# STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION HE MATTER OF THE HEARING LED BY THE OIL CONSERVATION 33.

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

name, address, phone and

contact person

CASE NO. 12282

APPLICATION OF YATES PETROLEUM CORPORATION FOR APPROVAL OF A UNIT AGREEMENT LEA 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 ATTORNEY** Yates Petroleum Corporation William F. Carr, Esq. Attn: Robert Bullock Campbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208 105 South Fourth Street Artesia, New Mexico 88210 Santa Fe, New Mexico 87504 (505) 982-1935 (505) 988-4421 name, address, phone and contact person OPPOSITION OR OTHER PARTY **ATTORNEY**

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### STATEMENT OF CASE

### **APPLICANT**

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

Applicant seeks approval of the East Sand Springs State Unit for an area comprising of 4573.92 acres, more or less, of state lands in all or portions of Sections 34 and 35, Township 10 South, Range 34 East; Sections 13 and 24, Township 11 South, Range 34 East; and Sections 5, 6, 7, and 18, Township 11 South, Range 35 East. The unit area is located approximately 12 miles east of Caprock, New Mexico.

### 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.)

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### PROPOSED EVIDENCE

### **APPLICANT**

WITNESSES EST. TIME EXHIBITS (Name and expertise)

Robert Bullock 10 Min. Approx. 6

(Landman)

Reed Meek 10 Min. Approx. 2 (Geologist)

## **OPPOSITION**

WITNESSES EST. TIME EXHIBITS (Name and expertise)

### **PROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to hearing)

Signature

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CERTIFICATE OF MAILING

I hereby certify that on this 12 day of November, 1999, I have caused to be hand-delivered a copy of our Pre-Hearing Statement in the above-captioned cases to the following counsel of record:

James Bruce, Esq. P.O. Box 1056 Santa Fe, NM 87504

William F. Carr