

**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. 13591**

**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. 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.  
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Post Office Box 2208  
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**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the Milsap State Exploratory Unit from the surface to the base of the Mississippian formation in an area comprising 2240 acres of State of New Mexico and Fee lands in Sections 25 and 36 in Township 12 South, Range 33 East, NMPM, Section 31 in

WY 12/12/05

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Township 12 South, Range 34 East, NMPM, and in Section 6 in Township 13 South, Range 34 East, NMPM which is located approximately 10 miles west of Tatum, 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.

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