

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

CASE NO. 10381

APPLICATION OF YATES PETROLEUM CORPORATION FOR
A PRESSURE MAINTENANCE PROJECT,
LEA COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MWJ
Producing Company as required by the Oil Conservation
Division.

APPEARANCE OF PARTIES

APPLICANT

Yates Petroleum Corporation

ATTORNEY

William F. Carr
CAMPBELL & BLACK
P.O. Box 2208
Santa Fe, NM 87501
(505) 988-4421

OTHER/INTERESTED PARTY

MWJ Producing Company
400 West Illinois, #1100
Midland, TX 79701
ATTN: Mr. Jim J. Dowdle
(915) 682-5216

ATTORNEY

W. Thomas Kellahin
KELLAHIN, KELLAHIN & AUBREY
P.O. Box 2265
Santa Fe, NM 87504
(505) 982-4285

STATEMENT OF CASE

APPLICANT

N/A

OPPOSITION

N/A

OTHER/INTERESTED PARTY

MWJ Producing Company is an oil and gas operator within one mile of the subject pressure maintenance project and is interested and potentially affected by the applicant's project.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
N/A		

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
N/A		

OTHER/INTERESTED PARTY

WITNESSES	EST. TIME	EXHIBITS
NONE		

Pre-Hearing Statement
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PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN, KELLAHIN & AUBREY

By: 

W. Thomas Kellahin
P.O. Box 2265
Santa Fe, New Mexico 87504
(505) 982-4285

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

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CASE NO. 10381

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CORPORATION FOR A PRESSURE
MAINTENANCE PROJECT,
LEA COUNTY, NEW MEXICO.

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AUG 27 1991

OIL CONSERVATION DIVISION

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Yates Petroleum Corporation_____
c/o Randy Patterson_____
105 South Fourth Street_____
Artesia, New Mexico 88210_____
(505) 748-1471_____
name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq._____
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208_____
Santa Fe, New Mexico 87504_____
(505) 988-4421_____

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Yates Petroleum Corporation, Applicant in the above-captioned cause, seeks authority to institute a pressure maintenance project on its Woodpecker "SY" State Lease comprising the N/2 of Section 21, Township 14 South, Range 33 East, by the injection of water into the Saunders-Permo Upper Pennsylvanian Pool, through 5 producing wells to be converted to injection.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

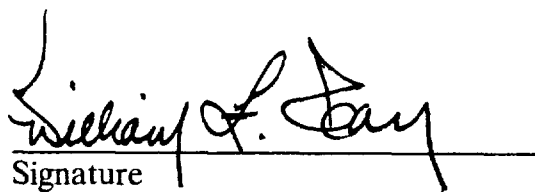
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Theresa Padilla, Petroleum Engineer	10 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature