330 feet from the East and West boundaries of the N/2 of Section 28, (b) the completed interval for the proposed Lybrook E27-2306 01H well will encroach the North line of Section 28, and (c) these two wells will be closer in proximity than the 1320 feet required by Rule 4 of the Special Rules.

Encana filed for administrative approval of the unorthodox well locations on July 8, 2013. This matter was set for hearing after Parko Inc. filed an untimely objection letter dated August 5, 2013, but prior to issuance of an approval order by the Division.

#### **APPLICANT'S PROPOSED EVIDENCE**

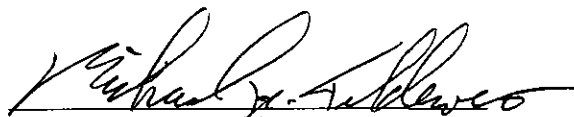
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Aaron T. Johnson, Petroleum Engineer	Approx. 10 minutes	Approx. 5

#### **PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert

Adam G. Rankin

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

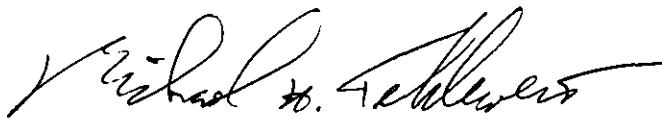
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

ATTORNEYS FOR ENCANA OIL & GAS (USA)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served upon the following  
counsel of record via electronic mail on the 26th day of September, 2013.

Ernest L. Padilla  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
[epadillapl@qwestoffice.net](mailto:epadillapl@qwestoffice.net)



Michael H. Feldewert