

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

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

CASE NO. 13476

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

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by  
the Oil Conservation Division.

**APPEARANCE OF PARTIES**

APPLICANT

Chuck Moran  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748-4572

ATTORNEY

Ocean Munds-Dry  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421

**STATEMENT OF CASE**

Applicant in the above-styled cause seeks approval of the Chicken Little State  
Exploratory Unit from the surface to the base of the Mississippian formation in an area  
comprising 3323.16 acres of State of New Mexico and Fee lands in Sections 24, 25, 35,  
and 36 Township 10 South, Range 31 East, NMPM and Irregular Section 4, Irregular  
Section 5, and Irregular Section 6 of Township 11 South, Range 32 East, NMPM which  
is located approximately 36 miles north of Maljamar, New Mexico.

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES  
(Name and Expertise)

ESTIMATED TIME

EXHIBITS

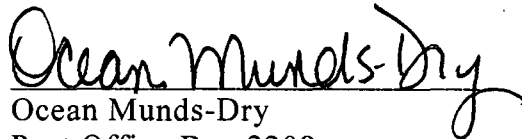
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**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

Respectfully submitted,

HOLLAND & HART, LLP



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**Attorneys for Yates Petroleum Corporation**