

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. 10363

RECEIVED

AUG 02 1991

OIL CONSERVATION DIV.
SANTA FE

APPLICATION OF YATES PETROLEUM
CORPORATION FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MCKAY OIL
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

(name, address, phone
and contact person)

Yates Petroleum Corp.

ATTORNEY

William F. Carr
Campbell & Black, P.A.
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OPPOSITION OR OTHER PARTY

(name, address, phone
and contact person)

McKay Oil Company

ATTORNEY

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

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STATEMENT OF CASE

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.)

McKay Oil Company believes there is a possibility of drilling two wells in Section 25, one in N/2 and one in S/2 thereby producing more oil because the proration unit would be on a horizontal basis rather than a vertical basis. Yates owns no interest in the N/2 so McKay, as owner of 280 acres in the N/2, should be operator of the N/2.

PROPOSED EVIDENCE

OPPOSITION

WITNESSES (name and expertise)	EST. TIME	EXHIBITS
Jim Schultz (Landman)	15-20 Min.	Land plat
George Reddy (Geologist)	15-20 Min.	Stratigraphic map
Charles Sanders (P.E.)	15-20 Min.	Isopach map
		Well logs
		Reservoir engineering data
		Production history from offset wells

PROCEDURAL MATTERS

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

KELLAHIN, KELLAHIN & AUBREY

By: 

Karen Aubrey

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