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OIL CONSERVATION DIV.
SANTA FE

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. 10544

APPLICATION OF YATES PETROLEUM,
CORPORATION FOR AN UNORHTODOX GAS
WELL LOCATION, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL
COMPANY as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT
(name, address, phone
and contact person)

ATTORNEY

Yates Petroleum Corporation

David Vandiver
7th and Mahone
Suite #E
Artesia, NM 88210

OPPOSITION OR OTHER PARTY
(name, address, phone
and contact person)

ATTORNEY

Marathon Oil Company
P.O. Box 552
Midland, TX 79702
ATTN: Thomas C. Lowry

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

Chevron USA, Inc.
ATTN: Al Bohling

William F. Carr
CAMPBELL, CARR, BERGE ET AL
P.O. Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

Pre-hearing Statement
NMOCD Case No. 10544
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STATEMENT OF CASE

APPLICANT

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

SEE APPLICANT FILING

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.)

Marathon Oil Company seeks either the denial of the applicant's request for an unorthodox well location or in the alternative a 68% production penalty on the applicant's well resulting from a combination of encroachment and non-productive acreage.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

SEE APPLICANT FILING

OPPOSITION

WITNESSES
(name and expertise)

EST. TIME

EXHIBITS

Craig Kent
Petroleum Engineer

45 Minutes

4 Exhibits

Eric Carlsen
Geologist

45 Minutes

3 Exhibits

PROCEDURAL MATTERS

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

None at this time.

KELLAHIN and KELLAHIN

By: 

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

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OIL CONSERVATION DIVISION

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

**IN THE MATTER OF THE APPLICA- :
TION OF YATES PETROLEUM COR- :
PORATION FOR AN UNORTHODOX : CASE NO. 10544
WELL LOCATION, EDDY COUNTY, :
NEW MEXICO :**

PREHEARING STATEMENT

This prehearing statement is submitted by David R. Vandiver of Fisk & Vandiver, attorneys for Yates Petroleum Corporation, as required by the Oil Conservation Division.

APPEARANCES BY PARTIES

APPLICANT

(name, address, phone and contact person)

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210
(505) 748-1471
Attention: Rob Bullock

ATTORNEYS

Fisk & Vandiver
611 Mahone, Suite E
Artesia, New Mexico 88210-2075
(505) 746-9841
Attention: David R. Vandiver

OPPOSITION OR OTHER PARTY

(name, address, phone and contact person)

ATTORNEYS

**PROPOSED EVIDENCE
APPLICANT (CONTINUED)**

WITNESSES		EST. TIME	EXHIBITS
<u>Name</u>	<u>Expertise</u>		
David Boneau	Engineer	20 minutes	Map with Formula Drainage Area for Diane Well

**PROPOSED EVIDENCE
OPPOSITION**

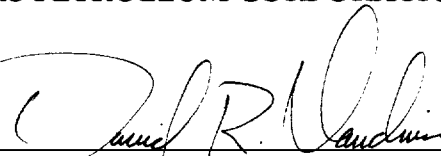
WITNESSES		EST. TIME	EXHIBITS
<u>Name</u>	<u>Expertise</u>		

PROCEDURAL MATTERS

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

None

YATES PETROLEUM CORPORATION

By: 
David R. Vandiver

FISK & VANDIVER
Seventh and Mahone, Suite E
Artesia, New Mexico 88210
(505) 746-9841

Attorneys for Applicant

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

**IN THE MATTER OF THE APPLICA- :
TION OF YATES PETROLEUM COR- :
PORATION FOR AN UNORTHODOX : CASE NO. 10544
WELL LOCATION, EDDY COUNTY, :
NEW MEXICO :**

PREHEARING STATEMENT

This prehearing statement is submitted by David R. Vandiver of Fisk & Vandiver attorneys for Yates Petroleum Corporation, as required by the Oil Conservation Division.

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APPLICANT

(name, address, phone and contact person)

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Artesia, New Mexico 88210
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OPPOSITION OR OTHER PARTY

(name, address, phone and contact person)

ATTORNEYS

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**PROPOSED EVIDENCE
 APPLICANT (CONTINUED)**

WITNESSES		EST. TIME	EXHIBITS
Name	Expertise		
David Boneau	Engineer	20 minutes	Morrow Reservoir in Section 2 Drainage Area of Irish Hills "KW" State No. 2 Well

**PROPOSED EVIDENCE
 OPPOSITION**

WITNESSES		EST. TIME	EXHIBITS
Name	Expertise		

PROCEDURAL MATTERS

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

None

YATES PETROLEUM CORPORATION

By: 

David R. Vandiver

FISK & VANDIVER

Seventh and Mahone, Suite E
 Artesia, New Mexico 88210
 (505) 746-9841

Attorneys for Applicant

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
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PRE-HEARING STATEMENT

OIL CONSERVATION DIV.
SANTA FE

This prehearing statement is submitted by William F. Carr, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Yates Petroleum Corporation_____

name, address, phone and
contact person

() _____

OPPOSITION OR OTHER PARTY

ATTORNEY

Chevron U.S.A. Inc._____
c/o Alan Bohling_____
Post Office Box 1150_____
Midland, Texas 79702_____

William F. Carr_____
Campbell, Carr, Berge & Sheridan_____
Post Office Box 2208_____
Santa Fe, New Mexico 87504_____

(915) 687-7246_____

(505) 988-4421_____

name, address, phone and
contact person