#### 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. 10221

APPLICATION OF CONOCO INC. FOR THE AMENDMENT OF ORDER NO. R-4691, AS AMENDED, EDDY COUNTY, NEW MEXICO

#### PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CONOCO INC. as required by the Oil Conservation Division.

#### APPEARANCE OF PARTIES

APPLICANT (name, address, phone and contact person)

ATTORNEY

Conoco Inc. 10 Desta Drive West Midland, TX 79705 Attn: Jerry Hoover (915) 686 - 5422

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

OPPOSITION OR OTHER PARTY ATTORNEY (name, address, phone and contact person)

RECEIVED

FEB 0 1 1991

OIL CONSERVATION DIV. SANTA FE

Pre-hearing Statement NMOCD Case No. 10221 Page 2

#### STATEMENT OF CASE

#### APPLICANT

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

Conoco Inc. seeks the amendment of Division Order No. R-4691, as amended, which promulgated special pool rules for the North Dagger Draw-Upper Pennsylvanian Pool located in Townships 19 and 20 South, Ranges 24 and 25 East. Conoco seeks establishment of a special depth bracket allowable for a standard 160-acre oil spacing and proration unit in said pool of 700 barrels of oil per day.

#### 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. 10221 Page 3

#### PROPOSED EVIDENCE

#### APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Jerry Hoover (Regulatory Coordinator)	20 Min.	Pool Boundaries
Leslie Hall (Landman)	20 Min.	Land Ownership Map List of Potential Operators Copy of letter sent for notification Copies of returned registered mail cards Copies of returned vaivers to objection
John McCarty (Geologist)	20 Min.	Structure & Isopach Cross-section
Clyde Findlay (PE)	20 Min.	Well Location Map Initial and Cum. Prod. Map Prod. Curve Initial BHP Map 160-acre drainage patterns Cross-section

Pre-hearing Statement NMOCD Case No. 10221 Page 4

CBIL Example
Table of
drainage
calculations
60-acre
drainage
patterns/
calculations
Porosity log w/
completion
Prod curve

#### OPPOSITION

WITNESSES
(name and expertise)

EST. TIME

**EXHIBITS** 

#### PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

W. Thomas Kellahan

P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JOEL M. CARSON JAMES E. HAAS A. J. LOSEE DEAN B. CROSS 300 YATES PETROLEUM BUILDING
P. O. DRAWER 239

ARTESIA, NEW MEXICO 88211-0239

TELEPHONE (505) 746-3508 TELECOPY (505) 746-6316

January 31, 1991

RECEIVED

1:11

#### FEDERAL EXPRESS

Ms. Florine Davidson
New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

OIL CONSERVATION DIVISION

LLE.

Re: Application of Conoco, Inc. for the Amendment

of Order R-4691, as amended, Eddy County,

New Mexico, NMOCD Case No. 10221

Dear Florine:

Enclosed herewith, please find in triplicate our Pre-Hearing Statement on behalf of Yates Petroleum Corporation for the above Application which was submitted by Conoco, Inc., which hearing is to be held on Thursday, February 7, 1991.

If you need anything further, please do not hesitate to contact me.

Yours truly,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Érnest L. Carroll

ELC:bjk Enclosures

cc: Ms. Kathy Porter

Mr. Pinson McWhorter Mr. W. Thomas Kellahin

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

IN THE MATTER OF THE APPLICATION
OF YATES PETROLEUM CORPORATION
FOR AN ORDER MAINTAINING COMMON
SPECIAL RULES AND REGULATIONS FOR
THE NORTH AND SOUTH DAGGER DRAW UPPER PENNSYLVANIAN ASSOCIATED
POOL

CASE NO. 10222

RECEIVED

F.F.B.

OIL CONSERVATION DIVISION

#### PRE-HEARING STATEMENT

:

This pre-hearing statement is submitted by Yates Petroleum Corporation, as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

#### **APPLICANT**

#### **ATTORNEY**

Yates Petroleum Corporation

Ernest L. Carroll
Losee, Carson, Haas
& Carroll, P. A.
P. O. Drawer 239

Artesia, New Mexico 88210

#### OPPOSITION OR OTHER PARTY

#### **ATTORNEY**

See attached Exhibit "A"

W. Thomas Kellahin Kellahin, Kellahin and Aubrey

P. O. Box 2265

Santa Fe, New Mexico 87504

Attorneys for Conoco, Inc.

