

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

APPLICATION OF APACHE CORPORATION **CASE NO. 21837**
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

APPLICATION OF APACHE CORPORATION **CASE NO. 21838**
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

APPLICATION OF APACHE CORPORATION **CASE NO. 21839**
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

APPLICATION OF APACHE CORPORATION **CASE NO. 21840**
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO

AMENDED CONSOLIDATED PRE-HEARING STATEMENT

Apache Corporation (“Apache”) submits this *Amended* Consolidated Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation

ATTORNEY

Earl E. DeBrine
Deana M. Bennett
Jamie L. Allen
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

INTERESTED PARTY

Colgate Operating, LLG

V-F Petroleum

COG Operating LLC and
Concho Oil and Gas

ATTORNEY

Ernest Padilla
Padilla Law Firm
P.O. Box 2523
Santa Fe, NM 87504-2523
padillalaw@qwestoffice.net

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com

Ocean Munds-Dry
Elizabeth Ryan
COG Operating LLC
1048 Paseo de Peralta
Santa Fe, NM 87501
Ocean.munds@conocophillips.com
Beth.Ryan@conocophillips.com

STATEMENT OF CASES

In Case No. 21837, Apache seeks an order from the Division pooling all uncommitted mineral interests within a Bone Spring standard horizontal spacing unit underlying the N/2 N/2 of Sections 25 and 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. This standard spacing unit will be dedicated to the Camacho 25-26 State Com 201H and Camacho 25-26 State Com 301H wells, to be horizontally drilled. The producing intervals for these wells will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Apache as operator of the wells, and a 200% charge for risk involved in drilling said wells.

In Case No. 21838, Apache seeks an order from the Division pooling all uncommitted mineral interests within a Bone Spring standard horizontal spacing unit underlying the S/2 N/2 of Sections 25 and 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. This standard spacing unit will be dedicated to the Camacho 25-26 State Com 202H and Camacho 25-26 State Com 302H wells, to be horizontally drilled. The producing intervals for these wells will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision,

designation of Apache as operator of the wells, and a 200% charge for risk involved in drilling said wells.

In Case No. 21839, Apache seeks an order from the Division pooling all uncommitted mineral interests within a Bone Spring standard horizontal spacing unit underlying the N/2 S/2 of Sections 25 and 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. This standard spacing unit will be dedicated to the Camacho 25-26 State Com 203H and Camacho 25-26 State Com 303H wells, to be horizontally drilled. The producing intervals for these wells will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Apache as operator of the wells, and a 200% charge for risk involved in drilling said wells.

In Case No. 21640, Apache seeks an order from the Division pooling all uncommitted mineral interests within a Bone Spring standard horizontal spacing unit underlying the S/2 S/2 of Sections 25 and 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. This standard spacing unit will be dedicated to the Camacho 25-26 State Com 204H and Camacho 25-26 State Com 304H wells, to be horizontally drilled. The producing intervals for these wells will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Apache as operator of the wells, and a 200% charge for risk involved in drilling said wells.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Landman - Blake Johnson	Approx. 1 Minute	Approx. 8
Geologist - TBD	Approx. 1 Minute	Approx. 12

PROCEDURAL ISSUES

Apache has had discussions with the parties who have entered in these cases and the parties who have entered an appearance do not object to Apache presenting these cases by affidavit. In addition, Apache and the other parties have reached an agreement regarding the deadline for submitting exhibits in this matter. The Pre-Hearing Order filed in these cases directed the parties to file with their pre-hearing statement required by 19.15.4.13.B NMAC, (a) list of material facts not in dispute; (b) a list of disputed facts and issues; (c) the identification of the witnesses and their qualifications; and (d) a full narrative of the direct testimony and exhibits for each witness. All of the parties who have entered an appearance have since agreed that these cases can now be presented by Affidavit in accordance with 19.15.4.12(A)(1)(b) and the Division’s Notice for Compulsory Pooling Applications Presented by Affidavits. Apache will therefore file its exhibits for these cases on or before July 13, 2021.

Respectfully submitted,

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

By: /s/ Deana M. Bennett

Earl E. DeBrine, Jr.

Deana M. Bennett

Jamie L. Allen

Post Office Box 2168

500 Fourth Street NW, Suite 1000

Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800

edebrine@modrall.com

deana.bennett@modrall.com

jallen@modrall.com

Attorneys for Applicant Apache Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Ernest Padilla
Padilla Law Firm
P.O. Box 2523
Santa Fe, NM 87504-2523
padillalaw@qwestoffice.net

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
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dhardy@hinklelawfirm.com
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Ocean Munds-Dry
Elizabeth Ryan
COG Operating LLC
1048 Paseo de Peralta
Santa Fe, NM 87501
Ocean.munds@conocophillips.com
Beth.Ryan@conocophillips.com

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

By: /s/ Deana M. Bennett
Deana M. Bennett

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 35685

QUESTIONS

Operator: APACHE CORPORATION 303 Veterans Airpark Ln Midland, TX 79705	OGRID: 873
	Action Number: 35685
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>