

JAMES BRUCE
ATTORNEY AT LAW

POST OFFICE BOX 1056
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)
(505) 660-6612 (Cell)
(505) 982-2151 (Fax)

jamesbruce@aol.com

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Case 15324

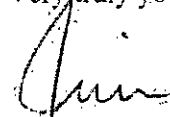
May 26, 2015

Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Devon Energy Production Company, L.P., are an application for compulsory pooling, *etc.*, together with a proposed advertisement. Please set this matter for the June 25, 2015 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Devon Energy Production Company, L.P.

EXHIBIT

A

Terri Blandin
PO Box 1282
Hobbs, NM

Johnny M. Kirk
3020 W. Lawrence.
Hobbs, NM 88242

Frances G. Horton
2201 W. Lawrence
Hobbs, NM 88242

Carolyn M. Layman
2301 W. Lawrence
Hobbs, NM 88242

Mildred Wier
224 Harkey Rd.
Lovington, NM 88260

Bryon Mark Kirk
2303 W. Lawrence
Hobbs, NM 88242.

Guy F. Stovall, Jr.
PO Box 906
El Campo, TX 77437

Ponderosa Royalty Co.
Attn: Trey Robbins
PO Box 10428
Midland, TX 79702

PIP 1990 Trust
PO Box 10508
Midland, TX 79702

TIG Properties
Attn: Wendell Iverson, Jr.
PO Box 10508
Midland, TX 79702

Pamela J. Burke, Trustee of the Claire Ann Iverson Revocable Trust
PO Box 10508
Midland, TX 79702

Pamela J. Burke, Trustee of the Seigfried Iverson III Revocable Trust
PO Box 10508
Midland, TX 79702

MYCO Industries, Inc.
PO Box 840
Artesia, NM 88221

Sharbro Holdings LLC
PO Box 840
Artesia, NM 88221

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

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APPLICATION OF DEVON ENERGY PRODUCTION
COMPANY, L.P. FOR A NON-STANDARD OIL SPACING
AND PRORATION UNIT AND COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

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Case No. 15324

APPLICATION

Devon Energy Production Company, L.P. applies for an order (i) approving a non-standard oil spacing and proration unit in the Bone Spring formation comprised of the $W\frac{1}{2}W\frac{1}{2}$ of Section 20, Township 17 South, Range 38 East, N.M.P.M., Lea County, New Mexico, and (ii) pooling all mineral interests in the Bone Spring formation underlying the non-standard unit, and in support thereof, states:

1. Applicant is an interest owner in the $W\frac{1}{2}W\frac{1}{2}$ of Section 20, and has the right to drill a well thereon.
2. Applicant proposes to drill its Schankbeir 20 Well No. 1H to a depth sufficient to test the Bone Spring formation, and seeks to dedicate the $W\frac{1}{2}W\frac{1}{2}$ of Section 20 to the well to form a non-standard 160 acre oil spacing and proration unit (project area) for any formations and/or pools developed on 40 acre spacing within that vertical extent. The well will be a horizontal well, with a surface location 160 feet from the south line and 1105 feet from the west line, and a terminus 330 feet from the north line and 660 feet from the west line, of Section 20. The producing interval will be orthodox.
3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the $W\frac{1}{2}W\frac{1}{2}$ of Section 20 for the purposes set forth herein.
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests.

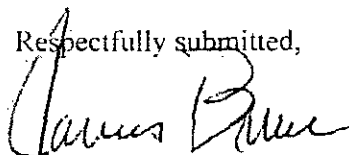
Therefore, applicant seeks an order pooling all mineral interest owners underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 20, as set forth above, pursuant to NMSA 1978 §§70-2-17, 18.

5. Approval of the non-standard unit and the pooling of all mineral interests underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 20 will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, applicant requests that, after notice and hearing, the Division enter its order:

- A. Approving a non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the $W\frac{1}{2}W\frac{1}{2}$ of Section 20;
- B. Pooling all mineral interests in the Bone Spring formation underlying the $W\frac{1}{2}W\frac{1}{2}$ of Section 20;
- C. Designating applicant as operator of the well;
- D. Considering the cost of drilling and completing the well, and allocating the cost among the well's working interest owners;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,



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

Attorney for Devon Energy Production
Company, L.P.

PROPOSED ADVERTISEMENT

Case No. 15324 :

Application of Devon Energy Production Company, L.P. for a non-standard oil spacing and proration unit and compulsory pooling, Lea County, New Mexico. Devon Energy Production Company, L.P. seeks an order approving a 160-acre non-standard oil spacing and proration unit (project area) in the Bone Spring formation comprised of the W/2W/2 of Section 20, Township 17 South, Range 38 East, NMPM. Applicant further seeks the pooling of all mineral interests in the Bone Spring formation underlying the non-standard unit for any formations and/or pools developed on 40 acre spacing within that vertical extent. The unit is to be dedicated to the Schankbeir 20 Well No. 1H, a horizontal well with a surface location 160 feet from the south line and 1105 feet from the west line, and a terminus 330 feet from the north line and 660 feet from the west line, of Section 20. The producing interval will be orthodox. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling and completing the well. The unit is located approximately 6 miles west-southwest of Knowles, New Mexico.

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