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

APPLICATIONS OF DEVON ENERGY PROUDCTION 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,

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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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Michael H. Feldewert

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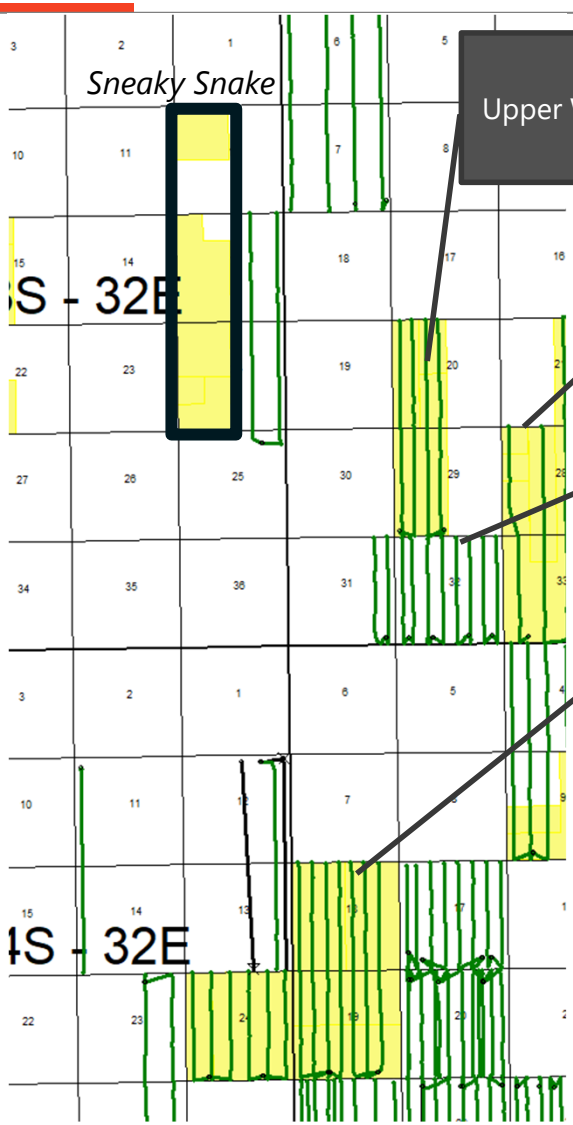
Upper Wolfcamp Recovery Factors Versus Spacing



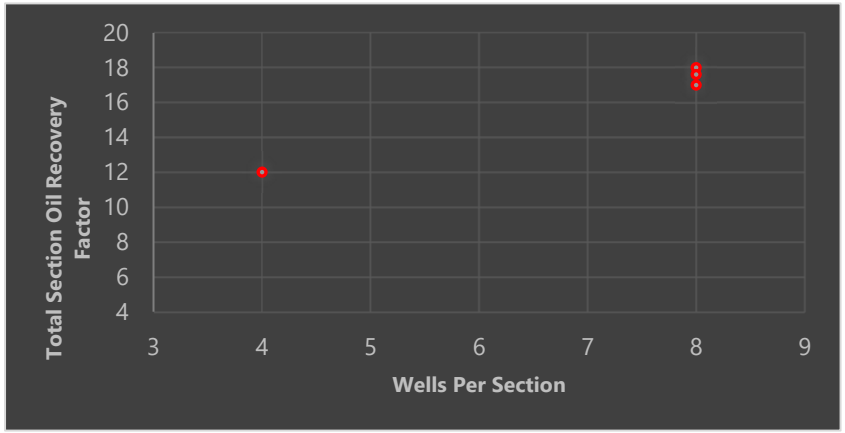
Danger Noodle
Upper Wolfcamp, 8 wps spacing (4 total wells)
17% Recovery Factor

Thistle 153H and 155H
Upper Wolfcamp, 4 wps spacing
12% Recovery Factor

Hemlock/Yarrow
Upper Wolfcamp, 8 wps spacing (8 total wells)
18% Recovery Factor

Bell Lake 18-19
Upper Wolfcamp, 8 wps spacing (7 total wells)
17.6% Recovery Factor

