

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

**AMENDED APPLICATION OF DEVON ENERGY
PRODUCTION COMPANY, L.P.
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.**

CASE NO. _____

AMENDED APPLICATION

Devon Energy Production Company, L.P. (“Devon” or “Applicant”) (OGRID No. 6137), through its undersigned attorneys, hereby files this amended application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all uncommitted interests in Bone Spring formation underlying a 960-acre standard horizontal spacing unit comprised of the W/2 of Sections 14, 23, and 26, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico. In support of this application, Devon states:

1. Applicant is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. Applicant seeks to dedicate the above-referenced horizontal spacing unit to the following proposed initial:
 - a. **Galapagos 14-26 Fed Com 211H well** to be horizontally drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 14 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 26;
 - b. **Galapagos 14-26 Fed Com 212H well** to be horizontally drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 14 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 26; and

- c. **Galapagos 14-26 Fed Com 213H well** to be horizontally drilled from a surface hole location in the NE/4 NW/4 (Unit B) of Section 14 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 26.
3. The completed interval for the proposed **Galapagos 14-26 Fed Com 212H well** will be within 330' of the quarter-quarter line separating the W/2 W/2 and the E/2 W/2 of Sections 14, 23, and 26 to allow inclusion of this acreage into a standard horizontal well spacing unit.
4. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the interest owners in the subject spacing unit.
5. The pooling of interests in the proposed horizontal well spacing unit will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.
6. In order to permit Applicant to obtain it's just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled and Applicant should be designated the operator of the proposed horizontal wells and spacing unit.

WHEREFORE, Applicant requests that this amended application be set for hearing before an Examiner of the Oil Conservation Division on October 8, 2020, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the Bone Spring formation underlying the proposed horizontal spacing unit;
- B. Approving the initial wells in the horizontal well spacing unit;
- C. Designating Applicant as the operator of the horizontal spacing unit and the wells to be drilled thereon;

- D. Authorizing Applicant to recover its costs of drilling, equipping and completing the wells;
- E. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the well against any working interest owner who does not voluntarily participate in the drilling of the well.

Respectfully submitted,

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**ATTORNEYS FOR DEVON ENERGY PRODUCTION
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