

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

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APPLICATION OF THE NEW MEXICO OIL CONSERVATION DIVISION THROUGH THE SUPERVISOR OF DISTRICT II FOR AN EMERGENCY ORDER SUSPENDING CERTAIN APPROVED APPLICATIONS FOR PERMITS TO DRILL, AND FOR ADOPTION OF SPECIAL RULES FOR DRILLING IN CERTAIN AREAS FOR THE PROTECTION OF FRESH WATER, CHAVES AND EDDY COUNTIES, NEW MEXICO.

Case No. 15487

AMENDED PRE-HEARING STATEMENT
OF YATES PETROLEUM CORPORATION

Yates Petroleum Corporation ("Yates") submits this Amended Pre-Hearing Statement as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Oil Conservation Division

ATTORNEY

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INTERESTED PARTIES

Pecos Valley Artesian Conservancy District

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STATEMENT OF THE CASE

Applicant the Oil Conservation Division (“the Division”) seeks an order adopting new casing and cementing requirements to be applied within a designated area specified by the Division. Yates opposes the Division’s application on the grounds that the proposed requirements are unnecessary and will significantly increase drilling costs and safety risks.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Jeremiah Mullen (Drilling Engineer)	15 minutes	none

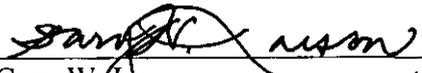
Yates reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Yates is not aware of any procedural matters that need to be resolved.

Respectfully submitted,

HINKLE, HENSLEY, SHANOR &
MARTIN, LLP



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Counsel for Yates Petroleum Corporation,

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of June, 2016, I served a true and correct copy of the foregoing *Amended Pre-Hearing Statement of Yates Petroleum Corporation* via email to:

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