

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

**RECEIVED**

**IN THE MATTER OF THE APPLICATION  
OF YATES PETROLEUM CORPORATION  
FOR COMPULSORY POOLING,  
CHAVES COUNTY, NEW MEXICO.**

NOV 3 2003

**CASE NO. 13182** Oil Conservation Division

**APPLICANT'S PRE-HEARING STATEMENT**

Applicant hereby submits this Pre-Hearing Statement as required by the rules of the New Mexico Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Yates Petroleum Corporation

**ATTORNEY**

Michael H. Feldewert, Esq.  
Holland & Hart, LLP  
P. O. Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421

**OPPONENT**

None

**OPPONENT'S ATTORNEY**

None

**APPLICANT'S STATEMENT OF CASE**

Applicant seeks an order pooling all mineral interests in all formations from the surface to the Pre-Cambrian in the following described spacing and proration units located in Section 1, Township 7 South, Range 25 East, N.M.P.M., Chaves County, New Mexico: the N/2 for all formations and/or pools developed on 320-acre spacing which includes but is not necessarily limited to the Undesignated Cottonwood Ranch-Pennsylvanian Gas Pool and the Undesignated Five Mile Draw-Pennsylvanian Gas Pool; the NW/4 for all formations and/or pools developed on

160-acre spacing which includes but is not necessarily limited to the Pecos Slope Abo Gas Pool; and the SE/4 of the NW/4 (Unit F) for all formations and/or pools developed on 40-acre spacing, which includes but is not necessarily limited to the Undesignated Linda-San Andres Pool. Said units are to be dedicated to Applicant's proposed Yankee ANK Fed. Com. Well No. 2 to be drilled at a standard gas well location 1650 feet from the North and West Lines (Unit F) of said Section 1. Yates Petroleum Corporation seeks to be designated operator of the well and the imposition of a 200% risk penalty against the non-consenting interest owners pursuant to Division Rule 19.15.1.35. Said area is located approximately 25 miles Northeast of Roswell, New Mexico.

**APPLICANT'S PROPOSED EVIDENCE**

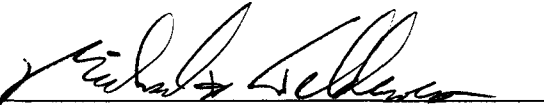
WITNESS (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Chuck Moran, Landman	Approx. 15 minutes	Approx. 6

**PROCEDURAL MATTERS**

None.

Respectfully submitted,

HOLLAND & HART, LLP

By: 

Michael H. Feldewert  
P.O. Box 2208  
Santa Fe, NM 87504-2208  
505/988-4421  
Attorneys for Yates Petroleum Corporation