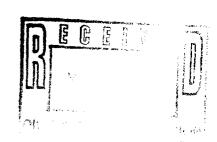
# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

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

CASE NO. 10981

APPLICATION OF YATES PETROLEUM CORPORATION TO AMEND DIVISION ORDER NO. R-9976 TO EXPAND ITS PILOT GAS ENHANCED RECOVERY PROJECT WITHIN PORTIONS OF THE PECOS SLOPE-ABO GAS POOL, CHAVES 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	ATTORNEY
Yates Petroleum Corporation	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	ATTORNEY
name, address, phone and contact person	

Pre-hearing Statement NMOCD Case No. 10981 Page 2

#### 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 to amend Division Order No. R-9976 to expand its pilot project within portions of the Pecos Slope Abo-Gas Pool by adding spacing units upon which may drill an additional well to determine if infill development is necessary to effectively and efficiently drain the Abo formation. The requested expansion is to include portions of Townships 5, 6 and 7 South, Ranges 25 and 26 East.

#### 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.)

Pre-hearing Statement NMOCD Case No. 10981 Page 3

#### PROPOSED EVIDENCE

### **APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Mecca Mauritsen, Land	10 Min.	Approximately 3
Leslie McKiever, Geologist	15 Min.	Approximately 3
Darrick Stallings, Petroleum Engineer	20 Min.	Approximately 3

### **OPPOSITION**

WITNESSES	EST. TIME	<b>EXHIBITS</b>
(Name and expertise)		

#### PROCEDURAL MATTERS

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

Signature & San

# SANDERS PETROLEUM CORPORATION

P.O. BOX 2918
RECEIVED

95 AU 14 AM 8 52

(505) 623-4735

JJC/

August 11, 1995

New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division P.O. Box 6429 Santa Fe, New Mexico 87505-6429

ATTENTION: Ms. Florene Davidson

REFERENCE: Hearing Notice dated August 4, 1995

Division Orders Nos. R-9976 and R-9976-A

Case Nos. 10793, 10981, and 11004

#### Gentlemen:

In conjunction with our various conversations regarding the captioned, Sanders Petroleum Corporation is in agreement with Yates Petroleum Corporation's infill drilling program in the Pecos Slope Abo Field area and will support the application to either integrate the South and West Pecos Slope Field areas into the Pecos Slope Field Rules or leave the field the field names and incorporate the 80 acre spacing.

Sanders Petroleum requests the OCD grant Sanders Petroleum an opportunity to speak in support of the proposal during the proposed hearing.

Very truly yours,

SANDERS PETROLEUM CORPORATION

Bill J. Milstead Land Manager

cc. Yates Petroleum Corporation

Mc Kay Oil Corporation.

ROY L. MCKAY, PRESIDENT

MAILING ADDRESS: P.O. Box 2014 Roswell, N.M. 88202 . TELEPHONE 505/623-473

STREET ADDRESS: ONE MCKAY PLACE ROSWELL, N.M. 88201 . FAX NO. 505/624-220



August 11, 1995

New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division P.O. Box 6429 Santa Fe, New Mexico 87505-6429

ATTENTION: Ms. Florene Davidson

REFERENCE: Hearing Notice dated August 4, 1995

Division Orders Nos. R-9976 and R-9976-A

Case Nos. 10793, 10981, and 11004

#### Gentlemen:

In conjunction with our various conversations regarding the captioned, McKay Oil Corporation is in agreement with Yates Petroleum Corporation's infill drilling program in the Pecos Slope Abo Field area and will support the application to either integrate the South and West Pecos Slope Field areas into the Pecos Slope Field Rules or leave the field the field names and incorporate the 80 acre spacing.

McKay Oil requests the OCD grant McKay Oil an opportunity to speak in support of the proposal during the proposed hearing.

