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

APPLICATIONS OF MATADOR PRODUCTION COMPANY FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

JUN 21 2018 PHO4:27

CASE NOS. 16061-16068

<u>DEVON ENERGY PRODUCTION COMPANY, L.P.'S</u> <u>PRE-HEARING STATEMENT</u>

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

APPEARANCES

<u>APPLICANT</u> <u>ATTORNEY</u>

Matador Production Company James Bruce

P.O. Box 1056 Santa Fe, 87504 jamesbruc@aol.com

<u>OPPONENT</u> <u>ATTORNEY</u>

OXY USA, Inc.

Dalva L. Moellenberg
1239 Paseo de Peralta

1239 Paseo de Peralta

Santa Fe, New Mexico 87501

dlm@gknet.com

INTERESTED PARTY ATTORNEY

Devon Energy Production Company, Seth C. McMillan

L.P. Montgomery & Andrews, P.A.

P.O. Box 2307 Santa Fe, NM 87504-2307

Santa Fe, NM 8/504-230/ smcmillan@montand.com

STATEMENT OF THE CASE

Case No. 16061: Applicant seeks an order approving a 177.24-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of Lots 1-4 (the W/2W/2) of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 121H, a horizontal well with a surface location in Lot 1, and a terminus in Lot 4, of Section 7.

Case No. 16062: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2W/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 132H, a horizontal well with a surface location in the NE/4NW/4, and a terminus in the SE/4SW/4, of Section 7.

Case No. 16063: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2E/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 133H, a horizontal well with a surface location in the NW/4NE/4, and a terminus in the SW/4SE/4, of Section 7.

Case No. 16064: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the E/2E/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 134H, a horizontal well with a surface location in the NE/4NE/4, and a terminus in the SE/4SE/4, of Section 7.

Case No. 16065: Applicant seeks an order approving a 177.24-acre non-standard oil spacing and proration unit (project area) in the Wolfcamp formation comprised of Lots 1-4 (the W/2W/2) of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 211H, a horizontal well with a surface location in Lot 1, and a terminus in Lot 4, of Section 7.

Case No. 16066: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Wolfcamp formation comprised of the E/2W/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 212H, a horizontal well with a surface location in the NE/4NW/4, and a terminus in the SE/4SW/4, of Section 7.

Case No. 16067: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Wolfcamp formation comprised of the W/2E/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 213H, a horizontal well with a surface location in the NW/4NE/4, and a terminus in the SW/4SE/4, of Section 7.

Case No. 16068: Applicant seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Wolfcamp formation comprised of the E/2E/2 of Section 7, Township 22 South, Range 32 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Wolfcamp formation underlying the non-standard spacing and proration unit (project area). The unit will be dedicated to the Laurie Wyman Fed. Com. Well No. 214H, a horizontal well with a surface location in the NE/4NE/4, and a terminus in the SE/4SE/4, of Section 7.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

Devon Energy Production Company, L.P. is a contractual interest owner in Section 7, Township 22 South, Range 32 East, NMPM. Devon does not at this time intend to put on any witnesses. Counsel may make a statement or seek admission of a relevant exhibit setting forth Devon's position.

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	<u>EXHIBIT</u>
Chris Carleton (landman)	25 min.	Approx. 20
Andrew Parker (geologist)	20 min.	Approx. 8

OPPONENT

WITNESSES	EST. TIME	EXHIBITS
Unknown at this time.		

INTERESTED PARTY

WITNESSES	EST. TIME	EXHIBITS

Devon Energy Production Company, L.P. does not at this time intend to put on any witnesses. Counsel may make a statement or seek admission of a relevant exhibit setting forth Devon's position.

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ Seth C. McMillan
Seth C. McMillan
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873
smcmillan@montand.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 served on the following counsel of record by electronic mail on June 21, 2018:

Dalva L. Moellenberg 1239 Paseo de Peralta Santa Fe, New Mexico 87501 dlm@gknet.com

James Bruce P.O. Box 1056 Santa Fe, 87504 jamesbruc@aol.com

/s/ Seth C. McMillan
Seth C. McMillan