

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

**APPLICATION OF ASCENT ENERGY, LLC  
FOR COMPULSORY POOLING, EDDY COUNTY,  
NEW MEXICO**

**CASE NOS. 16481, 16482**

**APACHE CORPORATION'S PRE-HEARING STATEMENT**

Apache Corporation ("Apache") submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Ascent Energy, LLC

**ATTORNEY**

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**OPPONENT**

Apache Corporation

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**STATEMENT OF CASE**

In Case No. 16481, Ascent Energy, LLC seeks an order pooling all mineral interests in the Bone Spring formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, N.M.P.M., Eddy County, New Mexico.

In Case No 16482, Ascent Energy, LLC seeks an order pooling all mineral interests in the Wolfcamp formation underlying a horizontal spacing unit comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, N.M.P.M., Eddy County, New Mexico.

The proposed horizontal spacing wells are within the Potash Area of Eddy County. Apache is in the process of submitting competing well proposals to pooled parties within this area and will file competing applications with the Division. Apache opposes Ascent's applications because if granted they will result in waste and impair Apache's correlative rights.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

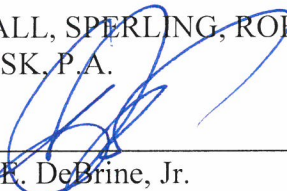
<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Laci Stretcher– Landman	Approx. 30	Approx. 4
Jim Vaca - Engineer	Approx. 30	Approx. 4
Mike Macy - Geologist	Approx. 40	Approx. 6

### **PROCEDURAL ISSUES**

Apache has requested that Case Nos. 16481 and 16482 be continued to a future Examiner Hearing Docket schedule or to a mutually agreeable special Examiner docket date and be heard with the case that will be filed for Apache's competing proposal.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
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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 October 25, 2018:

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By: \_\_\_\_\_

Earl E. DeBrine, Jr.

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