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. 13535

2005

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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

ATTORNEY

Mr. Robert Bullock

Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210-2118 (505) 748-1471 Ocean Munds-Dry, Esq. William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421

STATEMENT OF CASE

<u>APPLICANT</u>

Applicant seeks approval of the Ike State Exploratory Unit from the surface to the base of the Mississippian formation in an area comprising 3016.04 acres of State of New Mexico lands in Sections 25 and 36 in Township 12 South, Range 34

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Pre-Hearing Statement NMOCD Case No. 13529 Page 2

East, and Sections 29, 30, 31, and 32 in Township 12 South, Range 35 East, NMPM which is located approximately 10 miles west of Tatum, New Mexico.

PROPOSED EVIDENCE

APPLICANT

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WITNESSES (Name and Expertise) ESTIMATED TIME

EXHIBITS

BY AFFIDAVIT

PROCEDURAL MATTERS

Pursuant to Division policy Yates Petroleum Corporation will present this case by Affidavit.

William F. Carr Ocean Munds-Dry Attorneys for Yates Petroleum Corporation