

HOLLAND & HART LLP



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March 28, 2006

**HAND DELIVERY**

Mr. Mark Fesmire, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

*Case 13698*

**Re: Application of Yates Petroleum Corporation for approval of a  
unit agreement, Eddy County, New Mexico.**

Dear Mr. Fesmire:

Enclosed in triplicate is the Application of Yates Petroleum Corporation in the above-referenced case as well as a copy of the legal advertisement. Yates Petroleum Corporation requests that this matter be placed on the April 27, 2006 Examiner Hearing docket.

Sincerely,

*Ocean Munds-Dry*  
Ocean Munds-Dry

Enclosures

cc: Ms. Susan Vierra  
Yates Petroleum Corporation  
105 South Fourth Street  
Artesia, New Mexico 88210-2118

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

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

CASE NO. 13698

**APPLICATION**

YATES PETROLEUM CORPORATION ("Yates"), through its undersigned attorneys, hereby makes application for an order approving its Manchester State Exploratory Unit and in support of this application states:

1. The proposed Unit Area consists of 2,240 acres, more or less, of State of New Mexico lands, situated in Eddy County, New Mexico. The horizontal limits of said unit are described as follows:

**Township 19 South, Range 23 East, N.M.P.M.**

Section 20: All  
Section 29: All  
Section 31: E/2  
Section 32: All

2. The Unit Agreement has been approved by a sufficient percentage of the interest owners within the proposed Unit Area to provide effective control of unit operations.

3. The Applicant, Yates Petroleum Corporation, is designated as Unit Operator in said Unit Agreement and all oil and gas in all formations are unitized.


4. The unit boundaries are consistent and substantially supported by the geological limits of the unitized formations.

5. Said Unit Agreement and the unitized operation and management of the Unit Area will be in the interest of conservation and the prevention of waste, and it will protect the correlative rights of all parties concerned.

WHEREFORE, Yates Petroleum Corporation requests that this application be set for hearing before an Examiner of the Oil Conservation Division on April 27, 2006, that notice be given as required by law and the rules of the Division, and that the Manchester State Exploratory Unit be approved.

Respectfully submitted,

HOLLAND & HART, LLP

By:   
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ATTORNEYS FOR YATES PETROLEUM  
CORPORATION

CASE NO. 13698:

**Application of Yates Petroleum Corporation for approval of a Unit Agreement, Eddy County, New Mexico.** Applicant seeks approval of the Manchester State Exploratory Unit from the surface to the base of the Morrow formation in an area comprising 2,240 acres of State of New Mexico lands in Sections 20, 29, 31, and 32 in Township 19 South, Range 23 East, NMPM, which is located approximately 20 miles west of Lakewood, New Mexico.