OIL CONSERVE OF DICESION RECY JED

LAW OFFICES

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300 YATES PETROLEUM BUILDING

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(me 11232.

April 13, 1995

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director New Mexico Oil Conservation Division 2040 S. Pacheco P. O. Box 6429 Santa Fe, New Mexico 87505-5472

> Application of Yates Petroleum Corporation for Compulsory Pooling, Eddy County, New Mexico/Ross EG Fed. Com #14

Application of Yates Petroleum Corporation for Compulsory Pooling, Eddy County, New Mexico/Fairchild #2 Well

Dear Mr. LeMay:

MARY LYNN BOGLE

JOEL M. CARSON

BARRY D. GEWEKE

DEAN B. CROSS

JAMES E. HAAS A. J. LOSEE

ERNEST L. CARROLL

I am enclosing herewith Yates Petroleum Corporation's Consolidated Prehearing Statements, in triplicate, for filing in the above-referenced and corresponding cases. Please return the copies to me for my files.

Thank you very much.

Very truly yours,

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

Colul Z Court

Ernest L. Carroll

ELC: kth Encl.

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

IN THE MATTER OF THE APPLICATION OF NEARBURG EXPLORATION COMPANY FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 11232

IN THE MATTER OF THE APPLICATION OF YATES PETROLEUM CORPORATION FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO

CASE NO. 11264

CONSOLIDATED PREHEARING STATEMENT

This prehearing statement is submitted in both of the above captioned opposing applications by YATES PETROLEUM CORPORATION as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT ATTORNEY

Yates Petroleum Corporation Ernest L. Carroll

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Nearburg Exploration Company W. Thomas Kellahin

Kellahin & Kellahin

P. O. Box 2265

Santa Fe, NM 87504-2265

(505)982-4285

STATEMENT OF CASE

Both applicants seek an order pooling all mineral interests from the surface to the base of the Canyon formation underlying the NE/4 of Section 24, Township 19 South, Range 25 East, N.M.P.M., forming a standard 160-acre spacing and proration unit.

PROPOSED EVIDENCE

YATES PETROLEUM CORPORATION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mecca Mauritsen, Land	30	6
Brent May, Geology	30	4
Bob Fant, Engineering	30	6

Respectfully submitted,

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

By:

Ernest L. Carroll P. O. Box 1720

Artesia, New Mexico 88211-1720

(505) 746-3505

Attorneys for Yates Petroleum Corporation

I hereby certify that I caused to be mailed a true and correct copy of the foregoing to all counsel of record this April 13, 1995.

Ernest L. Carroll