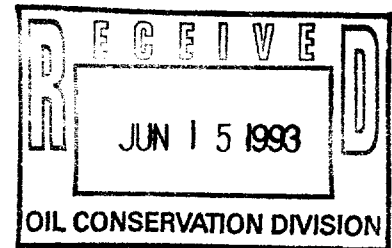


STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION

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

CASE NO. 10748

APPLICATION OF YATES PETROLEUM CORPORATION  
FOR POOL CREATION, CLASSIFICATION OF THE  
NEW POOL AND THE PROMULGATION OF SPECIAL  
POOL RULES, EDDY COUNTY, NEW MEXICO



PRE-HEARING STATEMENT

This prehearing statement is submitted by opposing counsel as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

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\_\_\_\_\_

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Name, address, phone and contact person)

OPPOSITION OR OTHER PARTY

ATTORNEY

Nearburg Producing Company

J. Scott Hall  
Miller, Stratvert, Torgerson  
& Schlenker, P.A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504-1986  
(505) 989-9614

STATEMENT OF CASE

APPLICANT

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

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.)

Nearburg Producing Company opposes provision in proposed special pool rules imposing limitation of one well per quarter section.

PROPOSED EVIDENCE

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

One or Possibly two witnesses  
to be identified at time of  
hearing.

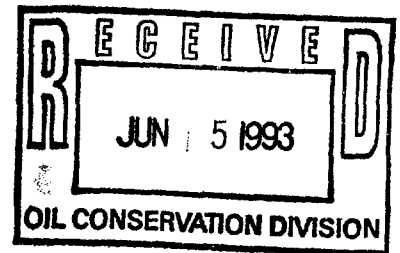
15 minutes  
per witness

None

PROCEDURAL MATTERS

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

*Z. Swartz*



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. 10748

APPLICATION OF YATES ENERGY CORPORATION  
FOR POOL CREATION, CLASSIFICATION OF THE  
NEW POOL AS AN ASSOCIATED POOL AND FOR  
SPECIAL POOL RULES, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by MARATHON OIL  
COMPANY as required by the Oil Conservation Division.

**APPEARANCE OF PARTIES**

**APPLICANT**

Yates Energy Corporation

**ATTORNEY**

William F. Carr, Esq.  
P. O. Box 2208  
Santa Fe, New Mexico 87504

**OPPOSITION OR OTHER PARTY**

Marathon Oil Company  
P. O. Box 552  
Midland, Texas 79702  
Attn: Thomas C. Lowry, Esq.

**ATTORNEY**

W. Thomas Kellahin  
KELLAHIN AND KELLAHIN  
P.O. Box 2265  
Santa Fe, NM 87504  
(505) 982-4285

Pre-Hearing Statement  
Case No. 10748  
Page 2

STATEMENT OF CASE

OPPOSITION OR OTHER PARTY

Marathon Oil Company is an operator in the Indian Basin-Upper Pennsylvanian Gas Pool is affected by this application.

PROPOSED EVIDENCE

OPPOSITION

WITNESSES

EST. TIME

EXHIBITS

None.

PROCEDURAL MATTERS

None applicable at this time.

KELLAHIN AND KELLAHIN

By: 

W. Thomas Kellahin


P.O. Box 2265

Santa Fe, New Mexico 87504

(505) 982-4285

I hereby certify that a true copy of the foregoing instrument was mailed to opposing counsel of record this 15 day of June, 1993

*Delivered*

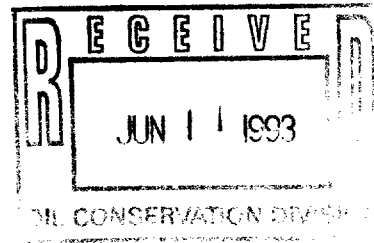


**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

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

CASE NO. 10748

APPLICATION OF YATES PETROLEUM  
CORPORATION FOR POOL CREATION,  
CLASSIFICATION OF THE NEW  
POOL AS AN ASSOCIATED POOL  
AND FOR SPECIAL POOL RULES,  
EDDY 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**

Yates Petroleum Corporation \_\_\_\_\_  
c/o David F. Boneau \_\_\_\_\_  
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 & Sheridan, P.A.  
Post Office Box 2208 \_\_\_\_\_  
Santa Fe, New Mexico 87504 \_\_\_\_\_  
(505) 988-4421 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

**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 creation of a new pool for the production of oil and gas from the Pennsylvanian formation underlying the W/2 of Section 17, Township 22 South, Range 24 East, N.M.P.M. Applicant also seeks classification of this new pool as an associated oil and gas pool and the promulgation of special rules and regulations for the pool including: 320-acre spacing and proration units; designated well location requirements; a limit of no more than one well per quarter section; a special depth bracket allowable for each well on a 320-acre spacing or proration unit of 1400 barrels of oil per day and; administrative procedures for approval of unorthodox well locations and non-standard spacing or proration units.

