

105 SOUTH FOURTH STREET ARTESIA, NEW MEXICO 88210 TELEPHONE (505) 748-1471

April 8, 1987

PRESIDENT

JOHN A. YATES

VICE PRESIDENT

S. P. YATES

B. W. HARPER SEC. - TREAS.

Oil Conservation Division
P. O. Box 2088
Santa Fe. New Mexico 87504-2088

ATTN: Michael Stogner

Dear Sir:

This letter is written in reference to Case No. 9118, the creation of the Cedar Lake Strawn oil pool, which was scheduled for hearing on April 8, 1987. Yates Petroleum Corporation believes that no basis exists for the creation of this pool and that the Strawn reservoir in question is a gas reservoir and not an oil reservoir.

Meridian Oil Company (formerly Southland Royalty) operates the proposed discovery well, the Holly 4 Federal #1. This well has been producing from the Strawn reservoir for approximately 4 years and the well has been properly designated as a gas well in the Sand Tank Strawn pool. The other wells in the field, the Holly 5 Federal #1 and Holly 8A Federal #1, are also operated by Meridian and are also properly assigned to the Sand Tank Strawn gas pool. Meridian Oil Company recompleted the Holly 4 Federal #1 in November 1986 to another interval in the Strawn and have reclassified the well as an oil well. Meridian informed Yates Petroleum the purpose of this reclassification is to change the spacing, from 320 acre gas to 40 acre oil so that they may reenter the plugged and abandoned FAF Federal #1 and complete it in the Strawn also. This well is located on the same 320 acre proration unit as the Holly 4 Federal #1 and Meridian believes one well is not capable of draining 320 acres. Yates Petroleum believes that the ability of a well to drain its proration unit has nothing to do with the classification of the reservoir as oil or gas. If Meridian believes that this new Strawn completion is an oil pool they have offered no evidence to support that claim. The initial potential after recompletion showed a GOR of 5111 SCF/STB which is higher than the initial GOR of the Sand Tank Strawn gas pool. Relatively low GOR's are common for Strawn gas pools in this area and are not indicative of an oil reservoir. Yates Petroleum believes that if the Holly 4 Federal #1 is not capable of draining its 320 acre proration unit that Meridian should request permission for an additional well on the existing proration unit but not try to reclassify the pool.

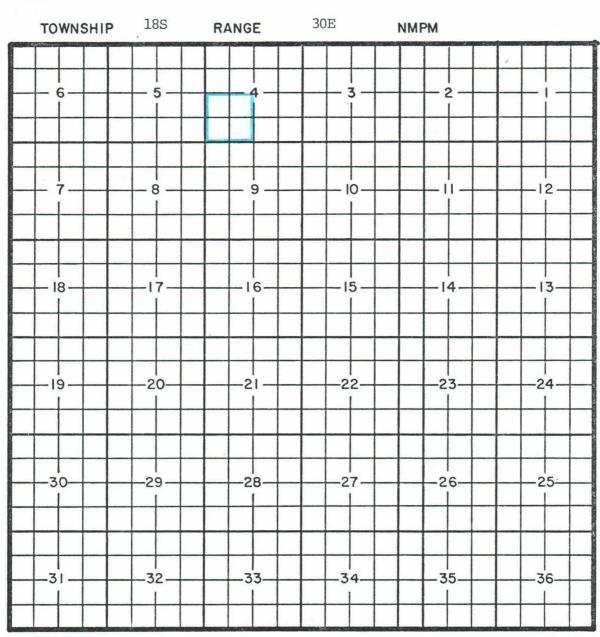
Michael Stogner April 8, 1987

Yates Petroleum and Meridian Oil are currently involved in Cases 9109 and 9110 which were heard before David Catanach and are continued until the April 22, 1987 hearing. These cases propose revised pool rules for the Benson Strawn pool which is approximately 5 miles south of the Holly 4 Federal #1 and the proposed new Cedar Lake Strawn oil pool. The testimony in this case presents a classic example of the problems that can be encountered when a pool is mistakenly classified as oil instead of gas. Yates Petroleum requests that our position opposing the creation of the Cedar Lake Strawn oil pool be made a part of the record in this case and we welcome the opportunity to answer any questions you may have regarding our position in this matter.

Very truly yours,

DAVID L. LANNING Petroleum Engineer

DLL/cvg



Purpose: One completed oil well capable of producing.

