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

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

CASE NO. 20528

APPLICATION

Devon Energy Production Company, L.P. (“Devon”), through its undersigned attorneys, hereby files this application with the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-17, for an order pooling all uncommitted interests in Bone Spring formation underlying a 960-acre standard horizontal spacing unit comprised of the W/2 of Sections 15, 22, and 27, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico. In support of this application, Devon states:

1. Devon (OGRID No. 6137) is a working interest owner in the proposed horizontal spacing unit and has the right to drill thereon.
2. Applicant seeks to dedicate the above-referenced horizontal spacing unit to two initial proposed wells to be drilled at a depth sufficient to test the Bone Spring formation from common surface hole locations in the NW/4 NW/4 (Unit D) of Section 15:
  - **Maldives 15-27 Fed Com 231H Well** to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 15 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 27.
  - **Maldives 15-27 Fed Com 232H Well** to be drilled from a surface hole location in the NW/4 NW/4 (Unit D) of Section 15 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 27.

3. The completed interval for the Maldives 15-27 Fed Com 232H Well will remain within 330 feet of the W/2 W/2 of Sections 15, 22, and 27 to allow inclusion of these proximity tracts in a standard 960-acre horizontal well spacing comprised of the W/2 of Sections 15, 22, and 27.

4. Because the proposed wells will be simultaneously drilled and completed, Applicant requests an extension of the normal 120-day period to drill and complete the initial well.

5. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all the interest owners in the subject spacing unit.

6. The pooling of interests in the proposed horizontal well spacing unit will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

7. In order to permit Applicant to obtain it's just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this horizontal spacing unit should be pooled and Applicant should be designated the operator of this proposed horizontal well and spacing unit.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on June 13, 2019, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the Bone Spring formation underlying the proposed horizontal spacing unit;
- B. Approving two initial wells in the horizontal well spacing unit;
- C. Authorizing an extension of the normal 120-day period to drill and complete the initial well;
- D. Designating Applicant as the operator of the horizontal spacing unit and the wells to be drilled thereon;

- E. Authorizing Applicant to recover its costs of drilling, equipping and completing the wells;
- F. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- G. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

HOLLAND & HART LLP

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

CASE 20528:

**Application of Devon Energy Production Company, L.P. for compulsory pooling, Eddy County, New Mexico.** Applicant in the above-styled cause seeks an order pooling all uncommitted interest owners in the Bone Spring formation underlying a 960-acre standard horizontal spacing unit comprised of the W/2 of Sections 15, 22, and 27, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico. Applicant seeks to dedicate the above-referenced horizontal spacing unit to two initial proposed wells: (1) the **Maldives 15-27 Fed Com 231H Well**, and (2) the **Maldives 15-27 Fed Com 232H Well**. These wells will be horizontally drilled from a common surface location in the NW/4 NW/4 (Unit D) of Section 15 to bottom hole locations in the SW/4 SW/4 (Unit M) and the SE/4 SW/4 (Unit N) of Section 27. The completed interval of the **Maldives 15-27 Fed Com 232H Well** will remain within 330 feet of the W/2 W/2 of Sections 15, 22, and 27 to allow inclusion of these proximity tracts into a standard 960-acre horizontal well spacing comprised of the W/2 of Sections 15, 22, and 27. Also to be considered will be the cost of drilling and completing the wells, the allocation of the costs thereof, the actual operating costs and charges for supervision, the designation of the Applicant as operator, and the imposition of a 200% charge for risk involved in drilling and completing the well. Said area is located approximately 30 miles southeast of Carlsbad, New Mexico.