

**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. 13694**

**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**

<b><u>APPLICANT</u></b>	<b><u>ATTORNEY</u></b>	<b>2006 APR 6 PM 4:58</b>
Mr. Robert Bullock Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210-2118 (505) 748-1471	Ocean Munds-Dry, Esq. William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421	

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Rascal State Exploratory Unit from the surface to the base of the Mississippian formation in an area comprising 963.38 acres of State of New Mexico lands in Sections 18 and 19 in Township 12 South, Range 32 East, NMPM, which is located approximately 10 miles south of Caprock, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and Expertise)

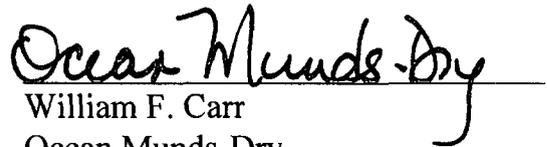
ESTIMATED TIME

EXHIBITS

BY AFFIDAVIT

**PROCEDURAL MATTERS**

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

A handwritten signature in black ink that reads "Ocean Munds-Dry". The signature is written in a cursive style and is positioned above a horizontal line.

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