

**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 EXXON CORPORATION  
FOR A WATERFLOOD PROJECT AND EOR  
QUALIFICATION,  
EDDY COUNTY, NEW MEXICO.

CASE NO. 11297

APPLICATION OF EXXON CORPORATION  
FOR STATUTORY UNITIZATION,  
EDDY COUNTY, NEW MEXICO.

CASE NO. 11298

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Exxon Corporation \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

Jim Bruce, Esq. \_\_\_\_\_  
Post Office Box 2068 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4554 \_\_\_\_\_

**PROPONENT**

Yates Petroleum Corporation  
c/o Dave Boneau \_\_\_\_\_  
105 South Fourth Street \_\_\_\_\_  
Artesia, New Mexico 88210 \_\_\_\_\_  
(505) 748-1471 \_\_\_\_\_

**ATTORNEY**

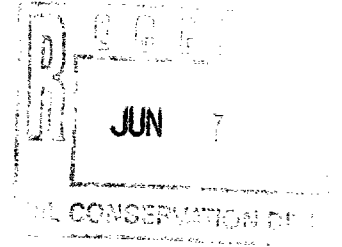
William F. Carr, Esq. \_\_\_\_\_  
Campbell, Carr & Berge, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPONENT**

Premier Oil & Gas Inc. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
(505) 748-1471 \_\_\_\_\_

**ATTORNEY**

W. Thomas Kellahin, Esq. \_\_\_\_\_  
Kellahin & Kellahin \_\_\_\_\_  
Post Office Box 2265 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 982-4285 \_\_\_\_\_



**STATEMENT OF CASE**

**APPLICANT/PROPONENT**

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

Yates Petroleum Corporation will present supporting evidence for the applications filed herein.

**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/PROPONENT

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Dave Boneau, Land	20 Min.	Approximately 3

OPPOSITION

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

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

  
\_\_\_\_\_  
Signature

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

IN THE MATTER OF THE APPLICATION  
OF EXXON CORPORATION  
FOR STATUTORY UNITIZATION,  
EDDY COUNTY, NEW MEXICO.

**RECEIVED**  
JUN 21 1995  
Oil Conservation Division

2715  
CASE NO. 11298

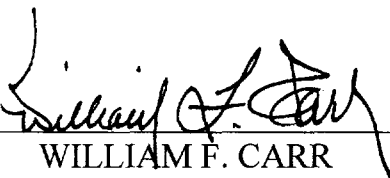
ENTRY OF APPEARANCE

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

Respectfully submitted,

CAMPBELL, CARR & BERGE, P.A.

By:



WILLIAM F. CARR

Post Office Box 2208

Santa Fe, New Mexico 87504

Telephone: (505) 988-4421

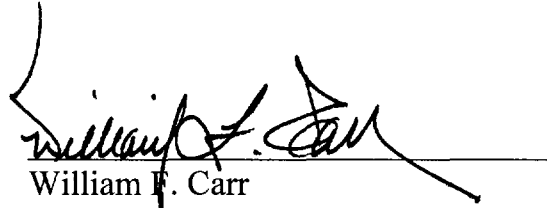
ATTORNEYS FOR YATES  
PETROLEUM CORPORATION

## CERTIFICATE OF SERVICE

I hereby certify that on this 21<sup>st</sup> day of June, 1995, I have caused to be mailed a copy of our Entry of Appearance in the above-captioned case to the following named counsel:

James G. Bruce, Esq.  
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Post Office Box 2068  
Santa Fe, New Mexico 87504-2068

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William F. Carr