

**BEFORE THE**

**OIL CONSERVATION DIVISION**

**NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES**

**IN THE MATTER OF THE APPLICATION  
OF APACHE CORPORATION  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

CASE NO. 11789

**APPLICATION**

APACHE CORPORATION ("Apache"), through its undersigned attorneys, hereby makes application pursuant to the provisions of N.M.Stat. Ann. § 70-2-17. (1978), for an order pooling all mineral interests in all formations developed on 160-acre spacing in the SE/4, in all formations developed on 80-acre spacing under the S/2 SE/4, and in all formations developed on 40-acre spacing under the SW/4 SE/4 of Section 28. Township 16 South, Range 38 East, N.M.P.M., Lea County, New Mexico, and in support thereof states:

1. Apache is a working interest owner in the SE/4 of Section 28 and has the right to drill thereon.
2. Applicant proposes to dedicate the above-referenced spacing or proration units to its Maltese Falcon "28" Well No. 1 to be drilled as a wildcat well at a standard location in the SE/4 of said Section 28, to a depth of approximately 11,700 feet to test any and all formations to the base of the Strawn formation.
3. Applicant has sought and been unable to obtain either voluntary agreement for pooling or farmout from certain interest owners in the subject spacing units.

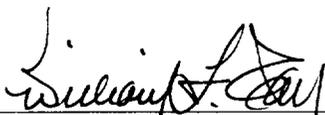
4. Said pooling of interests will avoid the drilling of unnecessary wells, will prevent waste and will protect correlative rights.

5. In order to permit the Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all mineral interests should be pooled, and Apache Corporation should be designated the operator of the well to be drilled.

WHEREFORE, Apache Corporation respectfully requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 29, 1997 and, after notice and hearing as required by law, the Division enter its order pooling the lands, including provisions for Applicant to recover its costs of drilling, equipping and completing the well, its costs of supervision while drilling and after completion, including overhead charges, and imposing a risk factor for the risk assumed by the Applicant in drilling, completing and equipping the well.

Respectfully submitted,

CAMPBELL, CARR, BERGE  
& SHERIDAN, P.A.

By: 

WILLIAM F. CARR  
Post Office Box 2208  
Santa Fe, New Mexico 87504  
Telephone: (505) 988-4421

ATTORNEYS FOR APACHE CORPORATION