

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

APPLICANT'S ATTORNEY

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

OPPONENT

V-F Petroleum, Inc.

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

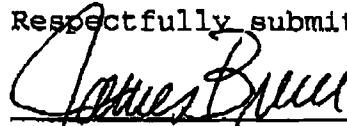
**OPPONENT**

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
------------------	------------------	-----------------

**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 15<sup>th</sup> 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**

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

**CASE NO. 2351**

**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**

Edge Petroleum Exploration Company

**ATTORNEY**

**OPPOSITION**

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

**ATTORNEY**

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.

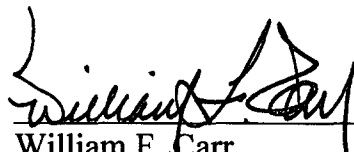
**PROPOSED EVIDENCE**

**APPLICANT**

<b>WITNESSES</b> (Name and Expertise)	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
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.