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OBIE O'BRIEN

Vice President - Government Affairs/
Corporate Outreach

December 9, 2015

Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, TX 78711-2967

**RE: Proposal to Amend Statewide Rule 86
Unconventional Fracture Treated Fields**

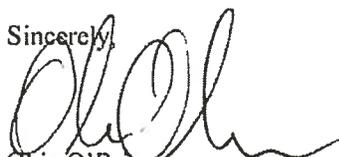
Apache Corporation is a large independent oil and gas producer with operations in Texas, several other states and around the world. Apache's operations include horizontal drilling and development in tight, unconventional reservoirs across the State of Texas. Apache is active in the Panhandle, Delaware Basin, Permian Basin, the Eagle Ford, and owns rights to acreage across the State. Because of this, Apache is very interested in the progress of the proposed Statewide Rule 86 amendments, and we appreciate the opportunity to provide input to the Railroad Commission regarding this proposal to amend Statewide Rule 86, and conforming changes to other statewide rules, as they relate to horizontal development in unconventional reservoirs.

In general, Apache supports the proposed changes as published. The proposed changes will allow orderly and efficient development of the state's unconventional resources by eliminating administrative hurdles. These proposed changes will simplify the regulatory structure under which these capital-intensive projects are proposed, permitted and operated. Overall the proposed changes are positive and will make Texas a leader in the efficient regulation of horizontal, unconventional oil and gas development.

Apache would like to commend Commission technical staff for considering these proactive, forward-looking regulations which will modernize the horizontal well regulations in Texas. These changes will be an important legacy this Commission can leave the citizens of this State.

Thank you for the opportunity to provide input during the rulemaking process. Please feel free to contact us if you have questions or need additional information. As always we stand ready to help however we can.

Sincerely,



Obie O'Brien
Vice President