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

2016 AUG 23 P 3: 41

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

APPLCATION OF MEWBOURNE OIL COMPANY TO REVOKE THE INJECTION AUTHORITY GRANTED UNDER SWD-744 FOR THE WILLOW LAKE WELL NO. 1 OPERATED BY PYOTE WELL SERVICE, LLC, EDDY COUNTY, NEW MEXICO.

Case No. 15,519

#### **NOTICE OF INTERVENTION**

This Notice of Intervention is submitted by Kaiser-Francis Oil Company ("KFOC") as required by the regulations of the Oil Conservation Division.

#### INTERVENOR'S NAME

Kaiser-Francis Oil Company c/o James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 Phone: (505) 982-2043

Fax: (505) 982-2151
jamesbruc@aol.com

Attorney for Kaiser-Francis Oil Company

#### NATURE OF INTERVENOR'S INTEREST

Applicant seeks an order revoking the authority granted by Administrative Order SWD-744 to inject into the Bone Spring formation in the Willow Lake Well No. 1, located in Unit C of Section 22, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

KFOC is the operator of the Willow Lake Well Nos. 1 and 2 located in the S½ of Section 22, Township 24 South, Range 28 East, NMPM.

## BASIS OF INTERVENOR'S POSITION

KFOC fully supports Mewbourne's application because the SWD well adversely affects KFOC's immediately offsetting acreage.

In addition, KFOC objects to the continuance requested by the receiver of Pyote Well Service, LLC.

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 23/6 day of August, 2016 by e-mail:

J. Scott Hall shall@montand.com

Michael H. Feldewert *mfeldewert@hollandhart.com* 

Jordan L. Kessler jlkessler@hollandhart.com

James Bruce