

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

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

CASE NOS. 20729, 20730, & 20731

DEVON'S CONSOLIDATED PRE- HEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon") submits this consolidated pre-hearing statement as required by the rule of the Oil Conservation Division.

APPEARANCES

APPLICANT

Devon Energy Production Company, LP

ATTORNEY

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 20729, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Laguna Salado; Bone Spring Pool (Pool Code 96721) & Laguna Salado; Bone Spring, South (Pool Code 96857)) underlying a 640-acre standard horizontal spacing unit comprised of the E/2 of Sections 22 and 27, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, and (2) dedicating the horizontal spacing unit to the proposed **Papas Fritas 27-22 Fed Com 333H well** to be horizontally drilled from a surface hole location in the SE/4 SE/4

(Unit P) of Section 27 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 22. The completed interval for the **Papas Fritas 27-22 Fed Com 333H well** will remain within 330 feet of the quarter-section line separating the W/2 E/2 from the E/2 E/2 of Sections 22 and 27 to allow inclusion of offset acreage into a standard 640-acre horizontal well spacing unit.

In Case No. 20730, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Laguna Salado; Bone Spring Pool (Pool Code 96721) & Laguna Salado; Bone Spring, South (Pool Code 96857)) underlying a 320-acre standard horizontal spacing unit comprised of the E/2 W/2 of Sections 22 and 27, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, and (2) dedicating the horizontal spacing unit to the proposed **Papas Fritas 27-22 Fed Com 332H well** to be horizontally drilled from a surface hole location in the SW/4 SE/4 (Unit O) of Section 27 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 22. The completed interval for the **Papas Fritas 27-22 Fed Com 332H well** will remain within the standard setback as required by the statewide rules for horizontal oil wells.

In Case No. 20731, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation (Laguna Salado; Bone Spring Pool (Pool Code 96721) & Laguna Salado; Bone Spring, South (Pool Code 96857)) underlying a 320-acre standard horizontal spacing unit comprised of the W/2 W/2 of Sections 22 and 27, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico, and (2) dedicating the horizontal spacing unit to the proposed **Papas Fritas 27-22 Fed Com 331H well** to be horizontally drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 34 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 22. The completed interval for the **Papas Fritas 27-22 Fed Com 331H well** will remain within the standard setback as required by the statewide rules for horizontal oil wells.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Verl Brown, Landman	Via Affidavit	8
Miranda Childress, Geologist	Via Affidavit	5

PROCEDURAL MATTERS

Devon respectfully requests Case Nos. 20729, 20730, and 20731 be consolidated for purposes of hearing. If uncontested, Devon intends to present these cases by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

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