

BEFORE THE  
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY AND MINERALS

IN THE MATTER OF THE APPLICATION  
OF YATES PETROLEUM CORPORATION  
FOR SPECIAL POOL RULES,  
EDDY COUNTY, NEW MEXICO.

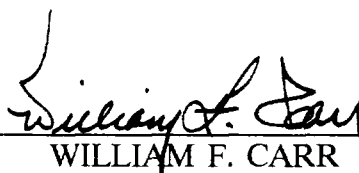
CASE NO. 10145

ENTRY OF APPEARANCE

COMES NOW CAMPBELL & BLACK, P.A., and hereby enters its appearance in  
the above referenced case on behalf of Larry Jones d/b/a Premier Production Company.

Respectfully submitted,

CAMPBELL & BLACK, P.A.

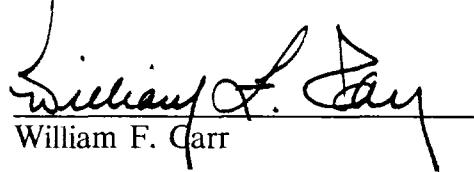
By: 

WILLIAM F. CARR  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR PREMIER  
PRODUCTION COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused to be mailed a true and correct copy of our Entry of Appearance in the above-captioned cause to Ernest Carroll, Esq., Post Office Box 239, Artesia, New Mexico 88210 on this 20<sup>th</sup> day of November, 1990.

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

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

IN THE MATTER OF THE APPLICATION :  
OF YATES PETROLEUM CORPORATION : CASE NO. 10145  
FOR AN ORDER ESTABLISHING SPECIAL :  
FIELD RULES FOR THE AVALON - :  
DELAWARE POOL :  
\_\_\_\_\_ :

**PRE-HEARING STATEMENT**

This prehearing statement is submitted by Yates Petroleum Corporation, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Yates Petroleum Corporation

**ATTORNEY**

Ernest L. Carroll  
Losee, Carson, Haas  
& Carroll, P. A.  
P. O. Drawer 239  
Artesia, New Mexico 88210

**STATEMENT OF CASE**

**APPLICANT**

Applicant is the operator of several wells, as listed in the Application, each of which is producing from the Avalon-Delaware Pool in Eddy County, New Mexico.

On July 1, 1980, the Commission, in Order No. R-63-68 established the Avalon-Delaware Pool. At this time, no special field rules or regulations for that pool have been established. The gas-oil ration limitation is, therefore, set by statewide rule 506, which creates a limitation of 2,000 cubic feet of gas per barrel of oil produced. Applicant seeks to have established a special field rule setting the gas-oil ratio limitation for the Avalon-Delaware Pool at 7,500 cubic feet of gas per barrel of oil produced.

The approval of this application will afford Applicant the opportunity to produce its just and equitable share of gas and oil, and such amendment is feasible in accordance with good conservation practices, and will otherwise prevent waste, and protect correlative rights.

**OPPOSITION OR OTHER PARTY**

See attached Exhibit "A", which sets out the offset operators and interest owners, noting which have provided waivers.

Premier Production Company is the only offset operator whose opposition has been indicated.

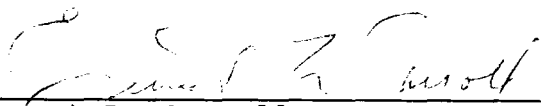
**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
David Boneau, Reservoir Engineer	1/2 hour	10
Janet Richardson, Landman	5 min.	2

**OPPOSITION**

Unknown

  
\_\_\_\_\_  
Ernest L. Carroll  
LOSEE, CARSON, HAAS & CARROLL, P.A.  
P. O. Drawer 239  
Artesia, New Mexico 88211-0239  
(505) 746-3505

