

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

2015 NOV -5 P 4: 03

**APPLICATION OF APACHE CORPORATION
FOR APPROVAL OF THE FIRE EAGLE STATE
SAN ANDRES EXPLORATORY UNIT, IN LEA
COUNTY, NEW MEXICO.**

CASE NO. 15401

APACHE CORPORATION'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Apache Corporation
303 Veterans Airpark Lane
Suite 3000
Midland, TX 79705

ATTORNEY

Earl E. DeBrine, Jr., Esq.
Jennifer L. Bradfute
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

STATEMENT OF CASE

APPLICANT:

Applicant in the above-styled cause seeks an order from the Division approving its Fire Eagle State San Andres Exploratory Unit pursuant to 19.15.20.14 NMAC. The proposed Unit Area for the Unit consists of approximately 3,360 acres of state lands situated in Lea County, New Mexico, described as follows:

Township 10 South, Range 36 East, N.M.P.M.:

Section 2: All
Section 3: All
Section 4: All
Section 9: N/2

Section 10: N/2 and SW/4
Section 11: All

The unitized interval is the stratigraphic equivalent of the San Andres formation defined at a depth of 4,243' down to the base of the formation at a measured depth of 5,643' as encountered in the Gainer 22 #1 well (API No. 30-025-38792) in Section 22, Township 10 South, Range 36 East, Lea County, New Mexico. Said subject acreage is located approximately 4.5 miles Southeast of Crossroads, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Laci Lawrence – Landman	Approx. 15 min.	Approx. 6
Adam Anderson - Geologist	Approx. 10 min.	Approx. 6
Juan Garcia Vaca – Reservoir Engineer	Approx. 10 min.	Approx. 2

PROCEDURAL MATTERS

Apache does not have any procedural matters at this time.

Respectfully submitted,

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

By: _____

Earl E. DeBrine, Jr.
Jennifer L. Bradfute
Post Office Box 2168
Bank of America Centre
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

ATTORNEYS FOR APACHE CORPORATION