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:

CASE NO. 11671

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

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by YATES PETROLEUM CORPORATION as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

ATTORNEY

Yates Petroleum Corporation 105 South Fourth Street Artesia, N.M. 88210 Attn: Mecca Mauritsen (505) 748-1471 W. Thomas Kellahin KELLAHIN AND KELLAHIN P.O. Box 2265 Santa Fe, NM 87504 (505) 982-4285

STATEMENT OF CASE

APPLICANT

Yates Petroleum Corporation ("Yates") proposes to drill its Stonewall DD State Com Well No. 3 at an unorthodox gas well location 990 feet FNL and 990 feet FWL of Section 20, T20S, R28E to test for production from the surface to the base of the Morrow formation including but not limited to the Burton Flat Morrow Gas Pool which provides for 320-acre gas spacing and proration units

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Yates requests permission to locate this well at an unorthodox gas well location because such a location is the optimum location in the W/2 of said Section 20 at which to drill to test for Morrow gas production.

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES EST. TIME EXHIBITS

Mike Hayes (geologist) 30 Min est. 3

PROCEDURAL MATTERS

By:

None at this time.

KELLAHIN AND KELLAHIN

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285