#### BEFORE THE OIL CONSERVATION DIVISION

## NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF ARCO PERMIAN, A UNIT OF ATLANTIC : RICHFIELD, FOR AMENDMENT OF THE SPECIAL: RULES AND REGULATIONS FOR THE EMPIRE-ABO PRESSURE MAINTENANCE PROJECT TO PERMIT PARTIAL GAS SALES, EDDY COUNTY, : NEW MEXICO.

# PRE-HEARING STATEMENT OF YATES PETROLEUM CORPORATION

This prehearing statement is submitted by YATES PETROLEUM CORPORATION, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

APPLICANT **ATTORNEY** 

ARCO Permian William F. Carr

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ATTORNEY OPPOSITION OR OTHER PARTY

Ernest L. Carroll Yates Petroleum Corporation

Losee, Carson, Haas & Carroll, P. A.

**CASE NO. 11109** 

P. O. Drawer 239

Artesia, NM 88211-0239

### STATEMENT OF CASE

Yates Petroleum Corporation objects to ARCO Permian's Application.

#### PROPOSED EVIDENCE

## OPPOSITION

WITNESSES EST. TIME EXHIBITS

(Name and expertise)

15 min. Bob Fant, Engineer

# LOSEE, CARSON, HAAS & CARROLL, P.A.

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Attorneys for Yates Petroleum Corporation

I hereby certify that I caused to be faxed a true and correct copy of the foregoing to all counsel of record this September 23, 1994.

Ernest L. Carroll