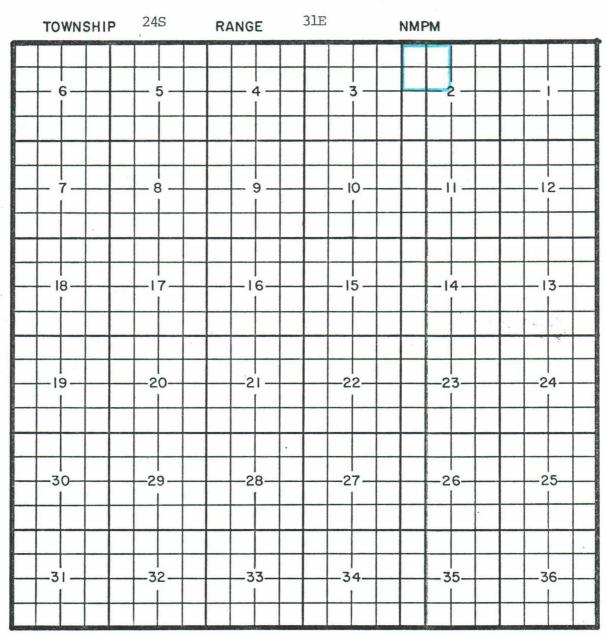
Disc. Well: Southland Royalty Co., Holly 4 Fed. #1-N-4-18-30

Comp: 11-20-86 thru Strawn perfs. Top: 10,485'

Pool boundary outlined in blue.

Section 4: SW/4

TO BE DISMISSED PENDING FURTHER STUDY.



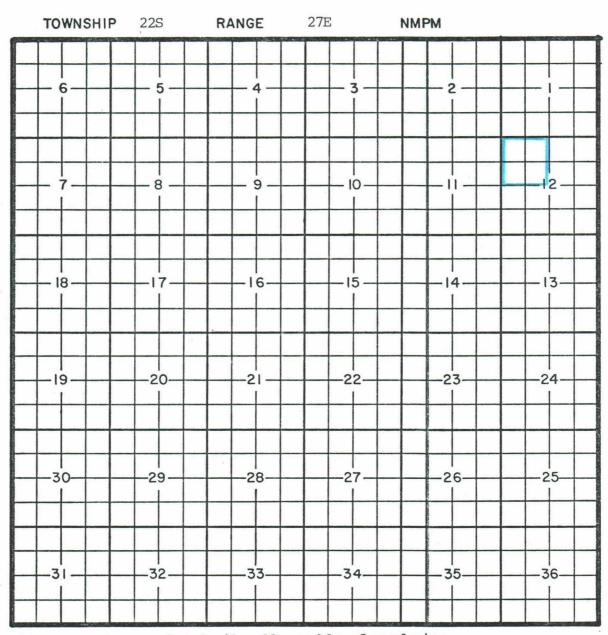
Purpose: One completed oil well capable of producing.

Disc. Well: Texaco Prod. Inc., Todd 2 St. #1-F-2-24-31

Comp: 1-19-87 thru Bone Spring perfs. Top: 10,874'

Pool boundary outlined in blue.

Section 2: NW/4



Purpose: One completed oil well capable of producing.

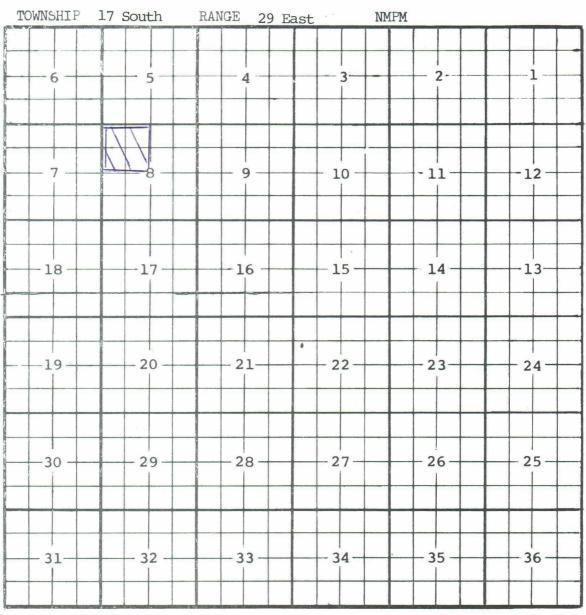
Disc.	Well:	TXO	Prod.	Corp.,	Delta	Fee	C	#1-C-12-2	2-2	1

Comp.: 12-11-86 thru Wolfcamp perfs. Top: 9819'

Pool boundary outlined in blue.

