

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

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24089**

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24090**

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24091**

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24092**

**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  
Yarithza Peña  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800

**INTERESTED PARTY**

Mongoose Minerals LLC

**ATTORNEY**

Dana S. Hardy  
Jaclyn McLean  
Hinkle Shanor, LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554

**STATEMENT OF CASES**

**In Case No. 24089**, Apache seeks an order pooling all uncommitted mineral interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of 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. 24090**, Apache seeks an order pooling all uncommitted mineral interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of 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. 24091**, Apache seeks an order pooling all uncommitted mineral interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of 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. 24092**, Apache seeks an order pooling all uncommitted mineral interests within the Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of 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. 6
Geologist - Drew Chenoweth	Approx. 1 Minute	Approx. 12

**PROCEDURAL ISSUES**

Apache requests that these matters be consolidated for hearing and intends to present these cases by affidavit if Mongoose Minerals LLC withdraws its opposition to presentation by affidavit prior to the time for filing of exhibits.

Respectfully submitted,

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

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

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*Attorneys for Apache Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on December 28, 2023:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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**Santa Fe, NM 87505**

QUESTIONS

Action 298276

**QUESTIONS**

Operator: APACHE CORPORATION 303 Veterans Airpark Ln Midland, TX 79705	OGRID: 873
	Action Number: 298276
	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	2
Testimony time (in minutes)	2