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. 21232

DEVON'S PRE-HEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon") (OGRID No. 6137) submits this prehearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

| APPLICANT | ATTORNEY |
|-----------|----------|
| | |

Devon Energy Production Company, LP 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

INTERESTED PARTIES

ConocoPhillips Company and James Bruce

Burlington Resources Oil & Gas Post Office Box 1056

Company LP Santa Fe, New Mexico 87504

505-982-2043

APPLICANT'S STATEMENT OF THE CASE

Devon seeks an order: (a) approving a 800-acre standard horizontal spacing unit comprised of the E/2 of Section 19, the E/2 of Section 30, and the NE/4 of Section 31, Township 23 South, Range 30 East, NMPM, Eddy County, New Mexico, and (b) pooling all uncommitted interests in

Wolfcamp formation underlying this standard horizontal spacing unit. Devon intends to initially dedicate this standard horizontal spacing unit to the following wells:

- The Yukon Gold 31-19 Fed Com #623H well to be horizontally drilled from a surface hole location in the SE/4 NE/4 (Unit H) of Section 31 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 19.
- The Yukon Gold 31-19 Fed Com #624H well and the Yukon Gold 31-19 Fed
 Com #712H well, both of which will be horizontally drilled from surface hole
 locations in the SE/4 NE/4 (Unit H) of Section 31 to a bottom hole location in the
 NE/4 NE/4 (Unit A) of Section 19.

The completed interval for the **Yukon Gold 31-19 Fed Com #712H well** will remain within 330 feet of the W/2 E/2 of Sections 19 and 30, and the W/2 NE/4 of Section 31 to allow inclusion of these proximity tracts in a standard 800-acre horizontal well spacing unit.

PROPOSED EVIDENCE

| WITNESSES Name and Expertise | ESTIMATED TIME | EXHIBITS |
|---------------------------------|----------------|----------|
| Verl Brown, Landman | Affidavit | 6 |
| Miranda Childress, Geologist | Affidavit | 4 |

PROCEDURAL MATTERS

Devon does not expect opposition at hearing and therefore 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
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR DEVON ENERGY PRODUCTION COMPANY, L.P.

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce Post Office Box 1056 Santa Fe, New Mexico 87504 505-982-2043 jamesbruc@aol.com

Attorney for ConocoPhillips Company and Burlington Resources Oil and Gas Company LP

Adam G. Rankin