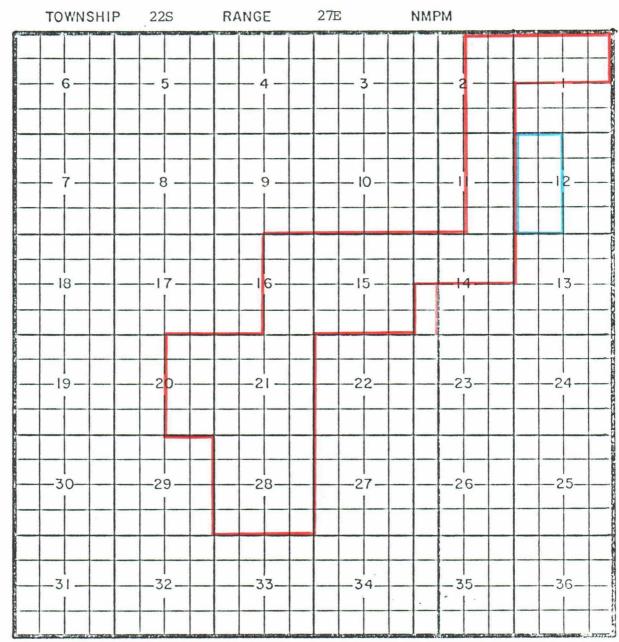
Section 12: NW/4

TO BE DISMISSED PENDING FURTHER STUDY.



PURPOSE: Abolish Cave-Seven Rivers Pool because acreage is already included in Grayburg Jackson Pool.	-
	_
Proposed pool abolishment outlined in blue.	
Section 8: NW/4	_
	_

East Carlsbad-Wolfcamp Gas Pool POOL



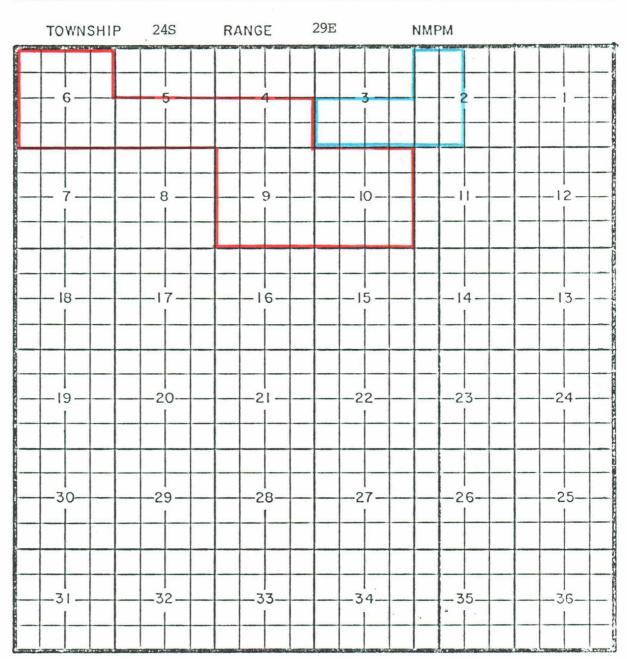
One completed gas well capable of producing. PURPOSE:

OPERATOR	LEASE	#-UT.	S-T-R	COMP.	FORMATION	JOB
TXO Prod. Corp.	Delta Fee C	1C	12-22-27	12/11/86	Wolfcamp	9811

Fool Loundary outlined in red.

Proposed extension outlined in blue.

Section 12: W/2



One completed gas well capable of producing. PURPOSE:

OPERATOR	LEASE	#-UT.	S-T-R	COMP.	FORMATION	TOP
Santa Fe Energy Operating Partners	H.B. State	1-E	2-24-29	1/30/87	Morrow	13,44
Fool	boundary outlined	in red.				
Constitution of the Consti	osed extension out		blue.			

