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William F. Carr wcarr@hollandhart.com

October 27, 2004	2004
BY HAND DELIVERY	OCT
Mr. David Catanach	27
Hearing Examiner	
Oil Conservation Division	Pm
New Mexico Department of Energy,	ယ
Minerals and Natural Resources	
1220 South Saint Francis Drive	22
Santa Fe, New Mexico 87505	

Re: <u>Case No. 13351</u>: Application of Edge Petroleum Exploration Company to Restrict the Effect of theSpecial Pool Rules and Regulations for the Dos Hermanos-Morrow Gas Pool, Eddy County, New Mexico.

Dear Mr. Catanach:

On October 7, Edge Petroleum Corporation presented its case in the above-referenced matter. Edge had a full opportunity to present evidence and argument to the Examiner at that time and the case was taken under advisement. Since that time, James Bruce, attorney for Edge, has corresponded with you concerning the testimony of the parties. Mr. Bruce is thereby attempting to engage you in an after the fact presentation of evidence and argument. He further seems to be trying to argue for an amendment of the pool rules for the Dos Hermanos-Morrow Gas Pool instead of addressing the issue presented in his application – the limitation of the current Special Pool Rules to the current pool boundaries. V-F Petroleum objects to the consideration of Mr. Bruce's letter and "testimony".

V-F Petroleum Inc. presented its objections to the application of Edge Petroleum Exploration company <u>at the hearing</u>. V-F objected to this application because, if granted, it would create two sets of rules within one common source of supply – one for Edge and another for everyone else. Furthermore, the adoption of two sets of rules within this pool, and the drilling of the well proposed by Edge, would impair the correlative rights of V-F Petroleum by authorizing Edge to drain reserves from V-F properties.

V-F Petroleum Inc. requests that the Examiner disregard the post hearing communications of Edge and enter its order based on the record made by the parties on October 7, 2004.

ery truly yours William F. Carr

cc: James G. Bruce, Esq.

Holland & Hart LLP