

**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:**

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

**CASE NO. 14473**

**RECEIVED  
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2010 MAY 20 4:37**

**PRE- HEARING STATEMENT**

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

**APPEARANCES OF PARTIES**

**APPLICANT**

Janet Richardson  
Assistant Land Manager  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, NM 88210-2118  
(505) 748-4572

**ATTORNEY**

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

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Herradura Unit for all formations from the surface to the base of the Precambrian formation in an area comprising 7,681.37 acres of Federal, State of New Mexico, and Fee lands comprised of all or portions of Sections 35 and 36 of Township 23 South, Range 25 East, and Sections 1 through 4, 9 through 11, and 15 through 18 of Township 24 South, Range 25 East, NMPM, which is located approximately 15 miles South and West of Carlsbad, New Mexico.

**PROPOSED EVIDENCE**

WITNESSES

ESTIMATED TIME

EXHIBITS

By Affidavit

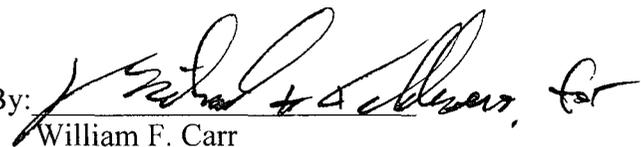
**PROCEDURAL MATTERS**

Yates Petroleum Corporation, has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

By:

A handwritten signature in black ink, appearing to read "William F. Carr", is written over a horizontal line. The signature is cursive and includes a small flourish at the end.

William F. Carr

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**ATTORNEY FOR**

**YATES PETROLEUM CORPORATION**