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 A NON-STANDARD SPACING AND PRORATION UNIT, NON-STANDARD LOCATIONS, AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

Case No. 16142

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by V-F Petroleum Inc. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation

OPPONENTS

V-F Petroleum Inc.

APPLICANT'S ATTORNEY

Jennifer L. Bradfute

OPPONENTS' ATTORNEY

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

STATEMENT OF THE CASE

APPLICANT

Apache Corporation seeks a non-standard unit in the Bone Spring formation comprised of the S/2N/2 of Section 26, Township 19 South, Range 28 East, N.M.P.M., an unorthodox location, and the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit.

OPPONENTS

V-F Petroleum Inc is an interested party in this case. However, Apache Corporation has not yet informed V-F Petroleum Inc. of the type of interest it owns. In addition, it received notice of the hearing on today's date, May 10, 2018.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENTS

WITNESSES

EST. TIME

EXHIBITS

Tom Beall

20 min.

Approx. 4

PROCEDURAL MATTERS

V-F Petroleum Inc. requests that this matter be continued a minimum of two weeks to allow it to prepare for hearing.

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for V-F Petroleum Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 10 hand a day of May, 2018 via e-mail:

Jennifer L. Bradfute jlb@modrall.com

James Bruce