# 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 NOS. 23180** 

## PRE-HEARING STATEMENT

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

**APPLICANT** 

V-F Petroleum, Inc.

**ATTORNEYS** 

Dana S. Hardy Jaclyn McLean Yarithza Peña Hinkle Shanor LLP

P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com ypena@hinklelawfirm.com

INTERESTED PARTY

None.

**ATTORNEYS** 

### STATEMENT OF THE CASE

Applicant applies for an order pooling all uncommitted interests within the Bone Spring formation underlying a 243.08-acre, more or less, standard horizontal spacing unit comprised of the N/2 SE/4, NE/4 SW/4, and Lot 3 (N/2 S/2 equivalent) of Section 19, Township 19 South, Range 28 East, and the N/2 SE/4 of Section 24, Township 19 South, Range 27 East, Eddy County, New Mexico. The spacing unit will be dedicated to the following wells:

• Lightfoot 19 State Com 222H well, to be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 19, Township 19 South, Range 28 East, to a

bottom hole location in the NW/4 SE/4 (Unit J) of Section 24, Township 19 South, Range 27 East; and

• **Lightfoot 19 State Com 232H** well, to be drilled from a surface hole location in the NE/4 SE/4 (Unit I) of Section 19, Township 19 South, Range 28 East, to a bottom hole location in the NW/4 SE/4 (Unit J) of Section 24, Township 19 South, Range 27 East.

The completed intervals of the Wells will be orthodox. Also to be considered in each case will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as the operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells.

The Wells are located approximately 20 miles southeast of Artesia, New Mexico.

# **PROPOSED EVIDENCE**

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>
Sean Johnson	Landman	Affidavit	Approx. 5
Jason Lodge	Geologist	Affidavit	Approx. 5

## **PROCEDURAL MATTERS**

Applicant will present these matters by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy Jaclyn McLean

Yarithza Peña

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com ypena@hinklelawfirm.com Counsel for V-F Petroleum Inc.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 165021

### **QUESTIONS**

Operator:	OGRID:
V-F PETROLEUM INC	24010
P.O. Box 1889	Action Number:
Midland, TX 79702	165021
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	