

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

**APPLICATION OF WPX ENERGY PRODUCTION, LLC FOR
APPROVAL OF AN UNORTHODOX LOCATION,
RIO ARriba COUNTY, NEW MEXICO**

CASE NO. 15355

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by WPX Energy Production, LLC ("WPX") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

WPX Energy Production, LLC
One Williams Center
Tulsa, OK 74172

ATTORNEY

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OPPONENT

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STATEMENT OF THE CASE

WPX seeks an order authorizing an unorthodox well location for its **NE Chaco Com Well No. 255H** (API No. 30-039-31291), a horizontal well drilled within the Northeast Chaco Horizontal Well Project Area approved under Division Order R-13817. This area is subject to the

Northeast Chaco Unit HZ Oil Pool (Pool Code 98088) created under Division Order R-13817-A which requires the completed interval to be at least 330 feet from the outer boundary of the Project Area. The subject well has been drilled from a surface location 1305 from the south line and 240 feet from the west line of Section 5 to a bottom hole location 325 feet from the north line and 231 feet from the east line of Section 8 in Township 23 North, Range 6 West, NMPM. The completed interval for this well was mistakenly perforated in Unit A of Section 8 at a point 293 feet from the eastern boundary of the Northeast Chaco Horizontal Well Project Area, thereby encroaching on the spacing unit to the east by 37 feet.

APPLICANT'S PROPOSED EVIDENCE

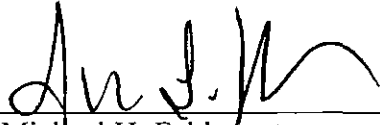
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Brennan West Landman	Approx. 15 minutes	Approx. 7
Ken McQueen Petroleum Engineer	Approx. 10 minutes	Approx. 4

PROCEDURAL MATTERS

WPX has filed a Motion for an Expedited Decision on the Legal Issue of Standing. WPX requests that this Motion be decided prior to presentation of evidence.

Respectfully submitted,

HOLLAND & HART, LLP

A handwritten signature in black ink, appearing to read 'Michael H. Feldewert', written over a horizontal line.

Michael H. Feldewert

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ATTORNEYS FOR WPX ENERGY PRODUCTION, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2015, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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