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

**APPLICATION OF APACHE CORPORATION  
FOR APPROVAL OF THE PACIFICO STATE  
SAN ANDRES UNIT, IN LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 15400**

**APACHE CORPORATION'S PRE-HEARING STATEMENT**

Apache Corporation ("Apache"), submits this Pre-Hearing Statement for the above-referenced case 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  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
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**STATEMENT OF CASE**

**APPLICANT:**

Applicant in the above-styled cause seeks an order from the Division approving its Pacifico State San Andres Exploratory Unit pursuant to 19.15.20.14 NMAC. The proposed Unit Area for the Unit consists of approximately 4,312.30 acres of state lands situated in Lea County, New Mexico, described as follows:

**Township 10 South, Range 36 East, N.M.P.M.**

Section 5: S/2  
Section 6: S/2  
Section 7: All

Section 8: All  
Section 16: All  
Section 17: N/2  
Section 18: N/2, SW/4, and N/2SE/4  
Section 19: N/2  
Section 20: E/2  
Section 21: NW/4 and W/2NE/4

The unitized interval is the stratigraphic equivalent of the San Andres formation defined at a depth of 4,243' down to the base of the formation at a measured depth of 5,643' as encountered in the Gainer 22 #1 well (API No. 30-025-38792) in Section 22, Township 10 South, Range 36 East, Lea County, New Mexico. Said subject acreage is located approximately 3 miles Southeast of Crossroads, New Mexico.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**


<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Laci Lawrence – Landman	Approx. 15	Approx. 6
Adam Anderson - Geologist	Approx. 10	Approx. 6
Juan Garcia Vaca – Reservoir Engineer	Approx. 10 min.	Approx. 2

### **PROCEDURAL MATTERS**

Apache does not have any procedural matters at this time.

Respectfully submitted,

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

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**ATTORNEYS FOR APACHE CORPORATION**