MA 2:16-99

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. 12128

APPLICATION OF YATES PETROLEUM CORPORATION FOR EXTENSION OF THE VERTICAL LIMITS OF THE SAND SPRINGS-ATOKA GAS POOL AND FOR SPECIAL POOL RULES, LEA COUNTY, NEW MEXICO.

contact person

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Yates Petroleum Corporation	William F. Carr, Esq.
c/o Randy Patterson	Campbell, Carr, Berge & Sheridan, P.A.
105 South Fourth Street	Post Office Box 2208
Artesia, New Mexico 88210	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	

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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 case seeks the expansion of the vertical limits of the Sand Springs-Atoka Gas Pool to include both the Atoka and Morrow formations and for the issuance of special pool rules for this expanded pool including provisions for a second gas well on each standard spacing and proration unit in the pool. This Sand Springs-Atoka Gas Pool is located in portions of Sections 1 and 2 of Township 11 South, Range 34 East.

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
Eric Cummins, Geologist	20 Min.	Approximately 4
David Pearson, Engineer	20 Min.	Approximately 6

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
(Name and expertise)		

PROCEDURAL MATTERS

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

Yates will request that this case be consolidated for purposes of hearing with Case 12130.

Signature