

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

**APPLICATIONS OF PRIDE ENERGY COMPANY FOR
COMPULSORY POOLING, NON-STANDARD SPACING AND
PRORATION UNIT, AND UNORTHODOX LOCATION,
LEA COUNTY, NEW MEXICO**

CASE NOS. 16169-16174

PRE-HEARING STATEMENT

Opponent Devon Energy Production Company, L.P. provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Pride Energy Company

APPLICANT'S ATTORNEYS

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OPPONENT

Devon Energy Production Company, L.P.

OPPONENT'S ATTORNEYS

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STATEMENT OF THE CASE

Applicant Pride Energy Company has filed applications in the Wolfcamp and Bone Spring formations as follows:¹

Case No. 16169: Applicant seeks an order pooling all mineral interests within the Bone Spring formation (Pool Code WC-205 G-05 S-253209L; Bone Spring 96715), dedicated to its Paduca 16 State 501H well, non-standard 160 acre spacing and proration unit, and unorthodox location, underlying the W/2 W/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Case No. 16170: Applicant seeks an order pooling all mineral interests within the Bone Spring formation (Pool Code WC-205 G-05 S-253209L; Bone Spring 96715), dedicated to its Paduca 16 State 502H well, non-standard 160 acre spacing and proration unit, and unorthodox location, underlying the W/2 E/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Case No. 16171: Applicant seeks an order pooling all mineral interests within the Bone Spring formation (Pool Code WC-205 G-05 S-253209L; Bone Spring 96715), dedicated to its Paduca 16 State 503H well, non-standard 160 acre spacing and proration unit, and unorthodox location, underlying the E/2 W/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Case No. 16172: Applicant seeks an order pooling all mineral interests within the vertical limits of the Wolfcamp formation (Pool Code 98270), dedicated to its Paduca 16 State 701H well,

¹ Applicant has also filed Applications in the Delaware (Paduca Delaware pool), Case Nos. 16166-16168. Devon does not own any interest in the Delaware within the subject acreage and therefore does not oppose those Applications.

non-standard 160 acre spacing and proration unit, unorthodox location, underlying the W/2 W/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Case No. 16173: Applicant seeks an order pooling all mineral interests within the vertical limits of the Wolfcamp formation (Pool Code 98270), dedicated to its Paduca 16 State 702H well, non-standard 160 acre spacing and proration unit, and unorthodox location, underlying the W/2 E/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Case No. 16174: Applicant proposes an order pooling all mineral interests within the vertical limits of the Wolfcamp formation (Pool Code 98270), dedicated to its Paduca 16 State 703H well, non-standard 160 acre spacing and proration unit, and unorthodox location, underlying the E/2 W/2 of Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Opponent Devon Energy Production Company, L.P. has filed competing applications in the Wolfcamp and Bone Spring formations, as follows:

Case No. 16099: Applicant seeks an order approving a non-standard oil spacing and proration unit in the 2nd Bone Spring formation ((WC-025 G-07 S253206M; Bone Spring (Pool Code 96715))), comprised of the W/2 W/2 of Section 16 and W/2 W/2 of Section 21, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the 2nd Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 28-16 State Fed Com 232H well

Case No. 16100: Applicant seeks an order approving a non-standard oil spacing and proration unit in the 2nd Bone Spring formation (WC-025 G-07 S253206M; Bone Spring (Pool Code 96715))), comprised of the E/2 W/2 of Section 16 and E/2 W/2 of Section 21, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the

2nd Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 21-16 State Fed Com 234H well.

Case No. 16101: Applicant seeks an order approving a non-standard oil spacing and proration unit in the 2nd Bone Spring formation (WC-025 G-07 S253206M; Bone Spring (Pool Code 96715)), comprised of the W/2 E/2 of Section 16 and W/2 E/2 of Section 21, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the 2nd Bone Spring formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 28-16 State Fed Com 236H well

Case No. 16102: Applicant seeks an order approving a non-standard oil spacing and proration unit in the Wolfcamp formation (WC-025 G-07 S253216D; Upper Wolfcamp Pool (Pool Code 98270)), comprised of the W/2 W/2 of Section 16 and W/2 W/2 of Section 21, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Wolfcamp formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 28-16 State Fed Com 712H well.

Case No. 16103: Applicant seeks an order approving a non-standard oil spacing and proration unit in the Wolfcamp formation (WC-025 G-07 S253216D; Upper Wolfcamp Pool (Pool Code 98270)), comprised of the E/2 W/2 of Section 16 and E/2 W/2 of Section 21, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Wolfcamp formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 21-16 State Fed Com 714H well.

Case No. 16104: Applicant seeks an order approving a non-standard oil spacing and proration unit in the Wolfcamp formation (WC-025 G-07 S253216D; Upper Wolfcamp Pool (Pool Code 98270)), comprised of the W/2 E/2 of Section 16 and W/2 E/2 of Section 21, Township 25

South, Range 32 East, NMPM, Lea County, New Mexico, and pooling all mineral interests in the Wolfcamp formation underlying the non-standard unit. The unit will be dedicated to Applicant's proposed Marwari 28-16 State Fed Com 716H well.

PROPOSED EVIDENCE

APPLICANT'S WITNESSES

EST. TIME

EXHIBITS

Unknown.

OPPONENT'S WITNESSES

Tim Prout, Land	20 min.	6
Kirk Malinowsky, Geologist	20 min.	4
Anoop Sharma, Engineer	10 min.	4

PROCEDURAL MATTERS

Devon Energy Production Company, L.P. requests that these matters be consolidated with Devon's applications in Case Nos. 16099-16104 and continued to a special hearing date, as previously discussed with the Examiners, of June 12, 2018.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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