

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

**RECEIVED**

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

MAR 21 2003

Oil Conservation Division

CASE NO. 13037

**APPLICATION OF YATES PETROLEUM CORPORATION  
FOR APPROVAL OF UNIT AGREEMENT, CHAVES 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**

Yates Petroleum Corporation  
Attn: Mr. Randy Patterson  
105 South Fourth Street  
Artesia, New Mexico 88210-2118  
(505) 748.1471

**ATTORNEY**

William F. Carr, Esq.  
Holland & Hart LLP and Campbell & Carr  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
(505) 988.4421

**STATEMENT OF CASE**

**APPLICANT**

Applicant seeks approval of the BiPlane Exploratory Unit for an area comprising 2170.72 acres of State of New Mexico, Federal and Fee lands in Sections 3, 4, 9, 10 15, and 16, of Township 6 South, Range 27 East, which is located approximately 3 miles west of Dougherty, New Mexico.

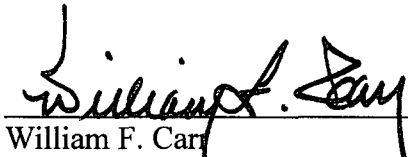
**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Chuck Moran (Land)	Approx. 15 Minutes	Approx.. 6
Tim Miller (Geology)	Approx. 15 Minutes	Approx. 3

**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

  
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William F. Carr  
Attorney for Yates Petroleum Corporation

WVD