

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

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

**CASE NO. 21082**

**PRE-HEARING STATEMENT**

Apache Corporation (“Apache” or “Applicant”) submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Apache Corporation

**ATTORNEY**

Earl E. DeBrine, Jr.  
Lance D. Hough  
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**OPPONENT**

None Anticipated

**ATTORNEY**

**STATEMENT OF CASE**

Applicant seeks an order from the Division: (1) to the extent necessary, approving the creation of a 320-acre, more or less, Bone Spring horizontal spacing unit; and, (2) pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the W/2 E/2 of Sections 11 and 14, Township 19 South, Range 32 East, NMPM, Lea County, New Mexico.

This spacing unit will be dedicated to the **Dustbowl 11-14 Fed Com #203H** well, to be horizontally drilled. The completed interval for this well will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Apache as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 33 miles west of Hobbs, New Mexico.

**PROPOSED EVIDENCE**

**APPLICANT:**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Nick Laris – Landman (Affidavit)	Approx. 1 Minute	Approx. 6
David Lewis – Geologist (Affidavit)	Approx. 1 Minute	Approx. 5

**PROCEDURAL ISSUES**

Apache is not aware of an entry of appearance or request for continuance from any party in this matter. Accordingly, Apache does not anticipate any opposition to these cases and intends to present its case by affidavit and consolidated with Case Nos. 21080, 21081, and 21083.

Respectfully submitted,

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

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

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