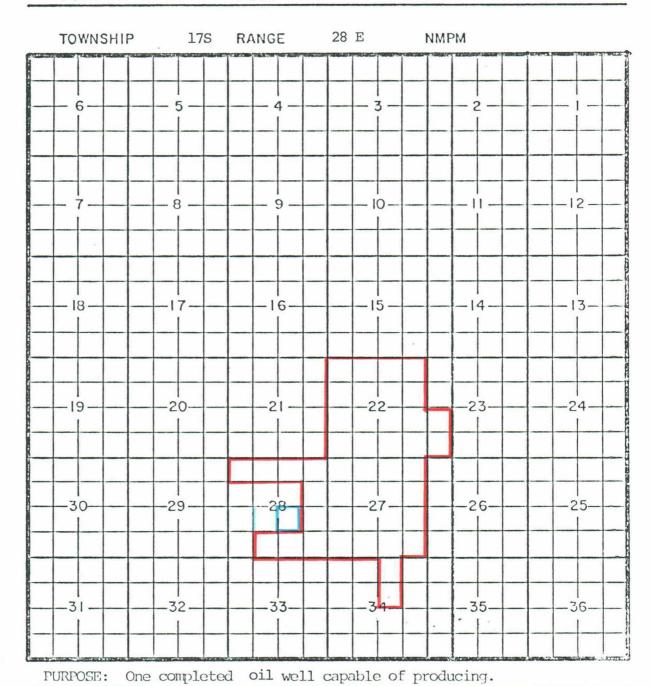
TOWNSHIP	108	RANGE	27E	NMPM	Turkey Manager and Editor of the
AND TO SERVICE TO SERV					
6	5	4	3-	2	
7-	8	9-			12-
18	-17-	16-	-15		13-
19	-20	2	-22-		24-
30-	29	28-	27-	26-	25
31-	_32	33-	34-	35	36-
	complete		l capable of		

OPERATOR LEASE #-UT. S-T-R COMP. FORMATION TOP 2072 Hanson Operating Co, Inc. Hanlad A St. 28-10-27 12/23/86 San Andres 1-I

Pool boundary outlined in red.

Proposed extension outlined in blue.

Section 28: SE/4



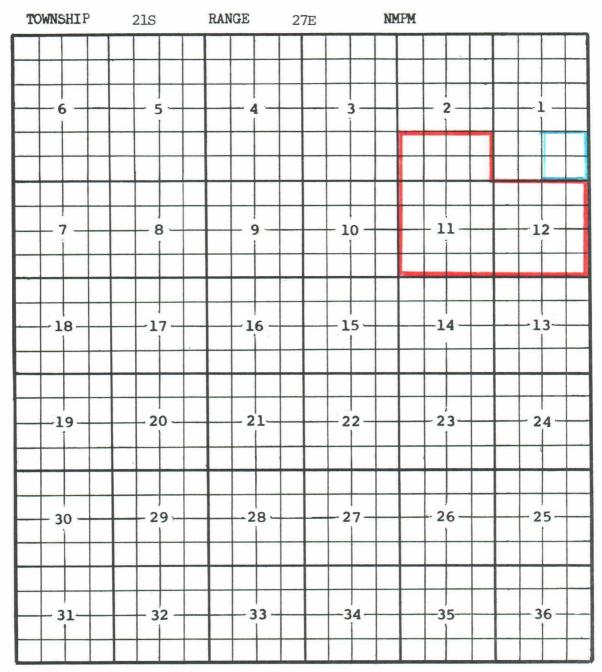
OPERATOR LEASE #-UT. S-T-R COMP. FORMATION TOP
Red Lake Oil Co. Welch State 1-J 28-17-28 1/7/87 Seven Rivers 736

rool boundary outlined in red.

Proposed extension outlined in blue.

