

RECEIVED

By Environmental Improvement Board at 4:23 pm, Dec 03, 2020

**STATE OF NEW MEXICO
ENVIRONMENTAL IMPROVEMENT BOARD**

IN THE MATTER OF THE APPEALS
OF THE AIR QUALITY PERMIT
NO. 7482-M1 ISSUED TO 3 BEAR
DELAWARE OPERATING – NM LLC

EIB No. 20-21(A)

AND

REGISTRATION NOS. 8720, 8730, AND 8733
UNDER GENERAL CONSTRUCTION PERMIT
FOR OIL AND GAS FACILITIES

EIB No. 20-33(A)

WildEarth Guardians,
Petitioner.

MOTION FOR RECUSAL

Pursuant to 20.1.2.113.G NMAC, WildEarth Guardians hereby moves for the recusal of Environmental Improvement Board (EIB) Member Amanda Trujillo Davis from the deliberations and decision-making in the above-referenced proceeding. In light of Member Trujillo Davis's indirect financial interest in the outcome of this proceeding, through her employment with Devon Energy, Member Trujillo Davis's impartiality and fairness may reasonably be questioned; therefore, her recusal is required by the EIB's rules. 20.1.2.113.G NMAC. Pursuant to 20.1.2.113.C NMAC, Guardians conferred with all parties in this case regarding this motion. Permittees (3 Bear Delaware Operating – NM, LLC, XTO Energy Co., and Spur Energy Partners LLC) oppose the motion. The New Mexico Environment Department did not provide a position on the motion by the time of filing.

Legal Standard

EIB member recusal is governed by 20.1.2.113.G NMAC, which reads as follows:

Recusal: No board member shall participate in any action in which his or her impartiality or fairness may reasonably be questioned, and the member shall recuse himself or herself in any such action by giving notice to the board and the general public by announcing this recusal on the record. In making a decision to recuse himself or herself, the board member may rely upon the Governmental Conduct Act, NMSA 1978, Sections 10-16A-1 through 10-16A-8, The Uniform Financial Disclosure Act or any other relevant legal authority.

The Governmental Conduct Act provides that any public officer “shall use the powers and resources of public office only to advance the public interest and not to obtain personal benefits or pursue private interests.” NMSA 1978 § 10-16-3.A. State courts have upheld this provision as mandating “the use of the powers and resources of a . . .public office only for the benefit of the people of New Mexico,” and prohibiting public officers from “exploiting their powers and resources for private gain.” *State v. Gutierrez*, 2020-NMCA-045, ¶ 33, 472 P.3d 1260, 1272, *cert. granted* (Sept. 8, 2020).¹ The Governmental Conduct Act further provides that “[f]ull disclosure of real or potential conflicts of interest shall be a guiding principle for determining appropriate conduct. At all times, reasonable efforts shall be made to avoid undue influence and abuse of office in public service.” NMSA 1978 § 10-16-3.C. Finally, the Governmental Conduct Act disqualifies public officers from taking official acts that directly affect their “financial interest,” 10-16-4.B NMSA, which is specifically defined to include employment, NMSA 1978 § 10-16-2.F(2):

A public officer or employee shall be disqualified from engaging in any official act directly affecting the public officer’s or employee’s financial interest, except a public officer or employee shall not be disqualified from engaging in an official act if the financial benefit of the financial interest to the public officer or employee is proportionately less than the benefit to the general public.

NMSA 1978 § 10-16-4.B.

¹ Knowing and willful violations of NMSA 1978 § 10-16-3.A may be subject to criminal prosecution. *State v. Gutierrez*, 2020-NMCA-045, ¶ 33, 472 P.3d 1260, 1272, *cert. granted* (Sept. 8, 2020).

