

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

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

**CASE NOS. 22179-22180, 22382**

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

**CASE NOS. 22313-22316**

**NOTICE OF REBUTTAL EXHIBITS**

Devon Energy Production Company, L.P. provides notice that it is supplementing the evidentiary record in these cases by submitting the attached Rebuttal Exhibits F through K.

Respectfully submitted,

**HOLLAND & HART, LLP**



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**CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2022, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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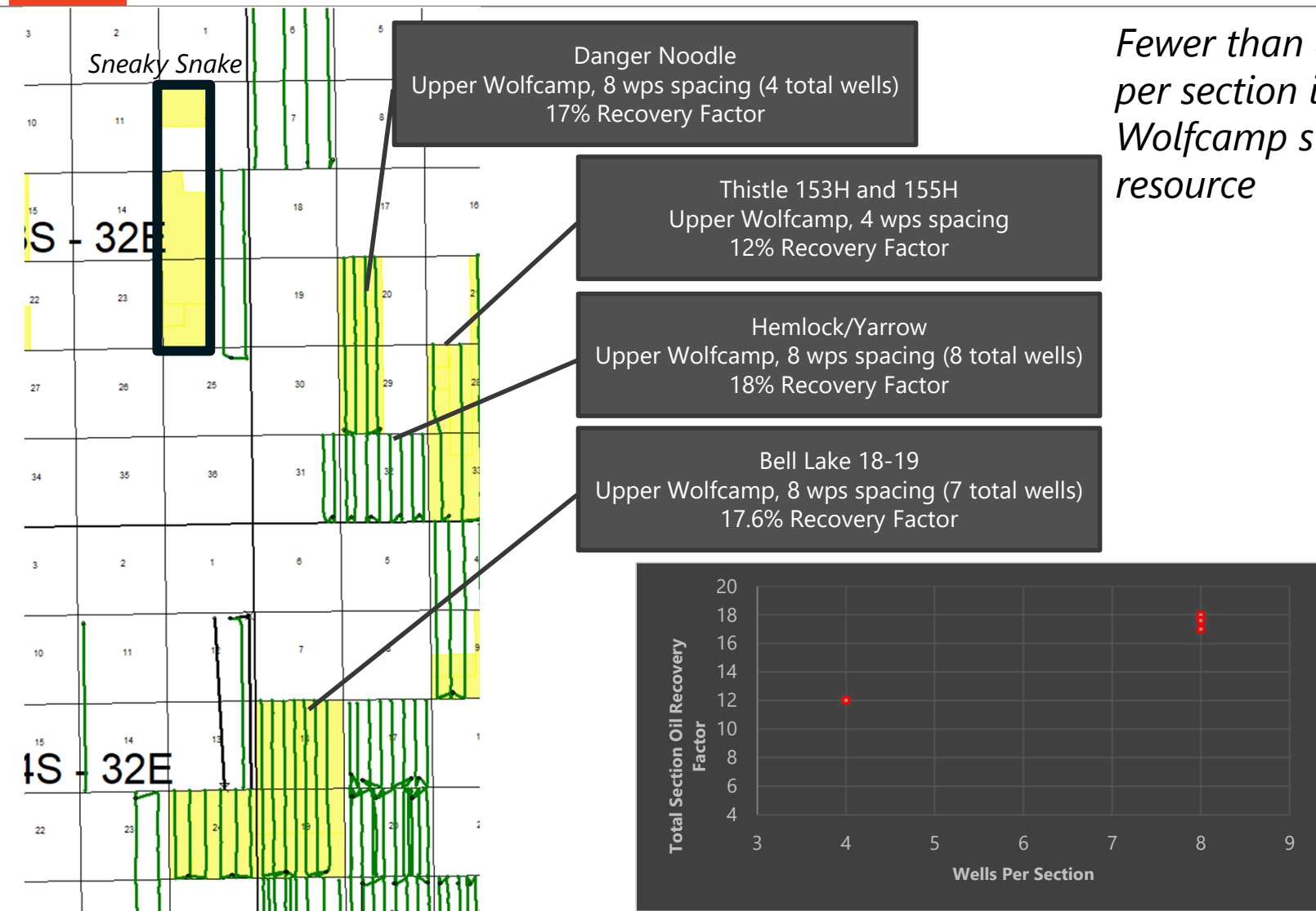
**Attorneys for Cimarex Energy Co.**



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Michael H. Feldewert

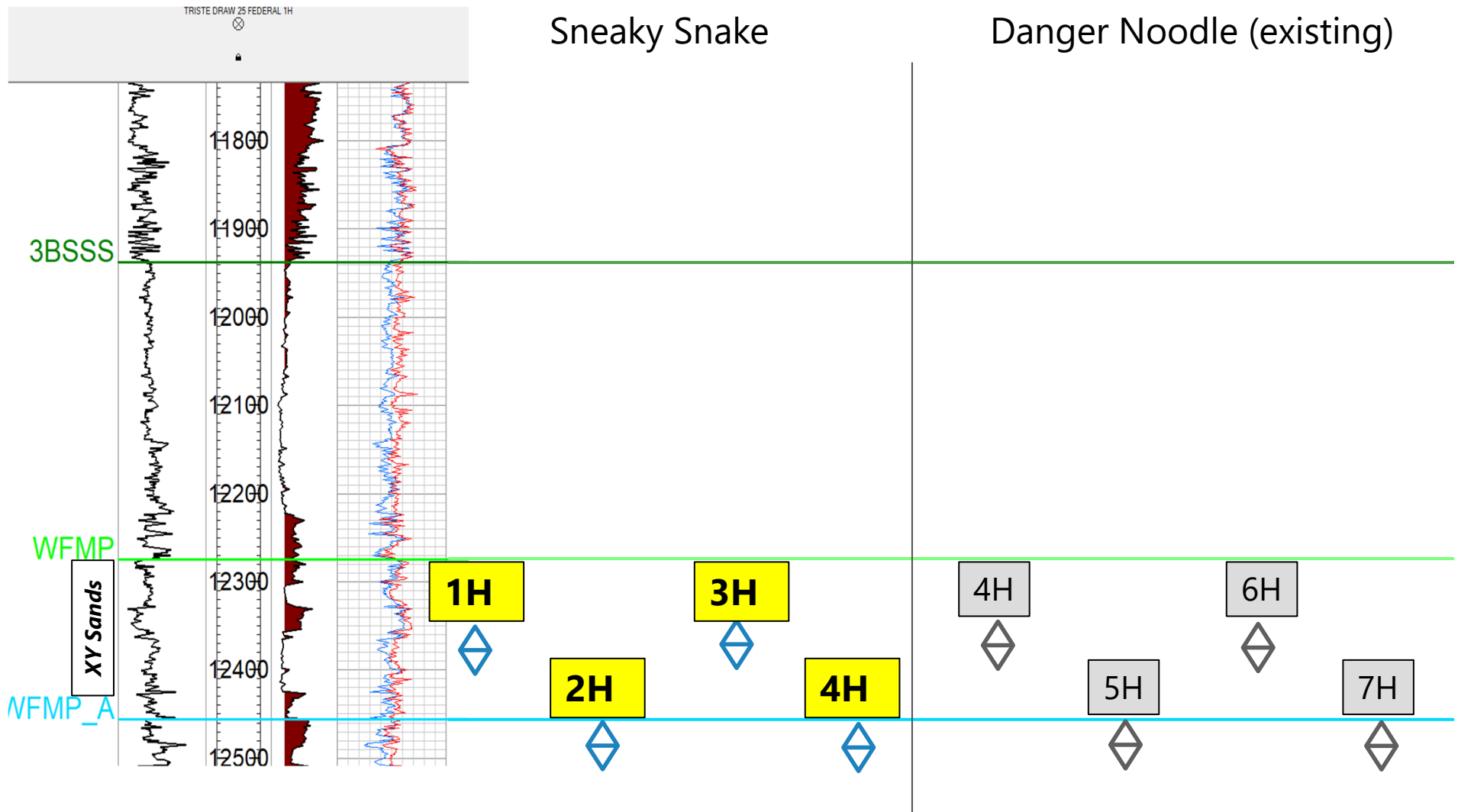
# Upper Wolfcamp Recovery Factors Versus Spacing



