

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

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

JUN 1 1991

OIL CONSERVATION DIVISION

Case No. [REDACTED]

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

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Santa Fe
Energy Operating Partners, L.P.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Kaiser-Francis Oil Company

William F. Carr

OPPOSITION OR OTHER PARTY

ATTORNEY

Chi Operating

W. Thomas Kellahin

Santa Fe Energy Operating
Partners, L.P.
550 W. Texas, #1330
Midland, Texas 79701
(915) 687-3551
Attention: Larry Murphy

James Bruce
Hinkle, Cox, Eaton,
Coffield & Hensley
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

STATEMENT OF CASE

APPLICANT

OPPOSITION OR OTHER PARTY

Santa Fe Energy Operating Partners, L.P. is an offset working interest owner, and as such is an interested party in this proceeding. Santa Fe supports the position of Chi Operating.

PROPOSED EVIDENCE

APPLICANT

| WITNESS | EST. TIME | EXHIBITS |
|---------|-----------|----------|
|---------|-----------|----------|

OPPOSITION

| WITNESS | EST. TIME | EXHIBITS |
|---------|-----------|----------|
|---------|-----------|----------|

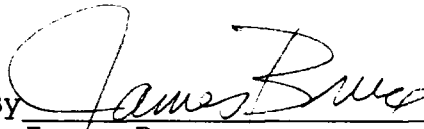
-None-

PROCEDURAL MATTERS

-None-

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &
HENSLEY

By 
James Bruce
500 Marquette, N.W.
Suite 800
Albuquerque, N.M. 87102
(505) 768-1500

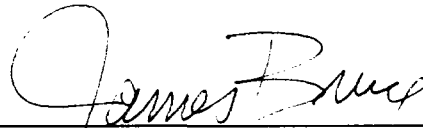
Attorneys for Santa Fe
Energy Operating Partners,
L.P.

Pre-hearing Statement
NMOCD Case No. 10,251 (De Novo)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 6th day of June, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504 and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By

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

James Bruce