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

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

CASE NOS. 21126, 21127

## **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 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

#### **APPLICANT'S STATEMENT OF THE CASE**

In Case No. 21126, Devon seeks an order pooling all uncommitted interests in the Wolfcamp formation (Purple Sage; Wolfcamp (Gas) Pool [98220]) formation underlying a 640-acre standard horizontal spacing unit comprised of the E/2 of Sections 2 and 11, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. Devon intends to initially dedicate this horizontal spacing unit to the following proposed wells: (1) The Shetland 2-11 State Fed Com 613H well (API No. 30-015-pending), and (2) the Shetland 2-11 State Fed Com 713H

well (API No. 30-015-pending), both of which are to be horizontally drilled from common surface hole locations in the NE/4 NE/4 (Unit A) of Section 2 to bottom hole locations in the SW/4 SE/4 (Unit O) of Section 11. The completed intervals of these wells will comply with Special Rules for the Purple Sage Wolfcamp Pool.

In Case No. 21127, Devon seeks an order pooling all uncommitted interests in the Wolfcamp (Purple Sage; Wolfcamp (Gas) Pool [98220]) formation underlying a 640-acre standard horizontal spacing unit comprised of the W/2 of Sections 2 and 11, Township 26 South, Range 31 East, NMPM, Eddy County, New Mexico. Devon intends to dedicate the horizontal spacing unit to the following initial proposed wells:

- (1) The Shetland 11-2 Fed State Com 611H well (API No. 30-015-pending), (2) the Shetland 11-2 Fed State Com 711H well (API No. 30-015-pending), and (3) the Shetland 11-2 Fed State Com 731H well (API No. 30-015-pending), all of which are to be horizontally drilled from common surface hole locations in the SW/4 SW/4 (Unit M) of Section 11 to bottom hole locations in the NW/4 NW/4 (Unit D) of Section 2.
- (4) The Shetland 11-2 Fed State Com 712H well (API No. 30-015-pending), and
   (5) the Shetland 11-2 Fed State Com 732H well, both of which are to be horizontally drilled from common surface hole locations in the SE/4 SW/4 (Unit N) of Section 11 to bottom hole locations in the NE/4 NW/4 (Unit C) of Section 2.

The completed intervals of these wells will comply with Special Rules for the Purple Sage Wolfcamp Pool.

## PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Tim Prout, Landman	Affidavit	8
Sloan Anderson, Geologist	Affidavit	6
340108101		

# PROCEDURAL MATTERS

Devon does not expect any opposition to these pooling applications and therefore intends to present these consolidated cases by affidavit.

Respectfully submitted,

**HOLLAND & HART LLP** 

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.