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

APPLICATIONS OF V-F PETROLEUM INC. FOR COMPULSORY POOLING AND APPROVAL OF NON-STANDARD SPACING UNIT, **EDDY COUNTY, NEW MEXICO**

CASE NOS. 23254 & 23255

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 ATTORNEYS

V-F Petroleum Inc. 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 **ATTORNEYS**

None.

STATEMENT OF THE CASE

In Case No. 23254, Applicant applies for an order: (1) establishing a 480-acre, more or less, non-standard horizontal spacing unit comprised of the NE/4 of Section 35 and the N/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico ("Unit"); and (2) pooling all interests in the Bone Spring formation underlying the Unit. 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;
- 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;
- 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; 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.

In Case No. 23255, Applicant applies for an order: (1) establishing a 480-acre, more or less, non-standard horizontal spacing unit comprised of the SE/4 of Section 35 and the S/2 of Section 36, Township 19 South, Range 27 East, Eddy County, New Mexico ("Unit"); and (2) pooling all interests in the Bone Spring formation underlying the Unit. 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;
- 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;

- 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; 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.

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 18 miles southwest of Artesia, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
John Lodge	Land	Affidavit	Approx. 5
	Consultant		
Jason Lodge	Geologist	Affidavit	Approx. 7

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

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 170059

QUESTIONS

Operator:	OGRID:
V-F PETROLEUM INC	24010
P.O. Box 1889	Action Number:
Midland, TX 79702	170059
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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