**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

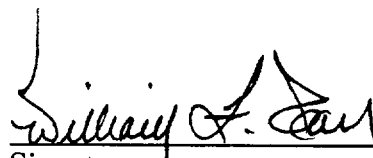
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
David Boneau, Petroleum Engineer	10 Min.	Approximately 3
Brent May, Geologist	15 Min.	Approximately 4
Janet Richardson, Land	10 Min.	Approximately 5

OPPOSITION

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

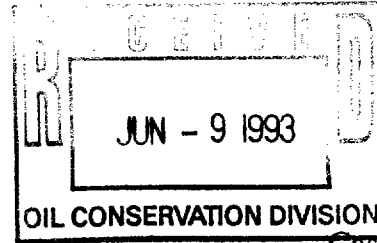
(Please identify any procedural matters which need to be resolved prior to hearing)

  
\_\_\_\_\_  
Signature



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. 10,748

APPLICATION OF YATES PETROLEUM  
CORPORATION FOR POOL CREATION, ETC.,  
EDDY COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Santa Fe Energy Operating Partners, L.P.  
as required by the Oil Conservation Division.

APPEARANCE OF PARTIES

APPLICANT

Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210  
(505) 748-1471

ATTORNEY

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

OPPOSITION OR OTHER PARTY

Santa Fe Energy Operating  
Partners, L.P.  
Suite 1330  
500 West Texas  
Midland, Texas 79701  
(915) 687-3551  
Attention: Gary Green

ATTORNEY

James Bruce  
Hinkle, Cox, Eaton, Coffield  
& Hensley  
Post Office Box 2068  
Santa Fe, New Mexico 87504  
(505) 982-4554

STATEMENT OF CASE

APPLICANT

OPPOSITION

Santa Fe Energy Operating Partners, L.P. is an offset lessee, and thus is an interested party.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
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OPPOSITION

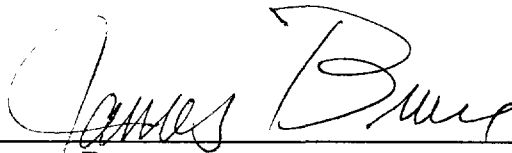
WITNESSES	EST. TIME	EXHIBITS
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Santa Fe Energy Operating Partners, L.P. does not anticipate presenting any witnesses at this time.

PROCEDURAL MATTERS

Respectfully submitted,

HINKLE, COX, EATON, COFFIELD  
& HENSLEY

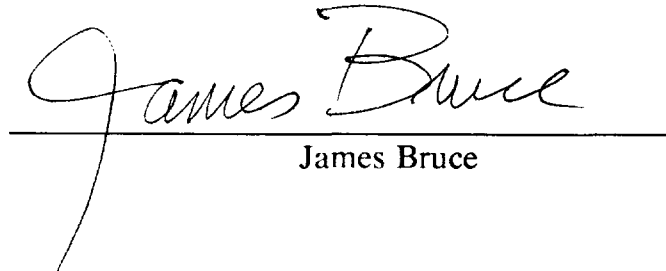
A handwritten signature in cursive script, reading "James Bruce", written over a horizontal line.

James Bruce  
Post Office Box 2068  
Santa Fe, New Mexico 87504-2068  
(505) 982-4554

Attorneys for Santa Fe Energy Operating  
Partners, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Pre-Hearing Statement was mailed to William F. Carr, Esq., Campbell, Carr, Berge & Sheridan, P.A., Post Office Box 2208, Santa Fe, New Mexico 87504-2208, this 9th day of June, 1993, by first-class mail, postage prepaid.

A handwritten signature in cursive script, reading "James Bruce", written over a horizontal line.

James Bruce