

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

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

CASE NOS. 23195 - 23198

CONSOLIDATED PRE-HEARING STATEMENT

V-F Petroleum Inc. (“V-F” or “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 PARTIES

None.

ATTORNEYS

STATEMENT OF THE CASE

In **Case No. 23195**, V-F 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 S/2 SE/4 of Section 35 and the S/2 S/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Angell Ranch 35/36 Fed Com #221H** well, to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 35 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 36; and
- **Angell Ranch 35/36 Fed Com #231H** well, to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 35 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 36.

In **Case No. 23196**, V-F 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 N/2 SE/4 of Section 35 and the N/2 S/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Angell Ranch 35/36 Fed Com #222H** well, to be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 35 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 36; and
- **Angell Ranch 35/36 Fed Com #232H** well, to be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 35 to a bottom hole location in the NE/4 SE/4 (Unit I) of Section 36.

In **Case No. 23197**, V-F 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 S/2 NE/4 of Section 35 and the S/2 N/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Angell Ranch 35/36 Fed Com #223H** well, to be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 35 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 36; and

- **Angell Ranch 35/36 Fed Com #233H** well, to be drilled from a surface hole location in the SE/4 NW/4 (Unit F) of Section 35 to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 36.

In **Case No. 23198**, V-F 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 N/2 NE/4 of Section 35 and the N/2 N/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

- **Angell Ranch 35/36 Fed Com #224H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 35 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 36; and
- **Angell Ranch 35/36 Fed Com #234H** well, to be drilled from a surface hole location in the NW/4 NE/4 (Unit B) of Section 35 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 36.

The completed intervals of the Angell Ranch 35/36 Fed Com 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 Angell Ranch 35/36 Fed Com wells are located approximately 18 miles southeast of Artesia, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
John Lodge	Land Consultant	Affidavit	Approx. 5
Jason Lodge	Geologist	Affidavit	Approx. 5

PROCEDURAL MATTERS

Applicant requests that the Division consolidate these matters for hearing. Applicant will present these matters 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.

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 160855

QUESTIONS

Operator: V-F PETROLEUM INC P.O. Box 1889 Midland, TX 79702	OGRID: 24010
	Action Number: 160855
	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.