

**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**

**SEMI-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. V-F does not oppose a continuance to the February 2, 2023 docket but has not responded as to why it objects to continuing the cases to February 16, 2023.

WHEREFORE Apache respectfully requests that these cases be continued to the March 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 17<sup>th</sup> 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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