

**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

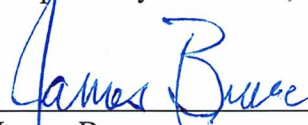
OTHER PARY

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

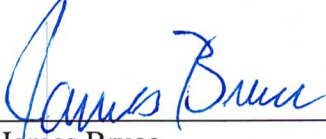
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 24<sup>th</sup> 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 161264

**QUESTIONS**

Operator: KAISER-FRANCIS OIL CO PO Box 21468 Tulsa, OK 74121146	OGRID: 12361
	Action Number: 161264
	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	Not answered.
Testimony time (in minutes)	Not answered.