

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

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

CASE NO. 21028

**PRE-HEARING STATEMENT**

Apache Corporation ("Apache" or "Applicant") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Apache Corporation

**ATTORNEY**

Earl E. DeBrine, Jr.  
Lance D. Hough  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
[edebrine@modrall.com](mailto:edebrine@modrall.com)  
[ldh@modrall.com](mailto:ldh@modrall.com)

**OPPONENT**

None Anticipated

**ATTORNEY**

**STATEMENT OF CASE**

Applicant seeks an order from the Division: (1) to the extent necessary, approving the creation of a 160-acre, more or less, Bone Spring horizontal spacing unit; and, (2) pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the S/2 S/2 of Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. This

spacing unit will be dedicated to the **Camacho 26 State Com 204H** well, to be horizontally drilled. The producing area for this well will be orthodox. Also to be considered will be the cost of drilling, completing and equipping said well, the allocation of these costs as well as the actual operating costs and charges for supervision, designation of Apache as operator of the well, and a 200% charge for risk involved in drilling said well. Said area is located approximately 15.5 miles southeast of Artesia, New Mexico.

### **PROPOSED EVIDENCE**

#### **APPLICANT:**

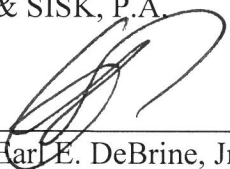
<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Blake Johnson – Landman	Approx. 1 Minute	Approx. 6
Justin Wagner – Geologist	Approx. 1 Minute	Approx. 5

### **PROCEDURAL ISSUES**

Apache is not aware of an entry of appearance or request for continuance from any party in this matter. Accordingly, Apache does not anticipate any opposition to these cases and intends to present its case by affidavit.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By:   
\_\_\_\_\_  
Earl E. DeBrine, Jr.  
Lance D. Hough  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[edebrine@modrall.com](mailto:edebrine@modrall.com)  
[ldh@modrall.com](mailto:ldh@modrall.com)  
*Attorney for Applicant*

W3677369.DOCX