

NEW MEXICO OIL CONSERVATION DIVISION  
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300 YATES PETROLEUM BUILDING

P. O. BOX 1720

ARTESIA, NEW MEXICO 88211-1720

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(505) 746-3505

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August 7, 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

Re: Application of Yates Petroleum Corporation  
for Compulsory Pooling, Eddy County, New  
Mexico/Case No. 11310

Application of Nearburg Producing Co. for  
Compulsory Pooling, Eddy County, New  
Mexico/Case No. 11311

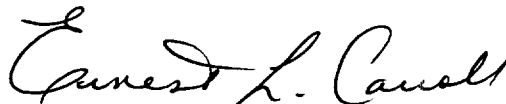
Dear Mr. LeMay:

I am enclosing herewith the Consolidated Prehearing Statement of  
Yates Petroleum Corporation, for filing in the above-referenced  
matter.

Thank you for your assistance.

Very truly yours,

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



Ernest L. Carroll

ELC:kth

xc: Ms. Janet Richardson  
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  
COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO

CASE NO. 11310

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

CASE NO. 11311

**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  
Losee, Carson, Haas  
& Carroll, P.A.  
P. O. Box 1720  
Artesia, NM 88211-1720  
(505)746-3505

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 SE/4 of Section 16, Township 19 South, Range 25 East, N.M.P.M., forming a standard 160-acre spacing and proration unit.

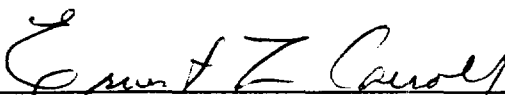
**PROPOSED EVIDENCE**

**YATES PETROLEUM CORPORATION**

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

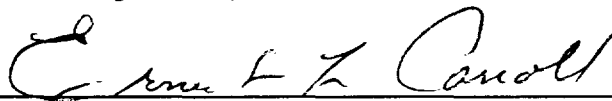
Respectfully submitted,

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 August 7, 1995.

  
Ernest L. Carroll