

**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. 3414

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

2005 FEB 11 AM 11 55

**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

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Brick State Exploratory Unit for all formations from the surface to the base of the Siluro-Devonian formation in an area comprising 2,520 acres, more or less, of State of New Mexico lands in Sections 8, 9, 10, and 16 of Township 8 South, Range 27 East, NMPM, which is located approximately 17 miles east 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.

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

William F. Carr  
Attorney for Yates Petroleum Corporation