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OIL CONSERVATION DIVISION

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

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

CASE NO. 10629

THE APPLICATION OF SANTA FE ENERGY  
OPERATING PARTNERS, LP FOR  
COMPULSORY POOLING AND AN  
UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO

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DEC 11

ENTRY OF APPEARANCE

OIL CONSERVATION DIVISION

COMES NOW, W. THOMAS KELLAHIN of Kellahin and  
Kellahin, and enters the firm's appearance on behalf of  
MARATHON OIL COMPANY in the above captioned matter.

KELLAHIN and KELLAHIN

By: 

W. Thomas Kellahin

Post Office Box 2265

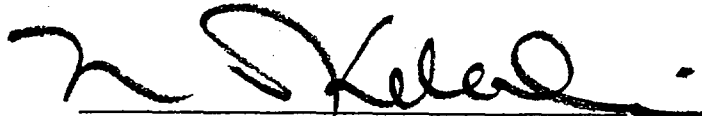
Santa Fe, New Mexico 87504

(505) 982-4285

ATTORNEYS FOR MARATHON OIL  
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of  
the foregoing Entry of Appearance was both sent by  
facsimile transmission and by U.S. Mail, postage pre-  
paid to James Bruce, Esq., (Fax No. 505/982-8623) The  
Hinkle Law Firm, P.O. Box 2068, Santa Fe, New Mexico  
87504 and was hand-delivered to William J. LeMay, Oil  
Conservation Division, 310 Old Santa Fe Trail, Room  
219, Santa Fe, NM 87501 on this 11 day of  
December, 1992.

  
W. Thomas Kellahin

**BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION**

IN THE MATTER OF THE APPLICATION  
OF SANTA FE ENERGY OPERATING  
PARTNERS, L.P. FOR COMPULSORY  
POOLING AND AN UNORTHODOX GAS  
WELL LOCATION, EDDY COUNTY,  
NEW MEXICO.

Case No. 10,629

IN THE MATTER OF THE APPLICATION  
OF YATES PETROLEUM CORPORATION  
FOR COMPULSORY POOLING AND AN  
UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

Case No. 10,628

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Santa Fe Energy Operating Partners, L.P. as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Santa Fe Energy Operating  
Partners, L.P.  
550 West Texas, Suite 1330  
Midland, Texas 79701  
  
Attn: Gary Green  
(915) 687-3551

**ATTORNEY**

James Bruce  
Hinkle, Cox, Eaton,  
Coffield & Hensley  
Post Office Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554

**OPPOSITION OR OTHER PARTY**

Yates Petroleum Corporation

**ATTORNEY**

William F. Carr  
Post Office Box 2208  
Santa Fe, NM 87504-2208  
(505) 988-4421

**STATEMENT OF CASE**

**APPLICANT**

Santa Fe Energy seeks to pool the W $\frac{1}{2}$  of Section 27 for a Morrow test well, and all of Section 27 for an Upper Penn well. The proposed well is to be drilled at an unorthodox location, based upon both topographical and geological reasons.

**OPPOSITION OR OTHER PARTY**

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES	EST. TIME	EXHIBITS
(a) Gary Green (Landman)	10 minutes	(1) Land Plat (2) Correspondence (3) Notice letters
(b) Gene Davis (Geologist)	30 minutes	(1) Area map (2) Morrow isopach (3) Morrow cross-section (4) Upper Penn isopach (5) Upper Penn cross-section (6) Upper Penn Structure map
(c) Darrell Roberts	25 minutes	(1) AFE (2) AFE comparison data (3) Topographic map map and photographs of well location

**PROCEDURAL MATTERS**

The Division issued a subpoena, requested by Santa Fe Energy, ordering Yates to turn over certain well data, which Yates has refused to do. Yates has filed a Motion to Quash Subpoena, which is opposed by Santa Fe. Santa Fe requests that Yates be ordered to turn over the requested data, or that it be barred from using at hearing any exhibits or testimony which is based on or relies on the requested data.

HINKLE, COX, EATON,  
COFFIELD & HENSLEY



James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

Attorneys for Santa Fe Energy  
Operating Partners, L.P.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement of Santa Fe Energy Operating Partners, L.P. was hand delivered to William F. Carr, Esq., 110 North Guadalupe, Suite 1, Santa Fe, New Mexico 87501, this 11th day of December, 1992.

  
James Bruce

**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. 10629

APPLICATION OF SANTA FE ENERGY  
OPERATING PARTNERS, L.P., FOR  
COMPULSORY POOLING AND AN  
UNORTHODOX GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

**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**

Santa Fe Energy Operating Partners, L.P.  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

James Bruce, Esq.\_\_\_\_\_  
Hinkle, Cox, Eaton, Coffield & Hensley  
Post Office Box 2068\_\_\_\_\_  
Santa Fe, New Mexico 87504\_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Yates Petroleum Corporation\_\_\_\_\_  
c/o Robert Bullock\_\_\_\_\_  
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\_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

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

**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.)

Yates Petroleum Corporation,

**PROPOSED EVIDENCE**

APPLICANT

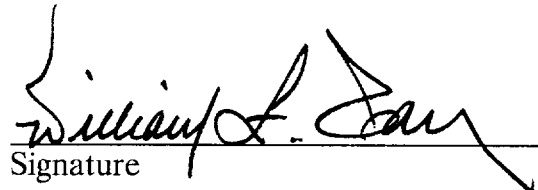
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Robert Bullock, Landman	10 Min.	Approximately 5
Brent May, Geologist	20 Min.	Approximately 7
David Boneau, Engineer	20 Min.	Approximately 5

OPPOSITION

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

Yates will request that this case be consolidated with Case No. 10628 for the purposes of hearing.

  
Signature



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

APPLICATION OF SANTA FE ENERGY  
PARTNERS, L.P., FOR COMPULSORY  
POOLING AND AN UNORTHODOX  
GAS WELL LOCATION,  
EDDY COUNTY, NEW MEXICO.

CASE NO. 10629

ENTRY OF APPEARANCE

COMES NOW CAMPBELL, CARR, BERGE & SHERIDAN, P.A., and hereby  
enters its appearance in the above referenced case on behalf of Yates Petroleum  
Corporation.

Respectfully submitted,

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.,

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DEC 10 1992

OIL CONSERVATION DIVISION

By: 

WILLIAM F. CARR

Post Office Box 2208

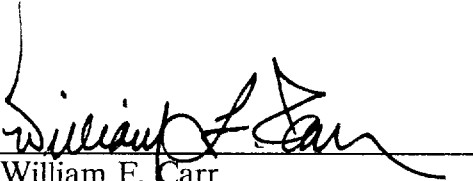
Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

ATTORNEYS FOR YATES  
PETROLEUM CORPORATION

**CERTIFICATE OF MAILING**

I hereby certify that I have caused to be mailed a true and correct copy of our foregoing Entry of Appearance to James Bruce, Hinkle, Cox, Eaton, Coffield & Hensley, Post Office Box 2068, Santa Fe, New Mexico 87504-2068 on this 11<sup>th</sup> day of December, 1992.

  
\_\_\_\_\_  
William F. Carr