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P. O. DRAWER 239
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January 31, 1991

FEDERAL EXPRESS

RECEIVED

Ms. Florine Davidson
New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

FEB 1 1991
OIL CONSERVATION DIVISION

Re: Application of Yates Petroleum Corporation
for Order Maintaining Common Special Rules
and Regulations for the North and South
Dagger Draw - Upper Pennsylvanian Associated
Pool, NMOCD 10222

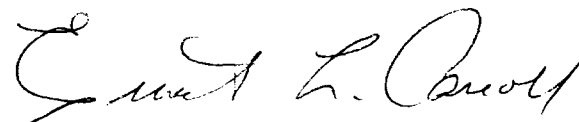
Dear Florine:

Enclosed herewith, please find in triplicate our Pre-Hearing Statement for the above Application submitted by Yates Petroleum Corporation, which hearing is to be held on Thursday, February 7, 1991.

If you need anything further, please do not hesitate to contact me.

Yours truly,

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


Ernest L. Carroll

ELC:bjk
Enclosures

cc: Ms. Kathy Porter
Mr. Pinson McWhorter
Mr. W. Thomas Kellahin

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 10222

APPLICATION OF YATES PETROLEUM
CORPORATION TO AMEND THE SPECIAL
RULES AND REGULATIONS FOR THE SOUTH
DAGGER DRAW-UPPER PENNSYLVANIAN
ASSOCIATED POOL, EDDY COUNTY,
NEW MEXICO

RECEIVED

JAN 18 1991

OIL CONSERVATION DIV.
SANTA FE

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by CONOCO, INC.
as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Yates Petroleum Corp.
Attn: Randy Patterson

Ernest Carroll
Attorney at Law
P.O. Box 239
Artesia, NM 88210
(505) 746-3508

OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

Conoco Inc.
10 Desta Drive West
Midland, TX 79705
(915) 686-5400
Attn: Jerry Hoover

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

Pre-hearing Statement
NMOCD Case No. 10222
Page 2

STATEMENT OF CASE

APPLICANT

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

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.)

Conoco Inc. as the applicant in Case 10221 seeks an increase oil allowable for the North Dagger Draw-Upper Penn Pool.

Because the South Dagger Draw-Upper Penn Pool, which is the subject of Case 10222, has a common boundary with the North Dagger Draw, Applicant supports rules for each pool which are compatible with the principle that oil allowables can equitably be increased for the pools.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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OTHER PARTY

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
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Unknown at this time.

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin

P.O. Box 2265

Santa Fe, New Mexico 87504

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