

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

**APPLICATION OF DEVON ENERGY PRODUCTION COMPANY,
L.P., FOR A HORIZONTAL SPACING UNIT AND
COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO**

Case No. 23555

PREHEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon"), OGRID No. 6137, through its undersigned attorneys, hereby files this Application with the Oil Conservation Division ("Division").

APPEARANCES

APPLICANT

Devon Energy Production
Company, L.P.

ATTORNEY

Darin C. Savage
Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

INTERESTED PARTIES

ConocoPhillips Company,
COG Operating LLC and
Concho Oil & Gas LLC

ATTORNEY

Ocean Munds-Dry
Elizabeth Ryan
Jobediah Rittenhouse
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-8000
ocean.munds-dry@conocophillips.com
beth.ryan@conocophillips.com
joby.rittenhouse@conocophillips.com

APPLICANT'S STATEMENT OF THE CASE

In Case No. 23555, Devon seeks an order (1) establishing a standard 640-acre, more or less, spacing and proration unit comprised of the N/2 of Sections 35 and 36, Township 20 South, Range 29 East, NMPM, Eddy County, New Mexico, and (2) pooling all uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying said unit. Devon proposes and dedicates to the HSU the **Tambora 36-35 Fed Com 331H Well**, as an initial well, to be drilled to a sufficient depth to test the Bone Spring formation.

Devon proposes the **Tambora 36-35 Fed Com 331H Well**, an oil well, to be horizontally drilled from a surface location in Lot 2 (SW/4 NW/4 equivalent) of Section 31-T20S-R30E to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35-T20S-R29E. The **Tambora 36-35 Fed Com 331H Well** is a proximity well, positioned so the unit can include proximity tracts located within 330 feet of the well's completed interval, thereby incorporating the S/2 N/2 of Sections 35 and 36, in order to establish the larger unit covering the N/2 of said Sections.

The **Tambora 36-35 Fed Com 331H Well** is orthodox in its location, and the take points and completed interval comply with setback requirements under the statewide rules.

APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Andy Bennett	Approx. 10 min	Approx. 6
Geologist: Joe Dixon	Approx. 10 min	Approx. 3

PROCEDURAL MATTERS

Devon requests that, for purposes of the hearings, Case Nos. 23556, 23557, 23558, 23559 and 23560 be consolidated with Case No. 23555 as they involve units within the same sections. No protests or objections have been filed and Devon does not anticipate any at this time; consequently, Devon plans to conduct the hearing by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ *Darin C. Savage*

Darin C. Savage

Andrew D. Schill
William E. Zimsky
214 McKenzie Street
Santa Fe, New Mexico 87501
Telephone: 970.385.4401
Facsimile: 970.385.4901
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

**Attorneys for Devon Energy Production
Company, L.P.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on August 10, 2023:

Ocean Munds-Dry - ocean.munds-dry@conocophillips.com
Elizabeth Ryan - beth.ryan@conocophillips.com
Jobediah Rittenhouse - joby.rittenhouse@conocophillips.com
Attorneys for ConocoPhillips Company, COG Operating LLC & Concho Oil & Gas LLC

/s/ Darin C. Savage
Darin C. Savage

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 250731

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 250731
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	20