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

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

Case No. 25258

#### **PREHEARING STATEMENT**

Devon Energy Production Company, L.P. ("Devon"), OGRID No. 6137, through its undersigned attorneys, hereby files this Prehearing Statement with the Oil Conservation Division ("Division"), pursuant to the Division's rules.

APPLICANT ATTORNEY

Devon Energy Production Company, L.P.

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.om andrew@abadieschill.com

bill@abadieschill.com

APPEARANCES ATTORNEY

EOG Resources, Inc. Jordan L. Kessler

125 Lincoln Ave., Suite 213 Santa Fe, New Mexico 87501 Telephone: 432.488.6108

jordan kessler@eogresources.com

COG Operating LLC; Concho Oil and Gas LLC Elizabeth Ryan

Keri L. Hatley ConocoPhillips

1048 Paseo de Peralta

Santa Fe, New Mexico 87501 Telephone: 505.780.8000 beth.ryan@conocophillips.com keri.hatley@conocophillips.com

Magnum Hunter Production Inc.

Deana M. Bennett Earl E. DeBrine, Jr. Yarithza Peña

Post Office Box 2168

500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-

2168

Telephone: 505.848.1800 deana.bennett@modrall.com earl.debrine@modrall.com Yarithza.Pena@modrall.com

COG Operating LLC; Concho Oil and Gas LLC

Michael H. Feldewert Adam G. Rankin Paula M. Vance Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com pmvance@hollandhart.com

# APPLICANT'S STATEMENT OF THE CASE

In Case No. 25258, Devon seeks an order pooling all uncommitted mineral interests in the Wolfcamp formation, designated as a gas pool, underlying a standard 639.26-acre, more or less, spacing unit comprised of Lots 1, 2, 3, and 4 and the S/2 N/2 (equivalent of the N/2) of Sections 3 and 4, all in Township 22 South, Range 27 East, NMPM, Eddy County, New Mexico as follows.

• Under <u>Case No. 25258</u>, Devon proposes the **War Club 3-4 Fed Com 621H Well**, the **War Club 3-4 Fed Com 622H Well**, the **War Club 3-4 Fed Com 821H Well**,

and the **War Club 3-4 Fed Com 822H Well,** as the initial wells, to be drilled to a sufficient depth to test the Wolfcamp formation.

- Also under <u>Case No. 25258</u>, Devon proposes the War Club 3-4 Fed Com 621H Well, a gas well, to be horizontally drilled from a surface location in the Lot 1 (NE/4 NE/4) of Section 3 to a bottom hole location in the Lot 4 (NW/4 NW/4) of Section 4.
- Also under <u>Case No. 25258</u>, Devon proposes the War Club 3-4 Fed Com 622H Well, a gas well, to be horizontally drilled from a surface location in the Lot 1 (NE/4 NE/4) of Section 3 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 4.
- Also nder <u>Case No. 25258</u>, Devon proposes the War Club 3-4 Fed Com 821H Well, a gas well, to be horizontally drilled from a surface location in the Lot 1 (NE/4 NE/4) of Section 3 to a bottom hole location in the Lot 4 (NW/4 NW/4) of Section 4.
- Also under <u>Case No. 25258</u>, Devon proposes the War Club 3-4 Fed Com 822H Well, a gas well, to be horizontally drilled from a surface location in the Lot 1 (NE/4 NE/4) of Section 3 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 4.

The wells proposed herein are unorthodox in their locations; the take points do not comply with setback requirements in Order No. R-14262 governing the Purple Sage; Wolfcamp pool. Devon will be applying with the Division for administrative approval of the nonstandard locations.

## APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS	
Landman: Jake Nourse	Approx. 10 min	Approx. 5	
Geologist: Joe Dixon	Approx. 10 min	Approx. 6	

# PROCEDURAL MATTERS

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 or self-affirmed statements.

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 May 1, 2025.

Jordan L. Kessler - jordan\_kessler@eogresources.com *Attorney for EOG Resources, Inc.* 

Elizabeth Ryan - beth.ryan@conocophillips.com Keri L. Hatley - keri.hatley@conocophillips.com Attorneys For COG Operating LLC and Concho Oil and Gas LLC

Deana M. Bennett - deana.bennett@modrall.com Earl E. DeBrine, Jr. - earl.debrine@modrall.com Yarithza Peña - Yarithza.Pena@modrall.com Attorneys for Magnum Hunter Production Inc.

Michael H. Feldewert - mfeldewert@hollandhart.com Adam G. Rankin - agrankin@hollandhart.com Paula M. Vance - pmvance@hollandhart.com Attorneys For COG Operating LLC and Concho Oil and Gas LLC

/s/ Darin C. Savage

Darin C. Savage

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory <a href="https://www.emnrd.nm.gov/ocd/contact-us">https://www.emnrd.nm.gov/ocd/contact-us</a>

# State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 457564

#### **QUESTIONS**

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	457564
	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	