

STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION COMMISSION RECEIVED

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:

JUN 1 1991

OIL CONSERVATION DIVISION

Case No. [REDACTED]

APPLICATION OF KAISER-FRANCIS  
OIL COMPANY FOR POOL CREATION,  
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Santa Fe  
Energy Operating Partners, L.P.

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Kaiser-Francis Oil Company

William F. Carr

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

Chi Operating

W. Thomas Kellahin

Santa Fe Energy Operating  
Partners, L.P.  
550 W. Texas, #1330  
Midland, Texas 79701  
(915) 687-3551  
Attention: Larry Murphy

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

**STATEMENT OF CASE**

APPLICANT

OPPOSITION OR OTHER PARTY

Santa Fe Energy Operating Partners, L.P. is an offset working interest owner, and as such is an interested party in this proceeding. Santa Fe supports the position of Chi Operating.

**PROPOSED EVIDENCE**

APPLICANT

WITNESS	EST. TIME	EXHIBITS
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OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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-None-

**PROCEDURAL MATTERS**

-None-

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

By 

James Bruce  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

Attorneys for Santa Fe  
Energy Operating Partners,  
L.P.

Pre-hearing Statement  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 6<sup>th</sup> day of June, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504 and W. Thomas Kellahin, P. O. Box 2265, Santa Fe, New Mexico 87504.

By James Bruce  
James Bruce