

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

2015 JUL 23 12:30 PM

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

**APPLICATION 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 23rd 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

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

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LAKE WELL NO. 1 OPERATED BY PYOTE WELL
SERVICE, LLC, EDDY COUNTY, NEW MEXICO.**

Case No. 15,519

AMENDED 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
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Attorney for Kaiser-Francis Oil Company

NATURE OF INTERVENOR'S INTEREST

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KFOC is the operator of the Willow Lake Well Nos. 1 and 2 located in the S½ of Section 15, 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

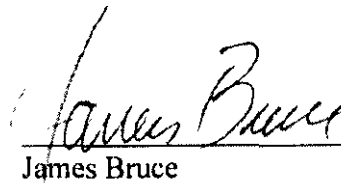
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 24th 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