

**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

Dana S. Hardy
Jaclyn McLean
Yarithza Peña
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
ypena@hinklelawfirm.com

INTERESTED PARTY

ConocoPhillips Company
COG Operating LLC

ATTORNEYS

Ocean Munds-Dry
Elizabeth A. Ryan
Joby Rittenhouse
ocean.munds-dry@conocophillips.com
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

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

Witness	Occupation	Estimated Time	Exhibits
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

/s/ Dana S. Hardy _____
 Dana S. Hardy
 Jaclyn McLean
 Yarithza Peña
 P.O. Box 2068
 Santa Fe, NM 87504-2068
 Phone: (505) 982-4554
 Facsimile: (505) 982-8623
 dhardy@hinklelawfirm.com
 jmclean@hinklelawfirm.com
 ypena@hinklelawfirm.com
 Counsel for V-F Petroleum Inc.

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:

Ocean Munds-Dry
Elizabeth A. Ryan
Joby Rittenhouse
ocean.munds-dry@conocophillips.com
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com
*Attorneys for COG Operating LLC and
ConocoPhillips Company*

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 154317

QUESTIONS

Operator: V-F PETROLEUM INC P.O. Box 1889 Midland, TX 79702	OGRID: 24010
	Action Number: 154317
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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