



MONTGOMERY  
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September 11, 2014

Ms. Jami Bailey, Director  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

*Hand Delivered*

**Re: NMOCD Case No. 15201: Application of WPX Energy Production, LLC  
for approval of Northwest Lybrook Unit, Rio Arriba and San Juan  
Counties, New Mexico.**

Dear Ms. Bailey:

On behalf of Opponent DJ Simmons Company Limited Partnership, enclosed  
is an entry of appearance and pre-hearing statement for the hearing to take place on  
September 18, 2014.

Thank you.

Very truly yours,

J. Scott Hall  
Seth C. McMillan

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Enclosure a/s

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

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CASE NO. 15201

**IN THE MATTER OF THE APPLICATION OF  
WPX ENERGY PRODUCTION, LLC FOR APPROVAL  
OF THE NORTHWEST LYBROOK UNIT; CREATION  
OF A NEW POOL FOR HORIZONTAL DEVELOPMENT  
WITHIN THE UNIT AREA, AND FOR ALLOWANCE OF  
330 FOOT SETBACKS FROM THE EXTERIOR OF THE  
PROPOSED UNIT, RIO ARRIBA AND SAN JUAN  
COUNTIES, NEW MEXICO**

**ENTRY OF APPEARANCE**

COMES NOW, DJ Simmons Company Limited Partnership, by and through its undersigned attorneys, Montgomery & Andrews, P.A. (J. Scott Hall and Seth C. McMillan), and hereby enters in appearance in the above matter.

MONTGOMERY & ANDREWS, P.A.

By: /s/ Seth C. McMillan  
J. Scott Hall, Esq.  
Seth C. McMillan, Esq.  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873  
(505) 982-4289 fax  
*Attorneys for DJ Simmons Company  
Limited Partnership*

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by U.S. Mail, postage prepaid, and by e-mail on September 11, 2014, as follows:

Michael H. Feldewert  
Gabrielle A. Gerholt  
Adam G. Rankin

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/s/ Seth C. McMillan \_\_\_\_\_  
Seth C. McMillan