

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. 13591

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

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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STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the Milsap State Exploratory Unit from the surface to the base of
the Mississippian formation in an area comprising 2240 acres of State of New Mexico and
Fee lands in Sections 25 and 36 in Township 12 South, Range 33 East, NMPM, Section 31 in

WY 12/12/05

Township 12 South, Range 34 East, NMPM, and in Section 6 in Township 13 South, Range 34 East, NMPM which is located approximately 10 miles west of Tatum, 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