

**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**

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**INTERESTED PARTY**

Colgate Operating, LLG

V-F Petroleum

COG Operating LLC and  
Concho Oil and Gas

**ATTORNEY**

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**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

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*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:

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

QUESTIONS

Action 35690

**QUESTIONS**

Operator: APACHE CORPORATION 303 Veterans Airpark Ln Midland, TX 79705	OGRID: 873
	Action Number: 35690
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	2
Testimony time (in minutes)	20