

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

IN THE MATTER OF THE APPLICATION  
OF YATES PETROLEUM CORPORATION  
FOR COMPULSORY POOLING AND AN  
UNORTHODOX GAS WELL LOCATION,  
LEA COUNTY, NEW MEXICO

CASE NO. 13,038

**ENTRY OF APPEARANCE**

Comes now DAVID H. ARRINGTON OIL & GAS, INC. by and through its undersigned  
attorneys, MILLER STRATVERT P.A., and hereby enters its appearance in the above cause.

MILLER STRATVERT P.A.

By: J. Scott Hall

J. Scott Hall  
Attorneys for David H. Arrington Oil & Gas, Inc.  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was faxed to counsel of  
record on the 23 day of July, 2003, as follows:

William F. Carr, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504

J. Scott Hall  
J. Scott Hall

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

**RECEIVED**

JUL 21 2003

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

Oil Conservation Division

CASE NO. 13038

APPLICATION OF YATES PETROLEUM CORPORATION  
FOR COMPULSORY POOLING AND AN UNORTHODOX  
GAS WELL, LEA COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Mr. Randy Patterson  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748.1471

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988.4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant in the above-styled cause seeks an order pooling all mineral interests from the surface to the base of the Mississippian formation for any and all formations and/or pools developed on 320-acre spacing and proration units under the E/2 of Section 19, Township 15 South, Range 35 East, NMPM, which includes but is not necessarily

limited to the Undesignated Northwest Big Dog-Mississippian Gas Pool and the Undesignated Big Dog-Morrow Gas Pool. Said units are to be dedicated to its Associate "AZP" State Com Well No. 1 to be drilled at an unorthodox well location 1650 feet from the South line and 2310 feet from the East line (Unit J) of said Section 19. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Yates Petroleum Corporation as operator of the well and a charge for risk involved in drilling said well. Said area is located approximately 6 miles northwest of Lovington, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Robert Bullock (Land)	Approx. 15 Minutes	Approx. 6
John Amiet (Geology)	Appxox. 15 Minutes	Approx. 4

**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

  
\_\_\_\_\_  
William F. Carr  
Attorney for Yates Petroleum Corporation