

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

**RECEIVED**

AUG 21 2002

Oil Conservation Division

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

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

**CASE NO. 12911**

**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. Randy Patterson  
Yates Petroleum Corporation  
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 West Echols State Exploratory Unit for an area comprising 11,284.24 acres of State of New Mexico lands located in Section 36 of Township 10 South, Range 37 East, NMPM, Sections 1, 2, 10, 11, 12, 13, 14, 15, 16, 23, and 24 of Township 11 South, Range 37 East, NMPM and Sections 4, 5, 6, 7, 8, 9, 17, 18, 19 and 20 of Township 11 South, Range 38 East, NMPM which is located approximately 10 miles northeast of Tatum, New Mexico.

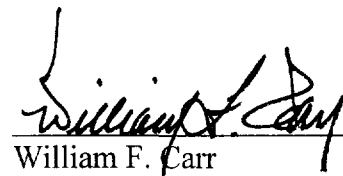
**PROPOSED EVIDENCE**

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
John Amiet (Geology)	Approx. 15 Minutes	Approx. 7

**PROCEDURAL MATTERS**

Yates Petroleum Corporation has none at this time.

  
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William F. Carr  
Attorney for Yates Petroleum Corporation

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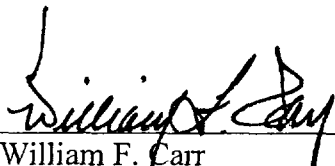
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