

HOLLAND & HART<sup>LLP</sup>



**William F. Carr**  
wcarr@hollandhart.com

January 12, 2004

**HAND DELIVERY**

Ms. Lori Wrotenbery, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**RECEIVED**

JAN 13 2004

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Case 13209

**Re: Application of Yates Petroleum Corporation for approval of a  
unit agreement, Lea County, New Mexico.**

Dear Ms. Wrotenbery:

Enclosed in triplicate is the Application of Yates Petroleum Corporation in the above-referenced case as well as a copy of the legal advertisement. Yates Petroleum Corporation requests that this matter be placed on the February 5, 2003 Examiner Hearing docket.

Very truly yours,

William F. Carr

Enclosures

cc: Mr. Robert Bullock  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118

**Holland & Hart<sup>LLP</sup>**

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

APPLICATION OF YATES PETROLEUM  
CORPORATION FOR APPROVAL JAN 13 2004  
OF A UNIT AGREEMENT,  
LEA COUNTY, NEW MEXICO.

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505  
APPLICATION

CASE NO. 13209

YATES PETROLEUM CORPORATION ("Yates"), through its undersigned attorneys, hereby makes application for an order approving its Tubb State Exploratory Unit and in support of this application states:

1. The proposed Unit Area consists of 1280.00 acres, more or less, of State of New Mexico lands, situated in Lea County, New Mexico. The horizontal limits of said unit are described as follows:

**Township 10 South, Range 34 East, N.M.P.M.**

Section 16: All  
Section 17: All

2. The Unit Agreement has been approved by a sufficient percentage of the interest owners within the proposed Unit Area to provide effective control of unit operations.

3. The Applicant, Yates Petroleum Corporation, is designated as Unit Operator in said Unit Agreement and all oil and gas in the all formations are unitized.

4. The proposed Unit Area covers all, or substantially all, of the geological structures or anomaly involved.

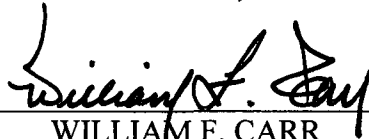
5. Said Unit Agreement and the unitized operation and management of the Unit Area will be in the interest of conservation and the prevention of waste, and that it will protect the correlative rights of all parties concerned.

WHEREFORE, Yates Petroleum Corporation requests that this application be set for hearing before an Examiner of the Oil Conservation Division on February 5, 2004, that notice be given as required by law and the rules of the Division, and that the Tubb State Exploratory Unit be approved.

Respectfully submitted,

HOLLAND & HART, LLP

By:

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

ATTORNEYS FOR YATES PETROLEUM  
CORPORATION

**CASE NO. 13209:**

**Application of Yates Petroleum Corporation for approval of a Unit Agreement, Lea County, New Mexico.** Applicant seeks approval of the Tubb State Exploratory Unit for an area comprising 1280.00 acres of State of New Mexico lands in Sections 16 and 17, Township 10 South, Range 34 East, NMPM which is located approximately 10 miles southwest of Crossroads, New Mexico.