

**BEFORE THE
NEW MEXICO ENERGY, MINERALS AND
NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

2008 DEC 6 PM 3 01

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

CASE NO. 13832

**APPLICATION OF BEPCO, L.P. TO RESCIND
ADMINISTRATIVE ORDER SWD-1044, EDDY
COUNTY, NEW MEXICO.**

ENTRY OF APPEARANCE

COMES NOW HOLLAND & HART, LLP and hereby enters its appearance in the
above referenced case on behalf of Yates Petroleum Corporation.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421


**ATTORNEYS FOR YATES PETROLEUM
CORPORATION**

CERTIFICATE OF SERVICE

I certify that on December 6, 2006, I served a copy of the foregoing document to the following by

- ☐ U.S. Mail, postage prepaid
- ☐ Hand Delivery
- ☒ Fax
- ☐ Electronic Service by LexisNexis File & Serve

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William F. Carr

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

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COUNTY, NEW MEXICO.**

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

BEPCO, L.P.

ATTORNEY

James Bruce, Esq.
Post Office Box 1056
Santa Fe, NM 87504-1056
(505) 982-2043

2006 DEC 6 PM 3 01

OPPOSITION

Yates Petroleum Corporation
Attention: David Boneau
105 South Fourth Street
Artesia, NM 88210
(505) 748-4357

ATTORNEY

William F. Carr, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks an order rescinding Administrative Order SWD-1044, which approved salt-water disposal into the Delaware formation for Yates Petroleum Corporation's

Jester Well No. 4, to be located 990 feet from the North line and 1650 feet from the West line of Section 12, Township 24 South, Range 29 East, NMPM.

OPPOSITION

Yates Petroleum Corporation opposes the application and states there is substantial development in this area but no production from the proposed injection intervals. Other operators are injecting into this Delaware interval and there is no evidence that the injection proposed by Yates will impair the rights of any other operator in the area.

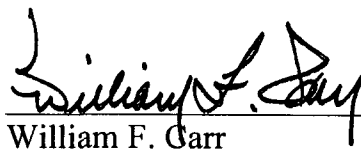
PROPOSED EVIDENCE

OPPOSITION

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
David Boneau (Reservoir Engineer)	Approx. 45 min.	Approx. 12

PROCEDURAL MATTERS

Yates Petroleum Corporation has none at this time.



William F. Garr

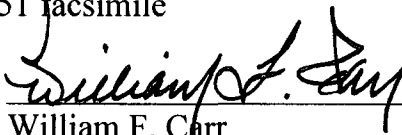
Attorney for Yates Petroleum Corporation

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