*Fewer than 8 wells per section in upper Wolfcamp strands resource*



# Sneaky Snake Wolfcamp Gunbarrel Compared to Successful Danger Noodle Development



# Wolfcamp Sands Producers



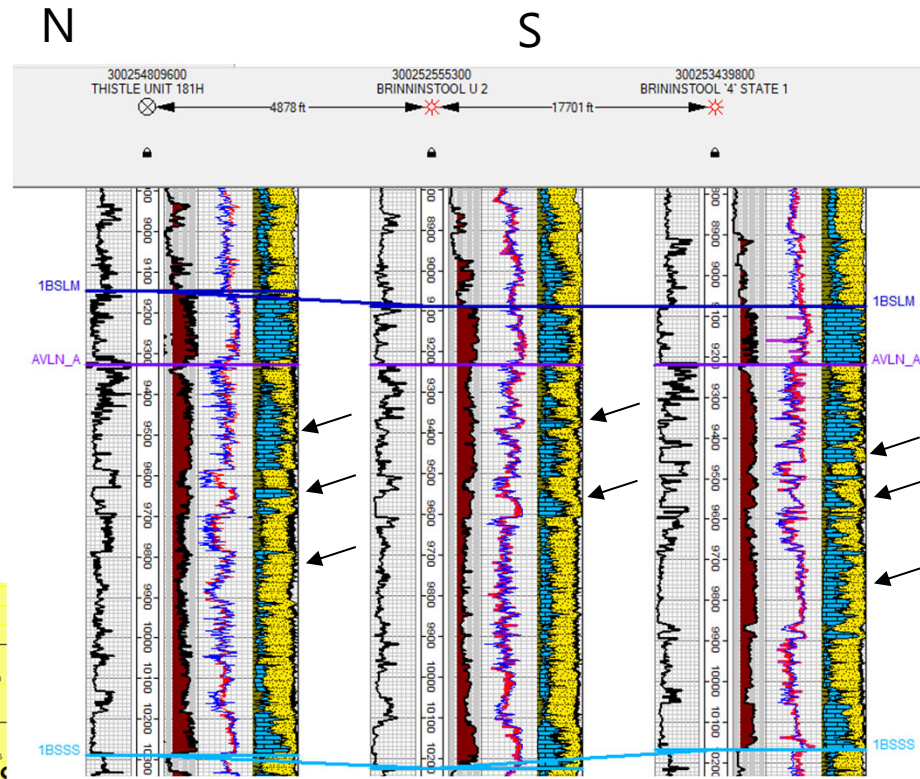
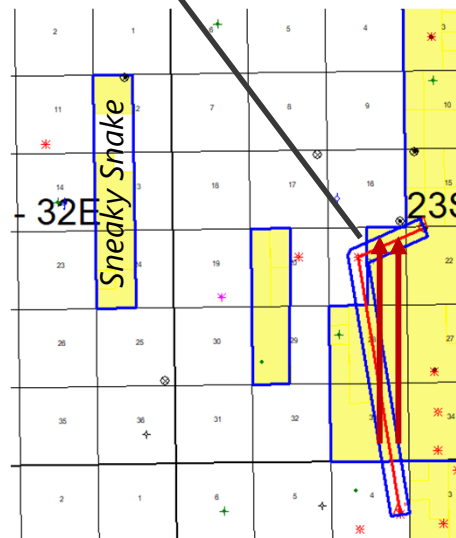
*Cimarex's implication that there is no oil in the Wolfcamp sands (exhibit C-6-D) in the northern Delaware basin is not in line with the existence of the large number of Wolfcamp sands (XY) wells, shown at left.*

BEFORE THE OIL CONSERVATION DIVISION  
 Santa Fe, New Mexico  
 Exhibit No. G  
 Submitted by: Devon Energy Production Co. L.P.  
 Hearing Date: March 24, 2022  
 Case Nos. 22179-22180, 22382



# 3 Mile Avalon wells in Geologically Complex settings

Thistle 159H and 156H Avalon, 3 Mile wells Successfully drilled and completed in 2019

