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OIL CONSERVATION DIVISION

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

**IN THE MATTER OF THE APPLICA- :  
TION OF YATES PETROLEUM COR- :  
PORATION FOR AN UNORTHODOX : CASE NO. 10542  
WELL LOCATION, EDDY COUNTY, :  
NEW MEXICO :**

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**PREHEARING STATEMENT**

This prehearing statement is submitted by David R. Vandiver of Fisk & Vandiver, attorneys for Yates Petroleum Corporation, as required by the Oil Conservation Division.

**APPEARANCES BY PARTIES**

**APPLICANT**

(name, address, phone and contact person)

Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210  
(505) 748-1471  
Attention: Rob Bullock

**ATTORNEYS**

Fisk & Vandiver  
611 Mahone, Suite E  
Artesia, New Mexico 88210-2075  
(505) 746-9841  
Attention: David R. Vandiver

**OPPOSITION OR OTHER PARTY**

(name, address, phone and contact person)

**ATTORNEYS**

**STATEMENT OF CASE**

**APPLICANT**

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

Yates Petroleum Corporation seeks an exception to the well location requirements of Rule 104 to permit the drilling of its proposed Federal "AB" Com. No. 11 Well at an unorthodox gas well location 1,980 feet from the north line and 1,650 feet from the west line of Section 30, Township 18 South, Range 25 East, N.M.P.M., Eddy County, to test all formations from the surface to the base of the Morrow formation which may be developed on 320-acre spacing, which presently includes but is not necessarily limited to the Undesignated Peñasco Draw San Andres – Yeso Associated Pool, Peñasco Draw – Permo Pennsylvanian Gas Pool, Undesignated Peñasco Draw – Atoka Gas Pool and Peñasco Draw – Morrow Gas Pool, and the dedication of Lots 1 and 2, NE/4, E/2 NW/4 (N/2) of said Section 30 to said well forming a standard 322.36 acre gas spacing and proration unit.

**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.)

**PROPOSED EVIDENCE**

**APPLICANT**

<b>WITNESSES</b>		<b>EST. TIME</b>	<b>EXHIBITS</b>
<b>Name</b>	<b>Expertise</b>		
Rob Bullock	Landman	10 minutes	Plat Affidavits of Mailing
D'nese Fly	Geologist	20 minutes	Isopach and Structure Map Cross Section

**PROPOSED EVIDENCE  
OPPOSITION**

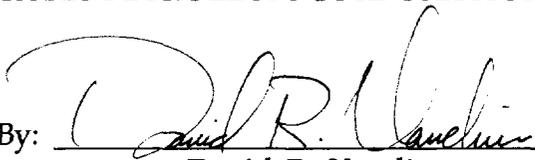
<b>WITNESSES</b>		<b>EST. TIME</b>	<b>EXHIBITS</b>
<b>Name</b>	<b>Expertise</b>		

**PROCEDURAL MATTERS**

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

None

**YATES PETROLEUM CORPORATION**

By:   
David R. Vandiver

**FISK & VANDIVER**  
Seventh and Mahone, Suite E  
Artesia, New Mexico 88210  
(505) 746-9841

Attorneys for Applicant



**LTR**



**Job separation sheet**

# FISK & VANDIVER

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JOHN FISK  
DAVID R. VANDIVER  
HARRY T. NUTTER

FAX  
(505) 746-4208

August 21, 1992

Energy, Minerals and Natural  
Resources Department  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504

Re: NMOCD Case No. 10542  
Federal "AB" Com. No. 11 Well  
Township 18 South, Range 25 East, NMPM  
Section 30: N/2  
Eddy County, New Mexico

*m.s.*

Gentlemen:

Please continue the referenced case which is set for hearing before an Examiner on September 3, 1992, until the Examiner Hearing of September 17, 1992.

Thank you.

Very truly yours,

FISK & VANDIVER



David R. Vandiver

DRV:pvw

cc: Mr. Mike Burch  
Murchinson Oil and Gas, Inc.  
Nearburg Exploration  
Bravo Operating  
Snow Oil & Gas, Inc.