

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

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

CASE NO. 21921

DEVON'S PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Devon Energy Production Company, LP

ATTORNEY

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APPLICANT'S STATEMENT OF THE CASE

Devon seeks an order pooling all uncommitted interests in the Wolfcamp formation underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 13 and 24, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico. Devon intends to initially dedicate this standard horizontal spacing unit to the following proposed initial wells:

- (1) The **Broadside 13-24 Fed Com #3H well**, and (2) the **Broadside 13-24 Fed Com #25H well**, to be horizontally drilled from a common surface hole location in the SE/4

SE/4 (Unit P) of Section 12 to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 24;

- (3) The **Broadside 13-24 Fed Com #4H well**, and (4) the **Broadside 13-24 Fed Com #15H well**, to be horizontally drilled from a common surface hole location in the SE/4 SE/4 (Unit P) of Section 12 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 24.

The completed interval of the Broadside 13-24 Fed Com #4H well will remain within 330 feet of the quarter-quarter line separating the W/2 E/2 from the E/2 E/2 of Sections 13 and 24 to allow inclusion of these proximity tracts into a standard horizontal spacing unit.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Ryan Cloer, Landman	Affidavit	6
Tom Peryam, Geologist	Affidavit	3

PROCEDURAL MATTERS

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

Respectfully submitted,

HOLLAND & HART LLP

By: _____

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