

**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:**

2005 SEP

CASE NO. 13536

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

PM 2 12

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Mr. Robert Bullock
Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210-2118
(505) 748-1471

ATTORNEY

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STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the Van Dyke State Exploratory Unit (formerly the Wills State Exploratory Unit) from the surface to the base of the Mississippian formation in an area comprising 9880.53 acres of State of New Mexico lands in Sections 11, 14, 15, 16, 17, 19, 20, 21, 23, 26, 27, 28, 29, 30, 31, 34 and 35 and to depths below 9400 feet to the base of the

Mississippian in Section 22 in Township 10 South, Range 33 East, NMPM which is located approximately 15 miles west of Crossroads, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

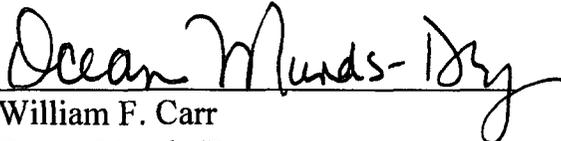
ESTIMATED TIME

EXHIBITS

BY AFFIDAVIT

PROCEDURAL MATTERS

Pursuant to Division policy Yates Petroleum Corporation will present this case by Affidavit.



William F. Carr

Ocean Munds-Dry
Attorneys for Yates Petroleum Corporation