Fewer than 8 wells per section in upper Wolfcamp strands resource



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

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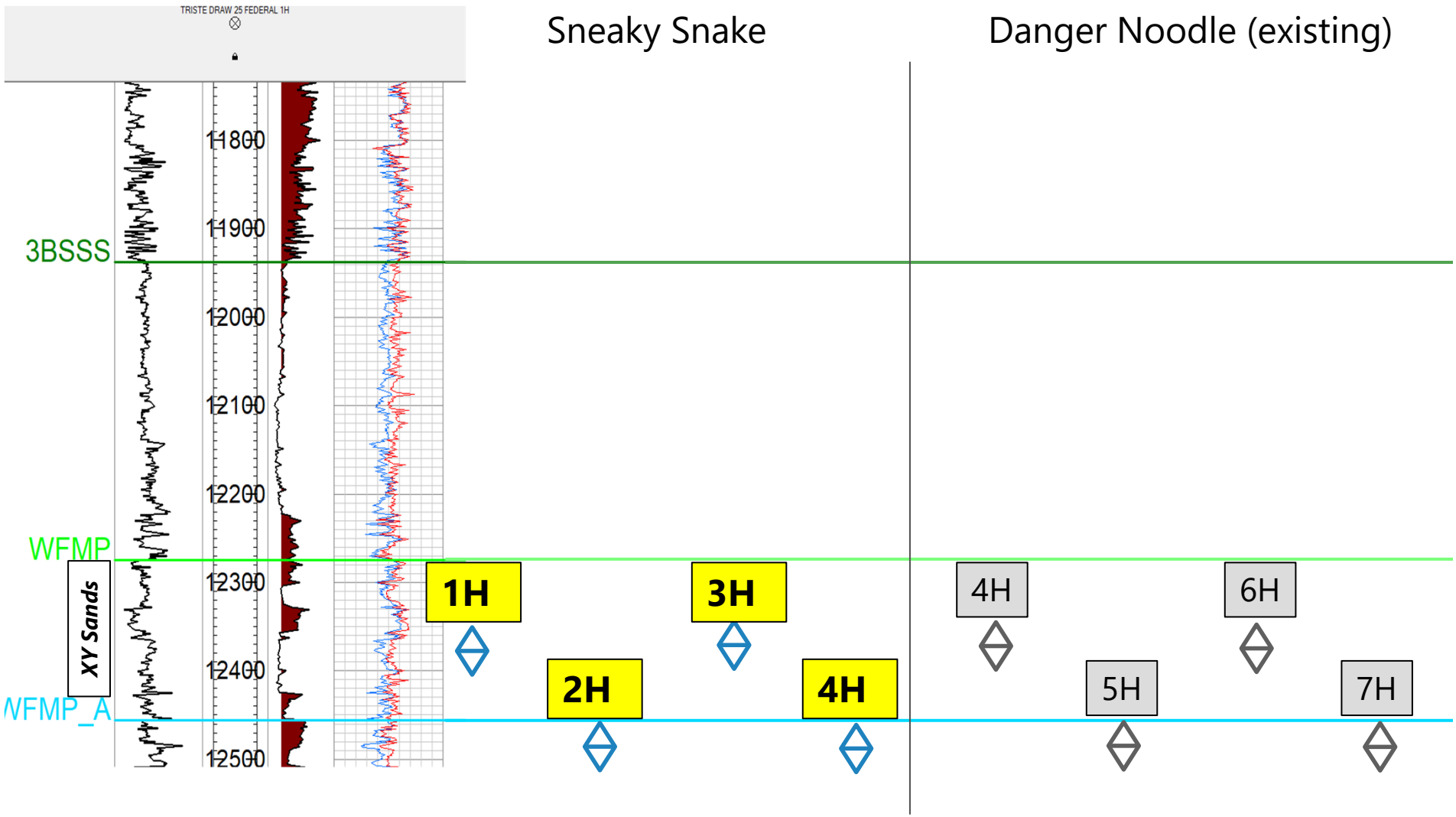
Sneaky Snake Wolfcamp Gunbarrel Compared to Successful Danger Noodle Development



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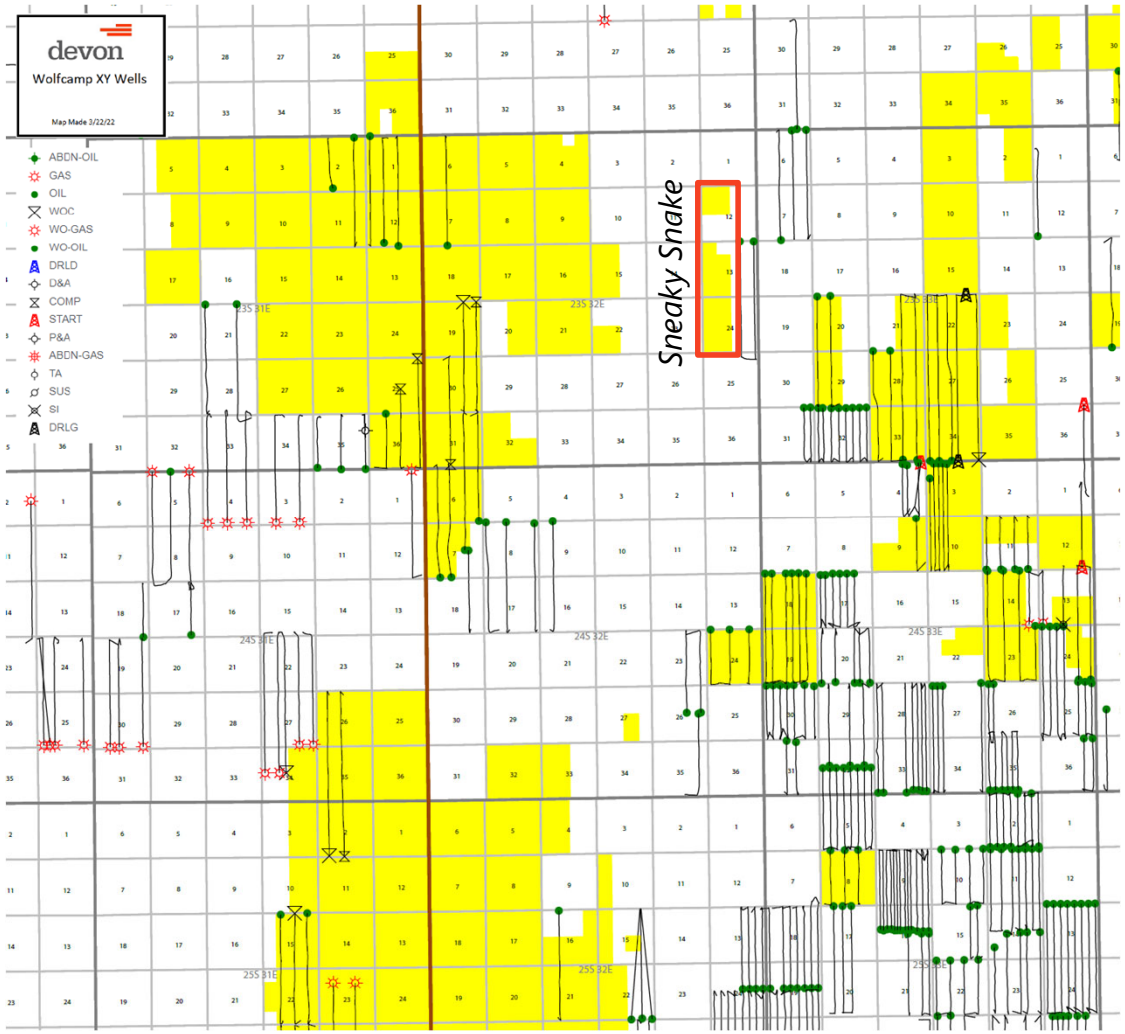
Wolfcamp Sands Producers



