

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

**APPLICATIONS OF APACHE CORPORATION  
FOR COMPULSORY POOLING AND  
APPROVAL OF A HORIZONTAL SPACING  
UNIT FOR A POTASH DEVELOPMENT  
AREA AND PILOT PROJECT,  
EDDY COUNTY, NEW MEXICO**

**Case No. 21489  
Case No. 21490  
Case No. 21491**

**UNOPPOSED MOTION FOR CONTINUANCE**

Apache Corporation (“Apache”) moves to continue the above referenced cases to the December 7, 2023 docket for a final status conference pursuant to the Hearing Examiner’s e-mail ruling dated October 6, 2023, in conjunction with case numbers 21361-21364, and 21393-21394.

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  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[earl.debrine@modrall.com](mailto:earl.debrine@modrall.com)  
[deana.bennett@modrall.com](mailto:deana.bennett@modrall.com)  
[jamie.allen@modrall.com](mailto:jamie.allen@modrall.com)

*Attorneys for Applicant Apache Corporation*

### CERTIFICATE OF SERVICE

I hereby certify that on this 11<sup>th</sup> day of October, 2023, I served a true and correct copy of the foregoing on the following counsel of record by electronic mail:

Dana S. Hardy  
Jaclyn M. McLean  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
Phone: (505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)  
*Counsel for Mewbourne Oil Company*

Michael H. Feldewert  
Adam G. Rankin  
Paula M. Vance  
P.O. Box 2208  
Santa Fe, NM 87504  
Phone: (505) 988-4421  
[mfeldewert@hollandandhart.com](mailto:mfeldewert@hollandandhart.com)  
[agrarkin@hollandandhart.com](mailto:agrarkin@hollandandhart.com)  
[pmvance@hollandandhart.com](mailto:pmvance@hollandandhart.com)  
*Counsel for Matador Production Company*

Ernest L. Padilla  
Padilla Law Firm, P.A.  
Post Office Box 2523  
Santa Fe, NM 87504  
Phone: (505) 988-7577  
[padillalaw@qwestoffice.net](mailto:padillalaw@qwestoffice.net)  
*Counsel for EOG Resources, Inc.*

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

By: /s/ Earl E. DeBrine, Jr.  
Earl E. DeBrine, Jr.

Sharon T. Shaheen  
Ricardo S. Gonzales  
P.O. Box 2307  
Santa Fe, NM 87504-2307  
Phone: (505) 986-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)  
*Counsel for Colgate Production, LLC*

Matthew M. Beck  
Peifer, Hanson, Mullins & Baker, P.A.  
20 First Plaza, Suite 725  
Albuquerque, NM 87102  
Phone: (505) 247-4800  
[mbeck@peiferlaw.com](mailto:mbeck@peiferlaw.com)  
*Counsel for Jalapeno Corporation*

W4735182.DOCX