

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

IN THE MATTER OF THE APPLICATION
OF YATES PETROLEUM CORPORATION FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO

CASE NO. 11310
REOPENED

IN THE MATTER OF THE APPLICATION OF
NEARBURG EXPLORATION COMPANY FOR
COMPULSORY POOLING, EDDY COUNTY,
NEW MEXICO

CASE NO. 11311
REOPENED

**YATES PETROLEUM CORPORATION'S
CONSOLIDATED PREHEARING STATEMENT**

This prehearing statement is submitted in both of the above captioned opposing applications by YATES PETROLEUM CORPORATION as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Yates Petroleum Corporation

Ernest L. Carroll
Losee, Carson, Haas
& Carroll, P.A.
P. O. Box 1720
Artesia, NM 88211-1720
(505) 746-3505

Nearburg Exploration Company

W. Thomas Kellahin
Kellahin & Kellahin
P. O. Box 2265
Santa Fe, NM 87504-2265
(505) 982-4285

STATEMENT OF CASE

Applicant Yates, after initially filing an application seeking an order pooling all mineral interests from the surface to the base of the Canyon formation underlying the SE/4 of Section 16, Township 19 South, Range 25 East, N.M.P.M., forming a standard 160-acre spacing and proration unit and the case being heard by the Division, filed a Motion to Reopen changing the location of its proposed well from the center of the NW/4 SE/4 of Section 16, Township 19 South, Range

25 East, to the center of the SW/4 SE/4 of Section 16, Township 19 South, Range 25 East. Unit Petroleum (24.443924% WI) has agreed to participate with Yates Petroleum Corporation on the basis of that location change.


PROPOSED EVIDENCE

YATES PETROLEUM CORPORATION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Janet Richardson, Land	30	6
Brent May, Geology	30	4
Bob Fant, Engineering	30	6


Respectfully submitted,

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

By: 
Ernest L. Carroll
P. O. Box 1720
Artesia, New Mexico 88211-1720
(505) 746-3505

Attorneys for Yates Petroleum Corporation

I hereby certify that I caused to be mailed a true and correct copy of the foregoing to all counsel of record this September 18, 1995.


Ernest L. Carroll