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

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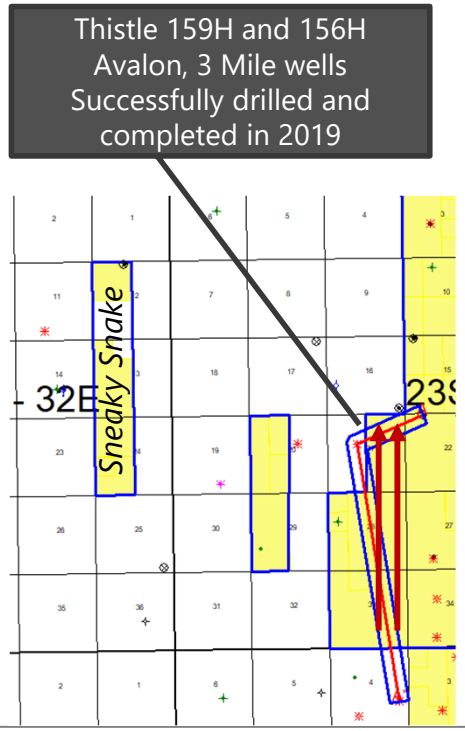
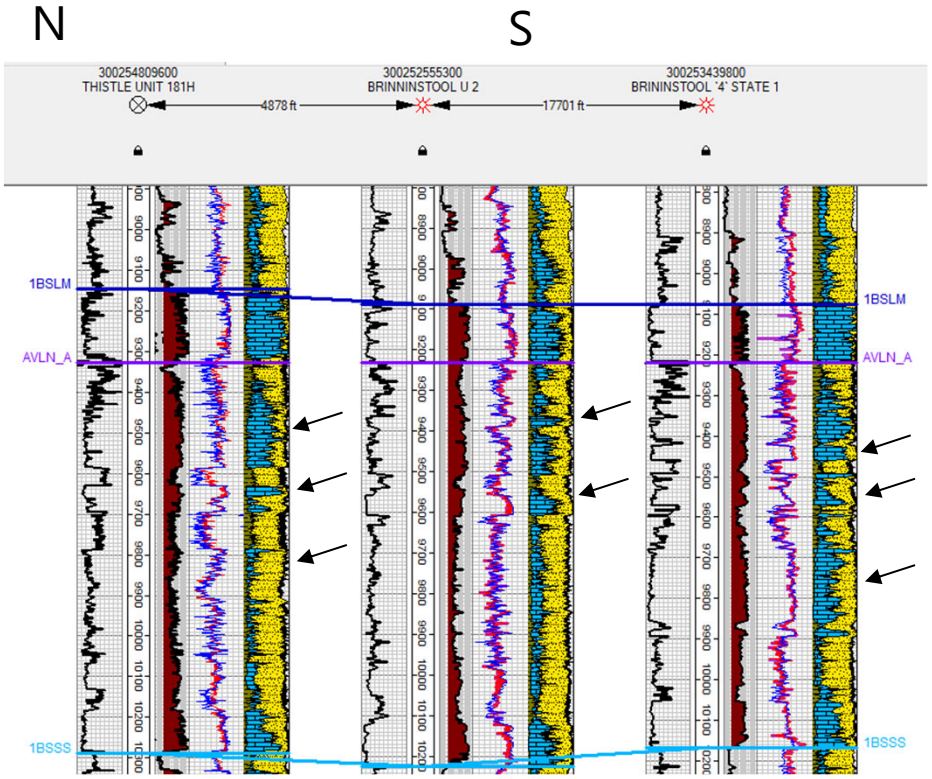
3 Mile Avalon wells in Geologically Complex settings





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.

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. H
Submitted by: Devon Energy Production Co. L.P.
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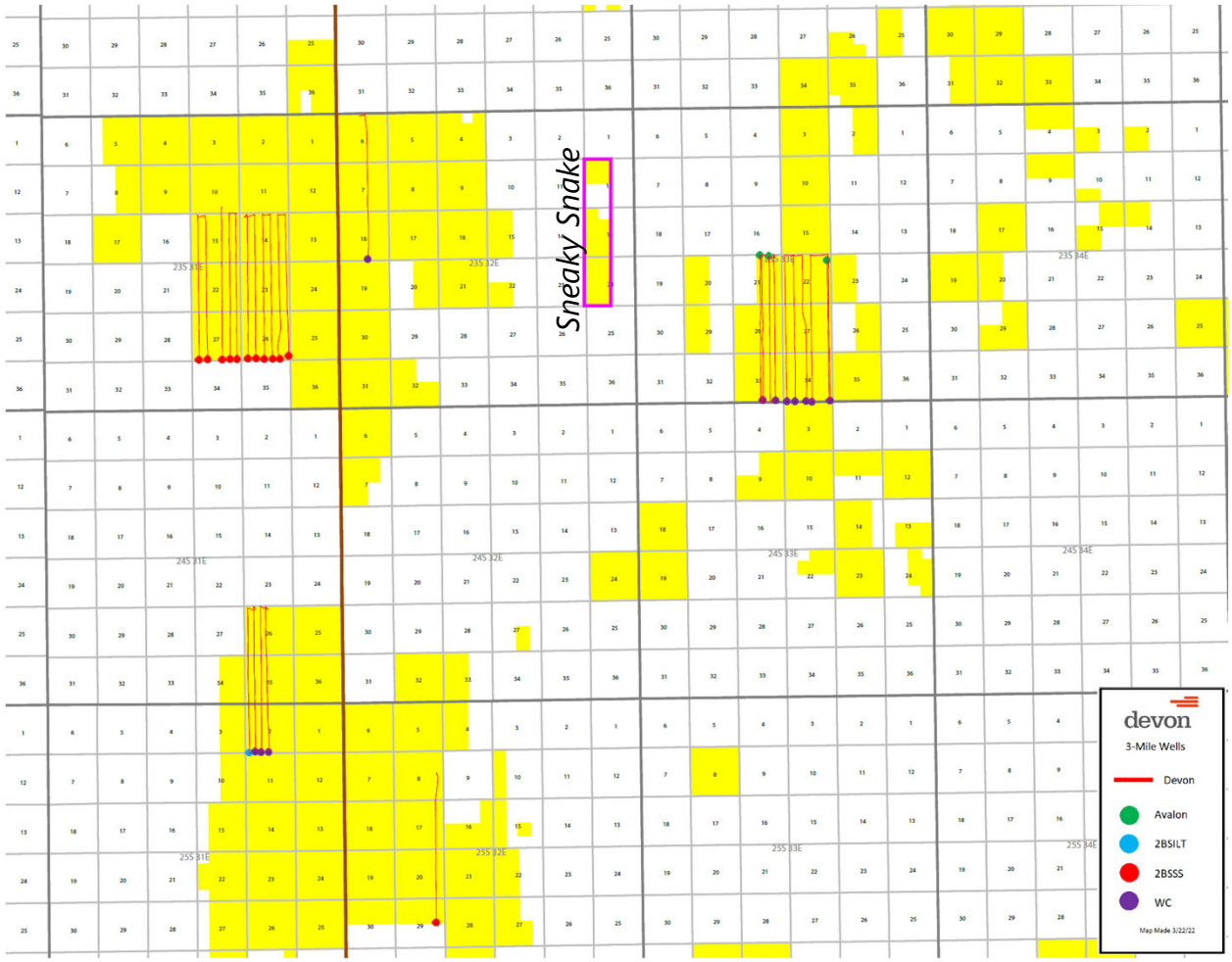
Existing Devon 3-Mile Wells



