

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

**IN THE MATTER OF THE HEARING CALLED BY
THE OIL CONSERVATION COMMISSION FOR THE
PURPOSE OF CONSIDERING:**

CASE NO. 13476

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

PRE-HEARING STATEMENT

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

APPEARANCE OF PARTIES

APPLICANT

Chuck Moran
Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210-2118
(505) 748-4572

ATTORNEY

Ocean Munds-Dry
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421

STATEMENT OF CASE

Applicant in the above-styled cause seeks approval of the Chicken Little State Exploratory Unit from the surface to the base of the Mississippian formation in an area comprising 3323.16 acres of State of New Mexico and Fee lands in Sections 24, 25, 35, and 36 Township 10 South, Range 31 East, NMPM and Irregular Section 4, Irregular Section 5, and Irregular Section 6 of Township 11 South, Range 32 East, NMPM which is located approximately 36 miles north of Maljamar, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

ESTIMATED TIME

EXHIBITS

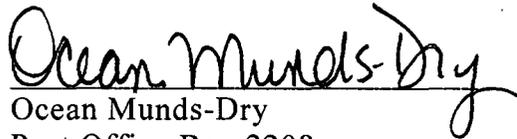
BY AFFIDAVIT

PROCEDURAL MATTERS

Yates Petroleum Corporation has none at this time.

Respectfully submitted,

HOLLAND & HART, LLP



Ocean Munds-Dry
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 facsimile

Attorneys for Yates Petroleum Corporation