

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

OCT 18 2018 PM 04:38

**APPLICATION OF KAISER-FRANCIS OIL  
COMPANY FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

Case No. 20050

**APPLICATION**

Kaiser-Francis Oil Company applies for an order pooling all mineral interests in the Bone Spring formation in a horizontal spacing unit comprised of Lots 3 and 4 (the W/2SW/4) of Section 31, Township 25 South, Range 33 East, N.M.P.M. and Lots 1-4 (the W/2W/2) of Section 6, Township 26 South, Range 33 East, N.M.P.M., and in support thereof, states:

1. Applicant is an interest owner in the W/2SW/4 of Section 31 and the W/2W/2 of Section 6, and has the right to drill a well or wells thereon.
2. Applicant proposes to drill the Red Hills Well No. 001H and the Red Hills Well No. 101H to depths sufficient to test the Bone Spring formation (wildcat Bone Spring) and to dedicate the W/2SW/4 of Section 31 and the W/2W/2 of Section 6 to the wells to form a 238.80 acre horizontal spacing unit. The wells are horizontal wells, with first take points in Lot 3 of Section 31 and last take points in Lot 4 of Section 6.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the Bone Spring formation in the W/2SW/4 of Section 31 and the W/2W/2 of Section 6 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the wells or to otherwise commit their interests to the wells, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the Bone Spring

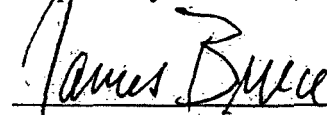
formation in the W/2SW/4 of Section 31 and the W/2W/2 of Section 6, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests in the Bone Spring formation underlying the W/2SW/4 of Section 31 and the W/2W/2 of Section 6 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

**WHEREFORE**, applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interests in the Bone Spring formation underlying the W/2SW/4 of Section 31 and the W/2W/2 of Section 6;
- B. Designating applicant as operator of the wells;
- C. Considering the cost of drilling and completing the wells and allocating the cost among the wells' working interest owners;
- D. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- E. Setting a 200% charge for the risk involved in drilling and completing the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,



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

Attorney for Kaiser-Francis Oil Company

PROPOSED ADVERTISEMENT

Case No. 20050:

***Application of Kaiser-Francis Oil Company for compulsory pooling, Lea County, New Mexico.*** Kaiser-Francis Oil Company seeks an order pooling all mineral interests in the Bone Spring formation in a 238.80 acre horizontal spacing unit comprised of Lots 3 and 4 (the W/2SW/4) of Section 31, Township 25 South, Range 33 East, N.M.P.M. and Lots 1-4 (the W/2W/2) of Section 6, Township 26 South, Range 33 East, N.M.P.M. The unit will be dedicated to the Red Hills Well No. 001H and the Red Hills Well No. 101H, horizontal wells with first take points in Lot 3 of Section 31 and last take points in Lot 4 of Section 31. Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The unit is located approximately 24 miles west of Bennett, New Mexico.

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October 16, 2018

*Case 20050*

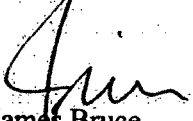
Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Kaiser-Francis Oil Company, is an application for compulsory pooling, together with a proposed advertisement. Please set the application for the November 15, 2018 Examiner hearing.

Thank you.

Very truly yours,

  
James Bruce

Attorney for Kaiser-Francis Oil Company