Very truly yours,

MCKAY OIL CORPORATION

Roy L. McKay President

cc. Yates Petroleum Corporation

LEASES . PRODUCTION . INVESTMENTS

MARTINIYA TESTIN JN DIVISION
1912-1985 RECE VED
FRANK W. YATES
1936-1986
195 00 77 PM 8 52



# 105 SOUTH FOURTH STREET ARTESIA, NEW MEXICO 88210 TELEPHONE (505) 748-1471

S. P. YATES
CHAIRMAN OF THE BOARD
JOHN A. YATES
PRESIDENT
PEYTON YATES
EXECUTIVE VICE PRESIDENT
RANDY G. PATTERSON
SECRETARY
DENNIS G. KINSEY
TREASURER

October 10, 1995

10793

TO: Interest Owners in the Pecos Slope-Abo Gas Pool Area

#### Gentlemen:

Yates Petroleum Corporation hereby notifies you that it has filed an application at the New Mexico Oil Conservation Division seeking the adoption of Special Pool Rules and Regulations for the Pecos Slope-Abo Pool including provisions authorizing the drilling of an optional additional well on each spacing and proration unit, and other provisions necessary to implement infill drilling in this pool. The Pecos Slope-Abo Gas Pool currently comprises approximately 199,000 acres in all or portions of Townships 4, 5, 6, 7, and 8 South, Ranges 24, 25, 26, and 27 East.

This case has been set for hearing before a Division Examiner on November 2, 1995 in the City Council Chambers on the Second Floor of the Roswell City Hall, 425 North Richardson Street, Roswell, New Mexico 88201.

At the November 2, 1995 Examiner Hearing, Yates will also review the geologic and engineering data acquired from its Pilot Infill Drilling Program in the portions of the Pecos Slope-Abo Gas Pool which it has operated pursuant to Division Order Nos. R-9976 and R-9976-A entered in Case Nos. 10793, 10981 and 11004.

You are not required to attend this hearing, but as the owner of an interest which may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record could preclude you from challenging the matter at a later date.

Parties appearing in cases before the Division have been requested to file a Prehearing Statement substantially in the form prescribed by the Oil Conservation Division Memorandum 2-90. Prehearing Statements should be filed by 4:00 p.m. on the Friday before a scheduled hearing.

Very truly yours,

YATES PETROLEUM CORPORATION

Mecca Mauritsen Landman

Meson Mayotsen

**Plains Radio Petroleum Company** 

Post Office Box 1300 • Amarillo, Texas 79105 (806) 372-6042 • Fax (806) 374-6340

GIL CONSERVATION DIVISION RECEIVED

October 27, 1995

Jim W. Walker President 195 00 134 AM 8152

Attn: Ms. Sally Martinez Oil Conservation Commission 2040 South Pacheco Santa Fe. New Mexico 87505

> Re: Yates Petroleum Application case numbers 11421 and 11422

Burh Whittenhy

Dear Ms. Martinez:

Enclosed are duplicate original pre-hearing statements executed in behalf of Plains Radio Petroleum Co. to be filed in the referenced cases.

Pursuant to your instructions, the pre-hearing statement was also faxed to the OCD by the filing deadline today.

Thank you.

Respectfully,

Burk Whittenburg

BW/gm

Enclosures

#### 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 NUMBERS: 11422 and 11421

APPLICATION OF YATES PETROLEUM CORPORATION

### PRE-HEARING STATEMENT

This prehearing statement is submitted by PLAINS RADIO PETROLFUM CO. as required by the Oil Conservation Division.

#### APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
YATES PETROLEUM CORPORATION	
name, address, phone and contact person	
OPENIX MONIX OTHER PARTY	ATTORNEY
PLAINS RADIO PETROLEUM CO.	N/A
P. O. Box 1300	
Amarillo, TX 79105	
806/372-6042	
Attn: Mr. Jim W. Walker	
name, address, phone and	

Pre-hearing Statement NMOCD Case No. Page 2

#### STATEMENT OF CASE

APPLICANT

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

N/A

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

This pre-hearing statement is filed to preserve our right to make an appearance, present evidence and make a position statement either in favor of or in opposition of the application after hearing the evidence, testimony and arguments of applicant.

