

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

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

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

CASE NO. 13201

**APPLICANT'S PRE-HEARING STATEMENT**

Applicant hereby submits this Pre-Hearing Statement as required by the rules of the New Mexico Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748.1471

**ATTORNEY**

Michael H. Feldewert, Esq.  
Holland & Hart, LLP  
P. O. Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421

**APPLICANT'S STATEMENT OF CASE**

Applicant seeks approval for its proposed Willie State Exploratory Unit, a voluntary unit consisting of approximately 2,240 acres of State of New Mexico lands in Lea County, New Mexico. The proposed Unit Area covers all, or substantially all, of the geological structures or anomaly involved. Yates seeks to be designated unit operator. The Unit Agreement has been approved by a sufficient percentage of the interest owners within the proposed Unit Area to provide effective control of unit operations, and Applicant expects to have an approval letter from the New Mexico State Land office prior to hearing.

**APPLICANT'S PROPOSED EVIDENCE**

WITNESS (Name and Expertise)	ESTIMATED TIME	EXHIBITS
John Amiet, Geologist	Approx. 5 minutes	Yates expects to present this case by affidavit.

**PROCEDURAL MATTERS**

None.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

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Attorneys for Yates Petroleum Corporation