

**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  
AN EXCEPTION TO DIVISION ORDER NOS. R-9922-E  
AND R-12121 TO PERMIT A THIRD WELL ON A WELL  
UNIT, EDDY COUNTY, NEW MEXICO.**

**Case No. 14,176**

**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: Paul Brindle

**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 an exception to Division Order Nos. R-9922-E and R-12121 to allow it to drill, complete, and produce the Lowe State Well No. 7, as an infill well in an existing 320 acre spacing unit in the Indian Basin-Upper Pennsylvanian Associated Pool comprised of the W/2 of Section 36, Township 21 South, Range 23 East, N.M.P.M., at an orthodox location in the NW/4NW/4 (Unit D) of Section 36. Applicant further seeks to simultaneously dedicate production from the Indian Basin-Upper Pennsylvanian Associated Pool in the W/2 of Section 36 to the proposed Lowe State Well No. 7 and to the existing (i) Lowe State Well No. 5, located 1650 feet from the south line and 2450 feet from the west line, and (ii) Lowe State Well No. 6, located 660 feet from the south line and 990 feet from the west line, of Section 36.

OPPONENT**PROPOSED EVIDENCE**APPLICANTWITNESSESEST. TIMEEXHIBITS

Paul Brindle  
(landman)

10 min.

Approx. 4

Robert Curtis  
(geologist)

25 min.

Approx. 8

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(engineer)

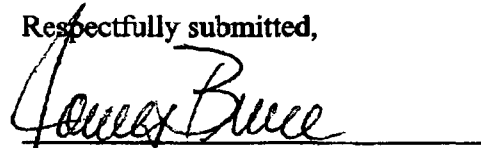
30 min.

Approx. 6

OPPONENTWITNESSESEST. TIMEEXHIBITS**PROCEDURAL MATTERS**

Applicant requests that this case be consolidated for hearing with Case No. 14,177 (Application of Apache Corporation for an exception to Division Order No. R-9922-E to permit a third well on a well unit, Eddy County, New Mexico).

Respectfully submitted,



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

Attorney for Apache Corporation