#### STATEMENT OF CASE

#### **APPLICANT**

Applicant is the operator of several wells, as listed in the Application, each of which is producing from the South Dagger Draw-Upper Pennsylvanian Associated Pool in Eddy County, New Mexico.

In Order R-5353-L, Case No. 10108, the Division allowed Applicant's Application for an Order Amending Special Rules for the South Dagger Draw-Upper Pennsylvanian Associated Pool. The purpose for said changes in pool rules for the South Dagger Draw-Upper Pennsylvanian Associated Pool was to result in rules which are equivalent to those in the North Dagger Draw-Upper Pennsylvanian Pool, allowing additional wells to be drilled and recom-

pleted and resulting in higher producing rates and the recovery of additional oil and gas.

Conoco has requested a hearing for revision of the special rules and regulations for the North Dagger Draw-Upper Pennsylvanian Pool, as promulgated by Division Order No. R-4691, to provide for a 700 BOPD allowable for each established 160-acre proration unit.

Any change in the special rules and regulations for the North Dagger Draw-Upper Pennsylvanian Pool will place the South Dagger Draw-Upper Pennsylvanian Pool in the same position of discrimination that existed prior to Order No. 5353-L.

Applicant requests that any changes in the special rules and regulations for the North Dagger Draw-Upper Pennsylvanian Pool be made applicable to the South Dagger Draw-Upper Pennsylvanian Pool.

#### OPPOSITION OR OTHER PARTY

See attached Exhibit "A", which sets out the offset operators and interest owners.

#### PROPOSED EVIDENCE

#### APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Kathy Porter, Landman	10 mins.	2
Pinson McWhorter, Reservoir Engineer	15 mins.	3
Dave Boneau, Engineer	15 mins.	3

#### OPPOSITION

Unknown

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88210

(505/746-3505)

Conoco, Inc. P. O. Box 1959 Midland, Texas 79702

Graham Royalty
P. O. Box 3134
Covington, LA 70434-3134

Estate of Kathleen Cone P. O. Box 1509 Lovington, New Mexico 88260

Clifford Cone P. O. Box 1509 Lovington, New Mexico 88260

Cathie Cone Auvenshine
P. O. Box 658
Dripping Spring, Texas 78620-0658

McKay Oil Corporation P. O. Box 2014 Roswell, New Mexico 88201

Texas Oil & Gas Corporation 900 Wilco Building Midland, Texas 79701

D. C. Trust
P. O. Box 64244
Lubbock, Texas 79464

Kenneth G. Cone P. O. Box 11310 Midland, Texas 79702

EXHIBIT "A"

#### BEFORE THE OIL CONSERVATION DIVISION

#### OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION
OF YATES PETROLEUM CORPORATION
FOR AN ORDER MAINTAINING COMMON
SPECIAL RULES AND REGULATIONS FOR
THE NORTH AND SOUTH DAGGER DRAW UPPER PENNSYLVANIAN ASSOCIATED
POOL

CASE NO. 10222

# CERTIFICATE OF MAILING AND COMPLIANCE WITH RULE 1207

In accordance with Division Rule 1207, I hereby certify that on January 2, 1991, a copy of the Application filed in the above referenced case, with notice of hearing date, was mailed, at least 20 days prior to hearing set for January 24, 1991, to the operators and interested parties listed in Exhibit "A" attached hereto. On January 18, 1991, a copy of our letter requesting continuance of the hearing to February 7, 1991, was mailed to the operators and interested parties listed in Exhibit "A" attached hereto.

Also attached hereto are copies of said correspondence as mailed to each operator and interested party as Exhibit "B" and Exhibit "C", respectively.

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

P. O. Drawer 239

Artesia, New Mexico 88210

(505/746-3505)

Attorneys for Applicant, Yates Petroleum Corporation

STATE OF NEW MEXICO )

SS.

COUNTY OF EDDY )

SUBSCRIBED AND SWORN TO before me this January 31,

1991.