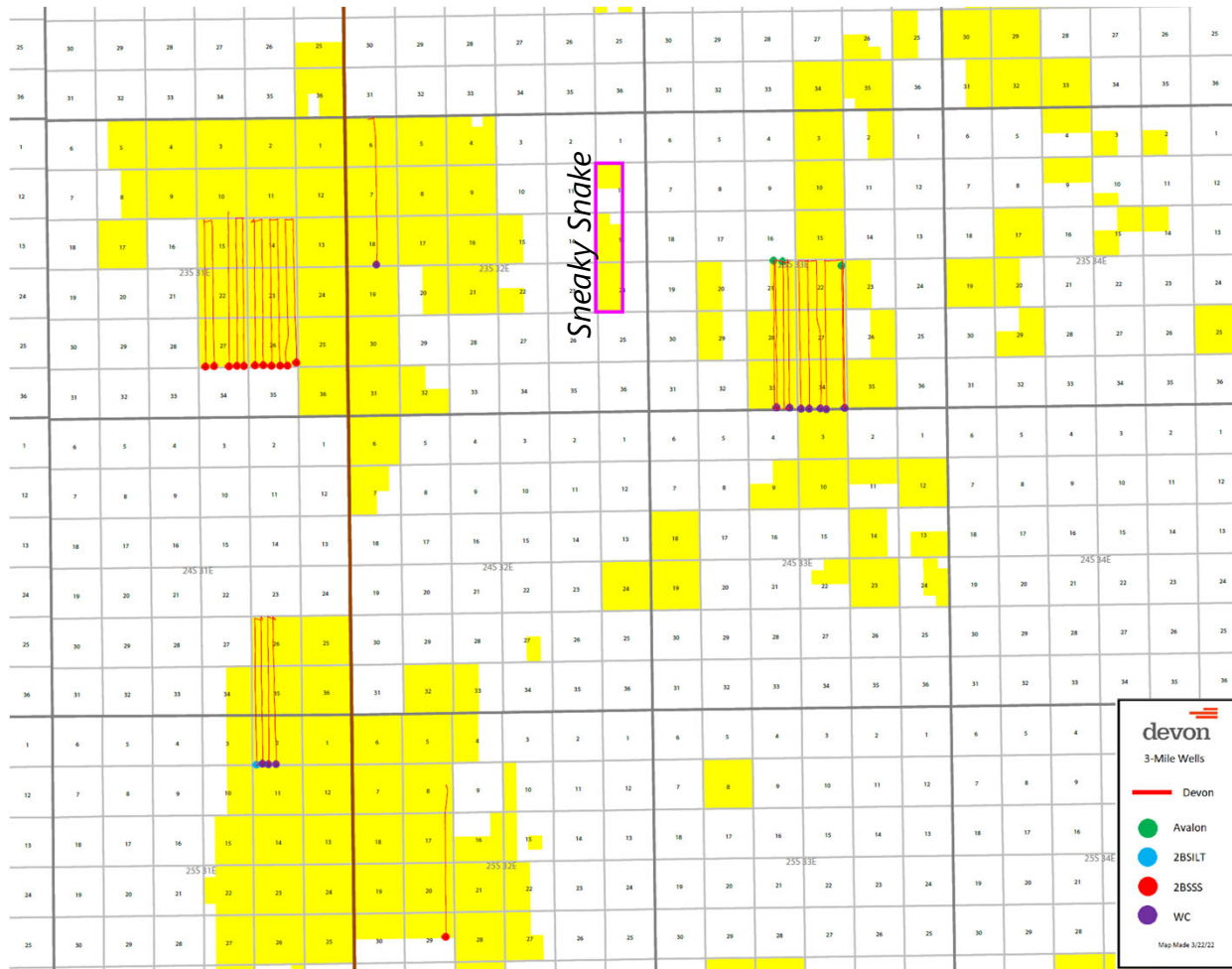


Arrows denote cherty carbonate bodies

*Devon has shown success in drilling 3 mile Avalon wells in geologically complex areas. High-quality well planning and execution allows wellbores to navigate across an area with widely-distributed carbonate and chert stringers and debris flows. Cimarex's claims that 3 mile Avalon drilling is risky or dangerous (e.g. Cimarex Exhibit C-3-D) may stem from lack of experience.*



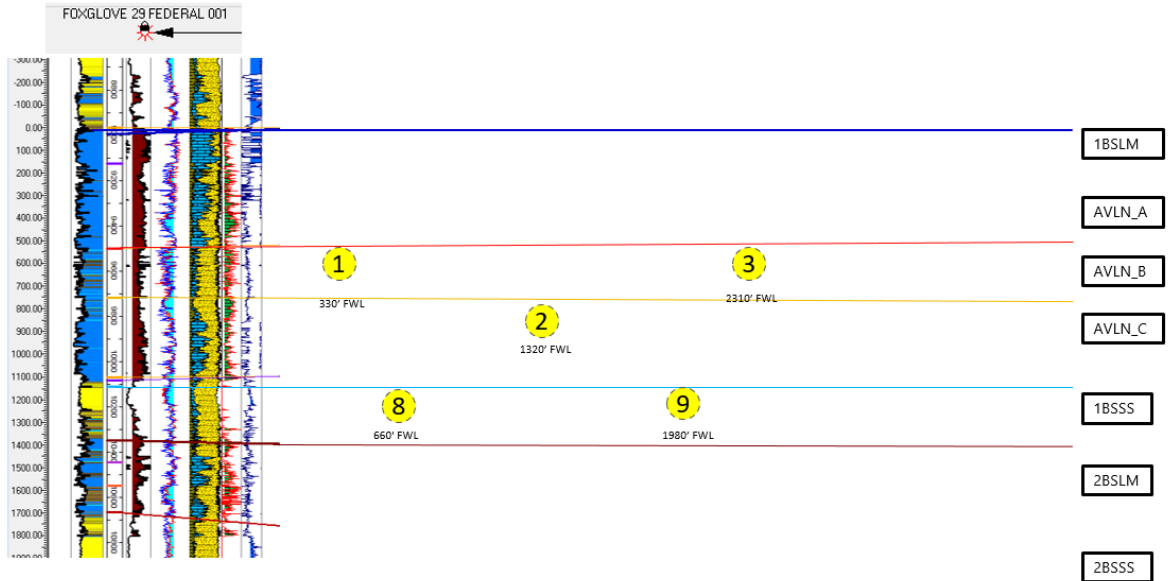
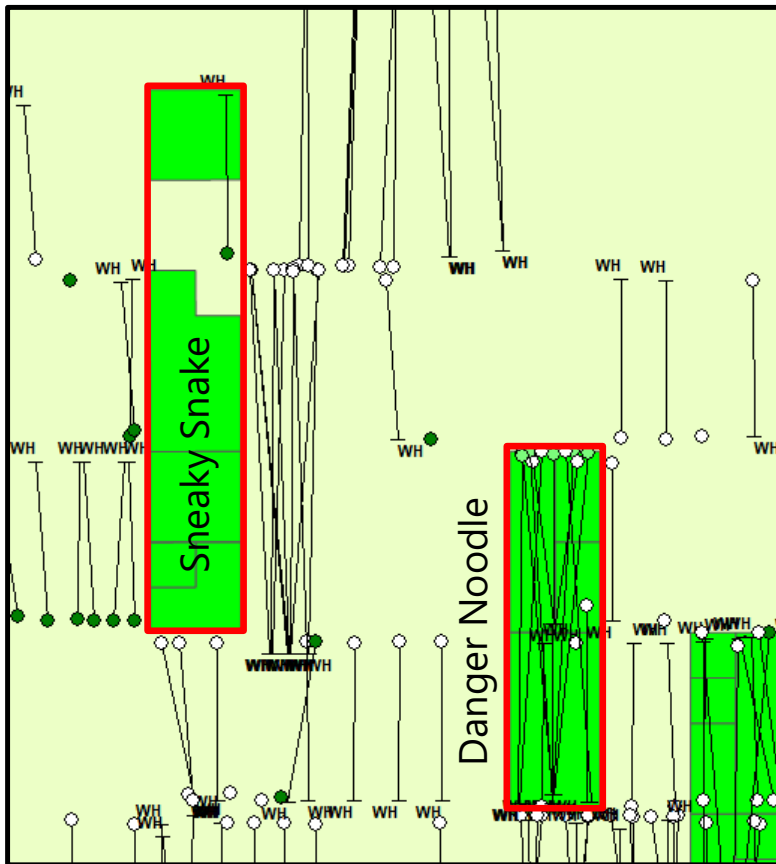
# Existing Devon 3-Mile Wells



