

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

**APPLICATION OF 3BEAR FIELD SERVICES, LLC
FOR APPROVAL OF A SALT WATER DISPOSAL WELL,
LEA COUNTY, NEW MEXICO**

Case No. 20586

OPPOSED MOTION FOR CONTINUANCE

V-F Petroleum, Inc. ("V-F") moves for the continuance of the hearing in this case to the August 22, 2019 docket. In support of its Motion, V-F states:

1. This case is currently scheduled to be heard on the July 11, 2019 docket. V-F submits that the Division should continue the hearing for the following reasons.

2. First, upon receiving a hearing notice letter from applicant 3Bear Field Services, LLC ("3Bear") on June 24, 2019, V-F initiated good-faith discussions with 3Bear about the location of 3Bear's proposed SWD well and the possibility that there may be producible hydrocarbons in the injection interval identified in 3Bear's application. Those discussions were cut short by vacation schedules. It is in the interests of 3Bear and V-F, as well as the Division, to give the parties an opportunity to engage in further discussions.

3. Second, V-F needs additional time to conduct its geologic and engineering evaluation of the proposed injection interval to determine whether there are producible hydrocarbons in the proposed injection interval.

4. Finally, V-F's witnesses and counsel need additional time to prepare for the hearing.

5. V-F has contacted counsel for 3Bear and the State Land Office regarding this motion. 3Bear opposes the motion, and the State Land Office does not oppose it.

6. In a July 3, 2019 email to the Division, 3Bear's counsel asked for a pre-hearing conference on July 9, 2019 to address V-F's request for a continuance. V-F agrees with 3Bear's request.

WHEREFORE, V-F requests that the Division (i) grant this motion, and (ii) continue the hearing in this case to the August 22, 2019 docket.

Respectfully submitted,

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Counsel for V-F Petroleum, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 2019 I served a true and correct copy of the foregoing ***Opposed Motion for Continuance*** via email to:

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