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

APPLICATION OF V-F PETROLEUM INC. TO AMEND ORDER NO. R-22947 FOR AN EXTENSION OF THE WELL COMMENCEMENT DATE, EDDY COUNTY, NEW MEXICO.

Case No. 24877

PREHEARING STATEMENT

V-F Petroleum Inc., ("V-F"), OGRID No. 24010, through its undersigned attorneys, hereby files this Application with the Oil Conservation Division ("Division"), pursuant to the Division's rules.

APPEARANCES	ATTORNEY
ALLEANANCES	AIIOMEI

APPLICANT

V-F Petroleum Inc. Darin C. Savage

Andrew D. Schill William E. Zimsky 214 McKenzie Street

Santa Fe, New Mexico 87501 Telephone: 970.385.4401 Facsimile: 970.385.4901 darin@abadieschill.om andrew@abadieschill.com bill@abadieschill.com

INTERESTED PARTIES

COG Operating, LLC Elizabeth Ryan Keri L. Hatley

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 24877, V-F seeks to reopen Case No. 23781 and amend Order No. R-22947 in order to allow a one-year extension of the well commencement deadline. In order to show good cause for this request, V-F states the following: (1) V-F is in good standing under state-wide rules and regulations with respect to Order No. R-22947; (2) V-F has made progress toward the development of the unit since issuance of the Order by working to schedule a drilling rig, among other efforts; and (3) while facing the approaching one-year deadline, V-F has experienced unanticipated delays in securing a rig for the commencement of drilling. As a result, V-F is respectfully requesting that an extension of time for the drilling commencement date be granted to ensure that a rig can be secured without the unnecessary rush to meet the impending deadline

Under the original Order, V-F would be required to commence drilling by October 31, 2024; and therefore, V-F is asking for the deadline to commence drilling to be extended for a year, to October 31, 2025, thereby affording V-F the opportunity to continue its development of the unit without interruption.

APPLICANT'S PROPOSED EVIDENCE

WITNESS ESTIMATED TIME EXHIBITS

Landman: Jordan Shaw Approx. 10 min Approx. 1

PROCEDURAL MATTERS

No protests or objections have been filed and V-F does not anticipate any at this time; consequently, V-F plans to conduct the hearing by affidavit or self-affirmed statements.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage
Darin C. Savage

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Attorneys for V-F Petroleum Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on October 24, 2024:

Elizabeth Ryan – beth.ryan@conocophillips.com Keri L. Hatley – keri.hatley@conocophillips.com

Attorneys for ConocoPhillips

/s/ Darin C. Savage
Darin C. Savage

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

QUESTIONS

Action 395704

QUESTIONS

Operator:	OGRID:
V-F PETROLEUM INC	24010
P.O. Box 1889	Action Number:
Midland, TX 79702	395704
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	1	
Testimony time (in minutes)	10	