

**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 CORP. FOR
COMPULSORY POOLING, ETC., EDDY COUNTY,
NEW MEXICO.**

Case No. 20171

**APPLICATION OF APACHE CORP. FOR
COMPULSORY POOLING, ETC., EDDY COUNTY,
NEW MEXICO.**

Case No. 20202

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Ascent Energy, LLC ("Ascent") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT
Apache Corp.

APPLICANT'S ATTORNEY
Deanna Bennett

OPPONENT
Ascent Energy, LLC

OPPONENT'S ATTORNEY
James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attention: Lee Zink

STATEMENT OF THE CASES

APPLICANT

Apache Corp. seeks the pooling of horizontal spacing units in Sections 28, 29, and 30, Township 20 South, Range 30 East, NMPM.

OPPONENT

Ascent filed applications covering Sections 28 and 33, Township 20 South, Range 30 East, NMPM. Ascent requests that Apache's applications be denied, and that Ascent's applications (Cases 16481 and 16482) be approved.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

Lee Zink
(landman)

15 min.

Approx. 10

William Metz
(geologist)

20 min.

Approx. 10

Alex Yancey
(engineer)

20 Min.

Approx. 5

PROCEDURAL MATTERS

Apache did not follow proper pooling procedures, and its applications should be dismissed.

Respectfully submitted,

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

Attorney for Ascent Energy, LLC