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

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

Case No. _____

APPLICATION

V-F Petroleum Inc. ("V-F Petroleum" or "Applicant"), OGRID No. 24010, through its undersigned attorneys, hereby files this Application with the Oil Conservation Division ("Division" or "OCD") pursuant to the provisions of NMSA 1978, Section 70-2-17, seeking an order pooling all uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying a non-standard 1,906.34-acre, more or less, horizontal spacing unit comprised of all of Sections 36, 35, and 34, all in Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico.

In support of its Application, V-F Petroleum states the following:

1. V-F Petroleum is a working interest owner in the proposed horizontal spacing unit ("HSU") and has a right to drill a well thereon.

2. V-F Petroleum proposes and dedicates to the HSU the Angel Ranch 36-34 Fed Com #221H Well, Angel Ranch 36-34 Fed Com #231H Well, Angel Ranch 36-34 Fed Com #222H Well, Angel Ranch Fed Com #232H Well, Angel Ranch 36-34 Fed Com #223H Well, Angel Ranch 36-34 Fed Com #233H Well, Angel Ranch 36-34 Fed Com #224H Well, and Angel Ranch 36-34 Fed Com #234H Well as initial wells to be drilled to a sufficient depth to test the Bone Spring formation. 3. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #221H Well,** an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 34.

4. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #231H Well,** an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 34.

5. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #222H Well**, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 34.

6. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #232H Well**, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 34.

7. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #223H Well**, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 34.

8. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #233H Well**, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 34.

9. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #224H Well**, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 34.

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10. V-F Petroleum proposes the **Angel Ranch 36-34 Fed Com #234H Well**, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 34.

11. The proposed wells are orthodox in their locations, and the take points and completed intervals comply with setback requirements under the statewide rules.

12. The unit proposed herein by V-F Petroleum is a non-standard spacing unit. V-F Petroleum will apply with the Division for administrative approval of the proposed non-standard spacing unit.

13. V-F Petroleum has sought in good faith but has been unable to obtain a voluntary agreement from all interest owners to participate in the drilling of the wells or the commitment of their interests to the wells for their development within the proposed HSU.

14. The pooling of all interests in the Bone Spring formation within the proposed HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

15. In order to provide for its just and fair share of the oil and gas underlying the subject lands, V-F Petroleum requests that all uncommitted interests in this HSU be pooled and that V-F Petroleum be designated the operator of the proposed horizontal wells and HSU.

WHEREFORE, V-F Petroleum requests that this Application be set for hearing on March 13, 2025, before an Examiner of the Oil Conservation Division, and after notice and hearing as required by law, the Division enter an order:

A. Pooling all uncommitted mineral interests in the Bone Spring formation underlying the proposed non-standard 1,906.34-acre, more or less, horizontal spacing unit comprised of all of Sections 36, 35, and 34, all in Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico;

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B. Approving the Angel Ranch 36-34 Fed Com #221H Well, Angel Ranch 36-34
Fed Com #231H Well, Angel Ranch 36-34 Fed Com #222H Well, Angel Ranch 36-34 Fed
Com #232H Well, Angel Ranch 36-34 Fed Com #223H Well, Angel Ranch 36-34 Fed Com
#233H Well, Angel Ranch 36-34 Fed Com #224H Well, and Angel Ranch 36-34 Fed Com
#234H Well, as the wells for the HSU.

C. Designating V-F Petroleum as operator of this HSU and the horizontal wells to be drilled thereon;

D. Authorizing V-F Petroleum to recover its costs of drilling, equipping, and completing the wells;

E. Approving actual operating charges and costs of supervision, to the maximum extent allowable, while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and

F. Setting a 200% charge for the risk assumed by V-F Petroleum in drilling and completing the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage

Darin C. Savage

William E. Zimsky Andrew D. Schill 214 McKenzie Street Santa Fe, New Mexico 87501 Telephone: 970.385.4401 Facsimile: 970.385.4901 darin@abadieschill.com bill@abadieschill.com andrew@abadieschill.com *Attorneys for V-F Petroleum Inc.* Application of V-F Petroleum Inc. for Compulsory Pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order from the Division: pooling all mineral interests in the Bone Spring formation, designated as an oil pool, underlying a non-standard 1,906.34-acre, more or less, horizontal spacing unit comprised of all of Sections 36, 35, and 34, all in Township 19 South, Range 27 East, NMPM, Eddy County, New Mexico. The proposed wells to be dedicated to the horizontal spacing unit are the Angel Ranch 36-34 Fed Com #221H Well, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 34; the Angel Ranch 36-34 Fed Com #231H Well, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 34; the Angel Ranch 36-34 Fed Com #222H Well, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 34; the Angel Ranch 36-34 Fed Com #232H Well, an oil well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 36 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 34; the Angel Ranch 36-34 Fed Com #223H Well, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 34; the Angel Ranch 36-34 Fed Com #233H Well, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 34; the Angel Ranch 36-34 Fed Com #224H Well, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 34; and the Angel Ranch 36-34 Fed Com #234H Well, an oil well, to be horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 36 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 34. The wells will be orthodox, and the take points and completed intervals will comply with the setback requirements under the Division's Statewide Rules. V-F Petroleum will apply with the Division for administrative approval of the proposed non-standard spacing unit. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs thereof; actual operating costs and charges for supervision; the designation of the Applicant as Operator of the wells and unit; and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 13.2 miles North of Carlsbad, New Mexico.