

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

**APPLICATION OF DEVON ENERGY PRODUCTION  
COMPANY, L.P. FOR APPROVAL OF AN  
OVERLAPPING HORIZONTAL WELL SPACING  
UNIT AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NO. 23485**

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

**CASE NO. 23486**

**DEVON'S AMENDED CONSOLIDATED PRE-HEARING STATEMENT**

Devon Energy Production Company, L.P. ("Devon" or "Applicant"), the applicant in the above-referenced matters, submits this Consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Devon Energy Production Company, L.P.

**ATTORNEY**



Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Paula M. Vance  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
pmvance@hollandhart.com

### APPLICANT'S STATEMENT OF THE CASE

Under these consolidated cases, Devon seeks orders pooling all uncommitted interests in the Bone Spring formation (WC-025 G-08 S263412K; Bone Spring [96672]) underlying the referenced acreage all in Township 26 South, Range 34 East, NMPM, Lea County, New Mexico, as follows:

- Under **Case No. 23485**, Devon seeks (a) approval of a standard 800-acre, more or less, overlapping horizontal well spacing unit in the Bone Spring formation comprised of the W/2 of Sections 3 and 10, and the NW/4 of Section 15, and (b) pooling all uncommitted mineral interests in this overlapping horizontal well spacing unit. Devon seeks to initially dedicate this overlapping Bone Spring spacing unit to the proposed **North Blondie 3–15 Fed Com #1H** and **North Blondie 3–15 Fed Com #6H** wells, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 15, Township 26 South, Range 34 East; **North Blondie 3–15 Fed Com #8H** well, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SE/4 NW/4 (Unit F) of Section 15, Township 26 South, Range 34 East; **North Blondie 3–15 Fed Com #9H** well, to be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SE/4 NW/4 (Unit F) of Section 15, Township 26 South, Range 34 East; and the **North Blondie 3–15 Fed Com #2H** well, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 34, Township 25 South, Range 34 East, to a bottom hole location on the

quarter-quarter line between the SW/4 NW/4 (Unit E) and the SE/4 NW/4 (Unit F) of Section 15, Township 26 South, Range 34 East.

- This 800-acre horizontal well spacing unit will overlap the following existing horizontal well spacing unit covering portions of the subject acreage:
  - 160-acre, more or less, horizontal well spacing unit comprised of the E/2 W/2 of Section 3, Township 26, South, Range 34 East, dedicated to the Dean APQ Federal #2 well (API: 30-025-40089).
- Under **Case No. 23486**, Devon seeks to pool a standard 800-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 3 and 10, and the NE/4 of Section 15 and initially dedicate this Bone Spring spacing unit to the proposed **North Blondie 3–15 Fed Com #3H** and **North Blondie 3–15 Fed Com #10H** wells, to be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SW/4 NE/4 (Unit G) of Section 15, Township 26 South, Range 34 East; **North Blondie 3–15 Fed Com #11H** well, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SW/4 NE/4 (Unit G) of Section 15, Township 26 South, Range 34 East; **North Blondie 3–15 Fed Com #5H** and **North Blondie 3–15 Fed Com #13H** wells, to be horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 34, Township 25 South, Range 34 East, to a bottom hole location in the SE/4 NE/4 (Unit H) of Section 15, Township 26 South, Range 34 East; and the **North Blondie 3–15 Fed Com #4H** well, to be horizontally drilled from a surface location in the SW/4 SE/4 (Unit O) of Section 34, Township 25 South, Range 34 East, to a bottom hole location

on the quarter-quarter line between the SW/4 NE/4 (Unit G) and the SE/4 NE/4 (Unit H) of Section 15, Township 26 South, Range 34 East.

The completed interval of the **North Blondie 3–15 Fed Com #11H** and **North Blondie 3–15 Fed Com #8H** wells are expected to remain within 330 feet of the adjoining quarter-quarter section (or equivalent) tracts to allow inclusion of these proximity tracts within the proposed horizontal spacing unit under 19.15.16.15.B(1)(b) NMAC.

Devon has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the subject acreage.

#### **APPLICANT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Daniel Brunsman, Landman	Self-Affirmed Statement	Approx. 6
Matthew Myers, Geologist	Self-Affirmed Statement	Approx. 4

#### **PROCEDURAL MATTERS**

Devon requests that these matters be consolidated for hearing and intends to present these cases by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

---

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Paula M. Vance  
Post Office Box 2208  
Santa Fe, NM 87504  
505-988-4421  
505-983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrarkin@hollandhart.com  
jbroggi@hollandhart.com  
pmvance@hollandhart.com

**ATTORNEYS FOR DEVON ENERGY PRODUCTION  
COMPANY, L.P.**

**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  
**District IV**  
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 217049

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 217049
	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.