

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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

Case Nos. 21817 - 21819

NOTICE OF FILING REPLACEMENT EXHIBIT

Kaiser-Francis Oil Company hereby submits Replacement Exhibit 3 in the above cases, which is necessary due to the geologist sending new set of exhibits late yesterday.

Respectfully submitted,




James Bruce
Post Office Box 1056
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(505) 982-2043
jamesbruc@aol.com

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 20th day of May, 2021 by e-mail:

Ocean Munds-Dry
ocean.munds-dry@conocophillips.com


James Bruce

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SELF AFFIRMED STATEMENT OF MITCH SULLIVAN

Mitch Sullivan states:

1. I am over the age of 18, and have personal knowledge of the geological matters stated herein. I am a geologist for Kaiser-Francis Oil Company ("KFOC").
2. I have been qualified by the Division as an expert petroleum geologist. My area of responsibility at KFOC includes this portion of Southeast New Mexico.
3. The following geological plats are attached hereto:

(a) Attachment A-1 is a structure map on the top of the Bone Spring formation. It shows that structure dips gently to the south-southeast. It also shows Bone Spring wells in the vicinity of the proposed Bell Lake Unit – South Block Well Nos. 207H, 208H, and 209H, as well as a line of cross-section.

Attachment A-2 is a Stratigraphic Bone Spring cross section. The well logs on the cross-section give a representative sample of the Bone Spring formation in this area. The target zone for the well is the Bone Spring, and that zone is continuous across the well unit.

(b) Attachment B-1 is a structure map on the top of the Wolfcamp formation. It shows that structure dips gently to the south-southeast. It also shows Wolfcamp wells in the vicinity of the proposed Bell Lake Unit – South Block Well Nos. 408H, 409H, and 411HH as well as a line of cross-section.

Attachment B-2 is a Stratigraphic Wolfcamp cross section. The well logs on the cross-section give a representative sample of the Wolfcamp formation in this area. The target zone for the wells is continuous across the well unit.

Replacement
EXHIBIT *3*

4. I conclude from the maps that:

(a) The horizontal spacing unit is justified from a geologic standpoint.

(b) Each quarter section in the well units will contribute more or less equally to production from the wells.

(c) There is no faulting or other geologic impediment which will adversely affect the drilling of the subject well.

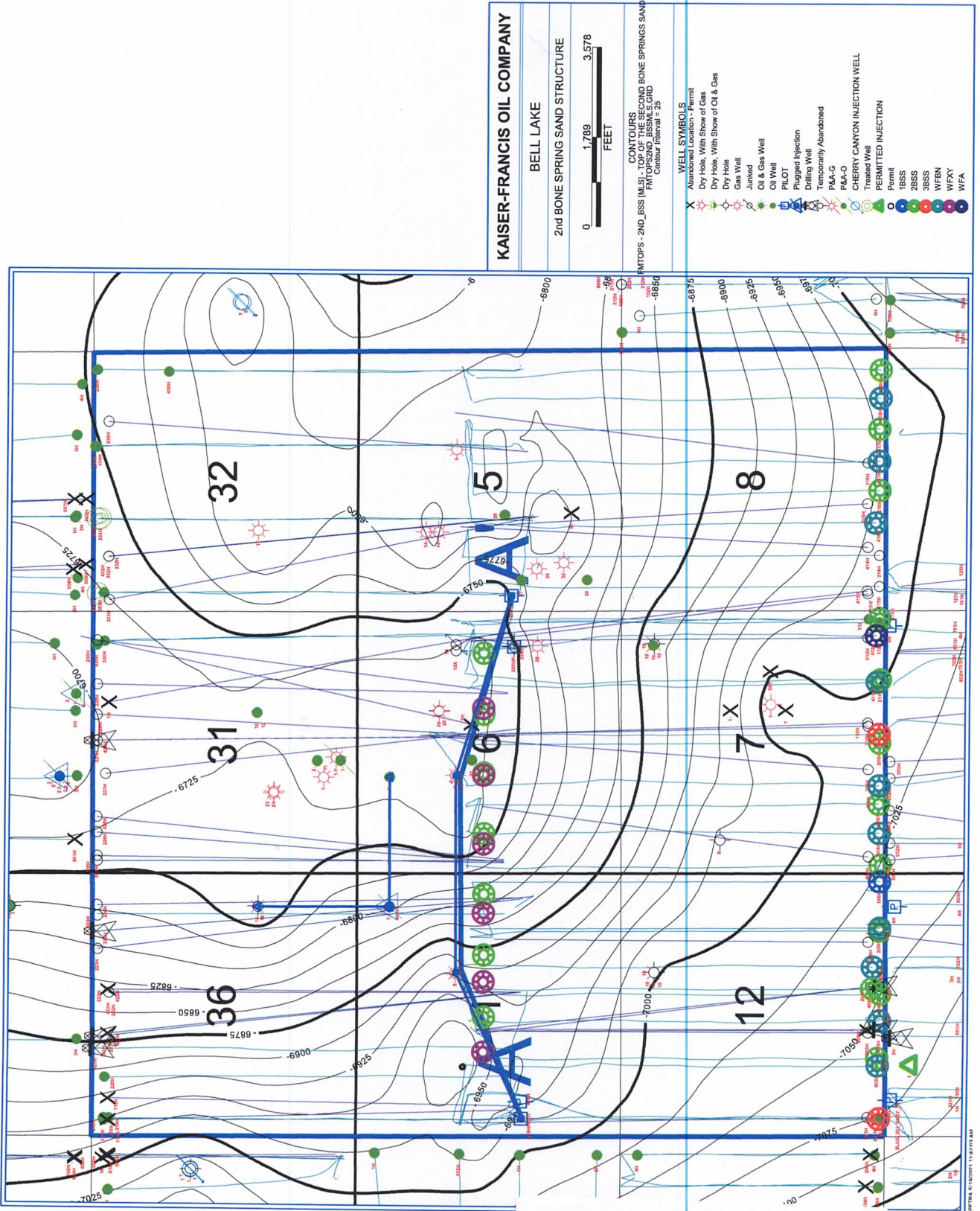
5. KFOC sees no preference geologically for standup or laydown wells in this area. However, the Ball Lake Unit is being drilled on 1-1/2 mile standup units.

