



MODRALL SPERLING

L A W Y E R S

May 10, 2018

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Florene Davidson
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**Re: No. 16142
APPLICATION OF APACHE CORPORATION FOR A
NON-STANDARD SPACING AND PRORATION UNIT,
NON-STANDARD LOCATIONS, AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

**No. 16143
APPLICATION OF APACHE CORPORATION FOR A
NON-STANDARD SPACING AND PRORATION UNIT,
NON-STANDARD LOCATIONS, AND COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO**

Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. Apache's Pre-Hearing Statement – Palmillo

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

Zina Crum, Legal Assistant to
Jennifer L. Bradfute

JLB/zc
Enclosure

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Modrall Sperling
Roehl Harris & Sisk
P.A.

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

**APPLICATION OF APACHE CORPORATION
FOR A NON-STANDARD SPACING AND
PRORATION UNIT, NON-STANDARD
LOCATIONS, AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16142

**APPLICATION OF APACHE CORPORATION
FOR A NON-STANDARD SPACING AND
PRORATION UNIT, NON-STANDARD
LOCATIONS, AND COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 16143

APACHE CORPORATION'S PRE-HEARING STATEMENT

Apache Corporation ("Apache"), submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation
303 Veterans Airpark Lane
Suite 3000
Midland, TX 79705

ATTORNEY

Earl E. DeBrine, Jr., Esq.
Jennifer L. Bradfute, Esq.
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
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STATEMENT OF CASE

In Case No. 16142, Apache by and through its attorneys, Modrall, Sperling, Roehl, Harris & Sisk, P.A., files an application with the Oil Conservation Division for an order: (1) creating a non-standard 160-acre, more or less, spacing and proration

unit in the Bone Spring formation, comprised of the S2/ N/2 of Section 26, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico; and, (2) approving non-standard locations; and (3) pooling all mineral interests in the Bone Spring formation underlying this proposed non-standard spacing and proration unit.

In Case No. 16143, Apache seeks an order: (1) creating a non-standard 160-acre, more or less, spacing and proration unit in the Bone Spring formation, comprised of the N/2 N/2 of Section 26, Township 19 South, Range 28 East, NMPM, Eddy County, New Mexico; and, (2) approving non-standard locations; and (3) pooling all mineral interests in the Bone Spring formation underlying this proposed non-standard spacing and proration unit.

PROPOSED EVIDENCE

APPLICANT:

| <u>WITNESS</u> | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|----------------------------|-----------------------|-----------------|
| Ashley St. Pierre– Landman | Approx. 20 min. | Approx. 6 |
| Mike Muncy – Geologist | Approx. 15 min. | Approx. 6 |
| Mindy Goldsmith –Engineer | Approx. 10 min. | Approx. 2 |

PROCEDURAL MATTERS

Apache asks that these matters be consolidated at hearing.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: 
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Attorneys for Apache Corporation