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.

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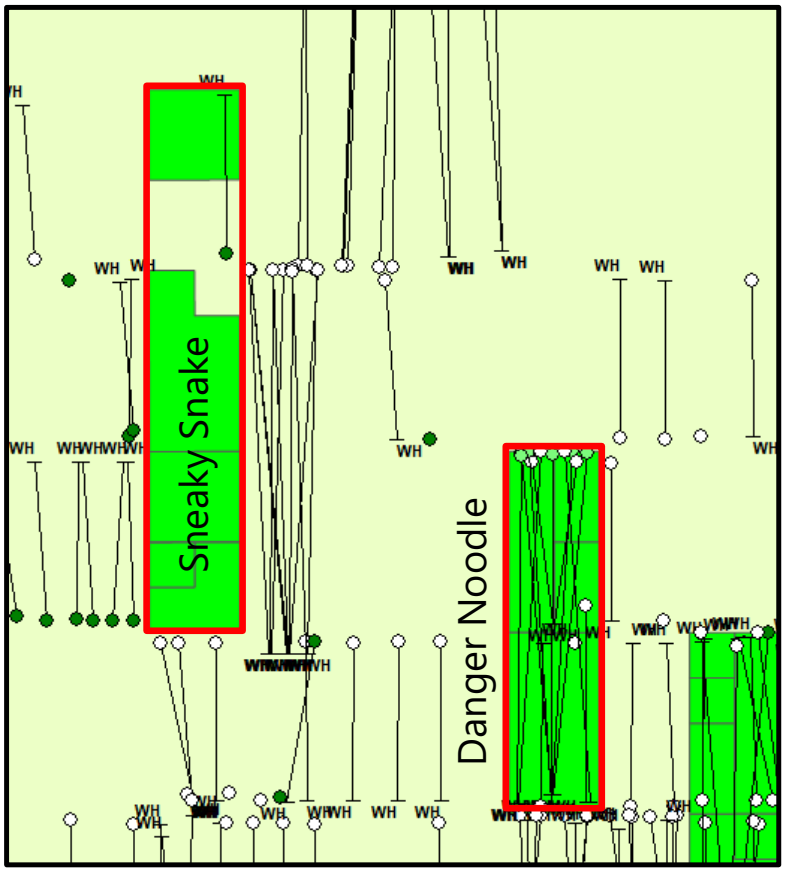
1BSSS LOCATIONS DRILLED IN DANGER NOODLE



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.

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

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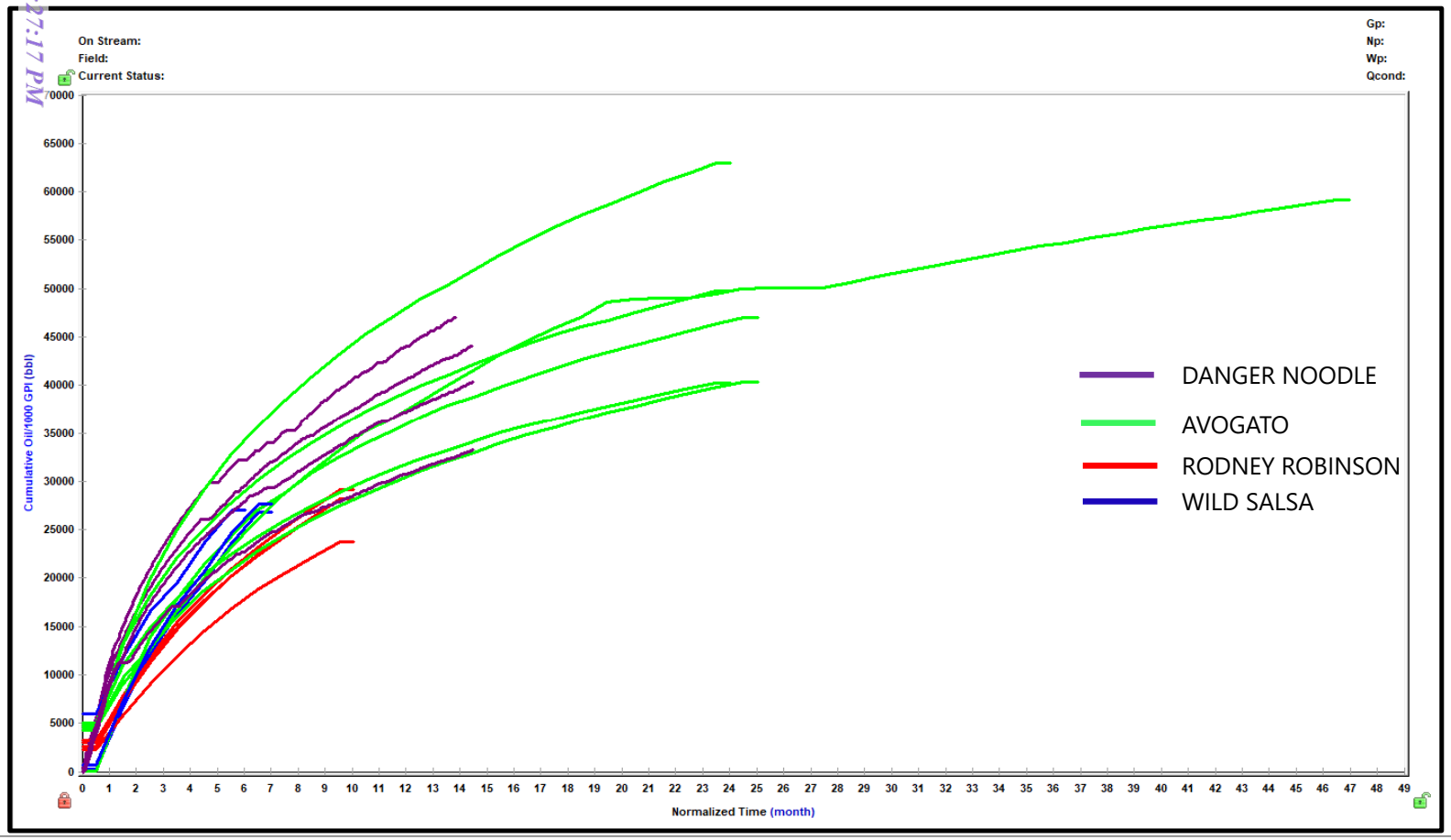
RESPONSE TO D-9 & D-10