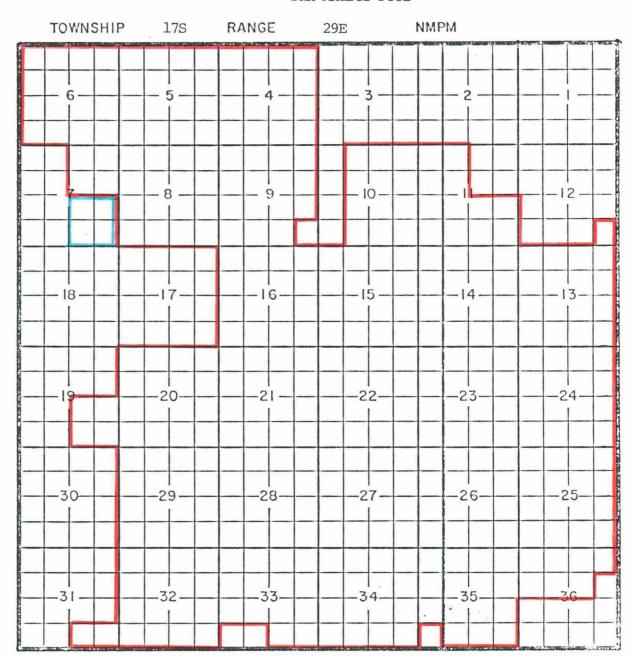
Section 28: NW/4 SE/4





PURPOSE: One completed oil well capable of producing.

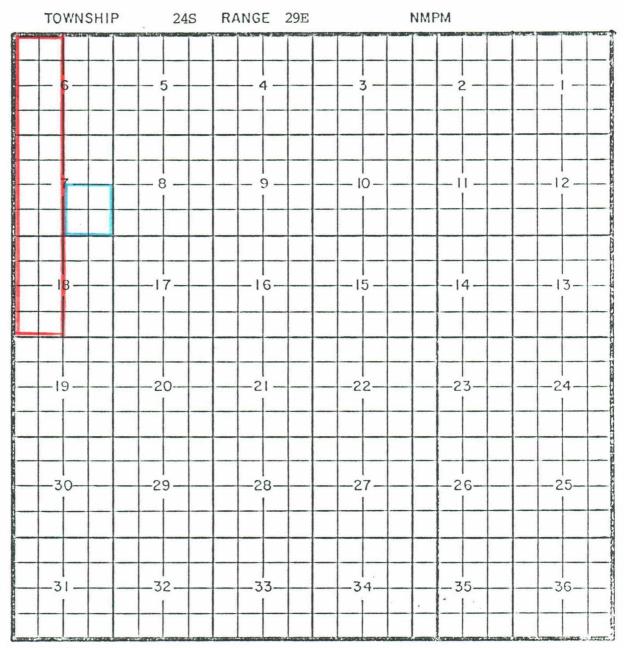
			AND DESCRIPTION OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWIND TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN			The second second
OPERATOR	R LEASE	#-Ut.	S-T-R	COMP.	FORMATION	TOF
Mobil	Government D	14-R	1-21-27	12/18/86	Delaware	2779
				-		
	Pool boundary outlin	ed in red.				
	Proposed extension of	outlined in	blue.			
	Section 1: SE	2/4				
			2			141



PURPOSE: One completed oil well capable of producing.

OPERATOR	LEASE	#-UT.	S-T-R	COMP.	FORMATION	JOP
Beach Exploration, Inc.	Phillips Fed.	1-0	7-17-29	12/30/86	Queen	2404
V V						
-						-
rool bo	oundary outlined	in red.				
Propose	ed extension outl	ined in	blue.			

Section 7: SE/4

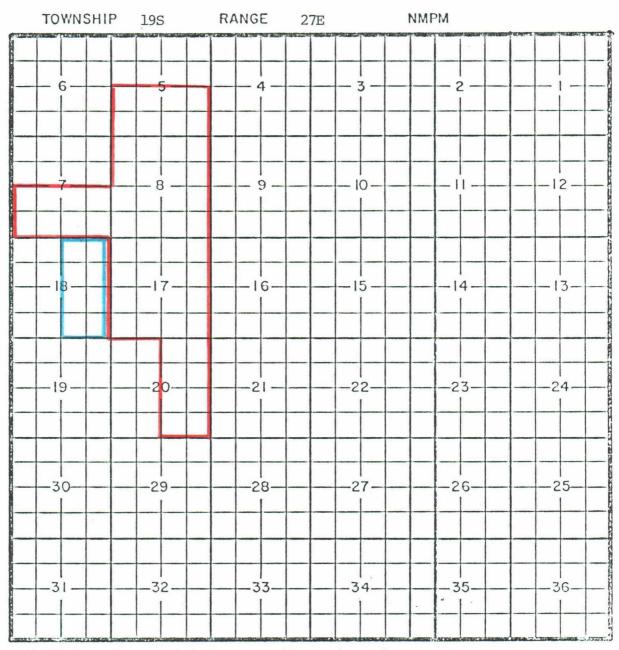


PURPOSE: One completed gas well capable of producing.

