

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

2006 SEP 7 PM 2 40

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**APPLICATION OF KAISER-FRANCIS OIL
COMPANY FOR POOL CREATION, *ETC.*,
EDDY COUNTY, NEW MEXICO.**

Case No. 13,771

PRE-HEARING STATEMENT

This pre-hearing statement is submitted as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Kaiser-Francis Oil Company

APPLICANT'S ATTORNEY

J. Scott Hall

OPPONENT

Hayes Land & Production, LP
P.O. Box 8364
Santa Fe, New Mexico 87504

OPPONENT'S ATTORNEY

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

Attention: William Bennett
(505) 983-0740

STATEMENT OF THE CASE

APPLICANT

Applicant requests an order establishing 320-acre oil spacing in the Bone Spring formation in the W½ of Section 11, Township 22 South, Range 26 East, N.M.P.M.

OPPONENT

Hayes Land & Production, LP opposes 320-acre spacing.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

William H. Bennett
(possible witness)

10 minutes

Approx. 2

PROCEDURAL MATTERS

-None-

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", written over a horizontal line.

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

Attorney for Hayes Land & Production, LP