

**BEFORE THE  
OIL CONSERVATION DIVISION  
NEW MEXICO ENERGY, MINERALS AND  
NATURAL RESOURCES DEPARTMENT**

**IN THE MATTER OF THE APPLICATION OF KERR-  
MCGEE OIL & GAS ONSHORE LLC TO EXPAND THE  
INDIAN BASIN-UPPER PENNSYLVANIAN GAS POOL,  
AND FOR APPROVAL OF FOUR NON-STANDARD GAS  
PRORATION UNITS, EDDY COUNTY, NEW MEXICO.**

**CASE NO. 12782**

OIL CONSERVATION DIV  
DEC 19 PM 3:22

**AMENDED ENTRY OF APPEARANCE**

COMES NOW HOLLAND & HART LLP and hereby enters its appearance  
in the above referenced case on behalf of Yates Petroleum Corporation.

Respectfully submitted,

HOLLAND & HART LLP

By: 


Michael H. Feldewert  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: 505.988.4421

ATTORNEYS FOR YATES PETROLEUM  
CORPORATION

## CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 2001, I have caused to be faxed a copy of the foregoing **Amended Entry of Appearance** in the above-captioned case to the following party:

James Bruce  
Attorney at Law  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
Fax No.: 505.982.2151

  
Michael H. Feldewert

**BEFORE THE  
OIL CONSERVATION DIVISION  
NEW MEXICO ENERGY, MINERALS AND  
NATURAL RESOURCES DEPARTMENT**

**IN THE MATTER OF THE APPLICATION OF KERR-  
MCGEE OIL & GAS OFFSHORE LLC TO EXPAND THE  
INDIAN BASIN-UPPER PENNSYLVANIAN GAS POOL,  
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**CASE NO. 12782**

OIL CONSERVATION DIV  
DEC 19 PM 3:32

**YATES PETROLEUM COMPANY'S AMENDED PRE-HEARING STATEMENT**

Yates Petroleum Company (Yates) hereby submits this amended pre-hearing statement in  
accordance with Division Rule 1208.B.

**APPEARANCES OF PARTIES**

**APPLICANT**

Kerr-McGee Oil & Gas Onshore, LLC

**ATTORNEY**

James Bruce  
Attorney at Law  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
505.982.2043

**OTHER PARTY**

Yates Petroleum Company

**OTHER PARTY'S ATTORNEY**

HOLLAND & HART  
and CAMPBELL & CARR  
Michael H. Feldewert  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
505.988.4421

## **STATEMENT OF CASE**

Applicant seeks an order expanding the Indian Basin-Upper Pennsylvanian Associated Pool (the "Associated Pool") to include certain designated acreage (the "extension area") and to contract the Indian Basin-Upper Pennsylvanian Gas Pool (the "Gas Pool") by deleting therefrom that same acreage. Applicant also seeks an exception to the special rules and regulations for the Associated Pool for the extension area. The special rules and regulations for the Associated Pool allow one well per 80-acre tract. Applicant requests that only one well be allowed per quarter section in the extension area.

Yates presently operates two wells in the NW/4 of Section 12, T-22-S, R-23-E, which is within the extension area and therefore affected by Applicant's proposed modification to the special pools rules and regulations for the Associated Pool. Yates does not oppose this application, so long as the NW/4 of Section 12 is grandfathered-in and Yates is allowed to continue to operate both of these wells in this quarter section.

## **YATES' PROPOSED EVIDENCE**

Yates does not anticipate the need to present any evidence at this hearing. However, the following witnesses may appear to present statements or testimony:


David Boneau, Engineer

George Freeman, Engineer

**PROCEDURAL MATTERS**

Yates is not aware of any procedural issues at this time.


HOLLAND & HART and  
CAMPBELL & CARR

By:   
Michael H. Feldewert  
Attorneys for YATES PETROLEUM COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of December, 2001, I have caused to be faxed a copy of the foregoing **Yates Petroleum Company's Amended Pre-Hearing Statement** to the following party:

James Bruce  
Attorney at Law  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
Fax No.: 505.982.2151

  
Michael H. Feldewert