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January 18, 1991

Energy, Minerals and Natural  
Resources Department  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87504

Re: Case No. 10223: Cowboy Draw Unit  
Case No. 10224: Blackwater Unit  
Case No. 10225: Salt Creek Unit

Gentlemen:

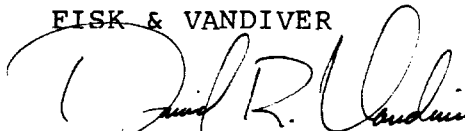
Enclosed for filing, please find the Prehearing Statements of  
Yates Petroleum Corporation.

These matters are set for hearing before an Examiner on January  
24, 1991.

Thank you.

Very truly yours,

FI SK & VANDIVER



David R. Vandiver

DRV:pvw  
Enclosures

cc w/enclosures: Mr. Rob Bullock

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. 10223

THE APPLICATION OF YATES PETROLEUM  
CORPORATION FOR APPROVAL OF A UNIT  
AGREEMENT, COWBOY DRAW UNIT AREA,  
CHAVES COUNTY, NEW MEXICO

PREHEARING STATEMENT

This prehearing statement is submitted by David R. Vandiver of Fisk & Vandiver, attorneys for Yates Petroleum Corporation, as required by the Oil Conservation Division.

APPEARANCES BY PARTIES

APPLICANT

(name, address, phone and contact person)

Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210  
(505) 748-1471  
Attention: Rob Bullock

ATTORNEY

Fisk & Vandiver  
Seventh and Mahone, Suite E  
Artesia, New Mexico 88210  
(505) 746-9841  
Attention: David R. Vandiver

OPPOSITION OR OTHER PARTY

(name, address, phone and contact person)

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefor.)

Yates Petroleum Corporation desires to establish an exploratory unit known as the Cowboy Draw Unit embracing the following lands in Chaves County, New Mexico:

Township 4 South, Range 20 East, N.M.P.M.

Sections 1 through 3: All  
Sections 10 through 15: All  
Sections 17 through 36: All

Township 4 South, Range 21 East, N.M.P.M.

Sections 6 through 7: All  
Sections 18 through 19: All

Township 5 South, Range 20 East, N.M.P.M.

Sections 1 through 12: All

containing 28,800 acres, more or less,

in order to enable Yates to more efficiently and effectively explore for and produce hydrocarbons underlying said lands.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>		<u>EST. TIME</u>	<u>EXHIBITS</u>	
<u>Name</u>	<u>Expertise</u>			
Rob Bullock	Landman	20 mins.	1.	Plat
			2.	Unit Agreement
			3.	Unit Operating Agreement
			4.	Application to the Commissioner of Public Lands for Preliminary approval of the Unit Agreement
			5.	Application to the Bureau of Land Management for designation of the area as logically subject to unit development
D'nese Fly	Geologist	20 mins.	6.	Regional Tectonic Facies Map
			7.	West to East Stratigraphic Cross-Section B-B'
			8.	Total Intensity Aeromagnetic Contour Map, Structural Contour Map on Top of Abo Formation, Isopach Map of West of West Abo Facies
			9.	North to South Structural Cross-Section A-A'

OPPOSITION

<u>WITNESSES</u>		<u>EST.</u>	
<u>Name</u>	<u>Expertise</u>	<u>TIME</u>	<u>EXHIBITS</u>

**PROCEDURAL MATTERS**

(Please identify any procedural matters which  
need to be resolved prior to the hearing)

NONE

YATES PETROLEUM CORPORATION

By: 

David R. Vandiver

FISK & VANDIVER

Seventh and Mahone, Suite E  
Artesia, New Mexico 88210  
(505) 746-9841

Attorneys for Applicant