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\* Also Admitted in Colorado

° New Mexico Board of Legal

Specialization Certified Specialist in

Natural Resources Law (Oil and Gas)

January 12, 2016

Ms. Florene Davidson  
New Mexico Oil Conservation Division  
1220 South Saint Francis Drive  
Santa Fe, NM 87505

**Re: Pre-Hearing Statement  
Case No. 15428: Application of WPX Energy  
Production, LLC for approval of the Ridge Unit, et al.**

Dear Ms. Davidson

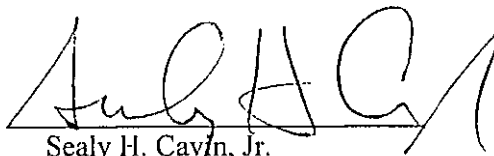
Pursuant to Oil Conservation Division Rule Subsection B of 19.15.4.13 NMAC, Lanford, LLC hereby files the enclosed pre-hearing statement as to the above-referenced matter, which is set for hearing on January 21, 2016. At this time, we do not have any evidence or exhibits to present in this matter. This statement will also be provided to all parties of record.

Please contact me if you have any questions. Thank you.

Very truly yours,

CAVIN & INGRAM, P.A.

By:



Sealy H. Cavin, Jr.

Attorney for Lanford, LLC

SHC:amw  
Enclosure

cc: Jordan L. Kessler, Holland & Hart, LLP

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

APPLICATION OF WPX ENERGY PRODUCTION, LLC  
FOR APPROVAL OF THE RIDGE 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, SAN JUAN COUNTY, NEW MEXICO

Case No. 15428

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted on behalf of Lanford, LLC by Cavin & Ingram,  
P.A., as required by Oil Conservation Division Rule 19.15.4.13 NMAC.

APPEARANCES

OTHER PARTIES

Lanford, LLC  
P.O. Box 90428  
Albuquerque, NM 87199-0428

ATTORNEY

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STATEMENT OF THE CASE

WPX Energy Production, LLC has brought this action to obtain approval of the Ridge Unit, creation of a new pool and allowances for setback limits. Lanford, LLC is an affected working interest owner. WPX Energy's notice to the working interest owners states the application should be scheduled for hearing on January 21, 2016, but the case appears on the docket for the January 7, 2016 hearing and shows it was continued from December 17, 2015. Lanford received notice of this application on December 30, 2015. Lanford has been in contact with WPX regarding issues regarding the proposed project, but has not been able to obtain any information at the time of this filing. Due to its inability to obtain requested information, Lanford cannot make an informed decision about the project and its participation therein.

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### **PROPOSED EVIDENCE**

Unknown at this time. We need copies of the proposed Unit Agreement, Operating Agreement and information regarding the technical merits of WPX's proposal.

### **PROCEDURAL MATTERS**

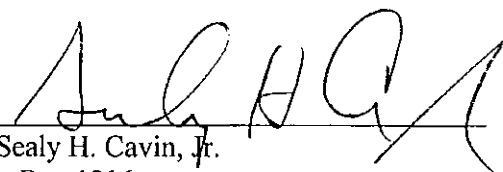
None at this time.

### **POSITION ON RELIEF SOUGHT**

Lanford requests the continuance of this application until such time as Lanford, LLC and other like-situated parties can be provided specific project information.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By:   
Sealy H. Cavin, Jr.

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[cilawfirm@aol.com](mailto:cilawfirm@aol.com)

ATTORNEY FOR LANFORD, LLC

I hereby certify that a true and correct copy  
of the foregoing was served via U.S. mail  
and e-mail on January 8, 2016 to the  
following:

Jordan L. Kessler  
Holland & Hart, LLP  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

CAVIN & INGRAM, P.A.

By: 

Sealy H. Cavin, Jr.