

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

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

**APPLICATION OF MEWBOURNE OIL COMPANY
TO REVOKE 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 15519 (*de novo*)

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Kaiser-Francis Oil Company ("KFOC") as required by the Oil Conservation Division

APPEARANCES

APPLICANT

Mewbourne Oil Company

APPLICANT S ATTORNEY

Jordan L Kessler

OPPONENT

Pyote Well Service, LLC and
David Baker, Receiver f/b/o Pyote Water
Solutions LLC and Pyote SWD II LLC

OPPONENT S ATTORNEY

J Scott Hall

OTHER PARTIES

OXY USA Inc

Kaiser Francis Oil Company
P O Box 21468
Tulsa, Oklahoma 74121

Attention Lee Lindman

OTHER PARTIES' ATTORNEYS

Jordan L Kessler

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

STATEMENT OF THE CASE

APPLICANT

Applicant seeks to revoke Opponent's authority to inject produced water 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

OPPONENT

OTHER PARTY

KFOC supports Applicant in this case because continued injection into the subject well will adversely affect KFOC's correlative rights and cause waste in its offsetting acreage

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST TIME

EXHIBITS

OPPONENT

WITNESSES

EST TIME

EXHIBITS

OTHER PARTY

WITNESSES

EST TIME

EXHIBITS

Lee Lindman KFOC)
(geologist)

15 min

1 (attached)

PROCEDURAL MATTERS

Respectfully submitted



James Bruce
Post Office Box 1056
Santa Fe New Mexico 87504
(505) 982 2043

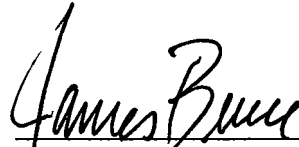
Attorney for Kaiser Francis Oil Company

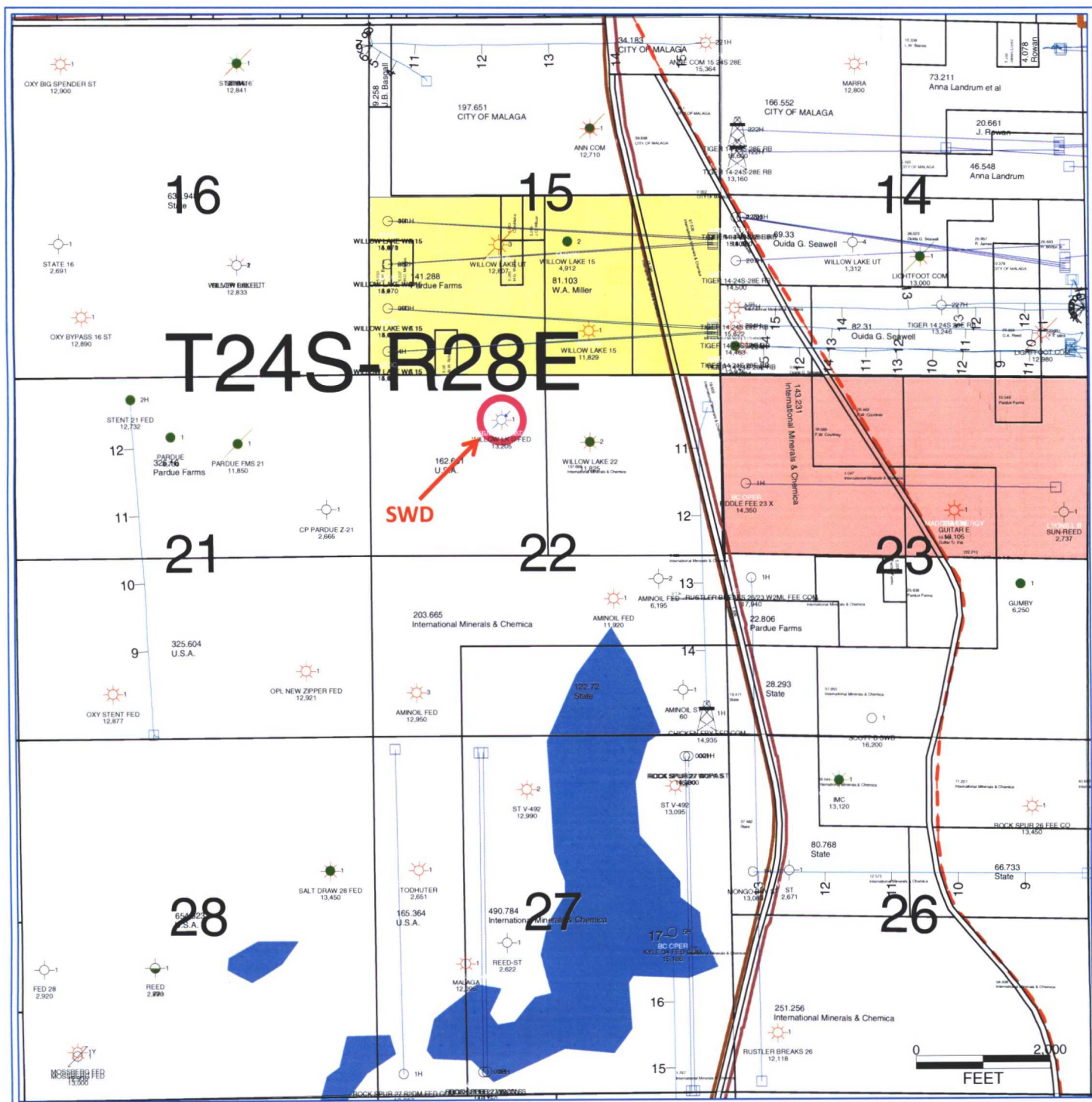
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 11th day of May, 2017 by e-mail

J Scott Hall
shall@montand.com

Jordan L Kessler
jlkessler@hollandhart.com


James Bruce



- Operated Acreage
- Non-Operated Acreage

Kaiser Francis Oil Company – Acreage Map
 Eddy Co., NM
 NMOCD Case #15519 *(denovo)*

KFOC EXHIBIT **1**