

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

RECEIVED

NOV 3 2003

IN THE MATTER OF THE APPLICATION OF
KAISER-FRANCIS OIL COMPANY FOR
THE ADOPTION OF SPECIAL RULES FOR
THE PADDOCK FORMATION, LEA COUNTY,
NEW MEXICO

Oil Conservation Division
Case No. 13180

ME-TEX OIL & GAS COMPANY'S PRE-HEARING STATEMENT

Me-Tex Oil & Gas Company, an affected party in the above referenced matter, hereby submits this Pre-Hearing Statement as required by the rules of the New Mexico Oil Conservation Division.

APPEARANCES

APPLICANT

Kaiser-Francis Oil Company

ATTORNEY

W. Thomas Kellahin
Kellahin & Kellahin
P.O. Box 2265
Santa Fe, NM 87504

OPPONENT

Me-Tex Oil & Gas Company

OPPONENT'S ATTORNEY

Michael H. Feldewert, Esq.
Holland & Hart, LLP
P. O. Box 2208
Santa Fe, NM 87504-2208
505/988-4421

WST 11/3/03

STATEMENT OF CASE

Kaiser Francis seeks to create a new pool in the Paddock formation and the creation of special pool rules, including 80-acre spacing and a special oil allowable of 300 barrels of oil per day, for its Cooper "3" Well No. 7 located in Unit C of Section 3, Township 20 South, Range 37

East, Lea County, New Mexico. It appears Kaiser Francis is also seeking a discovery allowable for this well pursuant to Division Rule 509. Me-Tex is an offset operator in the NE/4 of Section 3 that objects to all aspects of this application.

PROPOSED EVIDENCE

WITNESS (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Michael Pierce, Geologist	Approx. 15 minutes	Approx. 7

PROCEDURAL MATTERS

Me-Tex is informed by the Division's district office that Kaiser Francis' Cooper "3" Well No. 7 is completed in the Glorietta formation, rather than the Paddock formation. As a result, it does not appear that the matter was properly advertised.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

Michael H. Feldewert
P.O. Box 2208
Santa Fe, NM 87504-2208
505/988-4421
Attorneys for Me-Tex Oil & Gas Company

CERTIFICATE OF SERVICE

I certify that on November 3, 2003 I served a copy of the foregoing document to the following by;

U.S. Mail, postage prepaid
Hand Delivery
Fax

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
P.O. Box 2265
117 North Guadalupe
Santa Fe, NM 87504-2265
Facsimile No. 505-982-2047



Michael H. Feldewert

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

IN THE MATTER OF THE APPLICATION
OF KAISER-FRANCIS OIL COMPANY FOR
POOL CREATING AND SPECIAL POOL
RULES, LEA COUNTY, NEW MEXICO

CASE NO. 13180

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OCT 24 2003

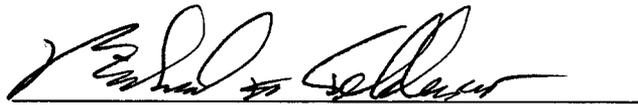
Oil Conservation Division

ENTRY OF APPEARANCE

HOLLAND & HART, LLP enters its appearance in the above-referenced case on behalf
of Me-Tex Oil & Gas Co.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert
P.O. Box 2208
Santa Fe, NM 87501
505-988-4421

Attorneys for Me-Tex Oil & Gas Co.

WVJT
10/27/03

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 24, 2003, a copy of this Entry
of Appearance was mailed to the following:

W. Thomas Kellahin
Kellahin & Kellahin
P.O. Box 2265
Santa Fe, NM 87504


Michael H. Feldewert