

**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.
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QUESTIONS

Action 35692

QUESTIONS

Operator: APACHE CORPORATION 303 Veterans Airpark Ln Midland, TX 79705	OGRID: 873
	Action Number: 35692
	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>