Pre-hearing Statement NMOCD Case No. \_\_\_\_ Page 3

#### PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)

EST. TIME

EXHIBI**TS** 

N/A

#### OPPOSITION

WITNESSES (Name and expertise)

EST. TIME

EXHIBITS

Jim W. Walker President Plains Radio Petroleum Co.

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

N/A

PLAINS RADIO PETROLEUM CO., a Texas corporation

Jim W. Walker, President



GIL GONSERVE JUN BIVESTON REC: VED

## THE EASTLAND

P. O. DRAWER 3488 . MIDLAND, TEXAS 79702 TELEPHONE: (916) 683-6283 . FAX: (916) 683-6286

27 October 1995

State of New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, NM 87504-2088

Attention: Sally Martinez

Re: Pecos Slope-Abo Gas Pool Hearing

November 2, 1995

Ms.: Sally Martinez:

The Eastland Oil Company will have a representative at the hearing. We do not wish to present any testimony at the hearing, but to become a party of record representing our interest for challenging the matter at a latter date if so needed.

Yours truly,

THE EASTLAND OIL COMPANY

Travis Reed

Production Superintendent

Danie Rud

TR/bt

To Whom it may concern;

I. M. Oil Conservation Division

Dente man,

of feel that the Special

Pooling Agreement that yates

Petroleum Eory - lation is proposing

on Town ships 4-5-6-7-8 South

Ranges 21-22-23-24-25-26-27

East, This agreement is not in

on y lest in terest and the hear by

offect to this preposal.

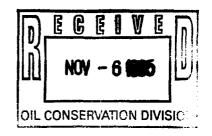
Thank you,

J. W. Dan ich

By Linson Daniel

To: Mr. Rand Carroll, ally 2040 40 E. D. Rehee Land Frehee

Mr. Rand Carroll, Att'y At-Law
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexica 87505



Re: Yates Petroleum Corp.
Application for Spacing Hearing--- 11/2-11/3/95
Roswell. N.M.

Dear Sir.

I appreciate your return call of Nov. 1, 1995 and respectfully request your due consideration to decline the above noted hearing.

I am enclosing a letter from Mr. Stinson Daniels (J. W. Daniels) protesting this procedure.

Also enclosed are the individual letter (copies) as addressed to Mr. Daniels and to Betty J. Moats re the above hearing.

Re the Yates letters signed by Mecca Mauritsen, you will note both letters are similar but not the same.

Our letter describes the area as TWPs 5,6,7,8,9. Daniels letter says TWPS 4,5,6,7,8. Ranges are stated on our letter as 21,22, & 23 East. Ranges on Mr. Daniels letter state 24,25,26, & 27 east. I trust these are duly noted by you.

Furthermore, the totals noted in Yates letter are different. As noted on our letterthe proposed area contains approximately 92,480 acres. Mr. Daniels letter noted the area contains approximately 199,000 acres.

The differences I have pointed lead me to believe someone is directly lying for a purpose.

Ifeel this entire procedure should be permanently TABLED due to misinformation.

We feel there is no need to add additional well allocations in this area due to the amounts of surface damages incurred that are impossible to repair in a reasonable time.

Regarding surface damages, I shall be happy to show current surface conditions from XXXXX other wells that have not regained their use as of today.

We hereby advise you that we will not approve of the Yates request and will not accept the approval of same.

Sincerely,

C Stuart Moate

P. O. Box 24 847

Roswell, N.M. 88202-0847

Moats Livestock and Property LLC

to: Mr. Rand Carroll, Atty-at-Law (Continued)

Please be advised that there are at least 2 other neighbors that have not received notices from Yates Petroleum Inc.

