

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

**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 UNIT AGREEMENT,  
CHAVES COUNTY, NEW MEXICO.**

**CASE NO.: 13915**

**2007 MAY 3 PM 2 54**

**PRE-HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Lucky Briggs  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210  
(505) 478-1471

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart, L.L.P.  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Pigskin State Exploratory Unit from the surface to the base of the Precambrian formation in an area comprising 1240.00 acres of State of New Mexico lands comprised of Sections 13 and 14 of Township 12 South, Range 26 East, NMPM, which is located approximately 20 miles southeast of Roswell, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES  
(Name and Expertise)

ESTIMATED TIME

EXHIBITS

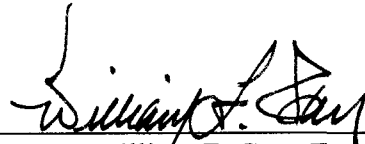
By Affidavit

Approx. 10 minutes

Approx. 2

**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

A handwritten signature in dark ink, appearing to read "William F. Carr", is written over a horizontal line.

William F. Carr, Esq.

**Attorney for  
Yates Petroleum Corporation**