

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

**APPLICATION OF DEVON ENERGY
PRODUCTION COMPANY, L.P. TO
AMEND ORDER R-21460 FOR A
STANDARD SPACING UNIT IN THE
W/2 W/2 OF SECTIONS 13 AND 24,
TOWNSHIP 23 SOUTH, RANGE 31 EAST,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 21563

**APPLICATION OF DEVON ENERGY
PRODUCTION COMPANY, L.P. TO
AMEND ORDER R-21460 FOR A
STANDARD SPACING UNIT IN THE
E/2 W/2 OF SECTIONS 13 AND 24,
TOWNSHIP 23 SOUTH, RANGE 31 EAST,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 21564

DEVON'S CONSOLIDATED PRE- HEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon") submits this consolidated pre-hearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Devon Energy Production Company, LP

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421
(505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF THE CASE

In these consolidated cases, Devon seeks to amend Order R-21460 for two separate orders approving standard 320-acre, more or less, horizontal spacing units in the W/2 of Sections 13 and 24, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico, and pooling all interests in the Bone Spring formation under the terms of Order R-21460, as follows:

- a. In **Case No. 21563**, Devon seeks an order approving a standard 320-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Sections 13 and 24, and dedicating this standard unit to the proposed initial **Bora Bora 13-24 Fed Com #212H well** to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 12 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 24.
- b. In Case No. 21564, Devon seeks an order approving a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Sections 13 and 24, and dedicating this standard unit to the proposed initial **Bora Bora 13-24 Fed Com 213H well** to be drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 12 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 24.

Order R-21460, entered on September 21, 2020, in Case No. 21389, created a 640-acre, more or less, standard horizontal well spacing unit consisting of the W/2 of Sections 13 and 24, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Devon as the operator of the Unit.

Order R-21460 further pooled the uncommitted interests in the Bone Spring formation [Livingston Ridge; Bone Spring Pool (Pool Code 39350)] in the Unit, and dedicated the Unit to the initial **Bora Bora 13-24 Fed Com #212H well** and the **Bora Bora 13-24 Fed Com #213H well**, with the **Bora Bora 13-24 Fed Com #212H well** as the proximity tract well including the E/2 W/2 of Sections 13 and 24 in the approved standard horizontal spacing unit.

Since the entry of Order R-21460, Devon has determined that it is prudent to drill the **Bora Bora 13-24 Fed Com #212H well** more than 330 feet from the quarter-quarter line separating the W/2 W/2 from the E/2 W/2 of Sections 13 and 24.

PROPOSED EVIDENCE

WITNESSES
Name and Expertise

Katie Dean,
Landman

ESTIMATED TIME

Affidavit

EXHIBITS

Approx. 5

PROCEDURAL MATTERS

Devon does not expect opposition at hearing and therefore intends to present these cases
by affidavit.

Respectfully submitted,

HOLLAND & HART LLP



By: _____

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
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
kaluck@hollandhart.com

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