

OIL CONSERVATION DIVISION  
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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. 10381

APPLICATION OF YATES PETROLEUM CORPORATION FOR  
A PRESSURE MAINTENANCE PROJECT,  
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MWJ  
Producing Company as required by the Oil Conservation  
Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Yates Petroleum Corporation

**ATTORNEY**

William F. Carr  
CAMPBELL & BLACK  
P.O. Box 2208  
Santa Fe, NM 87501  
(505) 988-4421

**OTHER/INTERESTED PARTY**

MWJ Producing Company  
400 West Illinois, #1100  
Midland, TX 79701  
ATTN: Mr. Jim J. Dowdle  
(915) 682-5216

**ATTORNEY**

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

**STATEMENT OF CASE**

APPLICANT

N/A

OPPOSITION

N/A

OTHER/INTERESTED PARTY

MWJ Producing Company is an oil and gas operator within one mile of the subject pressure maintenance project and is interested and potentially affected by the applicant's project.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
N/A		

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
N/A		

OTHER/INTERESTED PARTY

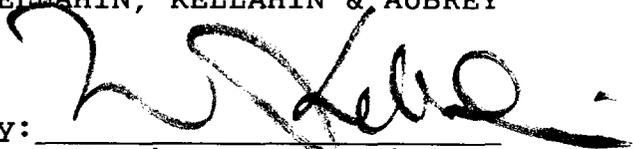
WITNESSES	EST. TIME	EXHIBITS
NONE		

Pre-Hearing Statement  
Case No. 10381  
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**PROCEDURAL MATTERS**

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

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

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

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CASE NO. 10381

APPLICATION OF YATES PETROLEUM  
CORPORATION FOR A PRESSURE  
MAINTENANCE PROJECT,  
LEA COUNTY, NEW MEXICO.

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OIL CONSERVATION DIVISION

**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**

Yates Petroleum Corporation \_\_\_\_\_  
c/o Randy Patterson \_\_\_\_\_  
105 South Fourth Street \_\_\_\_\_  
Artesia, New Mexico 88210 \_\_\_\_\_  
(505) 748-1471 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq. \_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**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 authority to institute a pressure maintenance project on its Woodpecker "SY" State Lease comprising the N/2 of Section 21, Township 14 South, Range 33 East, by the injection of water into the Saunders-Permo Upper Pennsylvanian Pool, through 5 producing wells to be converted to injection.

**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.)

**PROPOSED EVIDENCE**

APPLICANT

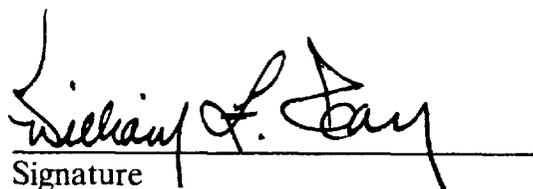
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Theresa Padilla, Petroleum Engineer	10 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

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

  
Signature