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 NOS. 21965 & 21966

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. 21965, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Section 17, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the proposed initial well: White Dove 17 Fed Com #23H well, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 17 to a bottom hole location in the SE/4 SE/4 (Unit P) of said Section 17. The completed interval of the well will remain within standard setbacks for oil wells.

In **Case No. 21966**, Devon seeks an order: (1) pooling all uncommitted interests in the Bone Spring formation underlying a standard 160-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Section 17, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) dedicating this horizontal spacing unit to the following proposed initial well: **White Dove 17 Fed Com #24H well**, to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 17 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 17. The completed interval of the well will remain within standard setbacks for oil wells.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Ryan Cloer, Landman	Affidavit	8
Tom Peryam, Geologist	Affidavit	6

PROCEDURAL MATTERS

Devon intends to present these consolidated cases by affidavit if unopposed at the time of the hearing.

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
agrankin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ATTORNEYS FOR DEVON ENERGY PRODUCTION COMPANY, L.P.