My commission expires:

Notary Public

Conoco, Inc. P. O. Box 1959 Midland, Texas 79702

Graham Royalty
P. O. Box 3134
Covington, LA 70434-3134

Estate of Kathleen Cone P. O. Box 1509 Lovington, New Mexico 88260

Clifford Cone
P. O. Box 1509
Lovington, New Mexico 88260

Cathie Cone Auvenshine P. O. Box 658 Dripping Spring, Texas 78620-0658

McKay Oil Corporation P. O. Box 2014 Roswell, New Mexico 88201

Texas Oil & Gas Corporation 900 Wilco Building Midland, Texas 79701

D. C. Trust
P. O. Box 64244
Lubbock, Texas 79464

Kenneth G. Cone P. O. Box 11310 Midland, Texas 79702

EXHIBIT "A"

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JOEL M. CARSON JAMES E. HAAS A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA, NEW MEXICO 88211-0239

(505) 746-3508 TELECOPY

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Conoco, Inc. P. O. Box 1959 Midland, Texas 79702

> Re: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

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	sted.
3. Article Addressed to:	4. Article Number 1916 6-34 1/41
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77607810	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature + Agent  * School 10. 4	
JAN 7 1991 PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-212	

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL
JOEL M. CARSON
JAMES E. HAAS
A. J. LOSEE
DEAN B. CROSS

300 YATES PETROLEUM BUILDING
P. O. DRAWER 239
ARTESIA, NEW MEXICO 88211-0239

TELEPHONE (505) 746-3508 TELECOPY (505, 746-6316

January 2, 1991

## CERTIFIED MAIL RETURN RECEIPT REQUESTED

McKay Oil Corporation P. O. Box 2014 Roswell, New Mexico 88201

> Re: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

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BSS (ONLY vid)
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#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JOEL M. CARSON JAMES E. HAAS A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA, NEW MEXICO 88211-0239

TELEPHONE 15051 746-3508 TELECOPY 1505-746-6316

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Graham Royalty P. O. Box 3134 Covington, Louisiana 70434-3134

> Application of Yates Petroleum Corporation Re: for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Jane 1 th Butt

Ernest L. Carroll

ELC:bjk Enclosure

SENDER: Complete items 1 and 2 when additional 3 and 4.  Put your address in the "RETURN TO" Space on the rever card from being returned to you. The return receipt ies will be to and the date of delivery. For additional fees the following Jor fees and check box(es) for additional service(s) request 1.   Show to whom delivered, date, and addressee's ad (Eura charge)	se side. Failure to do this will prevent this <u>ouide you the name of the person delivered</u> services are available. Consult postmaster led.
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12 Box 3134 Wenton, Ta 72034-3134	Type of Service:  Registered Insured Certified COD Express Mail Return Receipt for Merchandise
Handler, Ja 12684-3184	Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X	8. Addressee's Address (ONLY if requested and fee paid)
8. Signature - Agent	
7. Date of Delivery	·

PS Form 3877, Mar. 1988

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\* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

#### LOSEE, CARSON. HAAS & CARROLL, P. A.

ERNEST L. CARROLL JOEL M. CARSON JAMES E. HAAS A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA. NEW MEXICO 88211-0239

TELEPHONE 505 746-3508 TELECOPY 5051746-6316

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Texas Oil & Gas Corporation 900 Wilco Building Midland, Texas 79701

> Re: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

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Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

SENDER: Complete items 1 and 2 when additions 3 and 4.  Put your address in the "RETURN TO" Space on the recent from being returned to you. The return receipt fee wit to and the date of delivery. For additional fees the follow for fees and check box(es) for additional service(s) required to the property of the service of the feet of the service of the feet of the	rerse side. Failure to do this will prevent this I provide you the name of the person delivered ng services are available. Consult postmaster eated.
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111000 1 18 19/01	Always obtain signature of addressee or agent and DATE DELIVERED.
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7. Date of Delivery JAN 8 1991	

PS Form 38 11, Mar. 1988

\* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JOEL M. CARSON JAMES E. HAAS A.J. LOSEE DEAN B. CROSS 300 YATES PETROLEUM BUILDING
P. O. DRAWER 239

ARTESIA, NEW MEXICO 88211-0239

TELEPHONE (505) 746-3508 TELECOPY (505) 746-6316

January 2, 1991

### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Estate of Kathleen Cone P. O. Box 1509 Lovington, New Mexico 88260

> e: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

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Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

SENDER: Complete items 1 and 2 when, additional s 3 and 4.  Put your address in the "RETURN TO" Space on the revent card from being returned to you. The return receipt fee will prevent to and the date of delivery. For additional fees the following for fees and check box(es) for additional service(s) request 1.   Show to whom delivered, date, and addressee's addres	se side. Failure to do this will prevent this ovide you the name of the person delivered services କାର୍ଥ ଅଧାରଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥାଇଥ
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7. Date of Delivery	-865 DOMESTIC RETURN RECEIP

