

**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:

CASE NO. 10252
REOPENED

IN THE MATTER OF THE APPLICATION
OF KAISER-FRANCIS OIL COMPANY FOR
THE CREATION OF A NEW POOL,
LEA COUNTY, NEW MEXICO.

RECEIVED

OCT 11 1991

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Kaiser-Francis Oil Company _____
c/o Jim Wakefield _____
Post Office Box 21468 _____
Tulsa, Oklahoma 74121 _____
(918) 491-4510 _____

ATTORNEY

William F. Carr _____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

OPPOSITION OR OTHER PARTY

Telephone: _____

ATTORNEY

Telephone: _____

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

Kaiser-Francis Oil Company, applicant, seeks the creation of a new pool for the production of gas from the Delaware formation comprising the SE/4 of Section 8, Township 21 South, Range 36 East, Lea County, New Mexico.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

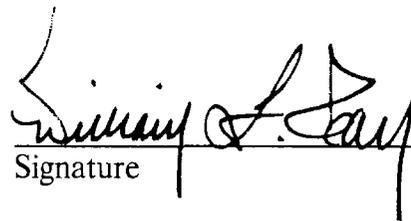
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Wakefield, Petroleum Engineer	20 Min.	Approximately 5

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS


Signature

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

RECEIVED

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

FEB 15 1991

OIL CONSERVATION DIV.
SANTA FE

CASE NO. 10251

APPLICATION OF KAISER-FRANCIS OIL
COMPANY FOR A POOL CREATION,
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CHI ENERGY
INC. as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Kaiser-Francis Oil Company

William F. Carr
Campbell & Black, P.A.
P.O. Box 2208
Santa Fe, NM 87504

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

Chi Energy Inc.
P.O. Box 1799
Midland, TX 79702
Attn: William R. Bergman
(915) 685-5001

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Chi Energy Inc. is an operator of oil wells in the Catclaw Draw Delaware Oil Pool located in Section 9, T21S, R26E, N.M.P.M., Eddy County, New Mexico.

Applicant seeks the creation of a gas pool for production in the 160 acres immediately adjacent to the Chi Energy oil wells.

Chi Energy is concerned that Kaiser-Francis is attempting to create a gas pool in the same pool with Chi Energy's oil wells. Chi Energy is concerned that the application if granted will prematurely deplete the gas drive mechanism for the oil pool unless the gas wells are treated as wells in an associated oil-gas pool with restricted allowables.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
William R. Bergman (landman)	15 min.	Structure map / Kaiser-Francis
Michael D. Hayes (geologist)	15 min.	Brushy Canyon Structure map / Middle Brushy Canyon Cross-section

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY

By: 
W. Thomas Kellahin
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

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 POOL CREATION,
EDDY COUNTY, NEW MEXICO.

Case No. 10,251

RECEIVED

FEB 1 1981

PRE-HEARING STATEMENT

OIL CONSERVATION DIVISION

This pre-hearing statement is submitted by Santa Fe Energy Operating Partners, L.P. as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Kaiser-Francis Oil Company

William F. Carr

OPPOSITION OR OTHER PARTY

ATTORNEY

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. At this point, Santa Fe takes no position, for or against the application, in this case. Santa Fe enters its appearance to preserve its appeal rights.

PROPOSED EVIDENCE

APPLICANT

WITNESS	EST. TIME	EXHIBITS
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OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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-None-

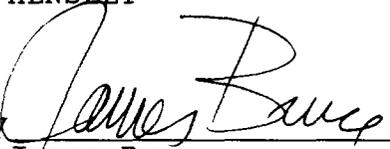
PROCEDURAL MATTERS

-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.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 13th day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504.

By James Bruce
James Bruce

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
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APPLICANT

ATTORNEY

Kaiser-Francis Oil Company _____
c/o Jim Wakefield _____
Post Office Box 21468 _____
Tulsa, Oklahoma 74121-1468 _____
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name, address, phone and
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William F. Carr _____
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Post Office Box 2208 _____
Santa Fe, New Mexico 87504 _____
(505) 988-4421 _____

OPPOSITION OR OTHER PARTY

ATTORNEY

name, address, phone and
contact person

STATEMENT OF CASE

APPLICANT

Kaiser-Francis Oil Company, applicant, seeks the creation of a new pool for the production of gas from the Delaware formation comprising the SE/4 of Section 8, Township 21 South, Range 26 East.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

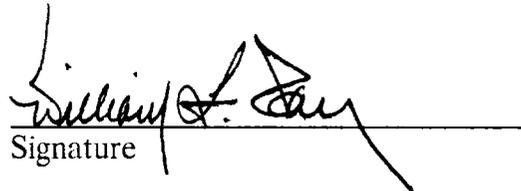
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS


Signature