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 APPROVAL FOR AUTHORIZATION TO INJECT, TRAILBLAZER GAS STORAGE PROJECT, CHAVES COUNTY, NEW MEXICO.



Oil Conservation Division

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr & Berge, P.A., as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Yates Petroleum Corporation c/o Pinson McWhorter 105 South Fourth Street Artesia, New Mexico 88210	William F. Carr, Esq Campbell, Carr & Berge, P.A. Post Office Box 2208 Santa Fe, New Mexico 87504
(505) 748-1471 name, address, phone and contact person	(505) 988-4421
OPPOSITION OR OTHER PARTY	ATTORNEY
name, address, phone and	

Pre-hearing Statement NMOCD Case No. 11322 Page 2

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Yates Petroleum Corporation, applicant in the above-captioned cause, seeks approval to reinject produced San Andres gas into the San Andres formation as part of its Trailblazer Gas Storage Project through one well located in the SW/4 NE/4 of Section 11, Township 8 South, Range 27 East, N.M.P.M., Chaves County, New Mexico.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

Pre-hearing Statement NMOCD Case No. 11322 Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES EST. TIME EXHIBITS

(Name and expertise)

Pinson McWhorter, Petroleum Engineer 10 Min. Approximately 2

OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)

Signature /