

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

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

CASE NOS. 21284-21291

DEVON'S CONSOLIDATED PRE-HEARING STATEMENT

Devon Energy Production Company, L.P. ("Devon") submits this consolidated 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

OTHER PARTIES

Cimarex Energy Co.

Earl E. DeBrine, Jr.
Deana M. Bennett
Lance D. Hough
Modrall, Sperling, Roehl,
Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico
87103-2168
(505) 848-1800

APPLICANT'S STATEMENT OF THE CASE

These cases are set on the docket for a status conference with Cimarex's Red Tank wells in Case Nos. 21236 and 21237, because the cases involved competing developments. Devon and Cimarex have reached an agreement and the cases are no longer competing or contested by any parties, and Devon intends to proceed with the presentation of the following cases by affidavit:

In **Case No. 21288**, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a 400-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Sections 4 and 9 and the W/2 NE/4 of Section 16 Township 23 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial **Bigger Cat 16-4 State Fed Com 513H** well and the **Bigger Cat 16-4 State Fed Com 523H** well, both of which will be horizontally drilled from a surface hole location in the SW/4 NE/4 (Unit G) of Section 16 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4.

In **Case No. 21289**, Devon seeks an order: (1) pooling all uncommitted interests in the Wolfcamp formation underlying a 400-acre, more or less, standard horizontal spacing unit comprised of the W/2 E/2 of Sections 4 and 9 and the W/2 NE/4 of Section 16 Township 23 South, Range 32 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial **Bigger Cat 16-4 State Fed Com 623H** well and the **Bigger Cat 16-4 State Fed Com 713H** well, both of which will be horizontally drilled from a surface hole location in the SW/4 NE/4 (Unit G) of Section 16 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 4.

Devon requests that the Division dismiss **Case Nos. 21284, 21285, 21286, 21287, 21290, and 21291.**

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Katie Dean, Landman	Affidavit	8
Derek Ohl, Geologist	Affidavit	6

PROCEDURAL MATTERS

These cases were previously set for a status conference. However, Devon and Cimarex have now reached an agreement so that these cases are no longer contested or competing with Cimarex's Red Tank wells. For that reason, Devon intends to present these consolidated **Case Nos. 21288 and 21289** by affidavit and requests that the Division hear these uncontested cases on October 22, 2020. Devon further requests that the Division dismiss **Case Nos. 21284, 21285, 21286, 21287, 21290, and 21291.**

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.**

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Earl E. DeBrine, Jr.
Deana M. Bennett
Lance D. Hough
Modrall, Sperling, Roehl, Harris & Sisk, P.A.
Post Office Box 2168
Albuquerque, New Mexico 87103-2168
TEL: (505) 848-1800
Email: earl.debrine@modrall.com
deana.bennett@modrall.com
lance.hough@modrall.com

Attorneys for Cimarex Energy Co.



Kaitlyn A. Luck