

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

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

Case No. 15,355

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  
Coleman Oil & Gas, Inc.  
Farmington, New Mexico

OTHER PARTY'S ATTORNEY  
James Bruce

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

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 approval of an unorthodox well location for its NE Chaco Com. Well No. 255H (API No. 30-039-31291).

OTHER PARTY

Coleman Oil & Gas, Inc. and JMJ Land and Minerals Company are offset lessees to the location, and object to it because it encroaches on their acreage.

**PROPOSED EVIDENCE**

APPLICANT

OTHER PARTY

WITNESSES

Chris Coleman

EST. TIME

10 min.

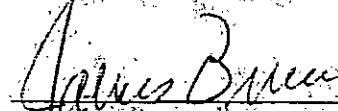
EXHIBITS

Approx. 2

**PROCEDURAL MATTERS**

-None-

Respectfully submitted,



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Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
jamesbruce@aol.com

Attorney for Coleman Oil. & Gas, Inc. and  
JMJ 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 24<sup>th</sup> day of July, 2015 via e-mail:

Michael H. Feldewert  
Holland & Hart LLP  
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James Bruce