

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

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

**CASE NOS. 21025 - 21028**

**EOG'S ENTRY OF APPEARANCE AND PRE-HEARING STATEMENT**

EOG Resources, Inc. ("EOG") hereby enters its appearance in these matters and submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

EOG Resources, Inc.

**ATTORNEY**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart LLP  
Post Office Box 2208  
Santa Fe, NM 87504  
(505) 988-4421  
(505) 983-6043 Facsimile

**EOG's STATEMENT OF THE CASE**

In these cases, Applicant seeks pooling orders creating four laydown 160-acre horizontal well spacing units in the Bone Spring formation underlying Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico for the proposed Camacho 26 State Com 201H-204H wells. EOG opposes the issuance of pooling orders for the requested horizontal well spacing units unless the orders include the following payment provision:

Applicant shall not furnish to EOG Resources the estimated well costs for any well for payment under this pooling order any sooner than 60 days before the commencement of the drilling of each well and EOG Resources will have 30 days after receipt of the estimated wells costs to pay its share of the estimated well costs.

This provision is reasonable and necessary to protect EOG from a premature demand for payment of estimated well costs.

Respectfully submitted,

HOLLAND & HART LLP

By:



Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

**ATTORNEYS FOR EOG RESOURCES, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on January 30, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. Debrine, Jr.  
Lance D. Hough  
MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.  
Post Office Box 2168  
Albuquerque, New Mexico 87103-2168  
505-848-1800  
*edebrine@modrall.com*  
*ldh@modrall.com*

***Attorneys for Apache Corporation***

  
\_\_\_\_\_  
Michael H. Feldewert