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.

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

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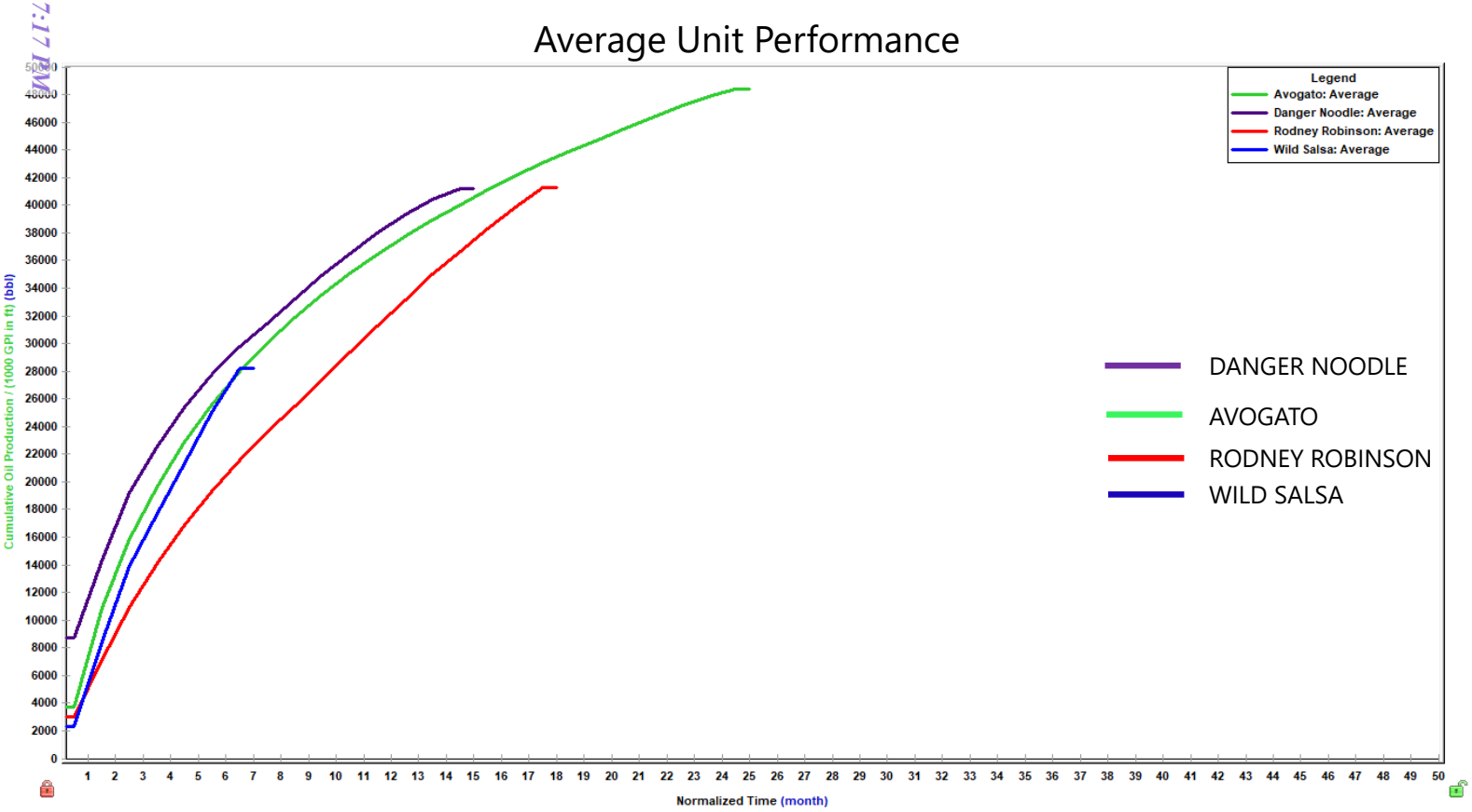
RESPONSE TO D-9 & D-10



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.

