

LAW OFFICES

OIL CONSERVATION DIVISION

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

RECEIVED

ERNEST L. CARROLL  
JOEL M. CARSON  
JAMES E. HAAS  
A. J. LOSEE

300 YATES PETROLEUM BUILDING

P. O. DRAWER 239

ARTESIA, NEW MEXICO 88211-0239

'91 JUN 21 AM 8:50

TELEPHONE  
(505) 746-3505

TELECOPY  
(505) 746-6316

DEAN B. CROSS  
MARY LYNN BOGLE\*

\*LICENSED IN ARIZONA ONLY

June 19, 1991

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

Re: Application of Conoco, Inc. for Approval of a  
Horizontal Directional Drilling Pilot Project  
and Unorthodox Surface Well Location in the  
North Dagger Draw Upper Pennsylvanian Pool,  
Eddy County, New Mexico, Case No. 10339

Dear Mr. LeMay:

I am enclosing herewith an original and three copies each of  
Yates Petroleum Corporation's Entry of Appearance and Prehearing  
Statement for filing in the above-referenced case.

Very truly yours,

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

  
Joel M. Carson

JMC:kth  
Enclosures

xc w/encl: Randy Patterson  
Conoco, Inc.

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

IN THE MATTER OF THE APPLICATION OF	:	
CONOCO, INC. FOR APPROVAL OF A HORIZONTAL	:	CASE NO. 10339
DIRECTIONAL DRILLING PILOT PROJECT AND	:	
UNORTHODOX SURFACE WELL LOCATION IN THE NORTH	:	
DAGGER DRAW UPPER PENNSYLVANIAN POOL, EDDY	:	RECEIVED
COUNTY, NEW MEXICO	:	
	:	JUN 21 1991

---

**PRE-HEARING 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**

Conoco, Inc.  
10 Desta Drive West  
Midland, TX 79705-4514

**OTHER PARTY**

**ATTORNEY**

Yates Petroleum Corporation  
105 S. Fourth St.  
Artesia, New Mexico 88210  
(505) 748-1471

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

**STATEMENT OF THE CASE**

**OTHER PARTY**

Yates intends to appear, but at this time does not object to Conoco's Application.

**PROPOSED EVIDENCE**

**OTHER PARTY**

None proposed at this time

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

None proposed at this time

YATES PETROLEUM CORPORATION

By: Joel M. Carson  
Joel M. Carson  
LOSEE, CARSON, HAAS & CARROLL, P.A.  
P.O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505) 746-3508

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

IN THE MATTER OF THE APPLICATION OF :  
CONOCO, INC. FOR APPROVAL OF A HORIZONTAL :  
DIRECTIONAL DRILLING PILOT PROJECT AND :  
UNORTHODOX SUFACE WELL LOCATION IN THE NORTH :  
DAGGER DRAW UPPER PENNSYLVANIAN POOL, EDDY :  
COUNTY, NEW MEXICO :

CASE NO. 10339

RECEIVED

MAY 21 1991

OIL CONSERVATION DIVISION

**ENTRY OF APPEARANCE**

COMES NOW Yates Petroleum Corporation, by and through Losee, Carson, Haas & Carroll, P. A. (Joel M. Carson), and enters its appearance in the above-referenced Application, thereby requesting copies of all filings with the Commission concerning said Application and advising of its intention to appear at the hearing before the Commission.

YATES PETROLEUM CORPORATION

By: Joel M. Carson  
Joel M. Carson  
LOSEE, CARSON, HAAS & CARROLL, P.A.  
P.O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505) 746-3508