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

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

> Case No. 23254 Case No. 23255

AMENDED UNOPPOSED MOTION FOR CONTINUANCE

Apache Corporation ("Apache") hereby moves to continue the above referenced cases to the February 16, 2023 docket. As grounds therefor, Apache states as follows:

- 1. These cases are currently set for hearing on January 19, 2023. They were continued at the request of the Applicant to allow the parties additional time to reach voluntary agreement concerning operations in the proposed spacing units.
- 2. Additional time is needed for the parties to reach agreement. Apache has been waiting since December 29, 2022 to receive feedback from the V-F Petroleum Inc. concerning questions it had concerning a proposed JOA and has yet to receive all of the exhibits to the JOA. It has twice followed up concerning its requests, most recently on January 11, 2023 but has yet to receive a response.
- 3. To allow the parties sufficient time to negotiate and reach agreement, Apache requests that these cases be continued to the February 16, 2023 docket.
 - 4. Applicant V-F Petroleum Inc. does not oppose this motion.

WHEREFORE Apache respectfully requests that these cases be continued to the February 16, 2023 docket.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

By:/s/ Earl E. DeBrine, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January 2023, I served a true and correct copy of the foregoing on the following counsel of record by electronic mail:

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