

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

**APPLICATIONS OF V-F PETROLEUM, INC.  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 23102 - 23104**

**CONSOLIDATED PRE-HEARING STATEMENT**

V-F Petroleum, Inc. (“Applicant”) submits its Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPLICANT**

V-F Petroleum, Inc.

**ATTORNEYS**

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**INTERESTED PARTY**

ConocoPhillips Company  
COG Operating LLC

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**STATEMENT OF THE CASE**

In Case No 23102, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit

comprised of the E/2 SE/4 of Section 29 and the E/2 E/2 of Section 32, Township 21 South, Range 35 East, Lea County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Cache River 29 32 State Com #104H well**, to be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 32, Township 21 South, Range 35 East;
- **Cache River 29 32 State Com #204H well**, to be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 32, Township 21 South, Range 35 East; and
- **Cache River 29 32 State Com #304H well**, to be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 32, Township 21 South, Range 35 East.

In **Case No. 23103**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the E/2 SW/4 of Section 29 and the E/2 W/2 of Section 32, Township 21 South, Range 35 East, Lea County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Cache River 29 32 State Com #102H well**, to be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 32, Township 21 South, Range 35 East;

- **Cache River 29 32 State Com #202H well**, to be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 32, Township 21 South, Range 35 East; and
- **Cache River 29 32 State Com #302H well**, to be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 32, Township 21 South, Range 35 East.

In **Case No. 23104**, Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 240-acre, more or less, standard horizontal spacing unit comprised of the W/2 SW/4 of Section 29 and the W/2 W/2 of Section 32, Township 21 South, Range 35 East, Lea County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Cache River 29 32 State Com #101H well**, to be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 32, Township 21 South, Range 35 East;
- **Cache River 29 32 State Com #201H well**, to be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 29, Township 21 South, Range 35 East, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 32, Township 21 South, Range 35 East; and
- **Cache River 29 32 State Com #301H well**, to be drilled from a surface hole location in the NW/4 SW/4 (Unit L) of Section 29, Township 21 South, Range 35

East, to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 32, Township 21 South, Range 35 East.

The completed intervals of the wells will be orthodox. Also to be considered in each case will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The wells are located approximately 13 miles West of Eunice, New Mexico.

**PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
Ryan Curry	Landman	Affidavit	Approx. 5
Michael Burke	Geologist	Affidavit	Approx. 7

**PROCEDURAL MATTERS**

Applicant intends to consolidate these cases for hearing and will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

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**CERTIFICATE OF SERVICE**

I certify that on October 27, 2022, I caused to be served a copy of the foregoing

*Consolidated Pre-Hearing Statement* on the following:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS

Action 154316

**QUESTIONS**

Operator: V-F PETROLEUM INC P.O. Box 1889 Midland, TX 79702	OGRID: 24010
	Action Number: 154316
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>