The Attorney General has explained that the Governmental Conduct Act is not simply concerned with avoiding official acts driven by improper internal motivations, but also is intended to avoid the appearance of unfairness by disqualifying officials from taking actions that directly affect their financial interest – irrespective of an official’s subjective motivations:

Even when the primary motive is something other than benefiting a public employee’s financial interest, the GCA generally disqualifies a public employee from taking an official act that directly affects the employee’s financial interests, unless the benefit to the public clearly outweighs the financial benefit to the employee. If a public employee has any doubt as to whether the employee should be disqualified from engaging in an official act that has an effect on the employee’s financial interest, the best course is full disclosure.

New Mexico Office of the Attorney General, New Mexico Governmental Conduct Act Compliance Guide 2d, at 17 (2015) (Ex. A).

Argument

In the consolidated proceedings at issue, Guardians only directly challenges one individual air permit and three registrations under the Department’s General Construction Permit-Oil & Gas (GCP-O&G). However, Guardians’ challenges could have much broader implications for the Department’s permitting throughout the Greater Carlsbad region. In particular, Guardians alleges that because the monitoring data in the Greater Carlsbad region shows the region to be out of compliance with the ozone NAAQS, facilities located in this area, which includes the entirety of Lea and Eddy Counties, are ineligible to register under the GCP-O&G (EIB NO. 20-33(A)). *See* WildEarth Guardians, Closing Argument, at 19–27 (Nov. 30, 2020).

Resolution of Guardians challenge to the individual permit for the 3 Bear Libby Gas Plant (EIB No. 20-21(A)) could also have broader impacts beyond this particular facility, as Guardians alleges that the Department is required to analyze the ambient ozone impacts of

individual minor source permits before their approval. Since testimony at the hearing indicated that the Department does not routinely conduct such analysis,² a decision in Guardians' favor could impact the Department's review of future individual minor source permits and potentially lead to denial of future permits based on potential ozone impacts.

According to her publicly-available bio, Member Trujillo Davis is an "environmental professional" with Devon Energy, and has been with the company for the past two years.³ While Devon Energy is not a litigant in this proceeding, resolution of these two cases in Guardians' favor could directly impact the financial interests of the company, Member Trujillo Davis's employer, if the Department were to implement the decision in this proceeding as precedent for other GCP-O&G registration and permit applications. Accordingly, by virtue of her employment with Devon Energy, Member Trujillo Davis's financial interests are also potentially affected by resolution of these appeals.

EIB records show that, as of November 20, 2020, Devon Energy had three separate pending GCP-O&G registration applications (GCP Nos. 9004, 8804-M1, 9029), as well as two pending individual NSR permits pending (Permit Nos. 9010, 9011), in Lea and Eddy Counties.⁴ EIB records further show 62 separate Devon Energy facilities – all located in the Greater Carlsbad area – indicating a substantial probability that the company will continue to seek additional GCP-O&G registrations and individual air permits in the future.⁵ But if Guardians' challenge to the Registrations at issue in EIB No. 20-33(A) is successful, the Department could

² EIB Hearing Transcript (Sept. 23, 2020), at 179-81, 184.

³ Amanda Trujillo Davis, LinkedIn, <https://www.linkedin.com/in/amanda-Trujillo-Davis-37040929> (last accessed Nov. 19, 2020) (Ex. B).

⁴ See NMED, Air Quality Bureau, Activity Report (Nov. 20, 2020) <https://www.env.nm.gov/air-quality/wp-content/uploads/sites/2/2020/11/AQBP-Activity-Report-20-11-20.xlsx> (last accessed Nov. 24, 2020) (Devon Energy excerpt attached as Ex. C).

