

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

**APPLICATION OF APACHE CORPORATION
TO AMEND ORDER NO. R-21181,
EDDY COUNTY, NEW MEXICO**

**CASE NO. 21638
ORDER NO. R-21181
(Re-Open)**

**APPLICATION OF APACHE CORPORATION
TO AMEND ORDER NO. R-21138,
EDDY COUNTY, NEW MEXICO**

**CASE NO. 21639
ORDER NO. R-21138
(Re-Open)**

**APPLICATION OF APACHE CORPORATION
TO AMEND ORDER NO. R-21139,
EDDY COUNTY, NEW MEXICO**

**CASE NO. 21640
ORDER NO. R-21138
(Re-Open)**

**APPLICATION OF APACHE CORPORATION
TO AMEND ORDER NO. R-21140,
EDDY COUNTY, NEW MEXICO**

**CASE NO. 21641
ORDER NO. R-21138
(Re-Open)**

CONSOLIDATED PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Apache Corporation

ATTORNEY

Earl E. DeBrine
Deana M. Bennett
Lance D. Hough
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INTERESTED PARTY

None

ATTORNEY

STATEMENT OF CASES

In Case No. 21638, Apache seeks an order from the Division for the limited purposes of amending Order No. R-21181 to allow for a one-year extension of time to commence drilling the well under the Order. The Division issued Order No. R-21181 on April 14, 2020, which pooled uncommitted interest owners in a 160-acre, more or less, Bone Spring horizontal spacing unit comprised of the N/2 N/2 of Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico and requires commencement of drilling the well within one year of the date of the Order unless Apache Corporation obtains an extension by an amendment of this Order for good cause shown. Good cause exists for Apache's request for an extension of time due to current market conditions.

In Case No. 21639, Apache seeks an order from the Division for the limited purposes of (1) conforming Division Order No. R-21138 to the amended order template ("Amended Order Template") described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); and (2) amending Order No. R-21138 to allow for a one-year extension of time to commence drilling the well under the Order. The Division issued Order No. R-21138 on February 21, 2020, which pooled uncommitted interest owners in a 160-acre, more or less, Bone Spring horizontal spacing unit comprised of the S/2 N/2 of Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico and required commencement of drilling the well within one year of the date of the Order. Good cause exists for Apache's request for an extension of time due to current market conditions.

In Case No. 21640, Apache seeks an order from the Division for the limited purposes of (1) conforming Division Order No. R-21139 to the amended order template ("Amended Order Template") described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); and (2) amending Order No. R-21139 to allow for a one-

year extension of time to commence drilling the well under the Order. The Division issued Order No. R-21139 on February 21, 2020, which pooled uncommitted interest owners in a 160-acre, more or less, Bone Spring horizontal spacing unit comprised of the N/2 S/2 of Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico and required commencement of drilling the well within one year of the date of the Order. Good cause exists for Apache’s request for an extension of time due to current market conditions.

In Case No. 21641, Apache seeks an order from the Division for the limited purposes of (1) conforming Division Order No. R-21140 to the amended order template (“Amended Order Template”) described in the Letter of the Division Director dated April 9, 2020 (Re: Amendments to Compulsory Pooling Order Template); and (2) amending Order No. R-21140 to allow for a one-year extension of time to commence drilling the well under the Order. The Division issued Order No. R-21140 on February 21, 2020, which pooled uncommitted interest owners in a 160-acre, more or less, Bone Spring horizontal spacing unit comprised of the S/2 S/2 of Section 26, Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico and required commencement of drilling the well within one year of the date of the Order. Good cause exists for Apache’s request for an extension of time due to current market conditions.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Blake Johnson – Landman	Approx. 1 Minute	Approx. 8

PROCEDURAL ISSUES

Apache is not aware of any opposition, requests for continuances, or any other procedural issues these cases. Accordingly, Apache does not anticipate opposition and intends to present these cases as consolidated and by affidavit.

Respectfully submitted,

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

By: /s/ Lance D. Hough

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