

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

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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 AND SPECIAL RULES AND  
REGULATIONS THEREFOR THE, LEA COUNTY,  
NEW MEXICO.

Case No. 15823

APPLICATION OF KAISER-FRANCIS OIL COMPANY  
FOR POOL CREATION AND SPECIAL RULES AND  
REGULATIONS THEREFOR THE, LEA COUNTY,  
NEW MEXICO.

Case No. 15824

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: Chris Miller

APPLICANT'S ATTORNEY

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

OTHER PARTIES

Seth Family

OTHER PARTIES' ATTORNEYS

J. Scott Hall

STATEMENT OF THE CASE

APPLICANT

Case No. 15823: Applicant seeks an order (i) creating a new pool for horizontal development of the Bone Spring formation, designated the Southwest Ojo Chiso-Bone Spring Pool, and (ii) instituting special rules and regulations for the pool. The new pool will include Section 36 of

Township 22 South, Range 33 East, NMPM, Sections 31 and 32 of Township 22 South, Range 34 East, NMPM, Sections 1 and 12 of Township 23 South, Range 33 East, NMPM, and Sections 5-8 of Township 23 South, Range 34 East, NMPM. The special rules will include standard 480 acre oil spacing and proration units, special well location requirements, a depth bracket allowable of 9600 barrels of oil per day for a standard 480 acre unit, and a gas:oil ratio of 5000:1.

Case 15284: Applicant seeks an order (i) creating a new pool for horizontal development of the Wolfcamp formation, designated the South Bell Lake-Wolfcamp Pool, and (ii) instituting special rules and regulations for the pool. The new pool will include Section 36 of Township 23 South, Range 33 East, NMPM, Sections 31 and 32 of Township 23 South, Range 34 East, NMPM, Sections 1 and 12 of Township 24 South, Range 33 East, NMPM, and Sections 5-8 of Township 24 South, Range 34 East, NMPM. The special rules will include standard 480 acre oil spacing and proration units, special well location requirements, a depth bracket allowable of 6000 barrels of oil per day for a standard 480 acre unit, and a gas:oil ratio of 5000:1.

#### OTHER PARTIES

### **PROPOSED EVIDENCE**

#### APPLICANT

| <u>WITNESSES</u>              | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|-------------------------------|------------------|-----------------|
| Barbara Courtney<br>(landman) | 15 min.          | Approx. 8       |
| Chris Miller<br>(geologist)   | 20 min.          | Approx. 18      |
| Mike Raines<br>(engineer)     | 20 min.          | Approx. 10      |

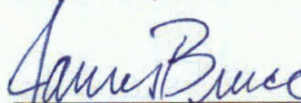
#### OTHER PARTIES

| <u>WITNESSES</u> | <u>EST. TIME</u> | <u>EXHIBITS</u> |
|------------------|------------------|-----------------|
|------------------|------------------|-----------------|

### **PROCEDURAL MATTERS**

Applicant requests that these two cases be consolidated for hearing.

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

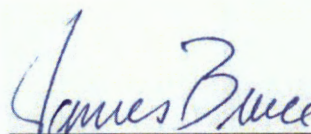
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 7th day of September, 2017 by e-mail:

J. Scott Hall

*shall@montand.com*

Jordan L. Kessler

*jlkessler@hollandhart.com*



James Bruce