6. I understand that this Self-Affirmed Statement will be used as written testimony in this case. I affirm that my testimony in paragraphs 1 through 5 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

Date: MAY 18 2021

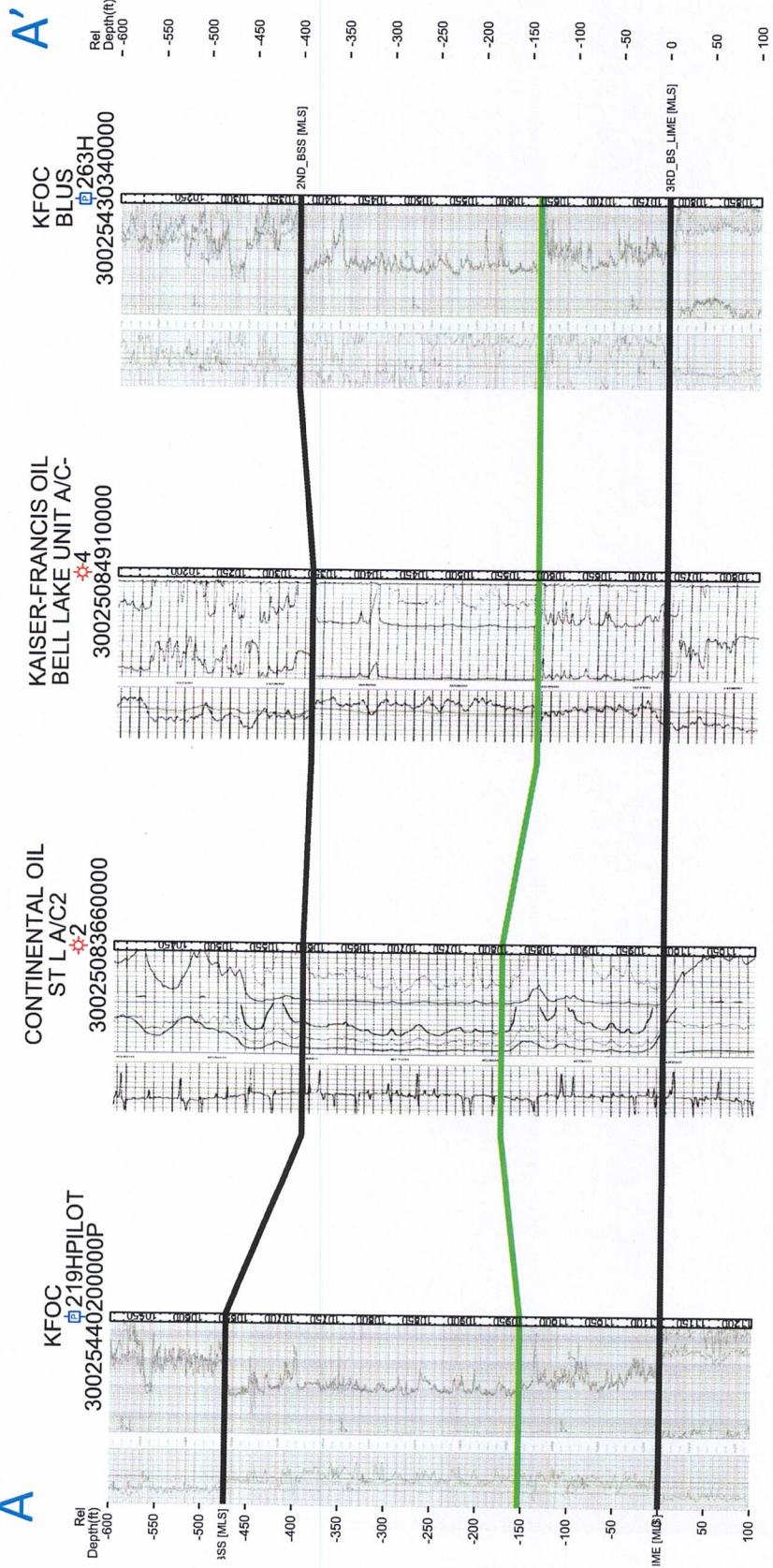


Mitch Sullivan



ATTACHMENT A-1

A'



