

**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. 20990**

**DEVON'S PRE- HEARING STATEMENT**

Devon Energy Production Company, L.P. ("Devon") (OGRID 6137) 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 Bone Spring formation (Livingston Ridge; Bone Spring (39350)) underlying a standard 640-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 13 and 24, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico; and (2) dedicating the horizontal spacing unit to the following initial proposed wells:

- (1) the **Bora Bora 13-24 Fed Com #214H Well** (API No. 30-015-46387), and (2) the **Bora Bora 13-24 Fed Com #216H Well** (API No. 30-015-46118), both of which are to be drilled from a common surface hole location in the NE/4 NE/4 (Unit A) of Section 13 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 24; and

- (3) the **Bora Bora 13-24 Fed Com #215H Well** (API No. 30-015-46117) to be drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 13 to a bottom hole location in the SE/4 SE/4 (Unit P) of Section 24.

The completed interval for the **Bora Bora 13-24 Fed Com #215H Well** will remain within 330 feet of the W/2 E/2 of Sections 13 and 24 to allow inclusion of these proximity tracts in a standard 640-acre horizontal well spacing comprised of the E/2 of Sections 13 and 24.

### **PROPOSED EVIDENCE**

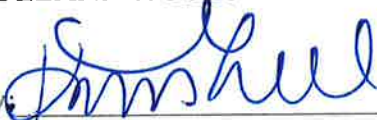
<b>WITNESSES Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Katie Dean, Landman	Affidavit	8
Bryan Currie, Geologist	Affidavit	6

### **PROCEDURAL MATTERS**

If uncontested, Devon 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.**