

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

APPLICATIONS OF CIMAREX ENERGY CO. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case Nos. 22313-22316

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

Case Nos. 22179-22180 & 22382

CONSOLIDATED PRE-HEARING STATEMENT

Cimarex Energy Co. ("Cimarex") submits this Pre-Hearing Statement for the above-referenced cases pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

CIMAREX ENERGY CO.

ATTORNEY

Earl E. DeBrine
Deana M. Bennett
Jamie L. Allen
Bryce H. Smith
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-
2168
(505) 848-1800

OPPOSING PARTIES

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

ATTORNEY

Michael Feldewert
Adam Rankin
Julia Broggi
Post Office Box 2208
Santa Fe, New Mexico 87504

TEL: (505) 988-4421
FAX: (505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com

OTHER PARTIES

ATTORNEY

CONOCOPHILLIPS

OCEAN MUNDS-DRY
Elizabeth A. Ryan
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-800
(505 428-0485 FAX
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com

STATEMENT OF CASES

APPLICANT:

1. **Case No. 22313:** In this case, Cimarex seeks an order from the Division pooling all uncommitted mineral interests within a Bone Spring horizontal spacing unit underlying the W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Coriander 1-12 Fed Com 12H; Coriander 1-12 Fed Com 16H; Coriander 1-12 Fed Com 18H; Coriander 1-12 Fed Com 25H; Coriander 1-12 Fed Com 27H; Coriander 1-12 Fed Com 28H; and Coriander 1-12 Fed Com 31H** wells, to be horizontally drilled. The **Coriander 1-12 Fed Com 31H** well was added to this application through an amended application.

2. **Case No. 22314:** In this case, Cimarex seeks an order from the Division pooling all uncommitted mineral interests within a Wolfcamp horizontal spacing unit underlying the W/2 W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Coriander 1-12 Fed Com 26H** well, to be horizontally drilled.

3. **Case No. 22315:** In this case, Cimarex seeks an order from the Division pooling all uncommitted mineral interests within an Avalon horizontal spacing unit underlying the W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Coriander 1-12 Fed Com 19H; Coriander 1-12 Fed Com 29H; and Coriander 1-12 Fed Com 30H** wells, to be horizontally drilled.

4. **Case No. 22316:** In this case, Cimarex seeks an order from the Division pooling all uncommitted mineral interests within a Wolfcamp horizontal spacing unit underlying the E/2 W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. This spacing unit will be dedicated to the **Coriander 1-12 Fed Com 13H** well, to be horizontally drilled.

OPPOSING PARTY:

In Cases 22179-22180 & 22382, Devon Energy Production Company, L.P. (“Devon”), is proposing wells in the W/2 of Sections 24, 13, and 12 of Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. Cimarex’s and Devon’s proposals overlap with respect to Section 12. Cimarex will demonstrate at the contested hearing in these matters that Ciamrex’s development plan for Sections 1 and 12 is more desirable than Devon’s plan for Sections 24, 13, and 12. Cimarex’s plan protects correlative rights, prevents waste, and allows both Cimarex and Devon to develop the acreage at issue with two-mile wells.

PROPOSED EVIDENCE

APPLICANT:

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Kelsi Henriques	Approx. 30 minutes	Approx. 8
Geologist: Jennifer Blake	Approx. 30 minutes	Approx. 25
Reservoir Engineer: Eddie Behm	Approx. 30 minutes	Approx. 20

PROCEDURAL ISSUES

These cases are currently set for a contested hearing on March 24, 2022.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

By: Deana M. Bennett
Deana M. Bennett
Earl E. DeBrine
Jaime L. Allen

Bryce H. Smith
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800
Deana.Bennett@modrall.com

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Ocean Munds-Dry
Elizabeth A. Ryan
1048 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 780-800
(505 428-0485 FAX
Ocean.Munds-Dry@conocophillips.com
Beth.Ryan@conocophillips.com
Attorneys for ConocoPhillips

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504
TEL: (505) 988-4421
FAX: (505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com
Attorneys for Devon Energy Production Company, L.P.

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

QUESTIONS

Action 91188

QUESTIONS

Operator: CIMAREX ENERGY CO. 600 N. Marienfeld Street Midland, TX 79701	OGRID: 215099
	Action Number: 91188
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>