

*Fcd 12/7/06 4:48 PM*

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

**IN THE MATTER OF THE APPLICATION  
OF APACHE CORPORATION FOR APPROVAL  
OF SIMULTANEOUS DEDICATION, AN  
UNORTHODOX GAS WELL LOCATION, AND  
TWO OPERATORS ON A GAS WELL UNIT,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 13837**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Miller Stratvert P.A. (J. Scott Hall) on behalf of Kaiser-Francis Oil Company, as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT'S ATTORNEY**

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504

**APPLICANT**

Apache Corporation

**INTERESTED PARTY'S ATTORNEY**

J. Scott Hall, Esq.  
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**INTERESTED PARTY**

Kaiser-Francis Oil Company

*WIT 12/11/06*

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks approval to re-complete its North Bell Lake Fed. Well No. 3 as an infill well in an existing 640 acre gas spacing unit in the North Bell Lake-Devonian Gas Pool comprising all of Section 6, Township 23 South, Range 34 East, N.M.P.M., at an unorthodox location 1930' FNL and 660' FEL (Unit H) of Section 6. Applicant further seeks to simultaneously dedicate production from the North Bell Lake-Devonian Gas Pool in Section 6 to the North Bell Lake Fed. Well No. 3 and to Kaiser-Francis Oil Company's Bell Lake Unit Well No. 6, located 660' FSL and 1980' FEL (Unit O) of Section 6, and to allow applicant to operate the North Bell Lake Fed. Well No. 3.

## PROPOSED EVIDENCE

WITNESSES:

Est. Time


No. of Exhibits

## PROCEDURAL MATTERS

Kaiser-Francis Oil Company does not plan to present testimony or exhibits, but will offer a letter in support of the relief requested by Apache Corporation in this matter.

MILLER STRATVERT P.A.

By:

  
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## Certificate of Service

I hereby certify that a true and correct copy of the foregoing was faxed or hand-delivered to counsel of record on the 7<sup>th</sup> day of December, 2006, as follows:

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J. Scott Hall