Jerry Don Martin Charlie Martin.

I am certain there are others which I have not contacted.

C. Stuart monto



YATES BUILDING - 105 SOUTH FOURTH STREET ARTESIA, NEW MEXICO 88210

#### ADDRESS CORRECTION REQUESTED

Betty Jean Moats PO Box 847 Roswell, NM 88201

MARTIN YATES, III 1912 - 1965



105 SOUTH FOURTH STREET ARTESIA, NEW MEXICO 88210 TELEPHONE (505) 748-1471

S. P. YATES JOHN A. YATES PEYTON YATES RANDY G. PATTERSON DENNIS G. KINSEY

October 10, 1995

TO: Interest Owners in the West Pecos Slope-Abo Gas Pool Area

Yates Petroleum Corporation hereby notifies you that it has filed an application at the New Mexico Oil Conservation Division seeking the adoption of Special Pool Rules and Regulations for the West Pecos Slope-Abo Pool including provisions authorizing the drilling of an optional additional well on each spacing and proration unit, and other provisions necessary to implement infill drilling in this pool. The West Pecos Slope-Abo Gas Pool currently comprises approximately 92,480 acres in all or portions of Townships 5, 6, 7, 8, and 9 South, Ranges 21, 22, and 23 East.

This case has been set for hearing before a Division Examiner on November 2, 1995 in the City Council Chambers on the Second Floor of the Roswell City Hall, 425 North Richardson Street, Roswell, New Mexico 88201.

At the November 2, 1995 Examiner Hearing, Yates will also review 🖰 peologic and engineering data acquired from its Pilot Infill Drilling Program in the portions of the Pecos Slope-Abo Gas Pool which it has operated pursuant to Division Order Nos. R-99 and R-9976-A entered in Case Nos. 10793, 10981 and 11004.

You are not required to attend this hearing, but as the owner affected by this application, you may appear and present testintime and become a party of record could preclude you from cl 3 date.

Parties appearing in cases before the Division have been re-Statement substantially in the form prescribed by the Oil Conserva 90. Prehearing Statements should be filed by 4:00 p.m. on th hearing.

interest which may be ailure to appear at that ing the matter at a later

1 to file a Prehearing ⊋ision Memorandum 2y before a scheduled

**PORATION** 

Time of Hering? Dece to File Prehering Statement? YATES PETROLEI Melec Mal Mecca Mauritsen Landman





YATES BUILDING - 105 SOUTH FOURTH STREET
ARTESIA, NEW MEXICO 88210

#### ADDRESS CORRECTION REQUESTED

J.W. Daniels C/O Stenson Daniels PO Box 1111 Dunlap Route Roswell, NM 88201

MARTIN YATES, III 1912 - 1985 FRANK W. YATES 1936 - 1946



105 SOUTH FOURTH STREET

ARTESIA, NEW MEXICO 88210

TELEPHONE (505) 748-1471

S. P. YATES
CHAIRMAN OF THE BOARD
JOHN A. YATES
PRESIDENT
PEYTON YATES
EXECUTIVE VICE PRESIDENT
RANDY G. PATTERSON
SECRETARY
DENNIS G. KINSEY
TREASUMER

October 10, 1995

TO: Interest Owners in the Pecos Slope-Abo Gas Pool Area

#### Gentlemen:

Yates Petroleum Corporation hereby notifies you that it has filed an application at the New Mexico Oil Conservation Division seeking the adoption of Special Pool Rules and Regulations for the Pecos Slope-Abo Pool including provisions authorizing the drilling of an optional additional well on each spacing and proration unit, and other provisions necessary to implement infill drilling in this pool. The Pecos Slope-Abo Gas Pool currently, comprises approximately 199,000 acres in all or portions of Townships 4, 5, 6, 7, and 8 South, Ranges 24, 25, 26, and 27 East.

