

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

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

Case No. 23789

PREHEARING STATEMENT

Devon Energy Production Company, L.P. (“Devon”), OGRID No. 6137, through its undersigned attorneys, hereby files this Application with the Oil Conservation Division (“Division”).

APPEARANCES

ATTORNEY

APPLICANT

Devon Energy Production
Company, L.P.

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APPLICANT’S STATEMENT OF THE CASE

In Case No. 23789, Devon seeks an order pooling all uncommitted mineral interests in the Purple Sage; Wolfcamp formation, designated as a gas pool, underlying a standard 639.56-acre, more or less, spacing and proration unit comprised of the W/2 of Section 35, Township 23 South, Range 29 East, NMPM, and Lot 3 (NE/4 NW/4 equivalent), Lot 4 (NW/4 NW/4 equivalent), the

S/2 NW/4, and the SW/4 of Section 2, Township 24 South, Range 29 East, NMPM, all in Eddy County, New Mexico. Section 2 is an irregular section containing correction lots. And (2) pooling all uncommitted mineral interests in the Purple Sage; Wolfcamp formation, designated as a gas pool, underlying said unit.

Devon proposes the **Tater Tot 2-35 Fed Com 621H Well, Tater Tot 2-35 Fed Com 711H Well, and Tater Tot 2-35 Fed Com 712H Well** as the initial wells to be drilled to a sufficient depth to test the Wolfcamp formation.

Devon proposes the **Tater Tot 2-35 Fed Com 621H Well**, a gas well, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.

Devon proposes the **Tater Tot 2-35 Fed Com 711H Well**, a gas well, to be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.

Devon proposes the **Tater Tot 2-35 Fed Com 712H Well**, a gas well, to be horizontally drilled from a surface location in Unit O (SW/4 SE/4 equivalent) of Section 2 to a bottom hole location in Unit C (NE/4 NW/4 equivalent) of Section 35.

The proposed wells are unorthodox in location, and the take points and completed intervals do not comply with setback requirements under the special Division rules for the Purple Sage Wolfcamp pool, which are set out in Order No. R-14262.

Devon has made applications for administrative approval of the Nonstandard Locations (“NSL”) of each well, and the Division has granted approval of each NSL in Order No. NSL-8625, Order No. NSL-8628, and Order No. NSL-8629.

APPLICANT’S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Aaron Young	Approx. 10 min	Approx. 6
Geologist: Sarah Jancuska	Approx. 10 min	Approx. 3

PROCEDURAL MATTERS

Devon requests that, for purposes of the hearings, Case Nos. 23786, 23787 and 23788 be consolidated with Case No. 23789 as they involve units within the same sections. No protests or objections have been filed and Devon does not anticipate any at this time; consequently, Devon plans to conduct the hearing by affidavit.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ Darin C. Savage

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
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QUESTIONS

Action 270245

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 270245
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	20