

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

**APPLICATION OF DEVON ENERGY PRODUCTION  
COMPANY, L.P., FOR A HORIZONTAL SPACING UNIT AND  
COMPULSORY POOLING, LEA COUNTY, NEW MEXICO**

Case No. 22885

**PREHEARING STATEMENT**

Devon Energy Production Company, L.P. (“Devon”), OGRID No. 6137, through its undersigned attorneys, submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division (“Division”).

**APPEARANCES**

**APPLICANT**

Devon Energy Production Company, L.P.

**ATTORNEY**

Darin C. Savage  
William E. Zimsky  
Luke Kittinger  
Andrew D. Schill  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
bill@abadieschill.com  
luke@abadieschill.com  
andrew@abadieschill.com

**APPLICANT’S STATEMENT OF CASE**

In Case No. 22885, Devon seeks an order (1) establishing a standard 800-acre, more or less, spacing and proration unit comprised of the E/2 of Sections 11 and 14, and the NE/4 of Section 23, Township 26 South, Range 34 East, NMPM, Lea County, New Mexico, and (2) pooling all

uncommitted mineral interests in the Bone Spring formation, designated as an oil pool, underlying said unit.

Devon proposes and dedicates to the horizontal spacing and proration unit (“HSU”) the **Muskie 23-11 Fed Com 14H Well**, an oil well, to be horizontally drilled from a surface location in the SW/4 NE/4 (Unit G) of Section 23 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 11; the **Muskie 23-11 Fed Com 16H Well**, an oil well, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 23 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 11; and the **Muskie 23-11 Fed Com 35H Well**, an oil well, to be horizontally drilled from a surface location in the SE/4 NE/4 (Unit H) of Section 23 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 11. The **Muskie 23-11 Fed Com 35H Well** is the proximity well positioned in the unit to allow for the use of proximity tracts in the W/2 NE/4 of Section 23 and the W/2 E/2 of Sections 14 and 11.

Devon has sought in good faith, but has been unable to obtain, voluntary agreement from all interest owners to participate in the drilling of the wells or in the commitment of their interests to the wells for development within the HSU. The pooling of all interests in the Bone Spring formation within the proposed HSU, and establishing the spacing unit, will avoid the drilling of unnecessary wells, prevent waste and protect correlative rights.

The proposed wells are orthodox in their location, and the take points and completed intervals comply with setback requirements under the statewide rules.

**APPLICANT’S PROPOSED EVIDENCE**

WITNESS	ESTIMATED TIME	EXHIBITS
Landman: Andrew Wenzel	Approx. 10 min	Approx. 5
Geologist: Matt Meyers	Approx. 10 min	Approx. 6

**PROCEDURAL MATTERS**

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

---

Darin C. Savage

William E. Zimsky  
Luke Kittinger  
Andrew D. Schill  
214 McKenzie Street  
Santa Fe, New Mexico 87501  
Telephone: 970.385.4401  
Facsimile: 970.385.4901  
darin@abadieschill.com  
bill@abadieschill.com  
luke@abadieschill.com  
andrew@abadieschill.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 121930

**QUESTIONS**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 121930
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

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