

**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. 10641

APPLICATION OF YATES DRILLING  
COMPANY FOR THE EXPANSION OF THE  
CACTUS QUEEN (VOLUNTARY) UNIT  
AND FOR THE AMENDMENT OF  
DIVISION ORDER NO. R-9075-A,  
CHAVES COUNTY, NEW MEXICO.

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,  
as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT**

Yates Petroleum Corporation\_\_\_\_\_  
c/o Toby Rhodes\_\_\_\_\_  
105 South Fourth Street\_\_\_\_\_  
Artesia, New Mexico 88210\_\_\_\_\_  
(505) 748-1471\_\_\_\_\_  
name, address, phone and  
contact person

**ATTORNEY**

William F. Carr, Esq.\_\_\_\_\_  
Campbell, Carr, Berge & Sheridan, P.A.  
Post Office Box 2208\_\_\_\_\_  
Santa Fe, New Mexico 87504\_\_\_\_\_  
(505) 988-4421\_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**STATEMENT OF CASE**

**APPLICANT**

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Yates Drilling Company, applicant in the above-captioned cause, seeks an amendment of Division Order No. R-9075-A which approved the voluntary unitization (for the purpose of establishing a secondary recovery project) of the Queen formation underlying the Cactus Queen Unit Area, which encompasses 320-acres, more or less, in portions of Sections 27 and 34, Township 12 South, Range 31 East, Southeast Chaves Queen Gas Area Associated Pool, to include at this time an additional 320-acres, more or less, comprising the SW/4 NE/4, S/2 NW/4, SW/4 and NW/4 SE/4 of said Section 34.

**OPPOSITION OR OTHER PARTY**

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

**PROPOSED EVIDENCE**

APPLICANT

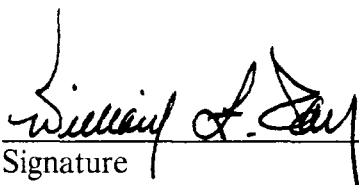
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Doug Hurlbutt, Landman	10 Min.	Approximately 3
Toby Rhodes, Engineering	20 Min.	Approximately 3

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
-----------------------------------	-----------	----------

**PROCEDURAL MATTERS**

Yates Drilling Company respectfully requests that this case be consolidated with Oil Conservation Division Case No. 10642 for purposes of testimony.

  
\_\_\_\_\_  
Signature