

**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. 13559**

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

**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. Chuck Moran  
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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2005 SEP 16 PM 2 45

WDT 9/16/05

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Mortar State Exploratory Unit from the surface to the top of the PreCambrian formation in an area comprising 1600 acres of State of New Mexico

lands in Sections 23, 25 and 26 in Township 8 South, Range 27 East, NMPM which is located approximately 25 miles northeast of Roswell, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and Expertise)

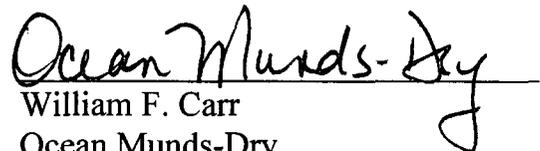
ESTIMATED TIME

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