

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

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION
FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF EDGE PETROLEUM
EXPLORATION COMPANY TO RESTRICT THE
EFFECT OF THE SPECIAL RULES AND
REGULATIONS FOR THE DOS HERMANOS-
MORROW GAS POOL, EDDY COUNTY, NEW MEXICO.

Case No. 13,351

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Edge Petroleum
Exploration Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Edge Petroleum Exploration Company
Suite 2000
1301 Travis
Houston, Texas 77002

Attention: Jeff Sikora
(713) 427-8843

OPPONENT

V-F Petroleum, Inc.

APPLICANT'S ATTORNEY

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

OPPONENT'S ATTORNEY

William F. Carr

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order limiting the effect of the special pool
rules for the Dos Hermanos-Morrow Gas Pool to the pool's current
horizontal extent. The pool currently encompasses Sections 21, 22,
27, and 28, Township 20 South, Range 30 East, NMPM. The pool rules
provide for 640 acre spacing, one well per spacing unit, and
special well location requirements.

OPPONENT

PROPOSED EVIDENCE**APPLICANT**

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Jeff Sikora (landman)	10 min.	Approx. 2
Howard Creasy (geologist)	15 min.	Approx. 3
Jim Keisling (engineer)	15 min.	Approx. 3

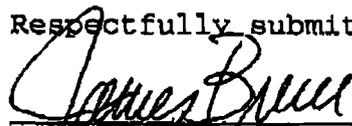
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

-None-

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Edge Petroleum
Exploration Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record via facsimile transmission this 15th day of October, 2004:

William F. Carr
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 983-6043



James Bruce

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

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IN THE MATTER OF THE HEARING CALLED BY THE
OIL CONSERVATION DIVISION FOR THE PURPOSE
OF CONSIDERING:

CASE NO. 93351

APPLICATION OF EDGE PETROLEUM
EXPLORATION COMPANY TO RESTRICT THE
EFFECT OF THE SPECIAL RULES AND
REGULATIONS FOR THE DOS HERMANOS-MORROW
GAS POOL, EDDY COUNTY, NEW MEXICO

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by
the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Edge Petroleum Exploration Company

OPPOSITION

ATTORNEY

V-F Petroleum, Inc.
Attn: Mr. Jerry Gahr
Post Office Box 1889
Midland, Texas 79702

William F. Carr, Esq.
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988.4421

STATEMENT OF CASE

APPLICANT

Applicant seeks an order limiting the effect of the special rules and regulations for the Dos Hermanos-Morrow Gas Pool, which provide for 640-acre spacing, one well per spacing and proration unit, and special well location requirements, to its current horizontal extent. The pool covers all of Sections 21, 22, 27, and 28, Township 20 South, Range 30 East. The pool is centered approximately 17 1/2 miles northeast of Carlsbad, New Mexico.

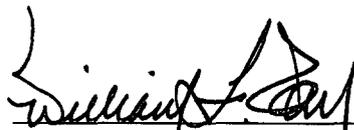
PROPOSED EVIDENCE

APPLICANT

WITNESSES (Name and Expertise)	ESTIMATED TIME	EXHIBITS
Louis J. Mazzullo (Geologist)	Approximately 15 Minutes	Approximately 2

PROCEDURAL MATTERS

V-F Petroleum Inc. has none at this time.



William F. Carr
Attorney for V-F Petroleum Inc.