



MODRALL SPERLING

L A W Y E R S

November 6, 2015

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Via E-mail and U.S. Mail

Mr. David Catanach, Director, and
Mr. Will Jones
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Consolidation of Case Nos. 15400 and 15401

Dear Mr. Catanach:

This letter serves as a request for the consolidation of Case Nos. 15400 and 15401, which are both set for hearing on November 12, 2015. These cases involve applications by Apache Corporation ("Apache") for the creation of the Pacifico State San Andres and Fire Eagle San Andres exploratory units, both of which involve unitization for the exploratory development of the San Andres formation and are located in Township 10 South, Range 36 East, N.M.P.M. Lea County, New Mexico. As a result, both applications include common issues of fact and law, and Apache plans on presenting the same witnesses and exhibits in each case. No opposing parties have entered an appearance in either case, and the State Land Office has issued preliminary approval letters for both units. Accordingly, in the interest of efficiency and judicial economy Apache asks that these cases be consolidated during the November 12th hearing.

Sincerely,


Jennifer L. Bradfute

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Case was UNCONSOLIDATED AT HEARING 11/9/15

*WVS
11/9/15*