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JAMES E. HAAS -A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA, NEW MEXICO 88211-0239

(505: 746-3506 TELECOPY

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

D. C. Trust P. O. Box 64244 Lubbock, Texas 79464

> Re: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Gentlemen:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

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Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclos

SENDER: Complete items 1 and 2 when addition 3 and 4.  Put your address in the "RETURN TO" Space on the recard from being returned to you. The return receipt fee we to and the date of delivery. For additional fees the folious for fees and check box(es) for additional service(s) recommend to whom delivered, date, and addressee the service is recommended.	everse side. Failure to do this will prevent this will prevent this will provide you the name of the person delivered wing services are available. Consult postmatter presented.
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5. Signature — Address X 6. Signature — Agent X 7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)
PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-	-212-865 DOMESTIC RETURN RECEI

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL
JOEL M. CARSON
JAMES E. HAAS
A. J. LOSEE
DEAN B. CROSS

300 YATES PETROLEUM BUILDING
P. O. DRAWER 239
ARTESIA, NEW MEXICO 88211-0239

TELEPHONE (505) 746-3508 TELECOPY (505: 746-6316

January 2, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Clifford Cone P. O. Box 1509 Lovington, New Mexico 88260

> Re: Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

Dear Mr. Cone:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

SENDER: Complete items 1 and 2 when additional s 3 and 4.  Put your address in the "RETURN TO" Space on the reven card from being returned to you. The return receipt fee will pr to and the date of delivery. For additional fees the following for fees and check box(es) for additional service(s) request 1.   Show to whom delivered, date, and addressee's a	is side. Failure to do this will prevent this pyride you the name of the person delivered services are available. Consult postmaster
3. Article Addressed to:  (Extra charge)  Actific Conc  (Actific C	4. Article Number  Type of Service: Registered Insured Cortified COD Express Mail Return Receipt for Merchandise  Always obtain signature of addressee
5. Signature – Address X 6. Signature – Agent	or agent and DATE DELIVERED.  8. Addressee's Address (ONLY if requested and fee paid)
X 7. Date of Delivery  PS Form 3811, Mar. 1988 * U.S.G.P.O. 1988-217	2-865 DOMESTIC RETURN RECEI

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JAMES E. HAAS A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA, NEW MEXICO 88211-0239

(505 746-3508 TELECOPY 505; 746-6316

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Kenneth G. Cone P. O. Box 11310 Midland, Texas 79702

> Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

Dear Mr. Cone:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

---

LOSEE, CARSON, HAAS & CARROLL, P.A.

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Fallure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the fallowing services are available. Consult postmaster to and check boxles) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address.

2. Restricted Delivery (Extra charge) ELC: Encl 4. Article Number 556 263 3. Article Addressed to: 130 Kenneth of Cone. Type of Service: Insured Registered a Bux 11310 COD
Return Receipt
for Merchandia Express Mail Always obtain signature of addre Milland TX 79702 or agent and DATE DELIVERED. 8. Addressee's Address (ONLY if requested and fee paid) 5. Signature - Address / curtele 6. Signature - Agent X 7. Date of Delivery DOMESTIC RETURN RECEIPT \* U.S.G.P.O. 1988-212-865 P8 Form 3811, Mar. 1988

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL JAMES E. HAAS A. J. LOSEE DEAN B. CROSS

300 YATES PETROLEUM BUILDING P. O. DRAWER 239 ARTESIA, NEW MEXICO 88211-0239

(505) 746-3508 TELECOPY (505) 746-6316

January 2, 1991

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Cathie Cone Auvenshire P. O. Box 658 Dripping Spring, Texas 78620-0658

> Application of Yates Petroleum Corporation for an Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools

#### Dear Ms. Auvenshire:

This office represents Yates Petroleum Corporation. On December 27, 1990 the above-referenced Application was sent for filing by Yates Petroleum Corporation for an Order by the Oil Conservation Commission Maintaining the Common Special Rules and Regulations for the North and South Dagger Draw - Upper Pennsylvanian Associated Pools. A copy of that Application is enclosed for reference. The date for the hearing on said Application has been set for January 24, 1991. Any party wishing to appear must file a prehearing statement by the Friday prior to the date of hearing, and any party wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

I would request that you notify us whether or not you will protest the proposed application referred to herein. If you have any questions, please do not hesitate to contact me.

