

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

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

**APPLICATION OF APACHE CORPORATION FOR  
AN EXCEPTION TO DIVISION ORDER NO. R-9922-E  
TO PERMIT A THIRD WELL ON A WELL UNIT, EDDY  
COUNTY, NEW MEXICO.**

**Case No. 14,177**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

Apache Corporation  
Suite 1500  
6120 South Yale  
Tulsa, Oklahoma 74136

**APPLICANT'S ATTORNEY**

James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attention: Paul Brindle

**OPPONENT**

**OPPONENT'S ATTORNEY**

**STATEMENT OF THE CASE**

**APPLICANT**

Applicant seeks an exception to Division Order No. R-9922-E to allow it to drill, complete, and produce the Conoco State Well No. 11, as an infill well in an existing 336.81 acre spacing unit in the Indian Basin-Upper Pennsylvanian Associated Pool comprised of Lots 1, 2, S/2NE/4, and SE/4 (the E/2) of Section 2, Township 22 South, Range 23 East, N.M.P.M., at an orthodox location in the NW/4NE/4 (Unit b) of Section 2. Applicant further seeks to simultaneously dedicate production from the Indian Basin-Upper Pennsylvanian Associated Pool in the E/2 of Section 2 to the proposed Conoco State Well No. 11 and to the existing (i) Conoco State Well No. 6, located 2250 feet from the north line and 1500 feet from the east line, and (ii) Conoco

State Well No. 8, located 1710 feet from the south line and 880 feet from the east line, of Section 2. The

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Paul Brindle (landman)	10 min.	Approx. 4
Robert Curtis (geologist)	25 min.	Approx. 8
_____ (engineer)	30 min.	Approx. 6

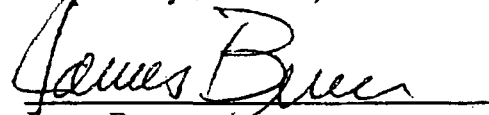
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

Applicant requests that this case be consolidated for hearing with Case No. 14,176 (Application of Apache Corporation for an exception to Division Order Nos. R-9922-E and R-12121 to permit a third well on a well unit, Eddy County, New Mexico).

Respectfully submitted,



James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Apache Corporation