

**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:**

2005 DEC 5 PM 4 54

**APPLICATION OF APACHE CORPORATION FOR
SIMULTANEOUS DEDICATION, AN UNORTHODOX
GAS WELL LOCATION, AND APPROVAL OF TWO
OPERATORS ON A GAS WELL UNIT, LEA COUNTY,
NEW MEXICO.**

Case No. 13,837

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

Attention: Steffanie Hayes

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks approval to re-complete its North Bell Lake Fed. Well No. 3 as an infill well in an existing 640 acre gas spacing unit in the North Bell Lake-Devonian Gas Pool comprising all of Section 6, Township 23 South, Range 34 East, N.M.P.M., at an unorthodox location 1930 feet from the north line and 660 feet from the east line (Unit H) of Section 6. Applicant further seeks to simultaneously dedicate production from the North Bell Lake-Devonian Gas Pool in Section 6 to the North Bell Lake Fed. Well No. 3 and to Kaiser-Francis Oil Company's Bell Lake Unit Well No. 6, located 660 feet from the south line and 1980 feet from the east line (Unit O) of Section 6, and to allow applicant to operate the North Bell Lake Fed. Well No. 3.

WJ 12/5/06

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Steffanie Hayes (landman)	10 min.	Approx. 3
Robert Curtis (geologist)	15 min.	Approx. 5
Kevin Mayes (engineer)	15 min.	Approx. 5

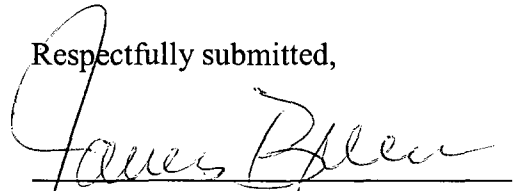
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

-None-

Respectfully submitted,




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

Attorney for Apache Corporation

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record via facsimile transmission this 5th day of December, 2006:

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James Bruce