

**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. 13550

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

2005 SEP 2 PM 2 11

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

ATTORNEY

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William F. Carr, Esq.
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STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the Lacrosse State Exploratory Unit from the surface to the top of the PreCambrian formation in an area comprising 3840 acres of State of New Mexico and Fee lands in Sections 22, 27, 28, 32, 33 and 34 in Township 11 South, Range 27

East, NMPM which is located approximately 16 miles southeast of Roswell, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

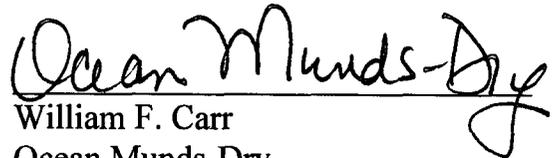
ESTIMATED TIME

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