

**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:**

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

CASE NO. 13592

RECEIVED

NOV 10 2005

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

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. Chuck Moran

Yates Petroleum Corporation
105 South Fourth Street
Artesia, New Mexico 88210-2118
(505) 748-1471

ATTORNEY

Ocean Munds-Dry, Esq.
William F. Carr, Esq.
Holland & Hart LLP
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Santa Fe, New Mexico 87504-2208
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Applicant seeks approval of the DeHavilland State Exploratory Unit from the surface to the base of the Pre-cambrian formation in an area comprising 7038.69 acres of State of New Mexico lands in Sections 6, 7, 16, 17, 18, 20, 21, 28, 29, 32

and 33 25 and 36 in Township 5 South, Range 26 East, NMPM which is located approximately 12 miles northeast of Elkins, New Mexico.

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and Expertise)

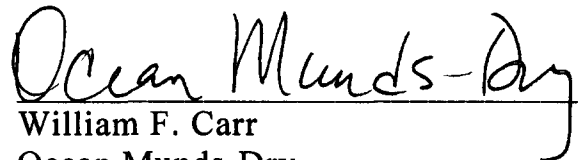
ESTIMATED TIME

EXHIBITS

BY AFFIDAVIT

PROCEDURAL MATTERS

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



William F. Carr

Ocean Munds-Dry

Attorneys for Yates Petroleum
Corporation