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

APPLICATION OF WPX ENERGY PERMIAN, LLC FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 22858

APPLICANT'S PRE- HEARING STATEMENT

WPX Energy Permian, LLC (OGRID No. 246289), a wholly owned subsidiary of Devon Energy Corporation, submits this pre-hearing statement as required by the rules of the Oil Conservation Division. for these consolidated cases.

APPEARANCES

APPLICANT

ATTORNEY

WPX Energy Permian, LLC

Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Julia Broggi, Esq. Paula M. Vance, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF CASE

Applicant seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 1219.08-acre, more or less, horizontal well spacing unit comprised of all of irregular Section 33, all of Section 28, and the S/2 of Section 21, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. Applicant seeks to initially dedicate the above-referenced horizontal spacing unit to the following proposed wells:

- Clawhammer 33-28-21 Federal Com 412H and Clawhammer 33-28-21 Federal Com 422H to be horizontally drilled from a surface location in the SE/4 NW/4 equivalent (Lot 3) of irregular Section 33 to bottom hole locations in the NE/4 SW/4 (Unit K) of Section 21;
- Clawhammer 33-28-21 Federal Com 413H, Clawhammer 33-28-21 Federal Com 414H and Clawhammer 33-28-21 Federal Com 423H to be horizontally drilled from a surface location in the SW/4 NE/4 equivalent (Lot 2) of irregular Section 33 to bottom hole locations in the NW/4 SE/4 (Unit J) of Section 21;
- Clawhammer 33-28-21 Federal Com 415H and Clawhammer 33-28-21 Federal Com 424H to be horizontally drilled from a surface location in the SE/4 NE/4 equivalent (Lot 1) of irregular Section 33 to bottom hole locations in the NE/4 SE/4 (Unit I) of Section 21; and
- Clawhammer 33-28-21 Federal Com 421H to be horizontally drilled from a surface location in the SE/4 NW/4 equivalent (Lot 3) of irregular Section 33 to a bottom hole location in the NW/4 SW/4 (Unit L) of Section 21.

The completed interval of Clawhammer 33-28-21 Federal Com 413H well is expected to remain within 330 feet of the offsetting quarter sections or equivalent tracts to include them in a standard horizontal well spacing unit. Applicant has sought but been unable to obtain voluntary agreement for the development of these lands from all mineral interest owners in the subject acreage.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS	
Ryan Cloer, Landman	Affidavit	Approx. 5	
Keegan DePriest, Geology	Affidavit	Approx. 3	

PROCEDURAL MATTERS

Applicant intends to present this case by affidavit if it remains unopposed at the time of hearing

Respectfully submitted,

HOLLAND & HART LLP

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Paula M. Vance
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrankin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR WPX ENERGY PERMIAN, LLC

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

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 122127

QUESTIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	122127
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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