

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

**APPLICATION OF APACHE CORPORATION  
TO AMEND ORDERS,  
EDDY COUNTY, NEW MEXICO**

**CASE NOS. 23037–23040**

**CONSOLIDATED PRE-HEARING STATEMENT**

Apache Corporation (“Apache”) submits this 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  
Bryce H. Smith  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800

**STATEMENT OF CASES**

In Case No. 23037, Apache seeks an order from the Division for the limited purpose of amending Order No. R-21906 to allow for a one-year extension of time to commence drilling the initial well under the Order. Order No. R-21906 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring horizontal spacing unit comprised of the N/2 N/2 of Sections 25 and 26, Township 19 South, Range 27 East, N.M.P.M., Eddy County, New Mexico. Said area is located approximately 16 miles southeast of Artesia, New Mexico.

In Case No. 23038, Apache seeks an order from the Division for the limited purpose of amending Order No. R-21907 to allow for a one-year extension of time to commence drilling the initial well under the Order. Order No. R-21907 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring horizontal spacing unit comprised of the S/2 N/2 of Sections 25 and 26, Township 19 South, Range 27 East, N.M.P.M., Eddy County, New Mexico. Said area is located approximately 16 miles southeast of Artesia, New Mexico.

In Case No. 23039, Apache seeks an order from the Division for the limited purpose of amending Order No. R-21908 to allow for a one-year extension of time to commence drilling the

initial well under the Order. Order No. R-21908 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring horizontal spacing unit comprised of the N/2 S/2 of Sections 25 and 26, Township 19 South, Range 27 East, N.M.P.M., Eddy County, New Mexico. Said area is located approximately 16 miles southeast of Artesia, New Mexico.

In Case No. 23040, Apache seeks an order from the Division for the limited purpose of amending Order No. R-21909 to allow for a one-year extension of time to commence drilling the initial well under the Order. Order No. R-21909 pooled uncommitted interest owners in a 320-acre, more or less, Bone Spring horizontal spacing unit comprised of the S/2 S/2 of Sections 25 and 26, Township 19 South, Range 27 East, N.M.P.M., Eddy County, New Mexico. Said area is located approximately 16 miles southeast of Artesia, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

<b>WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Landman - Blake Johnson	Approx. 5 minutes	Approx. 3

**PROCEDURAL ISSUES**

No party has entered an appearance in these cases and no opposition is expected at the hearing. Accordingly, Apache intends to present the above-referenced cases by declaration.

Respectfully submitted,

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

By: /s/ Earl E DeBrine, Jr.  
Earl E. DeBrine, Jr.  
Deana M. Bennett  
Jamie L. Allen  
Bryce H. Smith  
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 Apache Corporation*

**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 147593

**QUESTIONS**

Operator: APACHE CORPORATION 303 Veterans Airpark Ln Midland, TX 79705	OGRID: 873
	Action Number: 147593
	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 witnesses	1
Testimony time (in minutes)	5