

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

**APPLICATION OF APACHE CORPORATION
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NOS. 21837-21840

PREHEARING STATEMENT

V-F Petroleum, Inc. ("V-F") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Apache Corporation

ATTORNEYS

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OPPONENT

V-F Petroleum, Inc.

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INTERESTED PARTY

COG Operating, LLC

ATTORNEYS

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STATEMENT OF THE CASE

Applicant seeks orders pooling interests in four 320-acre spacing units that comprise, collectively, Sections 25 and 26, Township 19 South, Range 27 East in Eddy County. V-F holds a significant working interest in the SW/4 of Section 25 and opposes Apache’s applications because Apache has failed to provide V-F with a complete JOA, which is necessary for V-F to evaluate Apache’s proposal. In addition, V-F has geological concerns regarding the layout and orientation of Apache’s proposed wells. Accordingly, granting Apache’s applications would violate V-F’s correlative rights and result in waste.

PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
John E. Lodge (Land)	30 minutes	Approx. 5
Jason Lodge (Geology)	30 minutes	Approx. 5
Thomas M. Beall (Engineering)	30 minutes	Approx. 5

PROCEDURAL MATTERS

For the reasons discussed above, V-F objects to the presentation of these cases by affidavit.

HINKLE SHANOR LLP

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Attorneys for V-F Petroleum, Inc.

Certificate of Service

I hereby certify that I caused a true and correct copy of the foregoing *Prehearing Statement* to be electronically served on May 13, 2021 on the following:

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