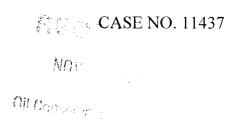
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

APPLICATION OF YATES PETROLEUM CORPORATION FOR AN UNORTHODOX GAS WELL LOCATION AND SIMULTANEOUS DEDICATION, EDDY COUNTY, NEW MEXICO.



#### **PRE-HEARING STATEMENT**

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

#### **APPEARANCES OF PARTIES**

| William F. Carr, Esq.        |
|------------------------------|
|                              |
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|                              |
|                              |
| ATTORNEY                     |
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#### 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 drill its Vandiver "DO" Com Well No. 2 at an unorthodox gas well location 660 feet from the South line and 800 feet from the East line (Unit P) of Section 7, Township 18 South, Range 26 East, NMPM. Applicant also seeks authority to simultaneously dedicate the S/2 of said Section 7 in the West Atoka-Morrow Gas Pool to this well and its Vandiver "DO" Com Well No. 1 located 660 feet from the South line and 2310 feet from the West line of Section 7. Applicant further requests approval of the unorthodox location as to all prospective pools or formations from the surface to the base of the Morrow formation.

#### 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.)

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#### PROPOSED EVIDENCE

## **APPLICANT**

| WITNESSES (Name and expertise) | EST. TIME | EXHIBITS        |
|--------------------------------|-----------|-----------------|
| Robert Bullock, Landman        | 10 Min.   | Approximately 2 |
| Brent May, Geologist           | 20 Min.   | Approximately 4 |
| Robert Fant, Engineer          | 20 Min.   | Approximately 4 |
| OPPOSITION                     |           |                 |
| WITNESSES (Name and expertise) | EST. TIME | EXHIBITS        |

## PROCEDURAL MATTERS

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

Signature