

**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 Nos. 22282**

**REPLACEMENT 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**

**OTHER PARTIES' ATTORNEYS**

**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 W/2NE/4 of Section 25 and the W/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. 1H, with a first take point in the SW/4NE/4 of Section 25 and a final take point in the NW/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. The unit is located approximately 3 miles southeast of Malaga, New Mexico.

**OTHER PARTIES**

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Brendon Kushnerick (landman)	15 min.	Approx. 6
Lee Lindman (geologist)	10 min.	Approx. 4

OTHER PARTIES

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

The case will be submitted by affidavit.

Respectfully submitted,




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James Bruce  
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Attorney for Kaiser-Francis Oil Company

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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 78203

**QUESTIONS**

Operator: KAISER-FRANCIS OIL CO P.O. Box 21468 Tulsa, OK 74121	OGRID: 12361
	Action Number: 78203
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>