2016 JUN -2 P 4: 03

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

APPLICATION OF ENCANA OIL & GAS (USA) INC. TO AMEND ORDER R-14081 TO EXPAND THE NORTH ALAMITO UNIT AND THE CORRESPONDING NORTH ALAMITO UNIT; MANCOS POOL, SANDOVAL AND SAN JUAN COUNTIES, NEW MEXICO.

CASE NO. 15367 (Re-Opened)

PRE-HEARING STATEMENT

WPX Energy Production, LLC, ("WPX"), provisionally provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

WPX ENERGY PRODUCTION, LLC

WPX ENERGY PRODUCTION, LLC's

ATTORNEY

J. Scott Hall, Esq. Seth C. McMillan, Esq.

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APPLICANT

APPLICANT'S ATTORNEY

ENCANA OIL & GAS (USA) INC.

Michael H. Feldewert Jordan L. Kessler Holland & Hart, LLP Post Office Box 2208 Santa Fe, NM 87504-2208

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STATEMENT OF THE CASE

<u>APPLICANT</u>:

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Applicant seeks an order amending Order No. R-14081 that will expand the horizontal boundaries of the North Alamito Unit and the North Alamito Unit Mancos Pool in San Juan and Sandoval Counties.

OTHER PARTY:

WPX Energy Production, LLC ("WPX") is a working interest owner in the North Alamito Unit and is Unit Operator of the adjoining West Alamito Unit. Encana's proposed expansion of the North Alamito Unit includes lease acreage in the West Alamito Unit which is owned by WPX. WPX seeks to preserve its rights and interests established under *inter alia* Order No. R-14002, issued July 22, 2015, which approved the original configuration of the West Alamito Unit. WPX does not oppose Encana's application. However, as a condition of WPX's non-opposition, Encana agrees that no Order should be issued by the Division on this Application until WPX has formally terminated or contracted the West Alamito Unit.

PROPOSED EVIDENCE

EST. TIME EXHIBITS

WPX ENERGY PRODUCTION, LLC

WITNESSES (MAY CALL):

Brennan West, Landman, WPX

20 Minutes

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ENCANA OIL & GAS (USA) INC.

WITNESSES:

Unknown at this time.

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ Seth C. McMillan

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Attorneys for WPX Energy Production, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on June 2, 2016:

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