Very truly yours,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

ELC:bjk Enclosure

SENDER: Complete items 1 and 2 when additional 3 and 4.  Put your address in the "RETURN TO" Space on the rever card from being returned to you. The return receipt fee will p to end the date of delivery. For additional fees the following for fees and check box(es) for additional service(s) reques 1.   Show to whom delivered, date, and addressee's ad (Extra charge)	rse side. Failure to do this will prevent this rovide you the name of the person delivered a services are available. Consult postmaster ted.  Idress. 2.  Restricted Delivery
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5. Signature - Address  X (Ather Cones Concensions)	Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .  8. Addressee's Address (ONLY if requested and fee paid)
6. Signature — Agent X	

#### LOSEE, CARSON, HAAS & CARROLL, P. A.

ERNEST L. CARROLL
JOEL M. CARSON
JAMES E. HAAS
A. J. LOSEE
DEAN B. CROSS

300 YATES PETROLEUM BUILDING
P. O. DRAWER 239
ARTESIA. NEW MEXICO 88211-0239

TELEPHONE 505 746 3509 TELEPTON 505 146 634

#### January 18, 1991

Ms. Florine Davidson New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87501

Per Application of Yates Petroleum Corp. for Order Maintaining Common Special Rules and Regulations for the North and South Dagger Draw-Upper Pennsylvanian Associated Pools, Eddy County, New Mexico

Dear Florine:

In accordance with your telephone conversation with my secretary this date, this letter will confirm that the above application has been continued from January 24, 1991 to February 7, 1991, to be heard at the same time that the Conoco application is heard. Thank you for your cooperation in this matter.

Yours truly,

LOSEE, CARSON, HAAS & CARROLL, P.A.

Ernest L. Carroll

#### ELC:bjk

CC: Ms. Kathy Porter
Mr. Pinson McWhorter
Conoco, Inc.
McKay Oil Corporation
Graham Royalty
Texas Oil & Gas Corporation
Estate of Kathleen Cone
D. C. Trust
Clifford Cone
Kenneth G. Cone
Cathie Cone Auvenshine

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date, and addressee's address.

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Restricted Delivery

(Extra charge) or agent and DATE DELIVERED.

8. Addressed & Address (ONLY is requested and fee, paid). Article Number Contified
Express Mail ype of Service: 1/8-5. Signature - Address X 3. Article Addressed to:

\* U.S.G.P.O. 1988-212-865 PS Form 3811, Mar. 1988

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Date of Delivery		7, Date of Delivery
Form 3811, Mar. 1988 + U.S.G.P.O. 1988-212-865	-865 DOMESTIC RETURN RECEIPT	PS Form 3811, Mar.

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#### CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL
BRUCE D. BLACK
MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN
WILLIAM P. SLATTERY
ANNIE-LAURIE COOGAN

JEFFERSON PLACE
SUITE I - IIO NORTH GUADALUPE
POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208

TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

January 21, 1991

#### **HAND-DELIVERED**

William J. LeMay, Director
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
State Land Office Building
Santa Fe, New Mexico 87503

RECEIVED

JAN 2 2 1991

OIL CONSERVATION DIV. SANTA FE

Re:

Case 10221

Application of Conoco Inc. for the Amendment of Order No. R-4991, as

Amended, Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed for your information is a copy of our Entry of Appearance for Nearburg Producing Company in the above-referenced case.

Very truly yours,

WILLIAM F. CARR

WFC:mlh

cc: Mr. Mark Nearburg

#### **BEFORE THE**

#### OIL CONSERVATION DIVISION

# NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

IN THE MATTER OF THE APPLICATION OF CONOCO INC. FOR THE AMENDMENT OF ORDER NO. R-4691, AS AMENDED, EDDY COUNTY, NEW MEXICO.

CASE NO. 10221

#### **ENTRY OF APPEARANCE**

COMES NOW CAMPBELL & BLACK, P.A., and hereby enters its appearance in the above referenced case on behalf of Nearburg Producing Company.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

RECEIVED

JAN 2 2 1991

OIL CONSERVATION DIV. SANTA FE WILLIAM F. CARR

Post Office Box 2208 Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR NEARBURG PRODUCING COMPANY