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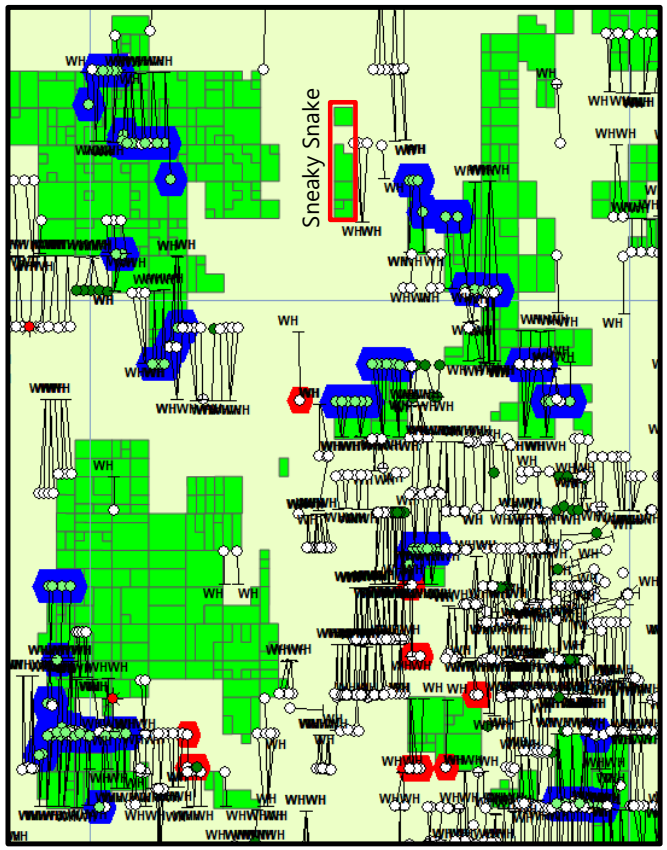
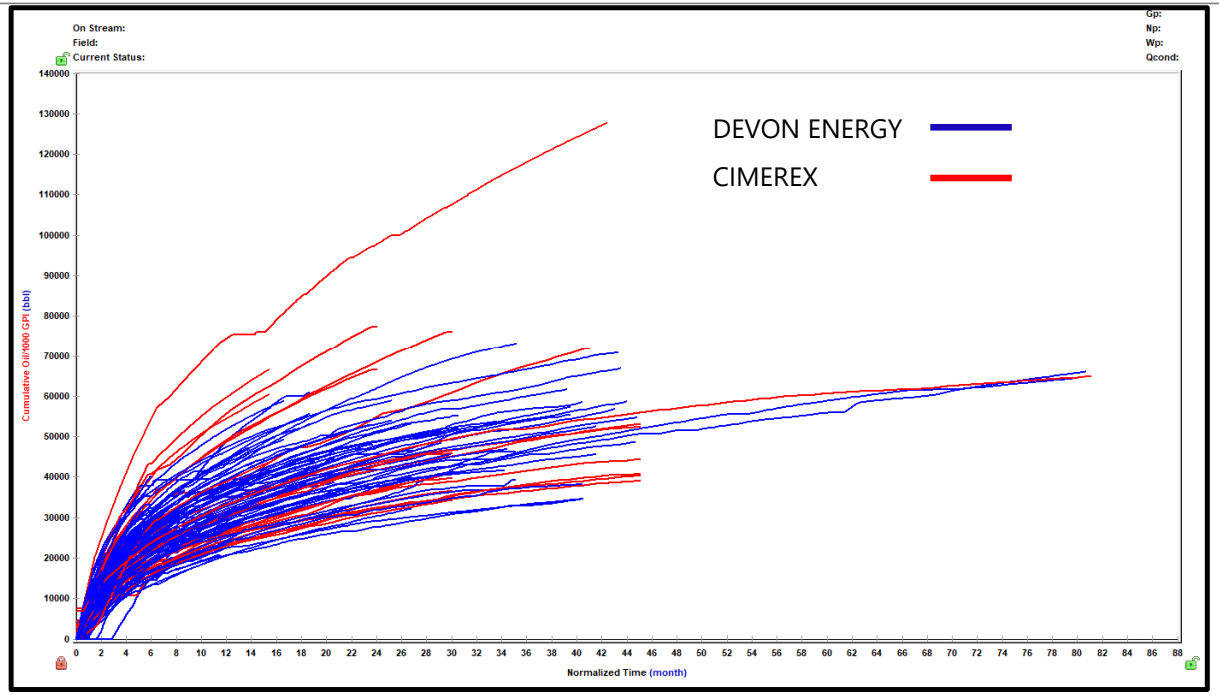
RESPONSE TO D-13





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.

