

Plains Radio Petroleum Company

Post Office Box 1300 • Amarillo, Texas 79105

(806) 372-6042 • Fax (806) 374-6340

October 27, 1995

Jim W. Walker
President



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

Re: Yates Petroleum
Application case
numbers 11421 and 11422


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 state-
ment was also faxed to the OCD by the filing deadline today.

Thank you,

Respectfully,



Burk Whittenburg

BW/gm

Enclosures

OCT-27-95 FRI 10:57 AM OIL CONSERVATION DIV

FAX NO. 5058278177

P.02/04

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 PETROLEUM CO.
as required by the Oil Conservation Division.

APPEARANCES OF PARTIESAPPLICANTATTORNEYYATES PETROLEUM CORPORATION

name, address, phone and
contact person

~~OPPOSITION~~ OR OTHER PARTYATTORNEYPLAINS RADIO PETROLEUM CO.N/AP. O. Box 1300Amarillo, TX 79105806/372-6042Attn: Mr. Jim W. Walker

name, address, phone and
contact person

OCT-27-95 FRI 10:58 AM OIL CONSERVATION DIV

FAX NO. 5058278177

P. 03/04

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

POSITION OF 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.)

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.

OCT 27 95 FRI 10:58 AM OIL CONSERVATION DIV

FAX NO. 5058278177

P. 04/01

Pre-hearing Statement
NMOCD Case No.
Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

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

By: 
Jim W. Walker, President



THE EASTLAND OIL COMPANY

P. O. DRAWER 3488 • MIDLAND, TEXAS 79702
TELEPHONE: (815) 683-6293 • FAX: (815) 683-6295

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

TR/bt



THE EASTLAND OIL COMPANY

P.O. DRAWER 3416 • MIDLAND, TEXAS 79702
TELEPHONE: (915) 683-6293 • FAX: (915) 683-6295

FAX TRANSMITTAL SHEET

DATE: 10-27-95 NUMBER OF PAGES (INCLUDING TRANSMITTAL): 2

TO: SALLY MARTINEZ

COMPANY: OIL CONSERVATION DIVISION

FAX NUMBER: 1-505-827-8177

FROM: TRAVIS FEE FAX NUMBER: (915) 683-6295

COMMENTS: _____

IF YOU DID NOT RECEIVE ALL PAGES OF THIS TRANSMISSION, PLEASE CONTACT EASTLAND
AT (915) 683-6293

Nov 1. 1995

To Whom it may concern;
Oil Conservation Division
Gentlemen,

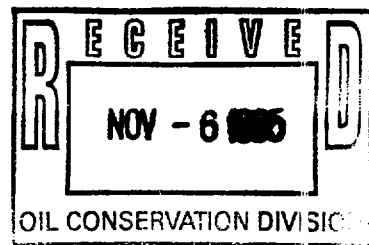
I feel that the Special
Pooling Agreement that Yates
Petroleum Corporation is proposing
on Townships 4-5-6-7-8 South
Ranges 21-22-23-24-25-26-27
East. This agreement is not in
my best interest and I heartily
object to this proposal.

Thank You,
J. W. Daniel
By Garrison Daniel

To: Mr. Rand Carroll, Atty
W. M. O. C. P.
2040 South Pacheco
Santa Fe, N. M. 87505

November 2, 1995

Mr. Rand Carroll, Att'y At-Law
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 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 TWP's 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 letter the 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.

I feel 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 ~~XXXX~~ 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,

Betty J. Moats
Betty J. Moats

C. Stuart Moats
C. Stuart Moats

P. O. Box 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 Moate



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 - 1995



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

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

Mecca Mauritsen
Landman

**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:

APPLICATION OF YATES PETROLEUM
CORPORATION FOR THE PROMULGATION OF
SPECIAL RULES AND REGULATIONS FOR THE
SOUTH PECOS SLOPE-ABO GAS POOL,
CHAVES COUNTY, NEW MEXICO.

CASE NO. 11421

APPLICATION OF YATES PETROLEUM
CORPORATION FOR THE PROMULGATION OF
SPECIAL RULES AND REGULATIONS FOR THE
WEST PECOS SLOPE-ABO GAS POOL,
CHAVES COUNTY, NEW MEXICO.

CASE NO. 11422

IN THE MATTER OF CASE NOS. 10793, 10981 AND 11004
BEING REOPENED PURSUANT TO THE PROVISIONS
OF DIVISION ORDER NOS. R-9976 and R-9976-A,
WHICH ORDERS ESTABLISHED A "PILOT INFILL
DRILLING PROGRAM" IN THE PECOS SLOPE-
ABO GAS POOL IN PORTIONS OF TOWNSHIPS 5,
6, and 7 SOUTH, RANGES 25 AND 26 EAST,
CHAVES COUNTY, NEW MEXICO.