*Devon has shown success in drilling 3 mile wells in a variety of formations and geologic settings. Cimarex's claims that 3 mile drilling is inherently risky is not true by Devon's experience.*



# 1BSSS LOCATIONS DRILLED IN DANGER NOODLE

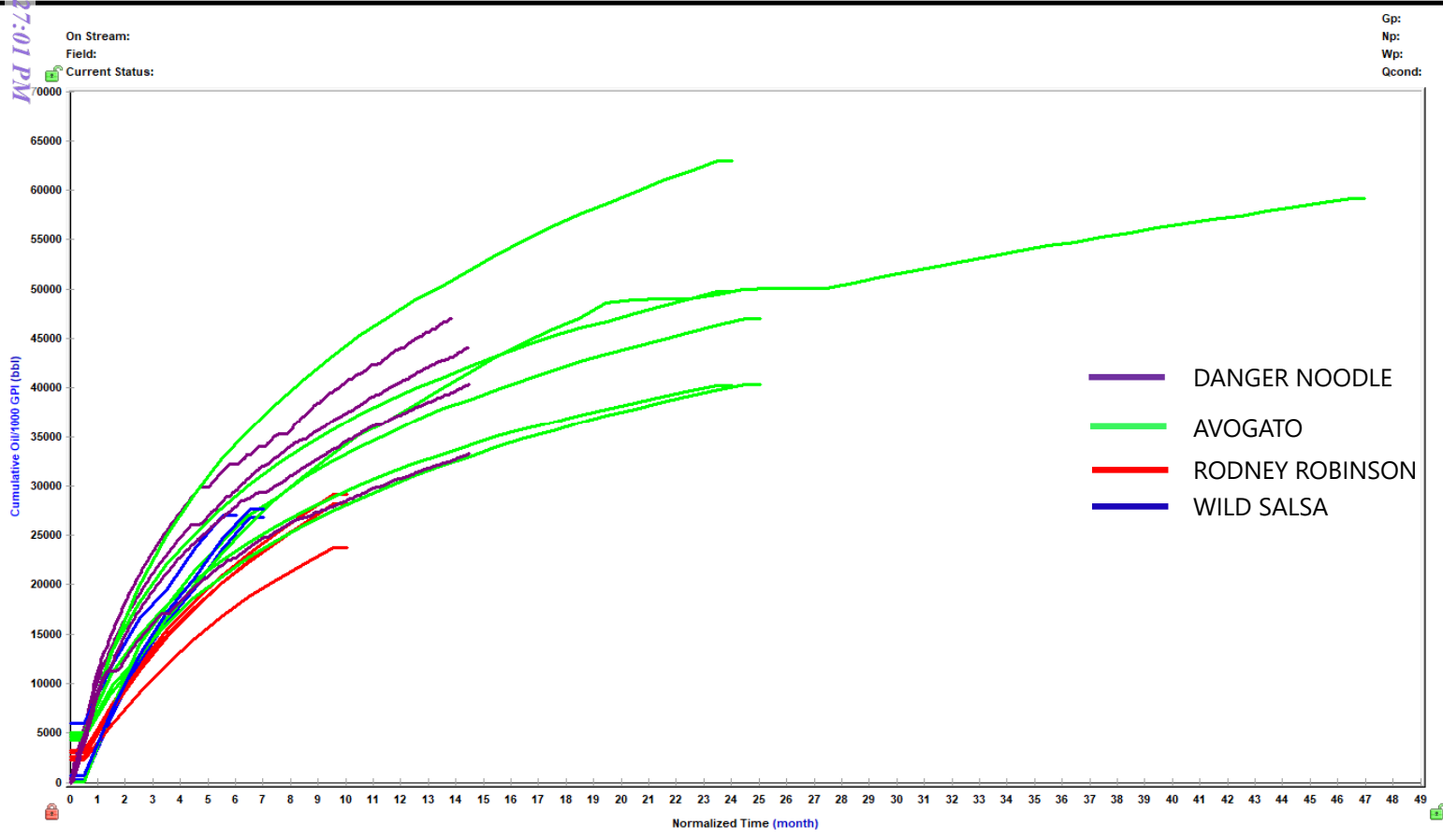


Devon has successfully developed 1BSSS in our Danger Noodle development section. Continued derisking of this horizon has prompted Devon to plan to develop the 1BSSS in Sneaky Snake in future phases. The 2 red boxes highlighted in the map show the proximity of the 2 programs.