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

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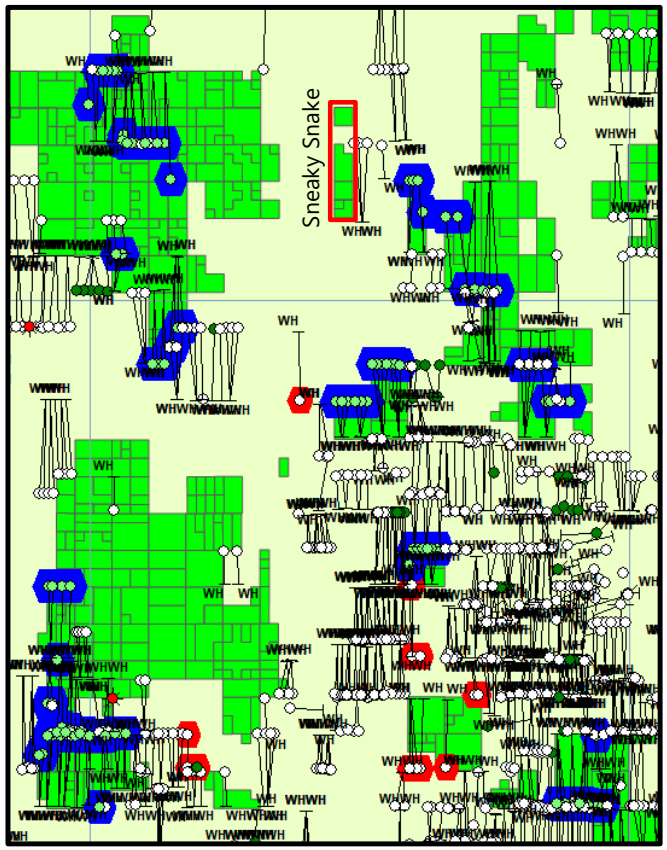
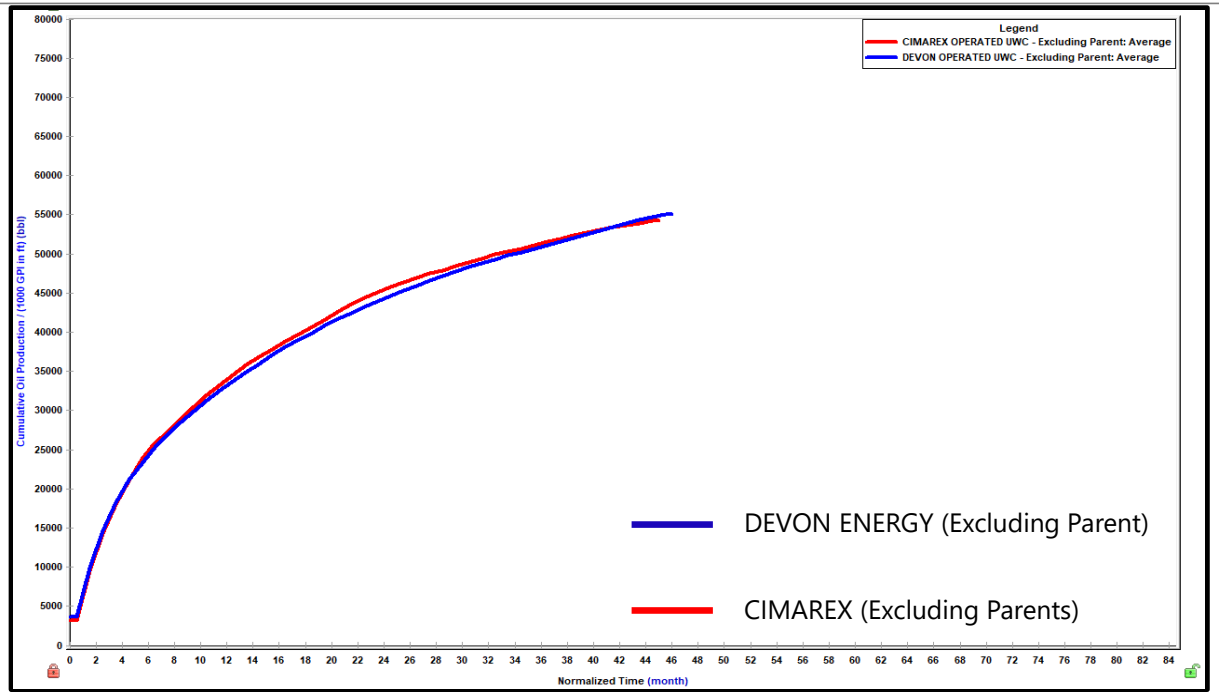
RESPONSE TO D-13





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.

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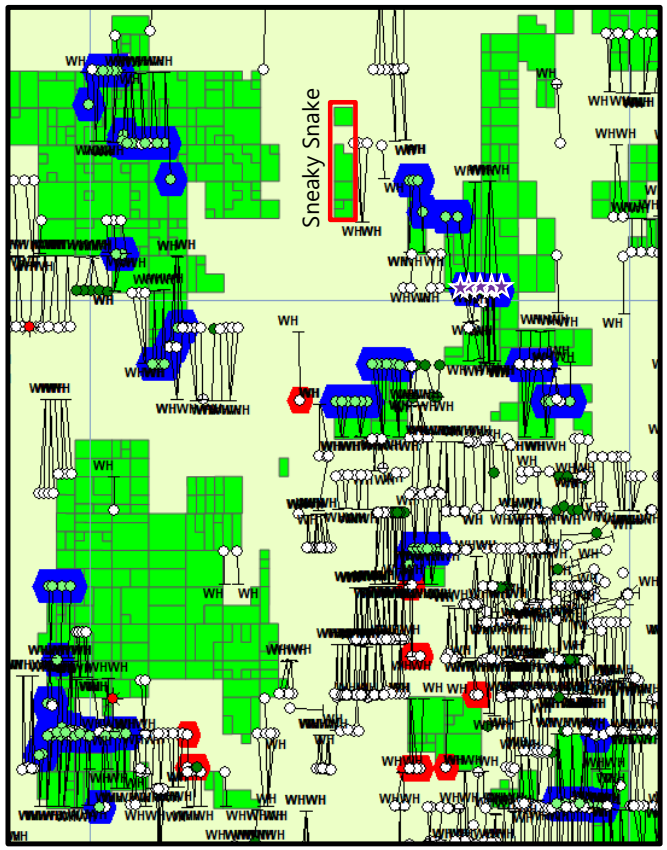
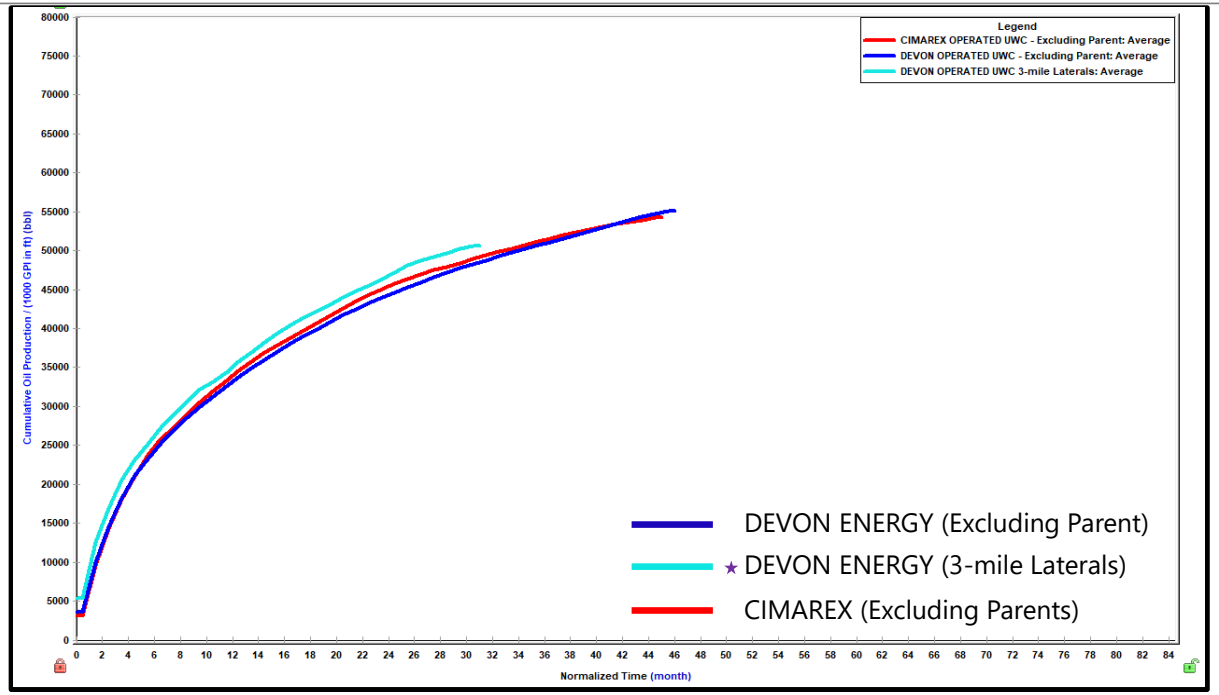
RESPONSE TO D-15





