

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

RECEIVED  
2014 FEB 27 A 10 17

**APPLICATION OF WPX ENERGY FOR APPROVAL  
OF A 9,238 ACRE PROJECT AREA COMPRISED OF  
ACREAGE SUBJECT TO A COMMUNITIZATION  
AGREEMENT FOR A "REFERENCE CASE" AUTHORIZING  
WITHIN THE PROPOSED PROJECT AREA THE  
DOWNHOLE COMMINGLING OF PRODUCTION FROM  
THE ESCRITO-GALLUP ASSOCIATED POOL,  
COUNSELORS GALLUP-DAKOTA OIL POOL, AND  
LYBROOK-GALLUP OIL POOL, AND FOR AN EXCEPTION  
TO WELL LOCATION REQUIREMENTS WITHIN THE  
PROPOSED PROJECT AREA , RIO ARRIBA AND SANDOVAL  
COUNTIES, NEW MEXICO.**

**Case No. 15,102**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by JMJ Land and Minerals Company as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**  
WPX Energy

**APPLICANT'S ATTORNEY**  
Michael Feldewert

**OTHER PARTY**  
JMJ Land and Minerals Company  
2204 North Santiago Avenue  
Farmington, New Mexico 87401

**OTHER PARTY'S ATTORNEY**  
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Matthew Strickler  
(405) 306-6081

**STATEMENT OF THE CASE**

**APPLICANT**  
Applicant seeks various relief pertaining to a large project area proposed for Gallup/Dakota oil production.

OTHER PARTY

JMJ Land and Minerals Company is an offset lessee to the project area. It does not object to the application in principle, but requests that applicant be required to set and cement casing and intermediate strings behind the project area boundaries.

**PROPOSED EVIDENCE**

APPLICANT

OTHER PARTY

WITNESSES

EST. TIME

EXHIBITS

Matthew Strickler

20 min.

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for MJM Land and Minerals  
Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 27th day of February, 2014 by facsimile transmission:

Michael H. Feldewert  
Holland & Hart LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 983-6043



James Bruce