

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

**RECEIVED**

MAR 31 1995

IN THE MATTER OF THE APPLICATION  
OF YATES PETROLEUM CORPORATION  
FOR A PRESSURE MAINTENANCE PROJECT,  
CHAVES COUNTY, NEW MEXICO

Oil Conservation Division

CASE NO. 11236

**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  
Pinson McWhorter  
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**

Mr. Jim K. Miller  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
name, address, phone and contact person

**ATTORNEY**

W. Thomas Kellahin, Esq.  
\_\_\_\_\_  
Kellahin & Kellahin  
\_\_\_\_\_  
Post Office Box 2265  
\_\_\_\_\_  
Santa Fe, New Mexico 87504-2265  
\_\_\_\_\_  
(505) 982-4285  
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**PROPOSED EVIDENCE**

APPLICANT

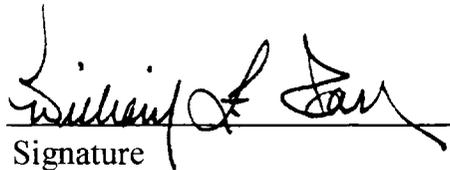
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
<u>Robert Bullock</u> Landman	10 min.	Approximately <u>4</u>
<u>Pinson McWhorter</u> Petroleum Engineer	20 min.	Approximately <u>5</u>

OPPOSITION

WITNESSES                      EST. TIME                      EXHIBITS

**PROCEDURAL MATTERS**

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

  
Signature

**STATEMENT OF CASE**

APPLICANT

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

Application of Yates Petroleum Corporation for approval of a pressure maintenance project, Chaves County, New Mexico. Applicant, in the above-styled cause, seeks authority to institute its Acme San Andres Southeast - Pressure Maintenance Project by injection of water into the Southeast Acme-San Andres Pool through the perforated interval from approximately 2162 feet to 2182 feet in its Quincy "AMQ" State Well No. 8, located 2310 feet from the North and West lines (Unit F) of Section 12, Township 8 South, Range 27 East, N.M.P.M. The project area is comprised of the NW/4 of said Section 12.

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.)