

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

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

CASE NO. 10252  
REOPENED

IN THE MATTER OF THE APPLICATION  
OF KAISER-FRANCIS OIL COMPANY FOR  
THE CREATION OF A NEW POOL,  
LEA COUNTY, NEW MEXICO.

RECEIVED

OCT 11 1991

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Kaiser-Francis Oil Company \_\_\_\_\_  
c/o Jim Wakefield \_\_\_\_\_  
Post Office Box 21468 \_\_\_\_\_  
Tulsa, Oklahoma 74121 \_\_\_\_\_  
(918) 491-4510 \_\_\_\_\_

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A. \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Telephone: \_\_\_\_\_

name, address, phone and  
contact person

**STATEMENT OF CASE**

**APPLICANT**

Kaiser-Francis Oil Company, applicant, seeks the creation of a new pool for the production of gas from the Delaware formation comprising the SE/4 of Section 8, Township 21 South, Range 36 East, Lea County, New Mexico.

**OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

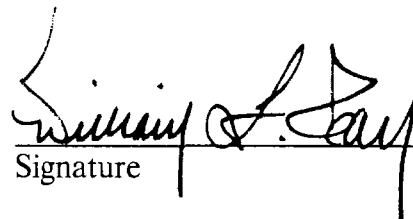
APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Wakefield, Petroleum Engineer	20 Min.	Approximately 5

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

  
\_\_\_\_\_  
Signature

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

**RECEIVED**

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

FEB 15 1991

OIL CONSERVATION DIV.  
SANTA FE

CASE NO. 10251

APPLICATION OF KAISER-FRANCIS OIL  
COMPANY FOR A POOL CREATION,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CHI ENERGY  
INC. as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT  
(name, address, phone  
and contact person)

ATTORNEY

Kaiser-Francis Oil Company

William F. Carr  
Campbell & Black, P.A.  
P.O. Box 2208  
Santa Fe, NM 87504

OPPOSITION OR OTHER PARTY  
(name, address, phone  
and contact person)

ATTORNEY

Chi Energy Inc.  
P.O. Box 1799  
Midland, TX 79702  
Attn: William R. Bergman  
(915) 685-5001

W. Thomas Kellahin  
KELLAHIN, KELLAHIN & AUBREY  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

**STATEMENT OF CASE**

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Chi Energy Inc. is an operator of oil wells in the Catclaw Draw Delaware Oil Pool located in Section 9, T21S, R26E, N.M.P.M., Eddy County, New Mexico.

Applicant seeks the creation of a gas pool for production in the 160 acres immediately adjacent to the Chi Energy oil wells.

Chi Energy is concerned that Kaiser-Francis is attempting to create a gas pool in the same pool with Chi Energy's oil wells. Chi Energy is concerned that the application if granted will prematurely deplete the gas drive mechanism for the oil pool unless the gas wells are treated as wells in an associated oil-gas pool with restricted allowables.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
William R. Bergman (landman)	15 min.	Structure map / Kaiser-Francis
Michael D. Hayes (geologist)	15 min.	Brushy Canyon Structure map / Middle Brushy Canyon Cross-section

**PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to the hearing)

KELLAHIN, KELLAHIN & AUBREY

By:   
W. Thomas Kellahin  
P.O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

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

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

APPLICATION OF KAISER-FRANCIS  
OIL COMPANY FOR POOL CREATION,  
EDDY COUNTY, NEW MEXICO.

Case No. 10,251

RECEIVED

FEB 1 1961

PRE-HEARING STATEMENT

OIL CONSERVATION DIVISION

This pre-hearing statement is submitted by Santa Fe  
Energy Operating Partners, L.P. as required by the Oil  
Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Kaiser-Francis Oil Company

William F. Carr

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

Santa Fe Energy Operating  
Partners, L.P.  
550 W. Texas, #1330  
Midland, Texas 79701  
(915) 687-3551  
Attention: Larry Murphy

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

**STATEMENT OF CASE**

**APPLICANT**

OPPOSITION OR OTHER PARTY

Santa Fe Energy Operating Partners, L.P. is an offset working interest owner, and as such is an interested party in this proceeding. At this point, Santa Fe takes no position, for or against the application, in this case. Santa Fe enters its appearance to preserve its appeal rights.

**PROPOSED EVIDENCE**

APPLICANT

WITNESS	EST. TIME	EXHIBITS
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OPPOSITION

WITNESS	EST. TIME	EXHIBITS
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-None-

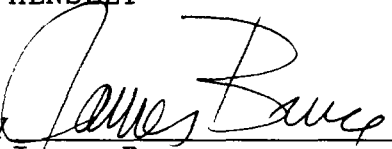
**PROCEDURAL MATTERS**

-None-

Respectfully Submitted,

HINKLE, COX, EATON, COFFIELD &  
HENSLEY

By

  
James Bruce  
500 Marquette, N.W.  
Suite 800  
Albuquerque, N.M. 87102  
(505) 768-1500

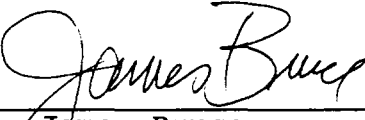
Attorneys for Santa Fe  
Energy Operating Partners,  
L.P.



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was mailed this 13<sup>th</sup> day of February, 1991 to William F. Carr, P. O. Box 2208, Santa Fe, New Mexico 87504.

By

  
James Bruce

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

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
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CONSIDERING:

CASE NO. 10251

RECEIVED

APPLICATION OF KAISER-FRANCIS  
OIL COMPANY FOR A POOL CREATION,  
EDDY COUNTY, NEW MEXICO.

FEB 1 1981

OIL CONSERVATION DIVISION

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Kaiser-Francis Oil Company \_\_\_\_\_  
c/o Jim Wakefield \_\_\_\_\_  
Post Office Box 21468 \_\_\_\_\_  
Tulsa, Oklahoma 74121-1468 \_\_\_\_\_  
(918) 491-4510 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell & Black, P.A. \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
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name, address, phone and  
contact person

**ATTORNEY**

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**STATEMENT OF CASE**

**APPLICANT**

Kaiser-Francis Oil Company, applicant, seeks the creation of a new pool for the production of gas from the Delaware formation comprising the SE/4 of Section 8, Township 21 South, Range 26 East.

**OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

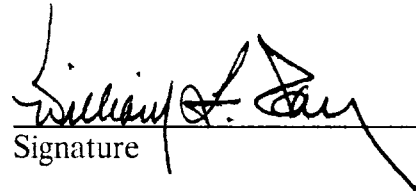
**APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Jim Wakefield, Petroleum Engineer	15 Min.	Approximately 5

**OPPOSITION**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

  
\_\_\_\_\_  
Signature