

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

2014 OCT -9 P 4:40

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

CASE NO. 15217

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Apache Corporation
Suite 300
300 Veterans Airpark Lane
Midland, Texas 79705
Attn: Chase Bradley

APPLICANT'S ATTORNEY

Candace Callahan
500 Don Gaspar Avenue
Santa Fe, New Mexico 87505
(505) 983-8545

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pooling all mineral interest from the surface to the base of the Abo formation underlying the SE/4NW/4 of Section 2, Township 20 South, Range 38 East, NMPM, to form a standard 40-acre oil spacing and proration unit for any and all formations or pools developed on 40-acre spacing within that vertical extent, including the House-Blinbry Pool, House-Tubb Pool, House-Drinkard Pool, and House-Abo Pool. The unit will be dedicated to the Pinot Well Nos. 3 and 6, to be drilled at an orthodox oil well location in the SE/4NW/4 of Section 2. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Chase Bradley
(landman)

EST. TIME

15 min.

EXHIBITS

Approx. 5

**IF THE MATTER IS UNCONTESTED IT WILL BE SUBMITTED BY
AFFIDAVIT.**

OPPONENT

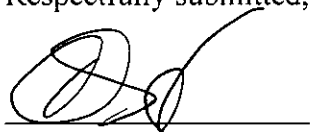
WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

Respectfully submitted,



Candace H. Callahan
500 Don Gaspar Avenue
Santa Fe, New Mexico 87505
(505) 983-8545
ATTORNEY FOR APACHE CORPORATION