MARTIN YATES, III 1912 - 1985 FRANK W. YATES



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S. P. YATES CHAIRMAN OF THE BOARD JOHN A. YATES PRESIDENT PEYTON YATES EXECUTIVE VICE PRESIDENT RANDY & PATTERSON SECRETARY DENNIS G. KINSEY TREASURER

November 4, 1998

New Mexico Oil Conservation Division 2040 South Pachaco Santa Fe. New Mexico 57505

Attention: Director Lori Wrotenbery

Re:

Application of Marbob Energy Corporation for

Simultaneous Dedication and Unorthodox Well Location

Lusk Deep Unit Well No. 14

1650' FNL, 990' FWL, Sec. 19, T198-R32E

Lea County, New Mexico

Dear Director Wrotenberry:

This letter is to advise you that Yates Patroleum Corporation supports the application of Marbob Energy in the above matter before the Oil Conservation Division. Yates Petroleum holds the position that the operator should be allowed discretion with regard to the appropriate field development density by providing for multiple wells within a specing unit in cases where offsetting correlative rights will not be impaired. Increasing the flexibility of an operator to match the development density to the geology and well performance will increase the recovery efficiency on a per acre basis resulting the total volume of gas and condensate recovered from a given cool.

Yates Petroleum Corporation supports the application of Marbob Energy in this matter and recommends it be granted.

Thank you for your consideration.

Very truly yours,

YATES PETROLEUM CORPORATION

David Pearson Reservoir Engineer

Randy G. Patterson Land Manager

BEFORE THE OIL CONSERVATION DIVISION

Santa Fe, New Mexico

Case No. <u>12076</u> Exhibit No. <u>4</u>

Submitted by: Marbob Energy Corporation

Hearing Date: <u>December 3, 1998</u>