

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

RECEIVED

MAR 12 2004

IN THE MATTER OF THE HEARING CALLED BY THE  
OIL CONSERVATION DIVISION FOR THE PURPOSE OF  
CONSIDERING:

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

CASE NO. 13233

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. Randy Patterson  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748.1471

ATTORNEY

William F. Carr, Esq.  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988.4421

WFC  
3/12/04

STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the Statler State Exploratory Unit for an area comprising  
3839.60 acres of State of New Mexico lands in Sections 33, 34 and 35, Township 11 South,  
Range 35 East, which is located approximately 8 miles northwest of Tatum, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT**

**WITNESSES**  
(Name and Expertise)

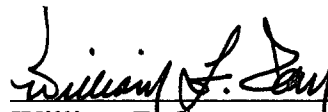
**ESTIMATED TIME**

**EXHIBITS**

**BY AFFIDAVIT**

**PROCEDURAL MATTERS**

Yates Petroleum Corporation will present this case by Affidavit.

A handwritten signature in black ink, appearing to read "William F. Carr", is written over a horizontal line.

William F. Carr

Attorney for Yates Petroleum Corporation