

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

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

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

**Case No. 16481**

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

**Case No. 16482**

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING AND APPROVAL  
OF A HORIZONTAL SPACING UNIT AND  
DEVELOPMENT AREA, EDDY COUNTY.**

**Case No. 20171**

**APPLICATION OF APACHE CORPORATION  
FOR COMPULSORY POOLING AND APPROVAL  
OF A HORIZONTAL SPACING UNIT AND  
DEVELOPMENT AREA, EDDY COUNTY.**

**Case No. 20202**

**CONSOLIDATED PRE-HEARING STATEMENT**

This consolidated pre-hearing statement is submitted by Ascent Energy, LLC ("Ascent") as required by the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Ascent Energy, LLC  
Attention: Lee Zink

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

**OPPONENT**

Apache Corporation

**OPPONENT'S ATTORNEY**

Earl DeBrine

OTHER PARTIES  
EOG Resources, Inc.

Mewbourne Oil Company

OTHER PARTIES' ATTORNEYS  
Michael Feldewert  
Adam Rankin

Gray Larson

## STATEMENT OF THE CASES

### APPLICANT

1. Ascent seeks the following in its cases:

**Case No. 16481:** Ascent seeks an order pooling all mineral interests in the Bone Spring formation underlying a 320-acre standup horizontal spacing comprised of the W/2W/2 of Section 28 and the W/2W/2 of Section 33, Township 20 South, Range 30 East, NMPM.

**Case No. 16482:** Ascent seeks an order pooling all mineral interests in the Wolfcamp formation underlying a 320-acre standup 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, NMPM.

2. Apache Corporation ("Apache") seeks the following in its cases:

**Case 20171:** Apache seeks an order pooling all mineral interests (apparently in the Bone Spring formation) underlying an 800-acre laydown horizontal spacing comprised of the N/2 of Section 28, N/2 of Section 29, and NE/4 of Section 30, Township 20 South, Range 30 East, NMPM.

**Case 20202:** Apache seeks an order pooling all mineral interests (apparently in the Wolfcamp formation) underlying an 800-acre laydown horizontal spacing unit comprised of the N/2 of Section 28, N/2 of Section 29, and NE/4 of Section 30, Township 20 South, Range 30 East, NMPM.

3. Exhibit A shows Ascent's acreage in this area. Please note that Apache owns no interest in Section 28, and there is no need to have Section 28 included in Apache's well units. In addition, granting Apache's applications may lead to Ascent's acreage to the south of Section 28 being stranded. This will adversely affect Ascent's correlative rights. As a result, Ascent's applications should be granted, and Apache's applications must be denied.

### OPPONENT

### OTHER PARTIES

## PROPOSED EVIDENCE

### APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Lee Zink (landman)	20 min.	Approx. 10
Ben Metz (geologist)	20 min.	Approx. 10
Alex Yancey (engineer)	20 min.	Approx. 5
Matt Ward (operations)	15 min.	Approx. 2

### OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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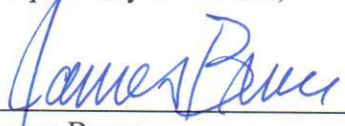
### OTHER PARTIES

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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## PROCEDURAL MATTERS

1. Ascent requests that these cases be continued due to witness availability problems, and will be filing motions for a continuance.
2. The four cases should be consolidated for hearing.

Respectfully submitted,

  
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James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Ascent Energy, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 13th day of August, 2019 by facsimile transmission:

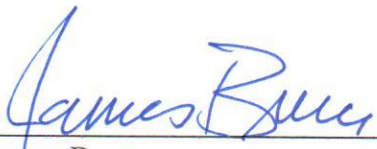
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James Bruce