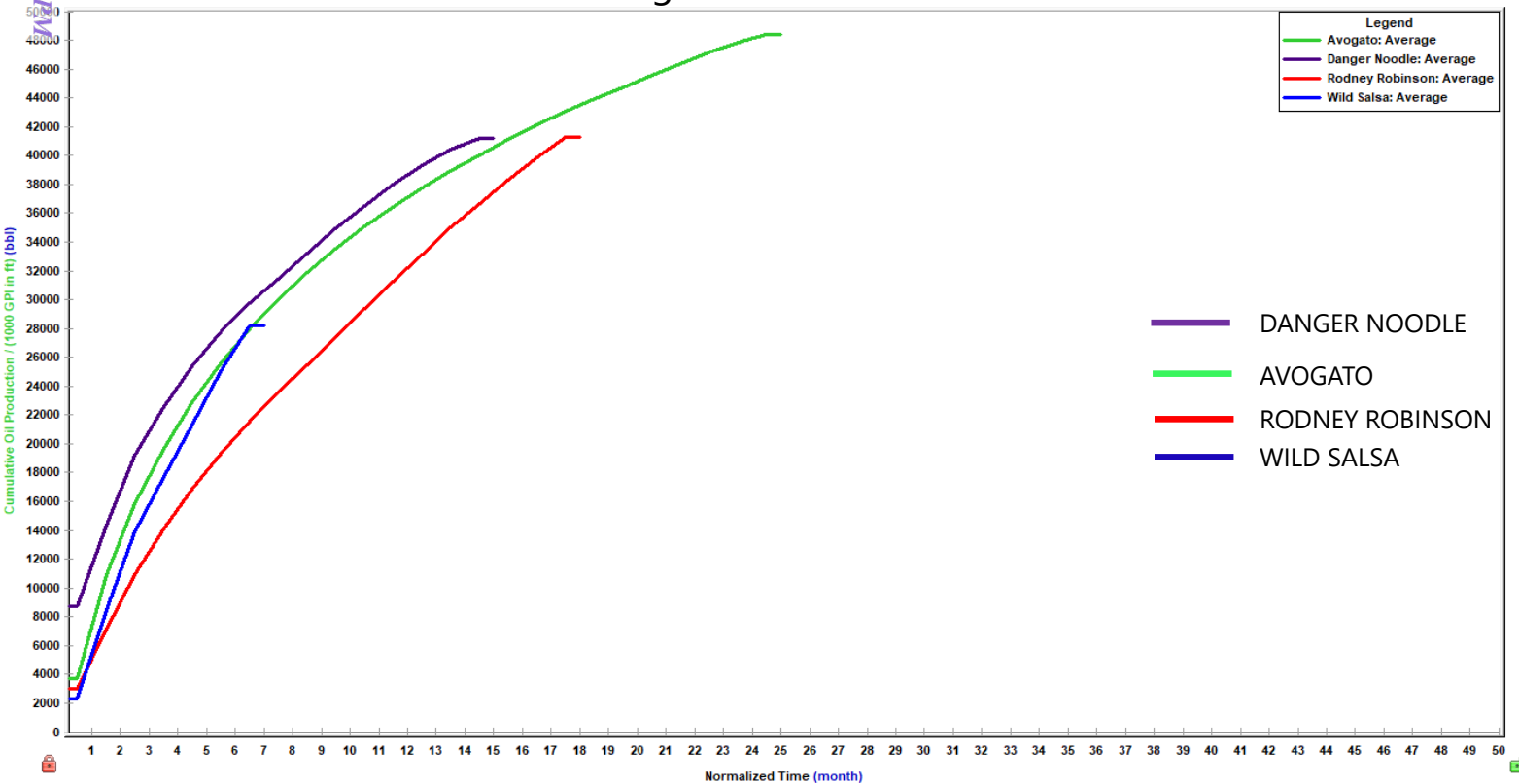
# RESPONSE TO D-9 & D-10



Devon operated upper Wolfcamp wells in the Danger Noodle section show to be in the top tier for production compared with combined WFMP/3BSS development sections near the Sneaky Snake acreage.

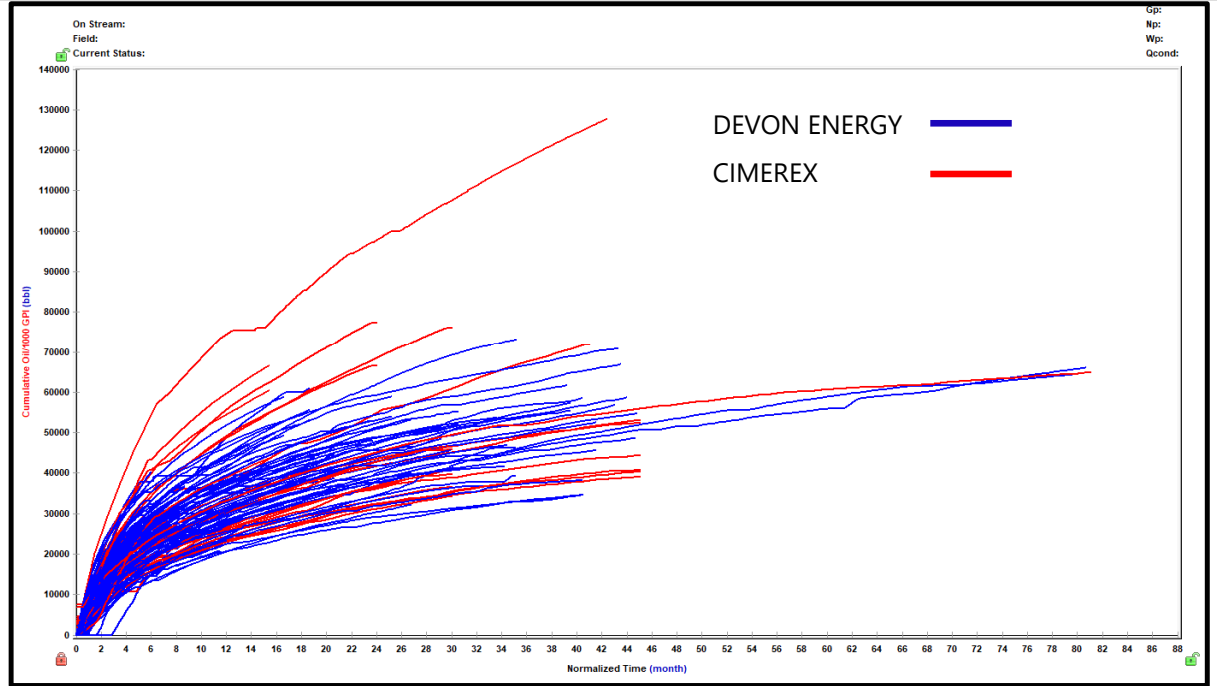
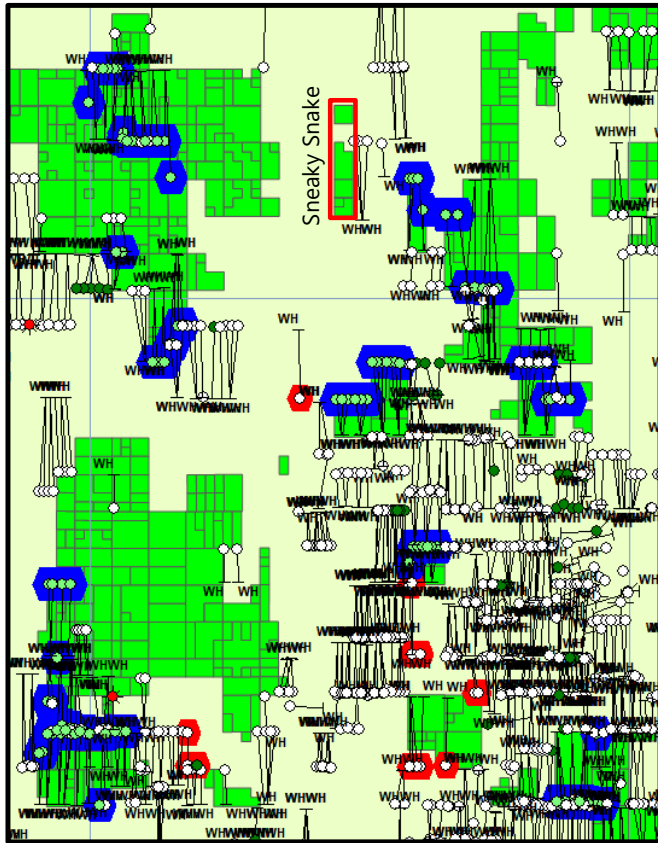
# RESPONSE TO D-9 & D-10

## Average Unit Performance



Devon operated upper Wolfcamp wells in the Danger Noodle section show to be in the top tier for production compared with combined WFMP/3BSS development sections near the Sneaky Snake acreage.