This case has been set for hearing before a Division Examiner on November 2, 1995 in the City Council Chambers on the Second Floor of the Roswell City Hall, 425 North Richardson Street, Roswell, New Mexico 88201.

At the November 2, 1995 Examiner Hearing, Yates will also review the geologic and engineering data acquired from its Pilot Infill Drilling Program in the portions of the Pecos Slope-Abo Gas Pool which it has operated pursuant to Division Order Nos. R-9976 and R-9976-A entered in Case Nos. 10793, 10981 and 11004.

You are not required to attend this hearing, but as the owner of an interest which may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record could preclude you from challenging the matter at a later date.

Parties appearing in cases before the Division have been requested to file a Prehearing Statement substantially in the form prescribed by the Oil Conservation Division Memorandum 2-90. Prehearing Statements should be filed by 4:00 p.m. on the Friday before a scheduled hearing.

Very truly yous,

YATES PETROLEUM CORPORATION

Mecca Mauntsu

Mecca Mauritsen Landman

#### KELLAHIN AND KELLAHIN

ATTORNEYS AT LAW

EL PATIO BUILDING

117 NORTH GUADALUPE

POST OFFICE BOX 2265

SANTA FE, NEW MEXICO 87504-2265

November 16, 1995

TE\_EPHONE (505) 982-4285 TELEFAX (505) 982-2047

9000 p

#### HAND DELIVERED

W. THOMAS KELLAHIN\*

\*NEW MEXICO BOARD OF LEGAL SPECIALIZATION RECOGNIZED SPECIALIST IN THE AREA OF NATURAL RESOURCES-OIL AND GAS LAW

JASON KELLAHIN (RETIRED 1991)

William F. Carr, Esq. Campbell Carr and Berg P. O. Box 2208 New Mexico, New Mexico 87501



NMOCD Cases 10793, 10981 & 11004: Applications of Yates Petroleum Corporation including "Infill Drilling" for the Pecos Slope-Abo Gas Pool, Chaves County, New Mexico

Dear Mr. Carr:

On November 2, 1995, Examiner Stogner granted my motion on behalf of Tide West Oil Company, requiring that Yates Petroleum Corporation provide to me a true and accurate copy of all of its decline curves for all its infill wells in phase one and phase two of its infill drilling program.

As of today, that data has not been provided. Please immediate provide me with the data as ordered by the Examiner.

W. Thomas Kellahin

OIL CONSERVATION DIVISION

cc: Michael E. Stogner, NMOCD

cc: Tide West Oil Company
Attn: Bob VonRhee

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

EAWTERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MICHAEL H. FELDEWERT
TANNIS L. FOX
TANYA M. TRUJILLO
PAUL R. OWEN

JACK M. CAMPBELL
OF COUNSEL

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208

SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421

TELECOPIER: (505) 988-4421 TELECOPIER: (505) 983-6043

November 20, 1995

#### **HAND-DELIVERED**

W. Thomas Kellahin, Esq. Kellahin & Kellahin El Patio Building 117 North Guadalupe Street Santa Fe, New Mexico 87501



Re: New Mexico Oil Conservation Division Cases 10793, 10981 and 11004:

Yates Petroleum Corporation
Pilot Enhanced Recovery Project
Pecos Slope Abo Gas Pool, Chaves County, New Mexico

Dear Mr. Kellahin:

Enclosed are copies of Yates Petroleum Corporation's decline curves for its infill wells in Phase I and Phase II of its pilot infill drilling program in the Pecos Slope Abo Gas Pool.

As usual, I note that you decided to send demand letters to me early in a week in which you knew I would be out of town and unavailable for response. Copying these letters to the Examiner suggests to me that you are more interested in posturing before the Division than acquiring information.

Very truly yours,

WILLIAM F. CARR

WFC:mlh

Enc.

cc: 

✓ Mr. Michael E. Stogner (w/enclosures)

Mr. Randy Patterson (w/enclosures)

