

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

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

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

CASE NO. 15218

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT

Apache Corporation  
Suite 300  
300 Veterans Airpark Lane  
Midland, Texas 79705  
Attn: Chase Bradley

APPLICANT'S ATTORNEY

Candace Callahan  
500 Don Gaspar Avenue  
Santa Fe, New Mexico 87505  
(505) 983-8545

OPPONENT

OPPONENT'S ATTORNEY

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks an order pooling all mineral interest from the surface to the base of the Abo formation underlying the SW/4NW/4 of Section 2, Township 20 South, Range 38 East, NMPM, to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent, including the House-Bliebry Pool, House-Tubb Pool, House-Drinkard Pool, and House-Abo Pool. The unit will be dedicated to the Pinot Well No. 5, to be drilled at an orthodox oil well location in the SW/4NW/4 of Section 2. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Chase Bradley  
(landman)

15 min.

Approx. 5

**IF THE MATTER IS UNCONTESTED IT WILL BE SUBMITTED BY  
AFFIDAVIT.**

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

**PROCEDURAL MATTERS**

Respectfully submitted,



Candace H. Callahan  
500 Don Gaspar Avenue  
Santa Fe, New Mexico 87505  
(505) 983-8545  
ATTORNEY FOR APACHE CORPORATION