

**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:**

**APPLICATIONS OF KAISER-FRANCIS OIL
COMPANY FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

Case Nos. 23211 - 23212

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 PARTY

MTC Permian Company

OTHER PARTY'S ATTORNEY

Holland & Hart LLP

STATEMENT OF THE CASE

APPLICANT

Case No. 23211: Kaiser-Francis Oil Company seeks an order pooling all uncommitted mineral interest owners in the Bone Spring formation underlying a horizontal spacing unit comprised of the SE/4 of Section 5 and the E/2 of Section 8, Township 24 South, Range 34 East, N.M.P.M. The unit will be dedicated to (a) The Bell Lake Unit South Well No. 217H, with a first take point in the NW/4SE/4 of Section 5 and a last take point in the SW/4SE/4 of Section 8; and (b) The Bell Lake Unit South Well No. 218H, with a first take point in the NE/4SE/4 of Section 5 and a last take point in the SE/4SE/4 of Section 8.

Case No. 23212: Kaiser-Francis Oil Company seeks an order pooling all uncommitted mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the SE/4 of Section 5 and the E/2 of Section 8, Township 24 South, Range 34 East, N.M.P.M. The unit will be dedicated to (a) The Bell Lake Unit South Well No. 417H, with a first take point in the NW/4SE/4 of Section 5 and a last take point in the SW/4SE/4 of Section 8; and (b) The Bell Lake Unit South Well No. 418H, with a first take point in the NE/4SE/4 of Section 5 and a last take point in the SE/4SE/4 of Section 8.

OTHER PARY

PROPOSED EVIDENCE

APPLICANT

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

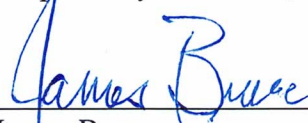
OTHER PARY

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------|------------------|-----------------|
|------------------|------------------|-----------------|

PROCEDURAL MATTERS

If the cases are unopposed they will be presented by affidavit.

Respectfully submitted,



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

Attorney for Kaiser-Francis Oil Company

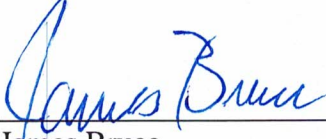
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 24th day of November, 2022 by e-mail:

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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 161262

QUESTIONS

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| Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146 | OGRID: 12361 |
| | Action Number: 161262 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

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