

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

**RECEIVED**

**IN THE MATTER OF THE APPLICATION OF  
KAISER-FRANCIS OIL COMPANY FOR  
THE ADOPTION OF SPECIAL RULES FOR  
THE PADDOCK FORMATION, LEA COUNTY,  
NEW MEXICO**

NOV 3 2003

Oil Conservation Division  
Case No. 13180

**ME-TEX OIL & GAS COMPANY'S PRE-HEARING STATEMENT**

Me-Tex Oil & Gas Company, an affected party in the above referenced matter, hereby submits this Pre-Hearing Statement as required by the rules of the New Mexico Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Kaiser-Francis Oil Company

**ATTORNEY**

W. Thomas Kellahin  
Kellahin & Kellahin  
P.O. Box 2265  
Santa Fe, NM 87504

**OPPONENT**

Me-Tex Oil & Gas Company

**OPPONENT'S ATTORNEY**

Michael H. Feldewert, Esq.  
Holland & Hart, LLP  
P. O. Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421

WST 11/3/03

**STATEMENT OF CASE**

Kaiser Francis seeks to create a new pool in the Paddock formation and the creation of special pool rules, including 80-acre spacing and a special oil allowable of 300 barrels of oil per day, for its Cooper "3" Well No. 7 located in Unit C of Section 3, Township 20 South, Range 37

East, Lea County, New Mexico. It appears Kaiser Francis is also seeking a discovery allowable for this well pursuant to Division Rule 509. Me-Tex is an offset operator in the NE/4 of Section 3 that objects to all aspects of this application.

**PROPOSED EVIDENCE**

WITNESS (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Michael Pierce, Geologist	Approx. 15 minutes	Approx. 7

**PROCEDURAL MATTERS**

Me-Tex is informed by the Division's district office that Kaiser Francis' Cooper "3" Well No. 7 is completed in the Glorietta formation, rather than the Paddock formation. As a result, it does not appear that the matter was properly advertised.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

Michael H. Feldewert  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421  
Attorneys for Me-Tex Oil & Gas Company


**CERTIFICATE OF SERVICE**

I certify that on November 3, 2003 I served a copy of the foregoing document to the following by;

☒  
☐  
☒

U.S. Mail, postage prepaid  
Hand Delivery  
Fax

W. Thomas Kellahin, Esq.  
Kellahin & Kellahin  
P.O. Box 2265  
117 North Guadalupe  
Santa Fe, NM 87504-2265  
Facsimile No. 505-982-2047

  
\_\_\_\_\_  
Michael H. Feldewert

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

**IN THE MATTER OF THE APPLICATION  
OF KAISER-FRANCIS OIL COMPANY FOR  
POOL CREATING AND SPECIAL POOL  
RULES, LEA COUNTY, NEW MEXICO**

**CASE NO. 13180**

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OCT 24 2003

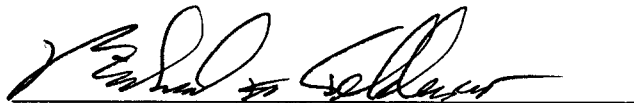
Oil Conservation Division

**ENTRY OF APPEARANCE**

HOLLAND & HART, LLP enters its appearance in the above-referenced case on behalf  
of Me-Tex Oil & Gas Co.

Respectfully submitted,

HOLLAND & HART, LLP



Michael H. Feldewert  
P.O. Box 2208  
Santa Fe, NM 87501  
505-988-4421

Attorneys for Me-Tex Oil & Gas Co.

WVJT  
10/27/03

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 24, 2003, a copy of this Entry  
of Appearance was mailed to the following:

W. Thomas Kellahin  
Kellahin & Kellahin  
P.O. Box 2265  
Santa Fe, NM 87504

  
Michael H. Feldewert