

CAMPBELL & BLACK, P.A.

LAWYERS

JACK M. CAMPBELL  
BRUCE D. BLACK  
MICHAEL B. CAMPBELL  
WILLIAM F. CARR  
BRADFORD C. BERGE  
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June 12, 1991

HAND-DELIVERED

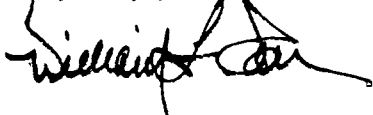
William J. LeMay, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
State Land Office Building  
Santa Fe, New Mexico 87503

Re: Oil Conservation Division Case No. 10327:  
In the Matter of the Application of Yates Petroleum Corporation for Pool  
Extension and the Assignment of a Special Depth Bracket Oil Allowable,  
Eddy County, New Mexico

Dear Mr. LeMay:

Enclosed please find our Entry of Appearance for Kaiser-Francis Oil Company in the  
above-captioned case.

Very truly yours,



WILLIAM F. CARR

Enc.

WFC:mlh

cc w/enc.: Mr. Jim Wakefield

**RECEIVED**

JUN 12 1991

OIL CONSERVATION DIV  
SANTA FE

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

APPLICATION OF YATES PETROLEUM CORPORATION  
FOR POOL EXTENSION AND THE ASSIGNMENT OF  
A SPECIAL DEPTH BRACKET OIL ALLOWABLE,  
EDDY COUNTY, NEW MEXICO.

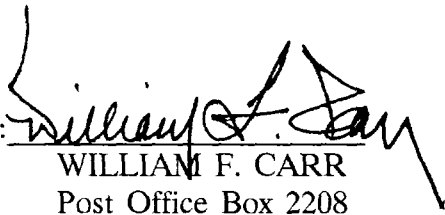
CASE NO. 10327

ENTRY OF APPEARANCE

COMES NOW CAMPBELL & BLACK, P.A., and hereby enters its appearance in  
the above referenced case on behalf of Kaiser-Francis Oil Company.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

By:   
WILLIAM F. CARR  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR KAISER-  
FRANCIS OIL COMPANY

**RECEIVED**

JUN 12 1991

OIL CONSERVATION DIV.  
SANTA FE

LAW OFFICES

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

300 YATES PETROLEUM BUILDING

P. O. DRAWER 239

ARTESIA, NEW MEXICO 88211-0239

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ERNEST L. CARROLL

JOEL M. CARSON

JAMES E. HAAS

A. J. LOSEE

DEAN B. CROSS

MARY LYNN BOGLE \*

\* LICENSED IN ARIZONA ONLY

June 4, 1991

Mr. William J. LeMay, Director  
New Mexico Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501

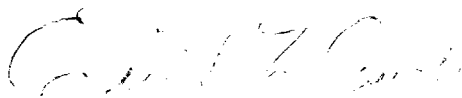
Re: Application of Yates Petroleum Corporation  
for the Creation of a New Pool and for  
Special Pool Rules, Eddy County, New Mexico,  
Case No. 10327

Dear Mr. LeMay:

Enclosed for filing, please find three copies of the Pre-hearing  
Statement of Yates Petroleum Corporation for filing in the above-  
referenced case.

Very truly yours,

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



Ernest L. Carroll

ELC:kth  
Enclosures

BEFORE THE OIL CONSERVATION DIVISION

OF THE STATE OF NEW MEXICO

IN THE MATTER OF THE APPLICATION OF :  
YATES PETROLEUM CORPORATION FOR THE : CASE NO. 10327  
CREATION OF A NEW POOL AND FOR SPECIAL :  
POOL RULES, EDDY COUNTY, NEW MEXICO :  
\_\_\_\_\_ :

PRE-HEARING STATEMENT

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

**APPEARANCES OF PARTIES**

**APPLICANT**

**ATTORNEY**

Yates Petroleum Corporation  
105 S. Fourth Street  
Artesia, New Mexico 88210  
(505)746-1471

Ernest L. Carroll  
Losee, Carson, Haas & Carroll, P.A.  
P. O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505)746-3505

**OPPOSITION OR OTHER PARTY**

**ATTORNEY**

None known

**STATEMENT OF CASE**

Applicant is the operator of the Delaware Formation at a location in Unit K, Section 16, Township 23 South, Range 31 East, N.M.P.M., Eddy County, New Mexico, upon which it has drilled its Medaño "VA" State No. 1 Well, 1947' FSL and 1986 FWL of Section 16. This well is a discovery well and there has been no pool designation for this area yet. Applicant seeks to produce its Medaño "VA" State No. 1 Well from all perforations in the Delaware Formation, and seeks an oil pool designation for the Delaware Formation underlying said lands as well as the creation of special rules as set out in the Amended Application.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

Mike Burch, Landman

20 min.

5

Brent May, Geologist

20 min.

7

Brian Collins, Engineer

20 min.

6

OPPOSITION

Unknown

YATES PETROLEUM CORPORATION

By: 

Ernest L. Carroll  
Losee, Carson, Haas & Carroll, P. A.  
P.O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505) 746-3505

**BEFORE THE OIL CONSERVATION DIVISION  
OF THE STATE OF NEW MEXICO**

**IN THE MATTER OF THE APPLICATION OF :  
YATES PETROLEUM CORPORATION FOR THE : CASE NO. 10327  
CREATION OF A NEW POOL AND FOR SPECIAL :  
POOL RULES, EDDY COUNTY, NEW MEXICO :  
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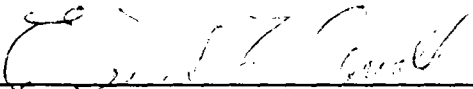
**APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mike Burch, Landman	20 min.	5
Brent May, Geologist	20 min.	7
Brian Collins, Engineer	20 min.	6

**OPPOSITION**

Unknown

YATES PETROLEUM CORPORATION

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**BEFORE THE OIL CONSERVATION DIVISION  
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**ATTORNEY**

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(Name and expertise)

**EST. TIME**

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Mike Burch, Landman

20 min.

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**OPPOSITION**

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