

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

IN THE MATTER OF THE APPLICATION OF :  
YATES PETROLEUM CORPORATION FOR AN :  
UNORTHODOX OIL WELL LOCATION, EDDY :  
COUNTY, NEW MEXICO :  
\_\_\_\_\_ :

CASE NO. 11235

**RECEIVED**

MAR 31 1995

PREHEARING STATEMENT

Oil Conservation Division

This prehearing statement is submitted by YATES PETROLEUM CORPORATION, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Yates Petroleum Corporation

Ernest L. Carroll  
Losee, Carson, Haas  
& Carroll, P.A.  
P. O. Box 1720  
Artesia, NM 88211-1720  
(505)746-3505

OPPOSITION

Conoco, Inc.

W. Thomas Kellahin  
Kellahin & Kellahin  
P. O. Box 2265  
Santa Fe, NM 87504-2265

STATEMENT OF CASE

Applicant proposes to drill its Aspden AOH Fed Com #2 at a point located 330' from the south line and 1980' from the west line of Section 29, Township 19 South, Range 25 East, N.M.P.M. The applicant seeks an exception to the well location requirements of Rule 104-C.II(a) of the Oil Conservation Division to permit the drilling of the well at the above-mentioned unorthodox location to a depth sufficient to adequately test the Canyon formation.

Conoco, Inc. has entered an appearance as an adverse party.


PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mecca Mauritsen, Land	20	2
Bob Fant, Engineer	30	6
Brent May, Geologist	30	3
Ken Beardemphl	30	6


Respectfully submitted,

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

By:   
Ernest L. Carroll  
P. O. Box 1720  
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Attorneys for Yates Petroleum Corp.

I hereby certify that I caused to be  
mailed a true and correct copy of the  
foregoing to all counsel of record  
this March 30, 1995.

  
Ernest L. Carroll