

**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. 13707**

**APPLICATION OF YATES PETROLEUM  
CORPORATION TO RESCIND OR AMEND  
ADMINISTRATIVE ORDER SWD-1021, LEA  
COUNTY, NEW MEXICO.**

2006 MAY 2 PM 3 55

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Yates Petroleum Corporation  
Attention: David Boneau  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748-1471

Ocean Munds-Dry, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant in the above-styled cause seeks an order rescinding or amending Administrative Order SWD-1021 issued on January 25, 2006, which authorizes Manzano, LLC to utilize its Peter Grande State Well No. 1 (API No. 30-025-36993) located 330 feet from the South line and 400 feet from the West line of Section 1, Township 10 South, Range 32 East, NMPM, Lea County, New Mexico, in such a manner as to permit the injection of produced water for disposal purposes into the San Andres formation through perforations from 4,350 feet to 4,470 feet and through plastic line tubing set in a packer located within

100 feet of the top of the injection interval. Yates seeks an order from the Division to protect its Mescalero State Well No. 1 (API No. 30-025-33969) located in Section 2, Township 10 South, Range 32 East, NMPM, Lea County, New Mexico. Said wells are located approximately 20 miles west of Tatum, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Dr. David Boneau	Approx. 20 Minutes	Approx. 8

**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

  
Ocean Munds-Dry  
Attorney for Yates Petroleum Corporation