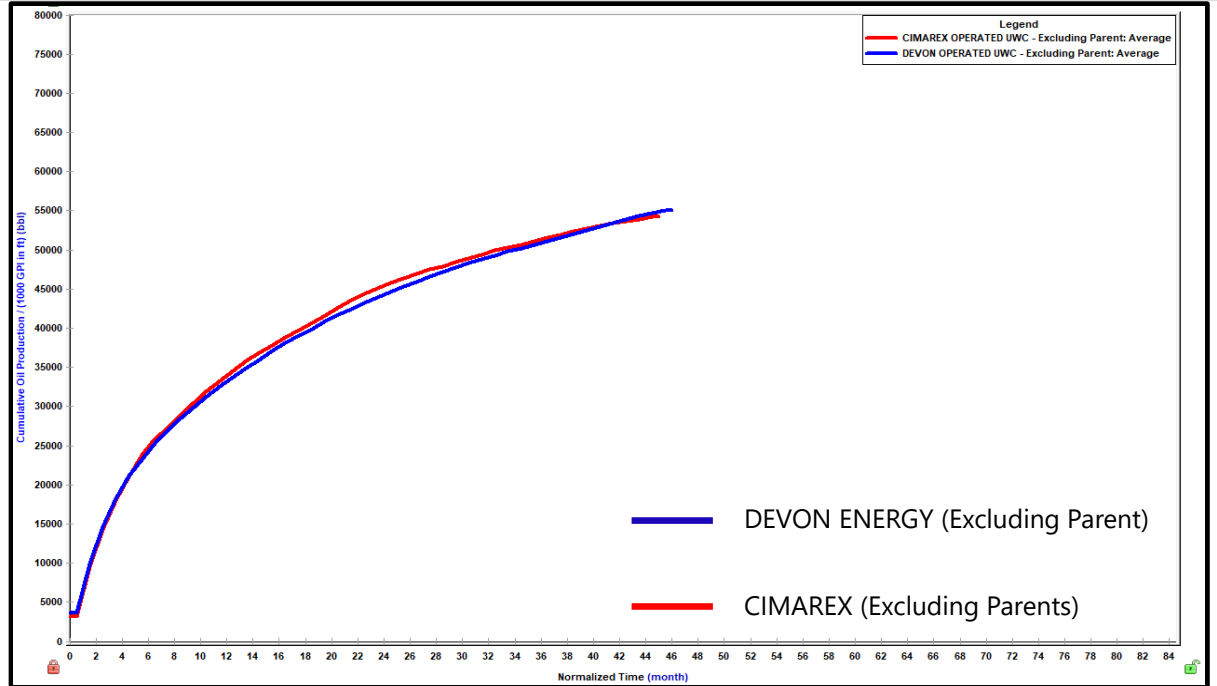
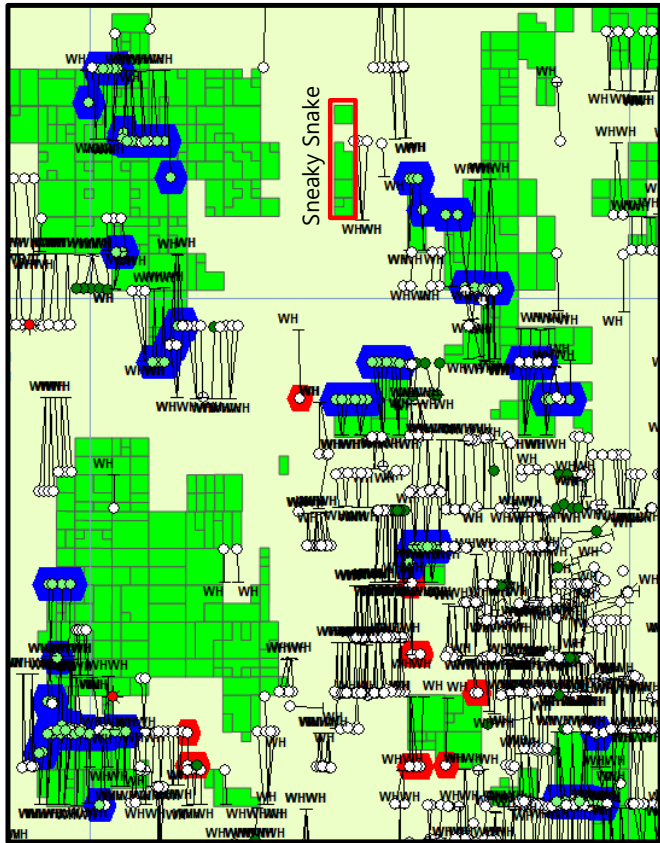
# RESPONSE TO D-13



Cumulative Oil/1000 ft of GPI for both Devon & Cimarex Upper Wolfcamp wells in the area of the disputed acreage. Devon has drilled and completed 106 upper Wolfcamp wells all at full section development while Cimarex shows has only drilled and completed 22 wells in the surrounding area, some of which are parent wells. Parent wells are known to give a higher cumulative oil because as they not fully bound, but they result in wasted resource due to the introduction of pressure depletion and degradation of subsequent infill wells. The overlap of Devon and Cimarex well performance clearly shows that Cimarex's statement about Devon operated Wolfcamp wells (Cimarex Exhibit D-13) is false and misleading.



