

**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 COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

Case No. 22033

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Kaiser-Francis Oil Company
P.O. Box 21468
Tulsa, Oklahoma 74121

Attention: Brendon Kushnerick

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OTHER PARTIES

MRC Permian Company

OTHER PARTIES' ATTORNEYS

Holland & Hart LLP

STATEMENT OF THE CASE

APPLICANT

. Kaiser-Francis Oil Company seeks an order pooling all mineral interest owners in the Delaware formation underlying a horizontal spacing unit comprised of the E/2NE/4 of Section 25 and the E/2E/2 of Section 24, Township 23 South, Range 28 East, NMPM. The unit will be dedicated to the Wright Fed. 2524 LBC Well No. 2H, with a first take point in the SE/4NE/4 of Section 25 and a final take point in the NE/4NE/4 of Section 24. Also to be considered will be the cost of drilling, completing, and equipping the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling, completing, and equipping the well.

OTHER PARTIES

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Brendon Kushnerick
(landman)

15 min.

Approx. 6

Lee Lindman
(geologist)

10 min.

Approx. 4

OTHER PARTIES

WITNESSES

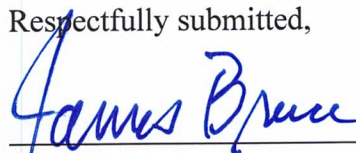
EST. TIME

EXHIBITS

PROCEDURAL MATTERS

The case will be submitted by affidavit.

Respectfully submitted,



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

Attorney for Kaiser-Francis Oil Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 15th day of ~~November~~, 2021 by e-mail:

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December

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 64470

QUESTIONS

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|---|--|
| Operator: KAISER-FRANCIS OIL CO P.O. Box 21468 Tulsa, OK 74121 | OGRID: 12361 |
| | Action Number: 64470 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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|--|----------------------|
| Testimony | |
| <i>Please assist us by provide the following information about your testimony.</i> | |
| Number of witnesses | <i>Not answered.</i> |
| Testimony time (in minutes) | <i>Not answered.</i> |