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)

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Devon Well List

Display Name	API Number
BELL LAKE 19-18 STATE COM 30H	30025456380000
BELL LAKE 19-18 STATE COM 31H	30025456390000
BELL LAKE 19-18 STATE COM 32H	30025456400000
BELL LAKE 19-18 STATE COM 34H	30025456410000
BELL LAKE 19-18 STATE COM 35H	30025456420000
BELL LAKE 19-18 STATE COM 36H	30025456430000
BELL LAKE 19-18 STATE COM 37H	30025456440000
BELL LAKE 24 FED 15H	30025468350000
BELL LAKE 24 FED 16H	30025468700000
BELL LAKE 24 FED 18H	30025468710000
BELL LAKE 24 FED 22H	30025468740000
BELL LAKE 24 FED 24H	30025468750000
BELL LAKE 24 FED 25H	30025468760000
BELLOQ 11-2 FED STATE COM 713H	30015467570000
BELLOQ 11-2 FED STATE COM 714H	30015467640000
BELLOQ 11-2 FED STATE COM 734H	30015467560000
*BELLOQ 2 STATE 2H – Parent	30015428950000
BLUE KRAIT 23 FED 33H	30025465400000
BLUE KRAIT 23 FED 38H	30025468320000
BLUE KRAIT 23-14 FED 31H	30025464300000
BLUE KRAIT 23-14 FED 32H	30025468330000
BLUE KRAIT 23-14 FED 35H	30025468340000
BLUE KRAIT 23-14 FED 36H	30025464650000
BLUE KRAIT 23-14 FED 37H	30025464660000
BOUNDARY RAIDER 6-18 FED COM 712H	30025477060000
BOUNDARY RAIDER 6-7 FED COM 612H	30025475700000
BOUNDARY RAIDER 6-7 FED COM 711H	30025475710000
BROADSIDE 13 W FEDERAL COM 001H	30025465170000
CATTY SHACK 6-7 FED COM 621H	30025484840000
CATTY SHACK 6-7 FED COM 623H	30025484850000
CATTY SHACK 6-7 FED COM 711H	30025484860000
CATTY SHACK 6-7 FED COM 713H	30025484870100
DANGER NOODLE 29-20 FED COM 4H	30025470500000
DANGER NOODLE 29-20 FED COM 5H	30025470510000
DANGER NOODLE 29-20 FED COM 6H	30025470520000
DANGER NOODLE 29-20 FED COM 7H	30025470530000

Display Name	API Number
FLAGLER 8 FED 12H	30025451630000
FLAGLER 8 FED 3H	30025452570000
FLAGLER 8 FED 4H	30025452580000
FLAGLER 8 FED 7H	30025449880000
FLAGLER 8 FED 8H	30025449890000
FLAGLER 8 FED COM 2H	30025450010000
FLAGLER 8 FED COM 6H	30025449800000
JAYHAWK 6-7 FED 11H	30025455430000
JAYHAWK 6-7 FED 14H	30025455460000
JAYHAWK 7 FED 13H	30025455510000
LUSITANO 27-34 FED COM 622H	30015456560000
LUSITANO 27-34 FED COM 624H	30015456320000
LUSITANO 27-34 FED COM 626H	30015444280000
LUSITANO 27-34 FED COM 713H	30015456580000
LUSITANO 27-34 FED COM 718H	30015444290000
LUSITANO 27-34 FED COM 734H	30015456360000
RIGHT MEOW 31-6 FED COM 626H	30025484590000
RIGHT MEOW 31-6 FED COM 716H	30025484600000
RIGHT MEOW 31-7 FED COM 627H	30025484910000
RIGHT MEOW 31-7 FED COM 717H	30025484920000
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SHETLAND 2-11 STATE FED COM 613H	30015471720000

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SHIRE 22-15 FED COM 616H	30015473270000
SHIRE 22-15 FED COM 716H	30015473290000
SHIRE 22-15 FED COM 718H	30015473300000
SHIRE 22-15 FED COM 733H	30015473610000
SNAPPING 12-1 FED 621H	30015471290000
SNAPPING 12-1 FED 711H	30015471300000
SNAPPING 12-1 FED 712H	30015471330000
*SNAPPING 2 STATE 14H – Parent	30015426880100
THISTLE UNIT 108H	30025437270000
THISTLE UNIT 121H	30025437320000
*THISTLE UNIT 153H – 3 mile	30025435890000
*THISTLE UNIT 155H – 3 mile	30025436580000
*THISTLE UNIT 180H – 3 mile	30025480980000
*THISTLE UNIT 181H – 3 mile	30025480960100
*THISTLE UNIT 182H – 3 mile	30025480970000
THOROUGHBRED 10-3 FED COM 621H	30015464780000
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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
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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

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