CASE NOS. 10793,
10981 AND 11004

PRE-HEARING STATEMENT

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

Pre-hearing Statement

NMOCD Case Nos. 11421, 11422 and 10793, 10981 and 11004 (Reopened)

Page 2

APPEARANCES OF PARTIES

APPLICANT

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, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

OPPOSITION OR OTHER PARTY

Tide West Oil Company

name, address, phone and
contact person

ATTORNEY

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504-2265
(Telephone) 505-9824285

OPPOSITION OR OTHER PARTY

Western Drilling Company

name, address, phone and
contact person

ATTORNEY

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504-2265
(Telephone) 505-9824285

Pre-hearing Statement

NMOCD Case Nos. 11421, 11422 and 10793, 10981 and 11004 (Reopened)

Page 3

STATEMENT OF CASE

APPLICANT

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

CASE 11421

Yates Petroleum Corporation, applicant in the above-captioned cause, seeks the promulgation of special rules and regulations for the currently unprorated South Pecos Slope-Abo Gas Pool, including provisions to permit the optional drilling of an additional well on each 160-acre standard gas spacing and proration unit, designated well location requirements, and any other provisions deemed necessary in the implementation of "infill drilling" in said pool. Currently the South Pecos Slope-Abo Gas Pool comprises approximately 73,440 acres in portions of Townships 8, 9, 10 and 11 South, Ranges 24, 25, 26 and 27 East.

CASE 11422

Yates Petroleum Corporation, applicant in the above-captioned cause, seeks the promulgation of special rules and regulations for the currently unprorated West Pecos Slope-Abo Gas Pool, including provisions to permit the optional drilling of an additional well on each 160-acre standard gas spacing and proration unit, designated well location requirements, and any other provisions deemed necessary in the implementation of "infill drilling" in said pool. Currently the West Pecos Slope-Abo Gas Pool comprises approximately 92,480 acres in portions of Townships 5, 6, 7, 8 and 9 South, Ranges 22, 22 and 23 East.

CASES 10793, 10981 and 11004:

Yates Petroleum Corporation, the applicant in this matter, seeks the promulgation of special rules and regulations for the currently unprorated Pecos Slope-Abo Gas Pool.

Pre-hearing Statement

NMOCD Case Nos. 11421, 11422 and 10793, 10981 and 11004 (Reopened)

Page 4

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
Mecca Mauritsen, Landman	15 Min.	Approximately 4
Darrick Stallings, Engineer	40 Min.	Approximately 10

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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Pre-hearing Statement

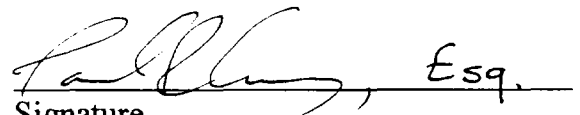
NMOCD Case Nos. 11421, 11422 and 10793, 10981 and 11004 (Reopened)

Page 5

PROCEDURAL MATTERS

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

Yates will request that Cases 11421, 11422 and Reopened Cases 10793, 10981 and 11004 be consolidated for purposes of testimony.


Signature
for William F. Carr, Esq.

Pre-hearing Statement

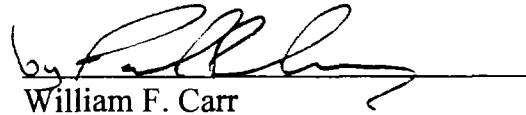
NMOCD Case Nos. 11421, 11422 and 10793, 10981 and 11004 (Reopened)

Page 6

CERTIFICATE OF SERVICE

I hereby certify that on this 27 day of October, 1995, I have caused to be mailed a copy of our Pre-Hearing Statement in the above-captioned cases to the following named counsel:

W. Thomas Kellahin, Esq.
Kellahin & Kellahin
Post Office Box 2265
Santa Fe, New Mexico 87504-2265


William F. Carr

SANDERS PETROLEUM CORPORATION

P.O. BOX 2918

ROSWELL, NEW MEXICO 88202
OIL CONSERVATION DIVISION
RECEIVED

(505) 623-4735

1995 AUG 14 PM 8 52



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

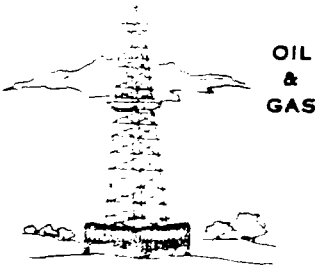
cc. Yates Petroleum Corporation

McKay Oil Corporation

ROY L. MCKAY, PRESIDENT

MAILING ADDRESS: P.O. BOX 2014 ROSWELL, N.M. 88202 • TELEPHONE 505 / 623 - 4735

STREET ADDRESS: ONE MCKAY PLACE ROSWELL, N.M. 88201 • FAX NO. 505 / 624 - 2202



CONSERVATION DIVISION
RECEIVED
35 JUL 14 AM 8 52

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

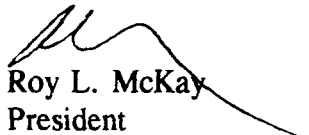
Gentlemen:

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

MARTIN YATES
1912 - 1985
FRANK W. YATES
1936 - 1986
OIL CONSERVATION DIVISION
RECEIVED
95 OCT 17 AM 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

10981

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.

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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

Mecca Mauritsen
Landman