

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

RECEIVED OCD

2015 JUL -2 P 4: 06

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

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

**Case No. 15342**

**YATES PETROLEUM CORPORATION'S  
PRE-HEARING STATEMENT**

Yates Petroleum Corporation ("Yates") submits its Pre-Hearing Statement as required by the Oil Conservation Division.

**APPEARANCES**

Yates is the applicant in this case. Its business address is 105 S. Fourth Street, Artesia, New Mexico 88210-2118. Yates is represented by the undersigned counsel.

**STATEMENT OF THE CASE**

Yates' application seeks approval of the Tomorrow State Exploratory Unit for all formations from the surface to the base of the Wolfcamp formation in an area comprising 1,920.76 acres, more or less, of State of New Mexico land. The proposed unit is comprised of all of Sections 35 and 36, Township 23 South, Range 35 East and all of Section 2, Township 24 South, Range 35 East, NMPM and is located approximately ten (10) miles northwest of Jal, New Mexico.

**PROPOSED EVIDENCE**

Yates will present its case by affidavit.

**PROCEDURAL MATTERS**

Yates is not aware of any procedural matters to be resolved prior to the hearing.

HINKLE SHANOR LLP



Gary W. Larson

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

[glarson@hinklelawfirm.com](mailto:glarson@hinklelawfirm.com)

*Counsel for Yates Petroleum Corporation*