

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:

APPLICATION OF APACHE CORPORATION FOR
CONTRACTION OF THE HARE-SAN ANDRES
GAS POOL, EXPANSION OF THE EAST HARE-
SAN ANDRES POOL, AND FOR SPECIAL POOL
RULES FOR THE EAST HARE-SAN ANDRES
POOL, LEA COUNTY, NEW MEXICO.

No. 13,256

(13256)

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by
the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation
Suite 1500
6120 South Yale
Tulsa, Oklahoma 74136

APPLICANT'S ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Mario R. Moreno, Jr.
(918) 491-4963

WJB
4/26/04

OPPONENTOPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order (i) contracting the horizontal boundaries of the Hare-San Andres Gas Pool to delete therefrom the S½ of Section 10, Township 21 South, Range 37 East, NMPM, (i) expanding the East Hare-San Andres Pool, which currently covers the SE¼ of Section 10 in said township and range, to include the S½ of Section 9, SW¼ of Section 10, and NW¼ of Section 16 in said township and range, and (iii) instituting special pools rules for the East Hare-San Andres Pool, including a gas:oil ratio of 5,000 cubic feet of gas for each barrel of oil produced.

OPPONENT

PROPOSED EVIDENCE**APPLICANT****WITNESSES**Mario Moreno
(landman)**EST. TIME**

10 Min.

EXHIBITS

Approx. 3

Bob Curtis
(geologist)

10 min.

Approx. 5

Kevin Mayes
(engineer)


15 min.

Approx. 3

OPPONENT**WITNESSES****EST. TIME****EXHIBITS****PROCEDURAL MATTERS**

-None-

Respectfully submitted,

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Apache Corporation