

**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. 21231

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

INTERESTED PARTIES

ConocoPhillips Company and
Burlington Resources Oil & Gas
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

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043

APPLICANT'S STATEMENT OF THE CASE

Devon seeks an order: (a) approving a 800-acre standard horizontal spacing unit comprised of the E/2 of Section 19, the E/2 of Section 30, and the NE/4 of Section 31, Township 23 South, Range 30 East, NMPM, Eddy County, New Mexico, and (b) pooling all uncommitted interests in

Bone Spring formation underlying this standard horizontal spacing unit. Devon intends to initially dedicate this standard horizontal spacing unit to the following wells:

- The **Yukon Gold 31-19 Fed Com #211H well** to be horizontally drilled from a surface hole location in the SE/4 NE/4 (Unit H) of Section 31 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 19.
- The **Yukon Gold 31-19 Fed Com #212H well**, the **Yukon Gold 31-19 Fed Com #213H well**, and the **Yukon Gold 31-19 Fed Com #333H well**, each of which will be horizontally drilled from surface hole locations in the SE/4 NE/4 (Unit H) of Section 31 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 19.

The completed interval for the Yukon Gold 31-19 Fed Com #212H well will remain within 330 feet of the W/2 E/2 of Sections 19 and 30, and the W/2 NE/4 of Section 31 to allow inclusion of these proximity tracts in a standard 800-acre horizontal well spacing unit.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Verl Brown, Landman	Affidavit	6
Miranda Childress, Geologist	Affidavit	7

PROCEDURAL MATTERS

Devon does not expect opposition at hearing and therefore 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.**

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

***Attorney for ConocoPhillips Company and
Burlington Resources Oil and Gas Company LP***



Adam G. Rankin