

**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,  
LEA COUNTY, NEW MEXICO.**

**Case Nos. 21817**

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

**Case Nos. 21818**

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

**Case Nos. 21819**

**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: David Hamilton

**OTHER PARTY**

Conoco Phillips Company

**APPLICANT'S ATTORNEY**

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

**OTHER PARTY'S ATTORNEY**

Ocean Munds-Dry

## STATEMENT OF THE CASE

### APPLICANT

Case No. 21817: Kaiser-Francis Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the SE/4 of Section 6 and the E/2 of Section 7, Township 24 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The unit will be dedicated to the Bell Lake Unit – South Block Well No. 411H, with a first take point in the NW/4SE/4 of Section 6 and a last take point in the SW/4SE/4 of Section 7.

Case No. 21818: Kaiser-Francis Oil Company seeks an order pooling all mineral interest owners in the Wolfcamp formation underlying a horizontal spacing unit comprised of the SW/4 of Section 6 and the W/2 of Section 7, Township 24 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The unit will be dedicated to the Bell Lake Unit – South Block Well No. 409H, with a first take point in the NE/4SW/4 of Section 6 and a last take point in the SE/4SW/4 of Section 7.

Case No. 21819: Spring formation underlying a horizontal spacing unit comprised of the SW/4 of Section 6 and the W/2 of Section 7, Township 24 South, Range 34 East, N.M.P.M., Lea County, New Mexico. The unit will be dedicated to the Bell Lake Unit – South Block Well Nos. 207H, 208H, 209H, and 408H, with first take points in the N/2SW/4 of Section 6 and last take points in the S/2SW/4 of Section 7.

Also to be considered will be the cost of drilling, completing, and equipping the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling, completing, and equipping the wells.

### OTHER PARTY

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
David Hamilton (landman)	15 min.	Approx. 8
Chris Miller (geologist)	10 min.	Approx. 4

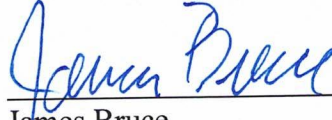
### OTHER PARTY

<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,



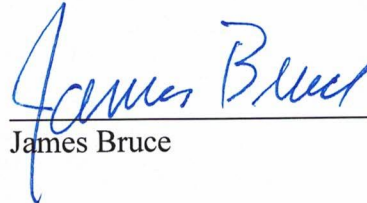
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

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 15<sup>th</sup> day of April, 2021 by e-mail:

Ocean Munds-Dry  
[ocean.munds-dry@conocophillips.com](mailto:ocean.munds-dry@conocophillips.com)



James Bruce