OPERATOR	LEASE	#-UT.	S-T-R	COMP.	FORMA'TION	TOP			
HNG Oil Co.	Fort 7 Com.	1-0	7-24-29	12/3/86	Atoka	12,125			
	Fool boundary outlined in red.								
	Proposed extension outlined in blue.								

Section 7: SE/4

Eddy

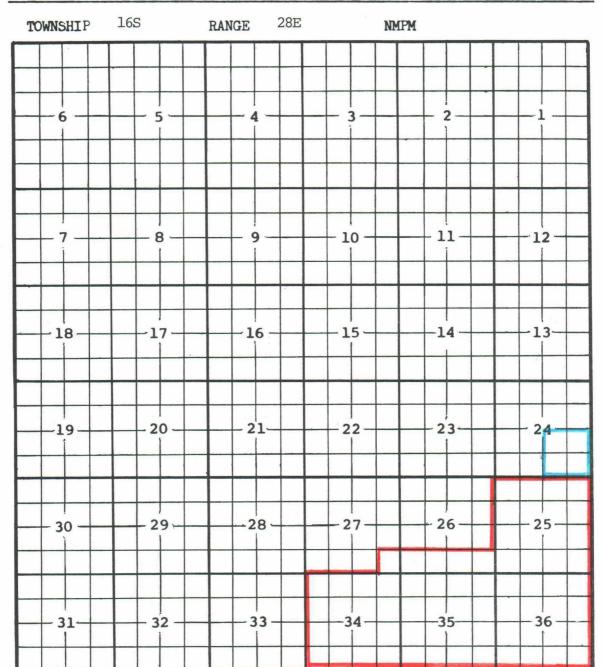


PURPOSE: One completed gas well capable of producing.

OPERATOR	LEASE	#-UT.	S-T-R	COMP.	FORMATION	JOP
Robert Enfield	Federal 18	1-A	18-19-27	12/24/86	Penn.	7906
						- domestic - domestic - the
		1		***************************************		
-						
L	ool boundary outlined	in red.				

Section 18: E/2

Proposed extension outlined in blue.



One completed oil well capable of producing. PURPOSE:

OPERATOR			LEASE	#-Ut.	S-T-R	COMP.	FORMATION	TOP
Spectrum 7	Expl.	Co.	State 24	1-0	24-16-28	1/10/87	Queen	1537
	Pool boundary outlined in red.							
	P	ropos	ed extension	outlined	in blue.			
		S	ection 24: S	SE/4				

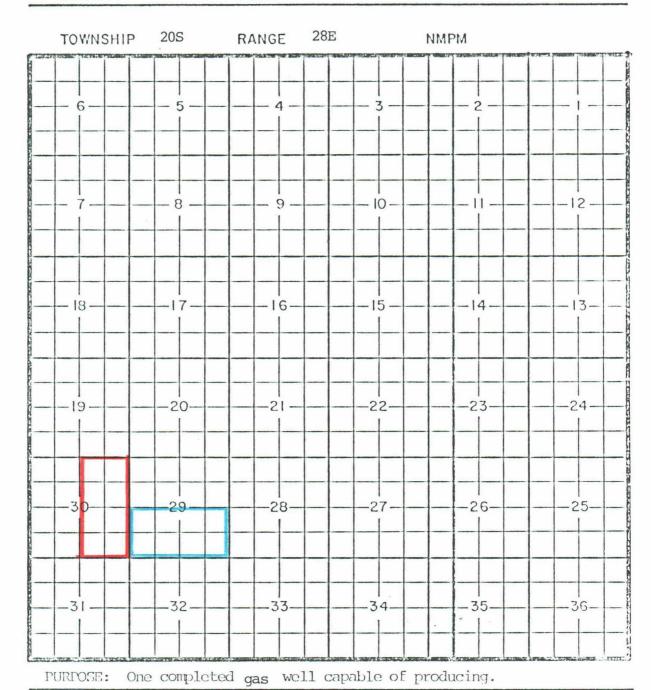
TOWNSHIP	26S	RANGE	30E	NMPM	TOP THE SHEET OF THE SHEET AND THE SHEET OF T
	5		3		
7	8	9-	10		12
18	17-	16-			13-
	20	21-	22	23	
		-			
30	29-	28-	27	26-	25
31	-32	33-	34	35	36-

PURPOSE: One completed oil well capable of producing.

