

# KELLAHIN & KELLAHIN Attorney at Law

W. Thomas Kellahin  
New Mexico Board of Legal  
Specialization Recognized Specialist  
in the area of Natural resources-  
oil and gas law

P.O. Box 2265  
Santa Fe, New Mexico 87504  
117 North Guadalupe  
Santa Fe, New Mexico 87501

Telephone 505-982-4285  
Facsimile 505-982-2047  
kellahin@earthlink.com

May 20, 2003

**HAND DELIVERED**

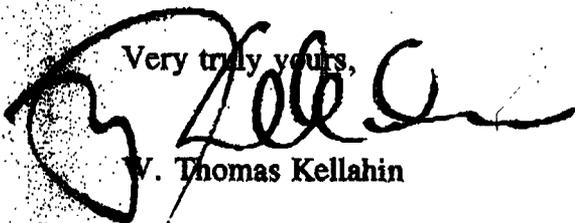
Ms. Lori Wrotenberg, Director  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: NMOCD Case 12064  
Application of Paladin Energy Corp.  
to Abolish the Bagley Siluro-Devonian  
Pool Rules, Lea County, New Mexico

Dear Ms. Wrotenberg:

On behalf of Apache Corporation, an adversely affected interest owner, please find enclosed our Entry of Appearance in the applicant in the referenced case which is currently set for an Examiner's hearing on May 22, 2003.

Very truly yours,



W. Thomas Kellahin

cfx:

William F. Carr, Esq.  
Attorney for Paladin Energy Corp.  
Apache Corporation  
Attn: Mario Moreno

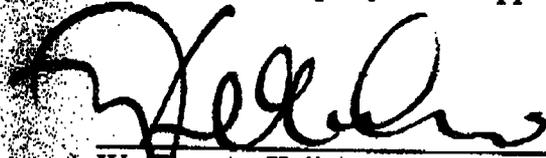
**STATE OF NEW MEXICO  
ENERGY, MINERAL AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION DIVISION**

**IN THE MATTER OF THE APPLICATION  
OF PALADIN ENERGY CORP. TO ABOLISH  
THE SPECIAL RULES AND REGULATIONS  
FOR THE BAGLEY SILVER-DEVONIAN POOL,  
LEA COUNTY NEW MEXICO**

CASE NO. 13064

**ENTRY OF APPEARANCE**

Comes now Apache Corporation, by its attorneys, Kellahin and Kellahin, and enters its appearance in this case as an interested party to the application.



W. Thomas Kellahin  
Kellahin & Kellahin  
P. O. Box 2265  
Santa Fe, New Mexico 87504  
(505) 982-4285

**CERTIFICATE OF MAILING**

I certify that a copy of this pleading was transmitted by facsimile to counsel for applicant this 20th day of May, 2005.

  
W. Thomas Kellahin