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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. 13611

**APPLICATION OF YATES PETROLEUM
CORPORATION FOR APPROVAL OF A UNIT
AGREEMENT, LEA 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. Randy Patterson
Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210-2118
(505) 748-1471

ATTORNEY

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William F. Carr, Esq.
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STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the Pitney State Exploratory Unit from the surface to the base of the Mississippian formation in an area comprising 12,480 acres of State of New Mexico and Fee lands in Sections 1, 2, 11, 12, 13, 14, 15, 21, 22, 23, 24, 25, 26, 27, 28, 29, 33, 34, 35, and 36 in Township 12 South, Range 35 East, NMPM, which is located approximately 2 miles west of Tatum, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

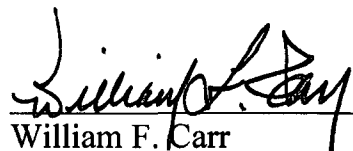
ESTIMATED TIME

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