

**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:**

2005 SEP

**CASE NO. 13536**

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

PM 2 12

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Mr. Robert Bullock  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748-1471

**ATTORNEY**

Ocean Munds-Dry, Esq.  
William F. Carr, Esq.  
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**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Van Dyke State Exploratory Unit (formerly the Wills State Exploratory Unit) from the surface to the base of the Mississippian formation in an area comprising 9880.53 acres of State of New Mexico lands in Sections 11, 14, 15, 16, 17, 19, 20, 21, 23, 26, 27, 28, 29, 30, 31, 34 and 35 and to depths below 9400 feet to the base of the

Mississippian in Section 22 in Township 10 South, Range 33 East, NMPM which is located approximately 15 miles west of Crossroads, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**  
(Name and Expertise)

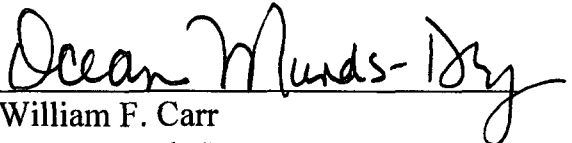
**ESTIMATED TIME**

**EXHIBITS**

**BY AFFIDAVIT**

**PROCEDURAL MATTERS**

Pursuant to Division policy Yates Petroleum Corporation will present this case by Affidavit.

  
William F. Carr  
Ocean Munds-Dry  
Attorneys for Yates Petroleum Corporation