

RE 10/20/98

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PLEASE REPLY TO SANTA FE

October 15, 1998

Ms. Lori Wrotenberg, Director
2040 South Pacheco
Post Office Box 6429
Santa Fe, N.M. 87505


Re: InRe: Application of Yates Petroleum Corporation

Dear Ms. Wrotenberg:

Enclosed please find Texaco Exploration and Production, Inc.'s Pre-Hearing Statement for filing.

Thank you.

Sincerely,


CHERYL M. WILSON
Secretary to J. Scott Hall

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. 12057

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Miller, Stratvert & Torgerson, P.A. on behalf of
Texaco Exploration & Production Inc., as required by the Oil Conservation Division.

APPEARANCES

APPLICANT'S ATTORNEY

Ernest L. Carroll, Esq.
LOSEE, CARSON, HAAS & CARROLL
311 West Quay Avenue
Artesia, New Mexico 88221
(505) 746-3505

APPLICANT

Yates Petroleum Corporation

OPPONENT'S ATTORNEY

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OPPONENT

Texaco Exploration and Production, Inc.

OTHER PARTY'S ATTORNEY

OTHER PARTY

STATEMENT OF THE CASE

APPLICANT

Yates Petroleum Corporation, seeks compulsory pooling of certain mineral interests underlying Section 14, Township 16 South, Range 32 East, NMPM and an unorthodox well location 1980' FSL and 1310' FWL to test all formations from the surface to the base of the Morrow formation, Undesignated Anderson Ranch-Morrow Gas Pool, Lea County New Mexico.

OPPONENT

Texaco Exploration and Production Inc. ("TEPI") will present testimony on, among other matters, the efforts of the applicant to obtain TEPI's voluntary participation in the proposed well.

PROPOSED EVIDENCE

WITNESSES

Ron Lanning, Landman

EST. TIME

20 min.


APPROX. #EXHIBITS

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PROCEDURAL MATTERS

MILLER, STRATVERT & TORGERSON, P.A.

By



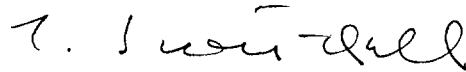
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Certificate of Mailing

I hereby certify that a true and correct copy of the foregoing was mailed to counsel of record on the 15 day of October, 1998, as follows:

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Post Office Box 3109
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J. Scott Hall