

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

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

CASE NOS. 20261-20262

APPLICANT'S PRE- HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by  
the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Devon Energy Corporation

ATTORNEY

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

STATEMENT OF CASE

Applicant seeks orders pooling all uncommitted interests in Bone Spring  
formation (Sand Dunes; Bone Spring South Pool (53805)) underlying the following  
standard horizontal spacing units in Sections 15 and 22, Township 23 South, Range 32  
East:

In Case No. 20261, a 320-acre standard horizontal well spacing unit comprised of  
the W/2 W/2 of Sections 15 and 22 to be dedicated to the **Grumpy Cat 15-22  
Federal Com 211H Well** to be drilled at a sufficient depth to test the Bone  
Spring formation from surface location in the NW/4 NW/4 (Unit D) of Section 15  
to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 22.

In Case No. 20262, a 320-acre standard horizontal well spacing unit comprised of the E/2 W/2 of Sections 15 and 22 to be dedicated to the **Grumpy Cat 15-22 Federal Com 212H Well** to be drilled at a sufficient depth to test the Bone Spring formation from surface location in the NW/4 NW/4 (Unit D) of Section 15 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 22.

The completed intervals for these wells will comply with the standard setback requirements for oil wells.

### PROPOSED EVIDENCE

<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Ryan Cloer, Landman	Via Affidavit	5
Kirk Malinowsky, Geologist	Via Affidavit	5

### PROCEDURAL MATTERS

Devon intends to consolidate for hearing Case Nos. 20261 and 20262.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
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

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