

LAW OFFICES

LOSEE, CARSON, HAAS & CARROLL, P.A.

300 YATES PETROLEUM BUILDING

P. O. DRAWER 239

ARTESIA, NEW MEXICO 88211-0239

OIL CONSERVATION DIVISION
RECEIVED

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March 27, 1992

VIA FACSIMILE AND FIRST CLASS MAIL

Mr. William J. LeMay, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Re: Application of Yates Petroleum Corporation for
Permission to Drill Deviated Holes, Eddy and
Lea County, New Mexico, Case Nos. 10460/10461

Dear Mr. LeMay:

Enclosed for filing, please find three copies of Yates Petroleum
Corporation's Consolidated Prehearing Statement for the above-
referenced cases.

Yours truly,

LOSEE, CARSON, HAAS & CARROLL, P.A.



Ernest L. Carroll

ELC:bjk
Enclosures

**BEFORE THE OIL CONSERVATION DIVISION
OF THE STATE OF NEW MEXICO**

IN THE MATTER OF THE APPLICATION)
OF YATES PETROLEUM CORPORATION)
FOR PERMISSION TO DRILL DEVIATED)
HOLES, EDDY AND LEA COUNTIES,)
NEW MEXICO) CASE NOS. 10460, 10461

CONSOLIDATED PRE-HEARING STATEMENT

This prehearing statement is submitted by YATES PETROLEUM CORPORATION, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT	ATTORNEY
Yates Petroleum Corporation 105 S. Fourth St. Artesia, New Mexico 88210 (505)748-1471	Ernest L. Carroll Losee, Carson, Haas & Carroll, P.A. P. O. Drawer 239 Artesia, New Mexico 88211-0239 (505)746-3505
OPPOSITION OR OTHER PARTY	ATTORNEY
See attached Exhibit "A"	No attorneys are known

STATEMENT OF CASE

APPLICANT

Applicant is the operator of the Delaware and intermediate formations underlying:

Township 21 South, Range 32 East, N.M.P.M.

Lea County, New Mexico

Section 19: Units L, M

and proposes to drill its Bonneville "AKK" Federal No. 2 Well to be bottomed at a location 660' FSL and 1049' FWL of said Section 19 (Unit M), and its Bonneville "AKK" Federal No. 3 Well to be bottomed at a location 1980' FSL and 660' FWL of said Section 19 (Unit L).

Applicant seeks permission to drill one or the other proposed location as a deviated hole, and will present testimony to support its request.

OPPOSITION OR OTHER PARTY

No opposition is expected.

PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Rob Bullock, Landman	10 mins.	2
Tim Bussells, Geologist	10 mins.	2
Brent May, Geologist	20 mins.	5

OPPOSITION

Unknown

YATES PETROLEUM CORPORATION

By: 
Ernest L. Carroll
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Attorneys for Yates Petroleum
Corporation

EXHIBIT "A"

**Mr. Armando Lopez
Area District Manager, Minerals
Bureau of Land Management
P. O. Box 1397
Roswell, NM 88210**

**Mr. Ernie Szabo
New Mexico State Land Office
310 Old Santa Fe Trail
Santa Fe, NM 87501**

**Mr. David L. Sleeper
Texaco, Inc.
P. O. Box 2100
Denver, CO 80201**