



SOUTHWEST ROYALTIES, INC.

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2014 SEP 12 P 3:10

Oil Conservation Division
Engineering and Geological Services Bureau
Oil Conservation Division
1220 S. St Francis Drive
Santa Fe, NM 87505

Re: CASE NO. 14613 (Re-opened)
APPLICATION OF APACHE CORPORATION AND COG OPERATING LLC
TO AMEND ORDER NO. R-13382, ETC.
LEA AND EDDY COUNTIES, NEW MEXICO

To Whom It May Concern:

Southwest Royalties, Inc. respectfully submits this letter in support of Applicants Apache Corporation and COG Operating, LLC in their efforts to increase the allowable in the order referenced above.

As an operator in New Mexico, Southwest Royalties, Inc. supports measures under consideration by the Division to more suitably accommodate the increase in horizontal development in New Mexico. Approving the allowable as requested by the applicants will encourage horizontal development across the State by removing arbitrary and restrictive allowable limits more suited to vertical development. Southwest Royalties, Inc. encourages the Division to review and approve the applicants' request as it benefits not only the operator, but the royalty owner and the State, as well.

Thank you for the opportunity to enter our support of this petition.

Sincerely,

George Harris
Petroleum Engineer