# 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 YATES PETROLEUM CORPORATION FOR COMPULSORY POOLING, CHAVES COUNTY, NEW MEXICO

CASE NO. 14059

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PRE- HEARING STATEMENT

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

### APPEARANCES OF PARTIES

# **APPLICANT**

Lucky Briggs Yates Petroleum Corporation 105 South Fourth Street Artesia, NM 88210-2118 (505) 748-1471

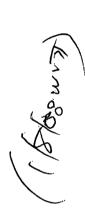
# **ATTORNEY**

Ocean Munds-Dry 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 pooling all mineral interests from the surface to the base of the Precambrian formation in the following described spacing and proration units located in the S/2 of Section 14, Township 6 South, Range 26 East, N.M.P.M., Chaves County, New Mexico: the S/2 for all formations and/or pools developed on 320-acre spacing within this vertical extent including the Undesignated Bosque-Pennsylvanian Gas Pool and the Undesignated Crockett Draw-Wolfcamp Gas Pool; the SE/4 for all formations and/or pools developed on 160-acre spacing within this vertical extent including the Undesignated Pecos Slope-Abo Gas Pool; and the NW/4 SE/4 for all formations and/or pools developed on 40-acre spacing within this vertical extent



including the Undesignated Crockett Draw-Siluro Devonian Pool. Said unit is to be dedicated to its Cooker BCB Fed Com Well No. 3 to be drilled at a location 1680 feet from the South line and 1980 feet from the East line of Section 14, Township 6 South, Range 26 East, NMPM, Chaves County, New Mexico to an approximate depth of 5,965 feet to test any and all formations from the surface to the base of the Precambrian formation. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Yates Petroleum Corporation as operator of the well and a charge for risk involved in drilling said well. Said area is located 30 miles northeast of Roswell, New Mexico.

#### PROPOSED EVIDENCE

WITNESSES	ESTIMATED TIME	<u>EXHIBITS</u>
Lucky Briggs Petroleum Landman	30	10

#### PROCEDURAL MATTERS

Yates Petroleum Corporation has none at this time.

Respectfully submitted,

**HOLLAND & HART LLP** 

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