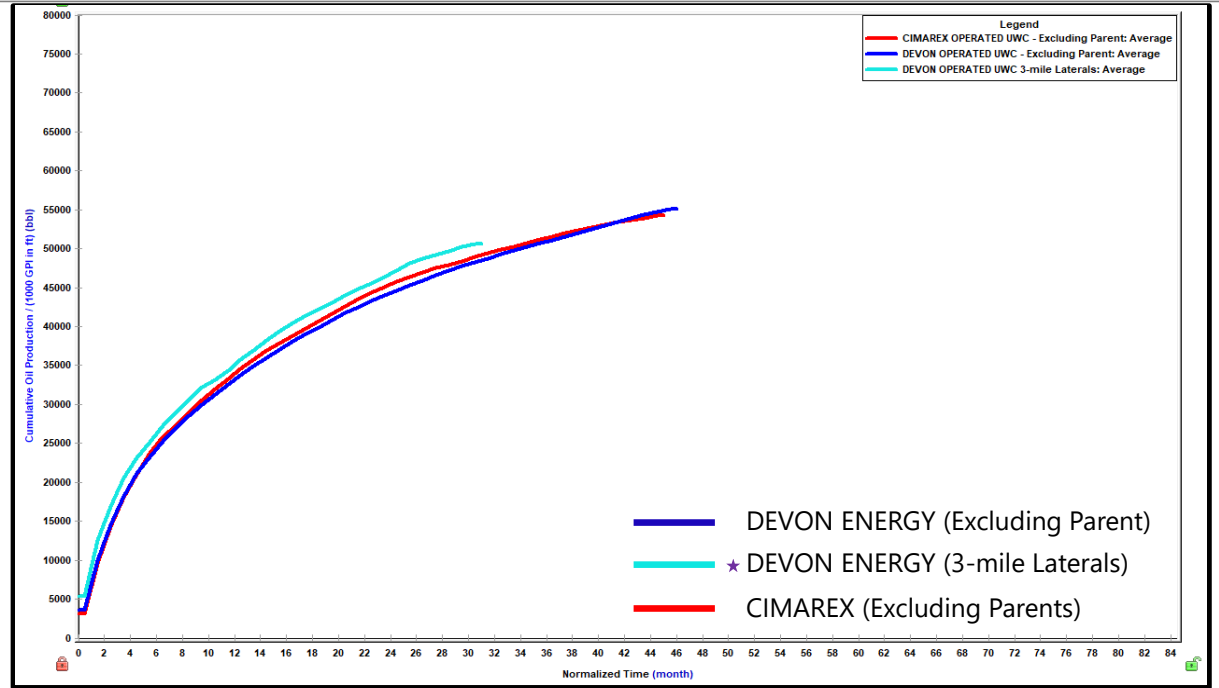
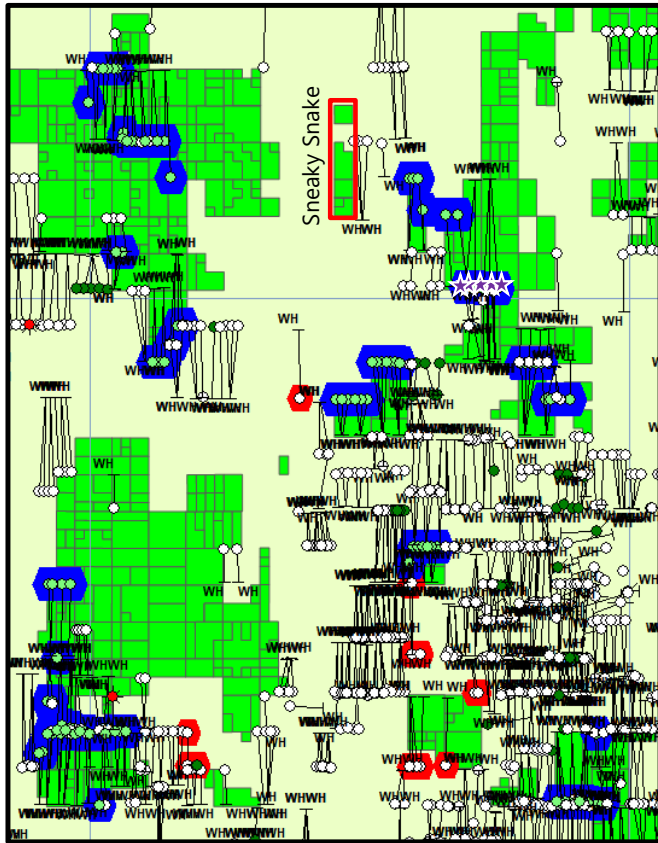
# RESPONSE TO D-13



Excluding parent wells from the well-set for reasons previously stated shows the average cumulative production per 1000' of lateral for Devon and Cimarex upper Wolfcamp developments in the region of the disputed acreage are equivalent. The overlap of Devon and Cimarex well performance clearly shows that Cimarex's statement about Devon operated Wolfcamp wells (Cimarex Exhibit D-13) is false and misleading.



# RESPONSE TO D-15



Excluding parent wells, average cumulative production per 1000' of lateral for Devon and Cimarex upper Wolfcamp developments in the region of the disputed acreage are equivalent. Devon's 3-mile Wolfcamp development in the immediate area (Thistle, purple stars) actually outperform the regional averages of both operators. Therefore, we find Cimarex's claims of 3 mile underperformance invalid (Exhibits D-15A&B)



