

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

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

APPLICATION OF COG OPERATING LLC
FOR A NON-STANDARD OIL SPACING AND
PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

Case No. 15,520

NOTICE OF INTERVENTION

This Notice of Intervention is submitted by Yates Petroleum Corporation ("Yates") as required by the regulations of the Oil Conservation Division.

INTERVENOR'S NAME

Yates Petroleum Corporation
c/o James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
Phone: (505) 982-2043
Fax: (505) 982-2151
jamesbruc@aol.com

Attorney for Yates Petroleum Corporation

NATURE OF INTERVENOR'S INTEREST

Applicant seeks pool the interest of OXY Y-1 Company ("OXY") into the well unit for the proposed Banter State Well No. 4H (the "Well"), being the W/2W/2 of Section 13, Township 23 South, Range 34 East, NMPM, in Lea County. See below regarding Yates interest.

BASIS OF INTERVENOR'S OPPOSITION

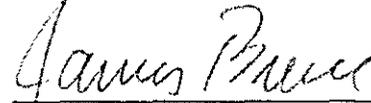
Yates opposes the application because of the following issues:

1. Yates owns the OXY interest under an Operating Agreement dated January 1, 1987 between Yates, OXY, and other parties. OXY non-consented the Well under the Operating Agreement, and under the terms thereof Yates is entitled to OXY's interest.

2. Yates has offered the OXY interest (proportionately) to other working interest owners in the Well pursuant to a separate agreement.

As a result, the OXY interest need not be pooled because its interest is already contractually bound.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

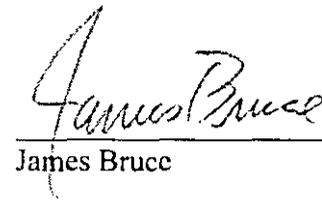
Attorney for Yates Petroleum Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 28th day of July, 2016 by e-mail:

Ocean Munds-Dry
omundsdry@concho.com

William F. Carr
wcarr@concho.com


James Bruce