

**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. 21099

DEVON'S PRE- HEARING STATEMENT

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

APPEARANCES

APPLICANT

Devon Energy Production Company, LP

ATTORNEY

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

APPLICANT'S STATEMENT OF THE CASE

Devon seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) underlying a standard 480-acre, more or less, horizontal spacing unit comprised of the SW/4 of Section 3 and the W/2 of Section 10, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico; and (2) dedicating the horizontal spacing unit to the following proposed initial wells, both of which are to be drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 10 to a bottom hole location in the NW/4

SW/4 (Unit L) of Section 3: (1) **Thoroughbred 10-3 Fed Com #621H well**; (2) **Thoroughbred 10-3 Fed Com #711H well**.

The completed intervals of these wells comply with the Special Rules for the Purple Sage Wolfcamp Pool.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Tim Prout, Landman	Affidavit	8
Sloan Anderson, Geologist	Affidavit	6

PROCEDURAL MATTERS

Devon does not expect any opposition at hearing and intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

**ATTORNEYS FOR DEVON ENERGY PRODUCTION
COMPANY, L.P.**