# Devon Well List

Display Name	API Number	Display Name	API Number	Display Name	API Number
BELL LAKE 19-18 STATE COM 30H	30025456380000	FLAGLER 8 FED 12H	30025451630000	SHIRE 22-15 FED COM 613H	30015473280000
BELL LAKE 19-18 STATE COM 31H	30025456390000	FLAGLER 8 FED 3H	30025452570000	SHIRE 22-15 FED COM 616H	30015473270000
BELL LAKE 19-18 STATE COM 32H	30025456400000	FLAGLER 8 FED 4H	30025452580000	SHIRE 22-15 FED COM 716H	30015473290000
BELL LAKE 19-18 STATE COM 34H	30025456410000	FLAGLER 8 FED 7H	30025449880000	SHIRE 22-15 FED COM 718H	30015473300000
BELL LAKE 19-18 STATE COM 35H	30025456420000	FLAGLER 8 FED 8H	30025449890000	SHIRE 22-15 FED COM 733H	30015473610000
BELL LAKE 19-18 STATE COM 36H	30025456430000	FLAGLER 8 FED COM 2H	30025450010000	SNAPPING 12-1 FED 621H	30015471290000
BELL LAKE 19-18 STATE COM 37H	30025456440000	FLAGLER 8 FED COM 6H	30025449800000	SNAPPING 12-1 FED 711H	30015471300000
BELL LAKE 24 FED 15H	30025468350000	JAYHAWK 6-7 FED 11H	30025455430000	SNAPPING 12-1 FED 712H	30015471330000
BELL LAKE 24 FED 16H	30025468700000	JAYHAWK 6-7 FED 14H	30025455460000	*SNAPPING 2 STATE 14H – Parent	30015426880100
BELL LAKE 24 FED 18H	30025468710000	JAYHAWK 7 FED 13H	30025455510000	THISTLE UNIT 108H	30025437270000
BELL LAKE 24 FED 22H	30025468740000	LUSITANO 27-34 FED COM 622H	30015456560000	THISTLE UNIT 121H	30025437320000
BELL LAKE 24 FED 24H	30025468750000	LUSITANO 27-34 FED COM 624H	30015456320000	*THISTLE UNIT 153H – 3 mile	30025435890000
BELL LAKE 24 FED 25H	30025468760000	LUSITANO 27-34 FED COM 626H	30015444280000	*THISTLE UNIT 155H – 3 mile	30025436580000
BELLOQ 11-2 FED STATE COM 713H	30015467570000	LUSITANO 27-34 FED COM 713H	30015456580000	*THISTLE UNIT 180H – 3 mile	30025480980000
BELLOQ 11-2 FED STATE COM 714H	30015467640000	LUSITANO 27-34 FED COM 718H	30015444290000	*THISTLE UNIT 181H – 3 mile	30025480960100
BELLOQ 11-2 FED STATE COM 734H	30015467560000	LUSITANO 27-34 FED COM 734H	30015456360000	*THISTLE UNIT 182H – 3 mile	30025480970000
*BELLOQ 2 STATE 2H – Parent	30015428950000	RIGHT MEOW 31-6 FED COM 626H	30025484590000	THOROUGHbred 10-3 FED COM 621H	30015464780000
BLUE KRAIT 23 FED 33H	30025465400000	RIGHT MEOW 31-6 FED COM 716H	30025484600000	THOROUGHbred 10-3 FED COM 623H	30015468990000
BLUE KRAIT 23 FED 38H	30025468320000	RIGHT MEOW 31-7 FED COM 627H	30025484910000	THOROUGHbred 10-3 FED COM 711H	30015464770000
BLUE KRAIT 23-14 FED 31H	30025464300000	RIGHT MEOW 31-7 FED COM 717H	30025484920000	THOROUGHbred 10-3 FED COM 712H	30015465060000
BLUE KRAIT 23-14 FED 32H	30025468330000	SEAWOLF 1-12 FED 102H	30025437910000	THOROUGHbred 10-3 FED COM 713H	30015469000000
BLUE KRAIT 23-14 FED 35H	30025468340000	SEAWOLF 1-12 FED 81H	30025437620000	THOROUGHbred 10-3 FED COM 714H	30015469020000
BLUE KRAIT 23-14 FED 36H	30025464650000	SEAWOLF 1-12 FED 82H	30025437630000	THOROUGHbred 10-3 FED COM 732H	30015465070000
BLUE KRAIT 23-14 FED 37H	30025464660000	SEAWOLF 1-12 FED 83H	30025437640000	THOROUGHbred 10-3 FED COM 733H	30015469040000
BOUNDARY RAIDER 6-18 FED COM 712H	30025477060000	SEAWOLF 1-12 FED 84H	30025437650000	THOROUGHbred 10-3 FED COM 734H	30015469070000
BOUNDARY RAIDER 6-7 FED COM 612H	30025475700000	SEAWOLF 1-12 FED 85H	30025437660000	TODD 36 STATE 625H	30015459390000
BOUNDARY RAIDER 6-7 FED COM 711H	30025475710000	SEAWOLF 1-12 FED 86H	30025437670000	TODD 36 STATE 715H	30015459400000
BROADSIDE 13 W FEDERAL COM 001H	30025465170000	SEAWOLF 1-12 FED 92H	30025437690000	TOMB RAIDER 1-12 FED 612H	30015459770000
CATTY SHACK 6-7 FED COM 621H	30025484840000	SEAWOLF 1-12 FED 94Y	30025441380000	TOMB RAIDER 1-12 FED 614H	30015449410000
CATTY SHACK 6-7 FED COM 623H	30025484850000	SEAWOLF 1-12 FED 95H	30025437900000	TOMB RAIDER 1-12 FED 702H	30015459780000
CATTY SHACK 6-7 FED COM 711H	30025484860000	SHETLAND 11-2 FED STATE COM 611H	30015471390000	TOMB RAIDER 1-12 FED 714H	30015449420000
CATTY SHACK 6-7 FED COM 713H	30025484870100	SHETLAND 11-2 FED STATE COM 711H	30015471560000	TOMB RAIDER 1-12 FED 732H	30015459790000
DANGER NOODLE 29-20 FED COM 4H	30025470500000	SHETLAND 11-2 FED STATE COM 712H	30015471570000	TOMB RAIDER 1-12 FED COM 718H	30015448110000
DANGER NOODLE 29-20 FED COM 5H	30025470510000	SHETLAND 11-2 FED STATE COM 732H	30015471590000	TOMB RAIDER 12-1 FED 611H	30015460950000
DANGER NOODLE 29-20 FED COM 6H	30025470520000	SHETLAND 2-11 STATE FED COM 613H	30015471720000	TOMB RAIDER 12-1 FED 701H	30015460960000
DANGER NOODLE 29-20 FED COM 7H	30025470530000				



# Cimarex Well List

Display Name	API Number
CASCADE 28 FEDERAL 085H	30025463130000
CASCADE 28 FEDERAL 086H	30025463140000
*DOS EQUIS 11 14 FEDERAL COM 004H – Parent	30025454130100
*HALLERTAU `5` FEDERAL 3H – Parent	30025404550100
HALLERTAU 5 FEDERAL 007H	30025439110000
HALLERTAU 5 FEDERAL 008H	30025426660000
HALLERTAU 5 FEDERAL 009H	30025433030000
HALLERTAU 5 FEDERAL 010H	30025433040000
HALLERTAU 5 FEDERAL 011H	30025438860000
HALLERTAU 5 FEDERAL 016H	30025438870000
RED HILLS 32-5 FEDERAL COM 155H	30025462940000
*RED HILLS UNIT 017H – Parent	30025423250000
RED HILLS UNIT 127H	30025455020000
RED HILLS UNIT 130H	30025463250000
RED HILLS UNIT 131H	30025455030000
*VACA DRAW 20-17 FEDERAL 001H – Parent	30025441350100
VACA DRAW 20-17 FEDERAL 002H	30025441360000
VACA DRAW 20-17 FEDERAL 003H	30025441370000
VACA DRAW 20-17 FEDERAL 004H	30025443040100
VACA DRAW 20-17 FEDERAL 007H	30025441660000
VACA DRAW 20-17 FEDERAL 008H	30025443590000
VACA DRAW 20-17 FEDERAL 013H	30025452900000