KFOC

Delaware portion of the Permian basin

2nd BSS Cross Section

Horizontal Scale = 50.0

Vertical Scale = 50.0

Vertical Exaggeration = 1.0x

TOPS AND MARKERS

2ND_BSS_MLS

3RD_BS_LIME_MLS

2BSSLTP_MLS

By: MLS

May 19, 2021 11:45 AM

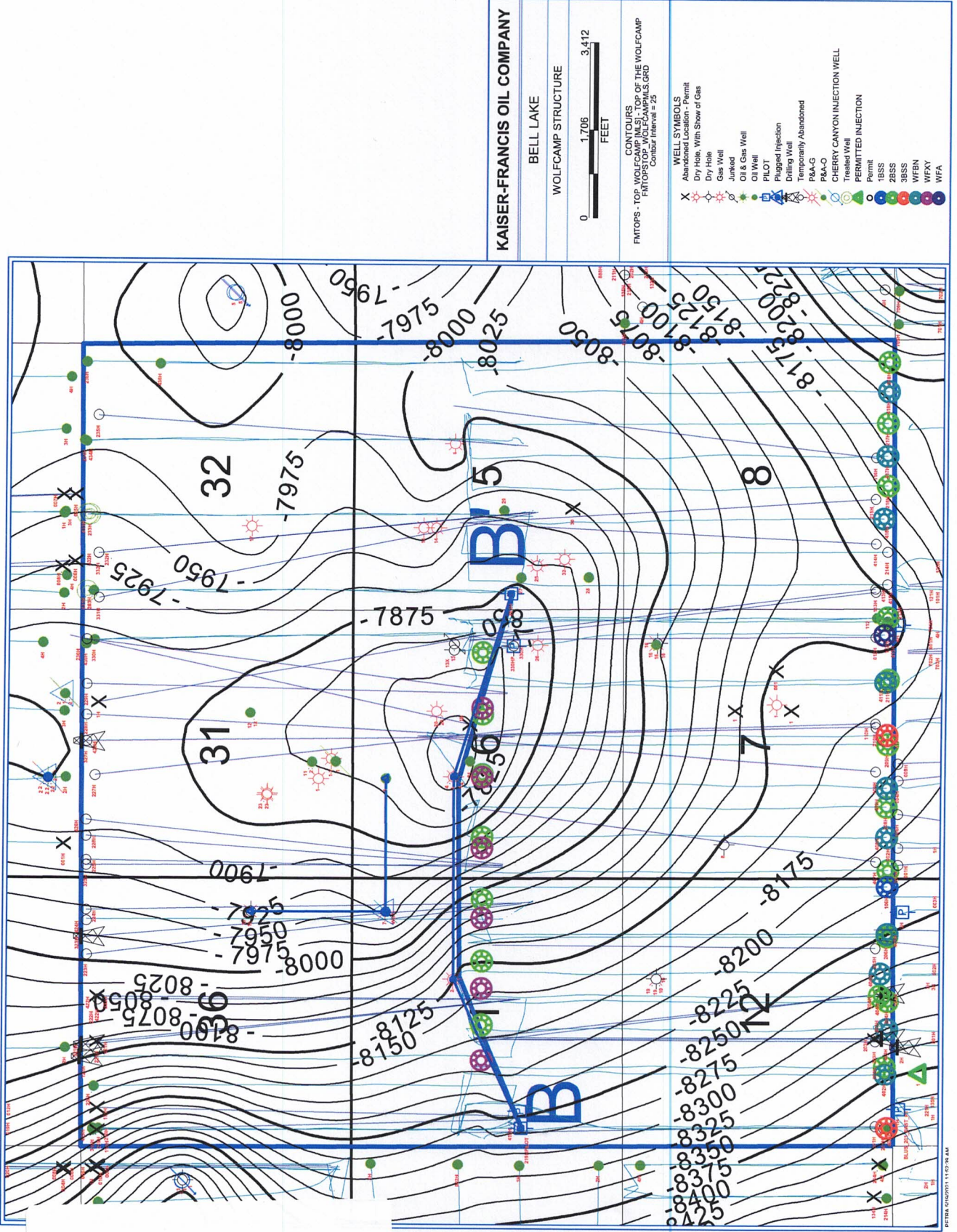
ATTACHMENT

A-2

A

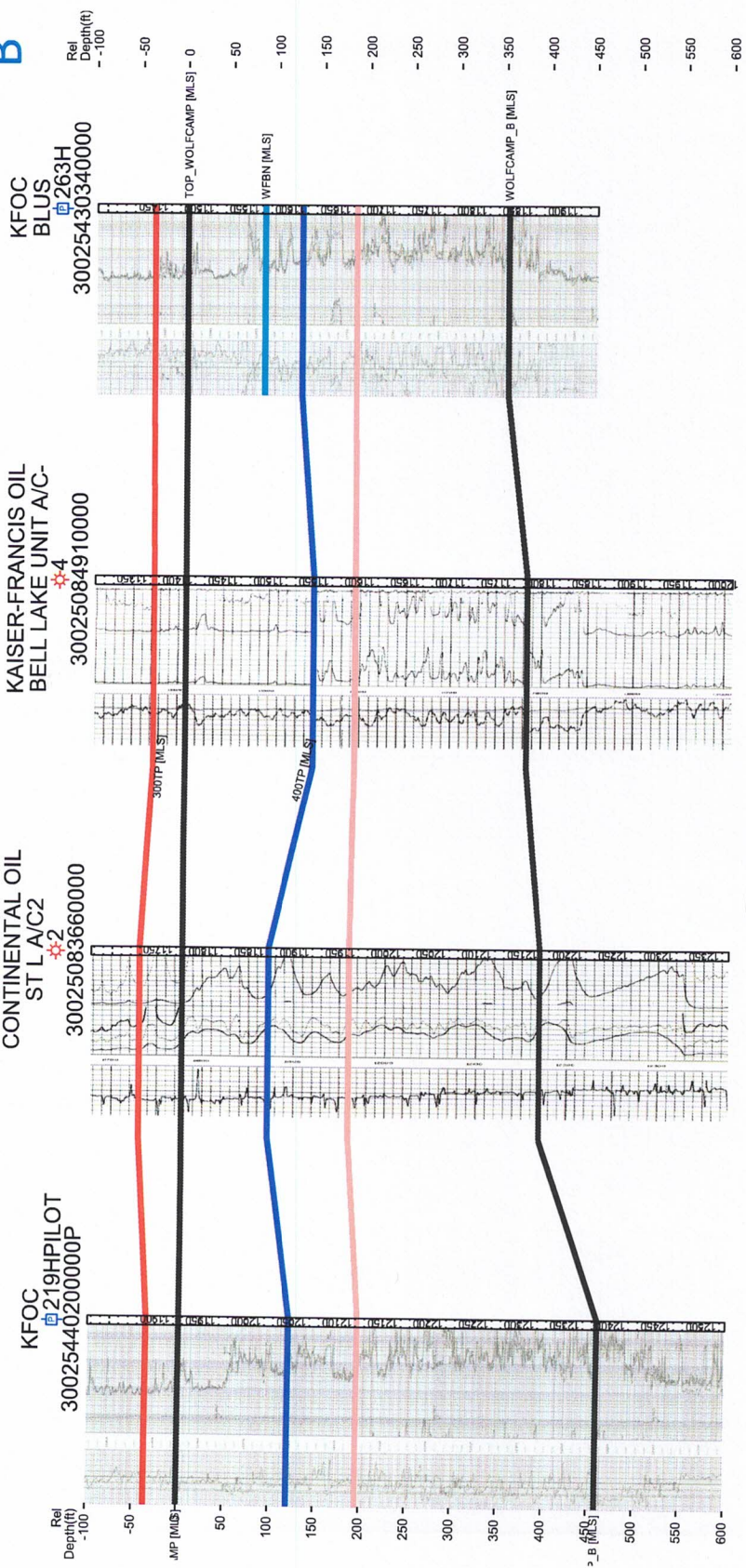
ATTACHMENT

B-1



B

B'



KFOC

Delaware portion of the Permian basin

Wolfcamp Cross Section

- Horizontal Scale = 50.0
- Vertical Scale = 50.0
- Vertical Exaggeration = 1.0x
- TOPS AND MARKERS
- TOP_WOLF CAMP MLS
- WOLF CAMP_B MLS
- WFBN MLS
- 300TP MLS
- 400TP MLS
- WOLF_A_SAND_BASE MLS

By: MLS
May 19, 2021 11:47 AM

ATTACHMENT B-2