

LAW OFFICES

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

MARY LYNN BOGLE
ERNEST L. CARROLL
JOEL M. CARSON
DEAN B. CROSS
JAMES E. HAAS
A. J. LOSEE
BARRY D. GEWEKE

300 YATES PETROLEUM BUILDING
P. O. BOX 1720
ARTESIA, NEW MEXICO 88211-1720

TELEPHONE
(505) 746-3505
TELECOPY
(505) 746-6316

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

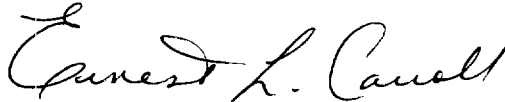
Dear Mr. LeMay:

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.

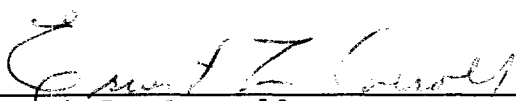
PROPOSED EVIDENCE

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