OPERATOR -	LEASE	#-UT.	S-T-R	COMP.	FORMA'I'ON	JOB
J. C. Williamson	Sun Ex. Fed. Ut.	2-M	14-26-30	2/1/87	Delaware	5793
-						
-						
	cool boundary outlined	in red.				-

Proposed extension outlined in blue.

Section 14: SW/4

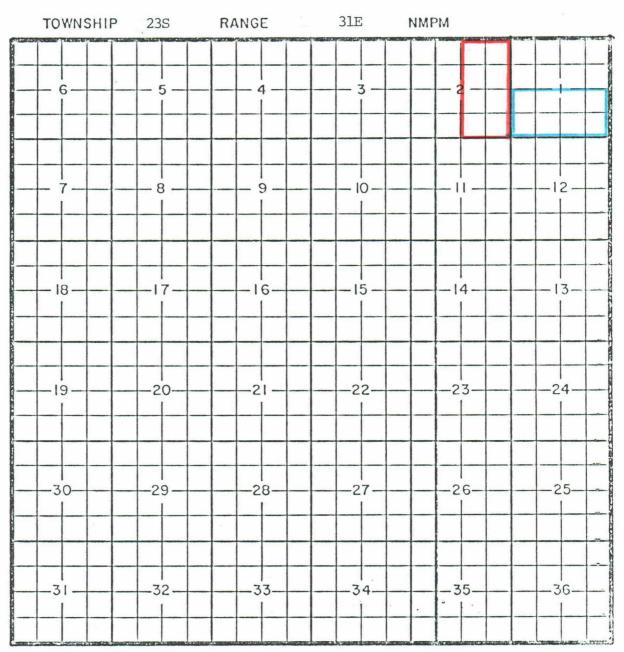


OPERATOR LEASE #-UT. S-T-R COMP. FORMATION TOP
Yates Pet. Corp. Federal DC 1-L 29-20-28 12/8/86 Strawn 10,168

Fool boundary outlined in red.

Proposed extension outlined in blue.

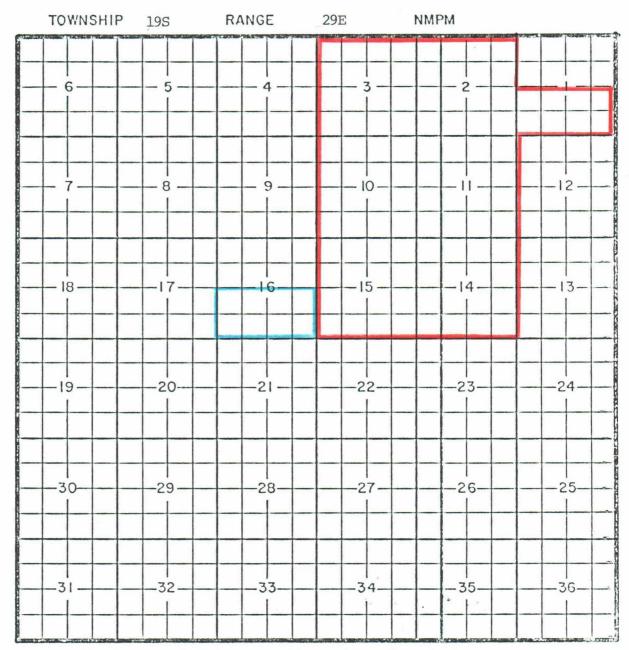
Section 29: S/2



PURPOSE: One completed gas well capable of producing.

								8667
OPE	RATOR		LEASE	#-UT.	S-T-R	COMP.	FORMATION	dQL
Union O	il of	California	Barclay Fed.	1-N	1-23-31	11/18/84	Morrow	14,818
							and the state of t	
					AND DESCRIPTION OF THE PARTY OF		CONT.	
9		Fool boundary outlined in red.						
			extension out		blue			
		TLOLOSCIC	extermion out	LILICU III	Diuc.			

Section 1: S/2



One completed gas well capable of producing. PURPOSE:

OPERATOR		LEASE	#-UT.	S-T-R	COMP.	FORMATION	dor
Southland Royalt	cy Co.	State 16 A Com.	1-0	16-19-29	12/9/86	Atoka	10,68
-					******		
			***				(8)
	Fool boundary outlined in red.						
	Proposed extension outlined in blue.						

Section 16: S/2