

**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 APACHE CORPORATION FOR
AN EXCEPTION TO DIVISION ORDER NO. R-9922-E
TO PERMIT A THIRD WELL ON A WELL UNIT, EDDY
COUNTY, NEW MEXICO.**

Case No. 14,177

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Apache Corporation
Suite 1500
6120 South Yale
Tulsa, Oklahoma 74136

Attention: Paul Brindle

APPLICANT'S ATTORNEY

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

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an exception to Division Order No. R-9922-E to allow it to drill, complete, and produce the Conoco State Well No. 11, as an infill well in an existing 336.81 acre spacing unit in the Indian Basin-Upper Pennsylvanian Associated Pool comprised of Lots 1, 2, S/2NE/4, and SE/4 (the E/2) of Section 2, Township 22 South, Range 23 East, N.M.P.M., at an orthodox location in the NW/4NE/4 (Unit b) of Section 2. Applicant further seeks to simultaneously dedicate production from the Indian Basin-Upper Pennsylvanian Associated Pool in the E/2 of Section 2 to the proposed Conoco State Well No. 11 and to the existing (i) Conoco State Well No. 6, located 2250 feet from the north line and 1500 feet from the east line, and (ii) Conoco

State Well No. 8, located 1710 feet from the south line and 880 feet from the east line, of Section 2. The

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Paul Brindle (landman)	10 min.	Approx. 4
Robert Curtis (geologist)	25 min.	Approx. 8
_____ (engineer)	30 min.	Approx. 6

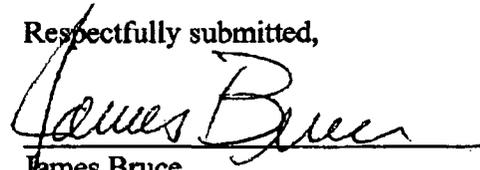
OPPONENT

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

Applicant requests that this case be consolidated for hearing with Case No. 14,176 (Application of Apache Corporation for an exception to Division Order Nos. R-9922-E and R-12121 to permit a third well on a well unit, Eddy County, New Mexico).

Respectfully submitted,



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

Attorney for Apache Corporation