

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

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

APPLICATION OF KAISER-FRANCIS  
OIL COMPANY FOR AN UNORTHODOX  
GAS WELL LOCATION,  
LEA COUNTY, NEW MEXICO.

CASE 11842

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Kaiser-Francis Oil Company  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265  
(505) 982-4285

**OTHER PARTY**

V.F. Petroleum Inc.  
c/o Jerry Gahr  
110 N. Marienfeld Street, Suite 580  
Midland, TX 79701-4465  
(915) 683-3344

name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq.  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**STATEMENT OF CASE**

**APPLICANT**

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

**OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

V-F Petroleum Inc., the East offset operator to the proposed unorthodox well location will present testimony in support of a production penalty on the Kaiser-Francis well because of its encroachment on the East boundary of the proposed N/2 spacing unit.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**  
(Name and expertise)

**EST. TIME**

**EXHIBITS**

**OTHER PARTY**

**WITNESSES**  
(Name and expertise)

**EST. TIME**

**EXHIBITS**

George Coss, Geology

Unknown at this time

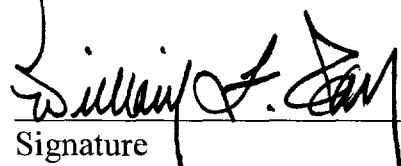
Robin Vasicek, Engineering

Unknown at this time

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

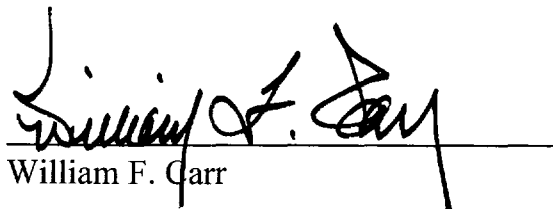
Request of V-F Petroleum for a continuance of this case.

  
Signature

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the foregoing Pre-Hearing Statement to be mailed on this 21<sup>st</sup> day of August, 1997 to the following counsel of record:

W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
Post Office Box 2265  
Santa Fe, New Mexico 87504-2265

  
William F. Carr