

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. 10225

THE APPLICATION OF YATES PETROLEUM
CORPORATION FOR APPROVAL OF A UNIT
AGREEMENT, SALT CREEK UNIT AREA,
CHAVES COUNTY, NEW MEXICO

PREHEARING STATEMENT

This prehearing statement is submitted by David R. Vandiver of Fisk & Vandiver, attorneys for Yates Petroleum Corporation, as required by the Oil Conservation Division.

APPEARANCES BY PARTIES

APPLICANT

(name, address, phone and contact person)

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210
(505) 748-1471
Attention: Rob Bullock

ATTORNEY

Fisk & Vandiver
Seventh and Mahone, Suite E
Artesia, New Mexico 88210
(505) 746-9841
Attention: David R. Vandiver

OPPOSITION OR OTHER PARTY

(name, address, phone and contact person)

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefor.)

Yates Petroleum Corporation desires to establish an exploratory unit known as the Salt Creek Unit embracing the following lands in Chaves County, New Mexico:

Township 6 South, Range 21 East, N.M.P.M.

Sections 1 through 36: All

Township 7 South, Range 21 East, N.M.P.M.

Sections 1 through 36: All

Township 7 South, Range 22 East, N.M.P.M.

Sections 3 through 11: All

Sections 14 through 23: All

Sections 26 through 35: All

Township 8 South, Range 21 East, N.M.P.M.

Sections 1 through 5: All

Section 6: E/2 SE/4

Section 7: S/2 NE/4, Lots 12, 13, 18, 19,
20, SE/4

Sections 8 through 17: All

Section 18: E/2

Section 19: Lots 4, 5, 12, 13, 17, 18, 19,
20, E/2

Sections 20 through 24: All

Sections 26 through 29: All

Section 30: Lots 4, 5, 12, 13, 17, 18, 19,
20, E/2

Section 31: Lots 4, 5, 12, 13, 17, 18, 19,
20, E/2

containing 97,800 acres, more or less.

in order to enable Yates to more efficiently and effectively explore for and produce hydrocarbons underlying said lands.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>		<u>EST. TIME</u>	<u>EXHIBITS</u>	
<u>Name</u>	<u>Expertise</u>			
Rob Bullock	Landman	20 mins.	1.	Plat
			2.	Unit Agreement
			3.	Unit Operating Agreement
			4.	Application to the Commissioner of Public Lands for Preliminary approval of the Unit Agreement
			5.	Application to the Bureau of Land Management for designation of the area as logically subject to unit development
D'nese Fly	Geologist	20 mins.	6.	Regional Tectonic Facies Map
			7.	West to East Stratigraphic Cross-Section B-B'

8. Total Intensity Aeromagnetic Contour Map, Structural Contour Map on Top of Abo Formation, Isopach Map of West of West Abo Facies
9. North to South Structural Cross-Section A-A'

OPPOSITION

<u>WITNESSES</u>		<u>EST.</u>	
<u>Name</u>	<u>Expertise</u>	<u>TIME</u>	<u>EXHIBITS</u>

PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to the hearing)

NONE

YATES PETROLEUM CORPORATION

By: 

David R. Vandiver

FI SK & VANDIVER
Seventh and Mahone, Suite E
Artesia, New Mexico 88210
(505) 746-9841

Attorneys for Applicant