Yates Petroleum Corporation

# OPERATORS WITHIN ONE MILE OF POOL BOUNDARIES

Chevron USA, Inc.  
P.O. Box 670  
Hobbs, New Mexico 88240

Bravo Operating Company  
P.O. Box 2160  
Hobbs, New Mexico 88241-2160

Mesa Petroleum Company\*  
P.O. Box 1432  
Amarillo, Texas 79101-1432

Amoco Production Company  
P.O. Box 800  
Denver, Colorado 80201

Pennzoil Producing Company  
P.O. Box 200948  
Houston, Texas 77216-0948

Premier Production Company  
P.O. Box 1246  
Artesia, New Mexico 88210

David Fasken (Estate of)\*  
303 West Wall Avenue, Suite 1901  
Midland, Texas 79701-5116

Maralo, Inc.  
P.O. Box 832  
Midland, Texas 79702-0832

Oxy USA, Inc. \*  
P.O. Box 50250  
Midland, Texas 79710-0100

Fred Pool Drilling  
P.O. Box 1393  
Roswell, New Mexico 88202

Mobil Oil Corporation  
P.O. Box 5444  
Denver, Colorado 80217

Kerr-McGee Oil Corporation \*  
P.O. Box 11050  
Midland, Texas 79702

Bridge Oil Company  
P.O. Box 910054  
Dallas, Texas 75391

George Riggs \*  
P.O. Box 116  
Carlsbad, New Mexico 88220

Hondo Oil & Gas Company\*  
P.O. Box 2208  
Roswell, New Mexico 88202-2208

Bonneville Fuels Corp.\*  
1600 Broadway, Suite 1110  
Denver, Colorado 80202

Barbara Fasken \*  
303 West Wall Ave., Ste. 1901  
Midland, Texas 79701-5116

BHP Petroleum Co., Inc.  
6 Desta Drive, Suite 3200  
Midland, Texas 79705-5505

Exxon Company, USA  
P.O. Box 1600  
Midland, Texas 79702

Gulf Oil Corporation  
P.O. Box 670  
Hobbs, New Mexico 88240

Barber Oil, Inc. \*  
P.O. Box 1658  
Carlsbad, New Mexico 88220

Monsanto Company  
5847 San Felipe, Ste. 3600  
Houston, TX 77057

## OPERATORS WITHIN POOL BOUNDARIES

Chevron USA, Inc.  
P.O. Box 670,  
Hobbs, New Mexico 88240

MWJ Producing Company  
400 W. Illinois, Suite 1100  
Midland, Texas 79701

Exxon Company, USA  
P.O. Box 1600  
Midland, Texas 79702

\*Indicates Operators who have executed waivers

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

RECEIVED

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

OIL CONSERVATION DIVISION

CASE NO. 10145

APPLICATION OF YATES PETROLEUM  
CORPORATION FOR SPECIAL POOL RULES,  
EDDY COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by William F. Carr, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Yates Petroleum Corporation \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

Ernest L. Carroll \_\_\_\_\_  
Post Office Box 239 \_\_\_\_\_  
Artesia, New Mexico 88210 \_\_\_\_\_  
\_\_\_\_\_

(505) 746-3508 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

Larry Jones d/b/a \_\_\_\_\_  
Premier Production Company \_\_\_\_\_  
Post Office Box 1246 \_\_\_\_\_  
Artesia, New Mexico 88210 \_\_\_\_\_

(505) (505) 748-2093 \_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr \_\_\_\_\_  
Campbell & Black, P.A. \_\_\_\_\_  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_

(505) 988-4421 \_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

**OPPOSITION OR OTHER PARTY**

Premier Production Company opposes this application because, if granted, it will prematurely deplete reservoir energy, will cause waste and will damage property operated by Larry Jones d/b/a Premier Production Company.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

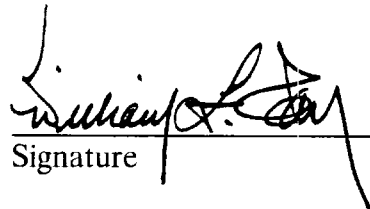
Larry Jones

15 Min.

Approximately 3

**PROCEDURAL MATTERS**

None

  
Signature