⁵ New Mexico Environment Department, Air Quality Air Permit Map (APMAP), Devon Energy Production Company LP, <https://air.net.env.nm.gov/rsmt/> (last accessed Nov. 24, 2020).

potentially be precluded from issuing further registrations in the Greater Carlsbad area, including the entirety of Lea and Eddy Counties. Accordingly, Devon's facilities in this area could be ineligible for GCP-O&G registration, and the company would need to seek individual air permits. Further, if Guardians' individual permit challenge is successful, this could require additional analysis for individual permittees to demonstrate that their emissions do not "cause or contribute" to exceedances of the ozone NAAQS. Because resolution of this case in Guardians' favor would potentially limit Devon Energy's ability to obtain fast-track permit registrations under the GCP-O&G in the Greater Carlsbad area and require additional analysis for the company's individual permit applications, Devon Energy has a clear financial interest in the outcome of this case.

With "[f]ull disclosure of real or potential conflicts of interest ... a guiding principle for determining appropriate conduct" under the Governmental Conduct Act, NMSA 1978 § 10-16-3.C, Member Trujillo Davis's failure to disclose the potential financial interests of her employer in the outcome of these proceedings is concerning. Accordingly, as a result of her ongoing employment with Devon Energy, Member Trujillo Davis's fairness and impartiality in resolving this matter may reasonably be questioned, and the EIB's governing rules require that Member Trujillo Davis recuse herself from further participation in these matters, including deliberations and decision-making on Guardians' appeals. 20.1.2.113.G NMAC.

Conclusion

For the foregoing reasons, Guardians respectfully requests that Member Trujillo Davis recuse herself from further participation in these proceedings.

Respectfully submitted this 3rd day of December, 2020,

/s/ Daniel L. Timmons

Daniel L. Timmons
WildEarth Guardians
301 N. Guadalupe Street, Suite 201
Santa Fe, NM 87501
dtimmons@wildearthguardians.org

/s/ Samantha Ruscavage-Barz

Samantha-Ruscavage-Barz
WildEarth Guardians
301 N. Guadalupe Street, Suite 201
Santa Fe, NM 87501
sruscavagebarz@wildearthguardians.org

Counsel for Petitioner WildEarth Guardians

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2020 I filed and served the foregoing **MOTION FOR RECUSAL** by electronic mail delivery to the following:

public.facilitation@state.nm.us

Administrator, Environmental Improvement Board

Pamela Jones

Pamela.Jones@state.nm.us

Hearings Administrator, Environmental Improvement Board

John Volkerding

JVNatrc@aol.com

Hearing Officer and Board Chair, Environmental Improvement Board

Karla Soloria

ksoloria@nmag.gov

Counsel for the Environmental Improvement Board

Lara Katz

Lara.Katz@state.nm.us

Counsel for the New Mexico Environment Department

Chris Colclasure

Beatty & Wozniak, P.C.

CClolclasure@bwenergylaw.com

Counsel for Applicant 3 Bear Delaware Operating – NM LLC

Jody Rittenhouse

Beatty & Wozniak, P.C.

jrittenhouse@bwenergylaw.com

Counsel for Applicant 3 Bear Delaware Operating – NM LLC

Adam G. Rankin

Holland & Hart LLP

agrarkin@hollandhart.com

Counsel for Applicant Spur Energy Partners, LLC

Jill H. Van Noord

Holland & Hart LLP

jhvannord@hollandhart.com

Counsel for Applicant Spur Energy Partners, LLC

Louis W. Rose

Montgomery & Andrews, P.A.

Lrose@montand.com

Counsel for Applicant XTO Energy Inc.

Kari E. Olson

Montgomery & Andrews, P.A.

kolson@montand.com

Counsel for Applicant XTO Energy Inc.

Andrew Tarrant

Exxon Mobil Corporation

Andrew.j.tarrant@exxonmobil.com

Counsel for Applicant EXT Energy Inc.

/s/ Daniel L. Timmons

Daniel L. Timmons

Counsel for Petitioner WildEarth Guardians



Join now

Sign in

Amanda Trujillo Davis



Amanda Trujillo Davis

Environmental Regulatory Program Specialist

Carlsbad, New Mexico · 334 connections



Devon Energy



New Mexico State University

Join to Connect

About

Qualifications

- Inherent self-motivation and committed work ethic
- Independent thinker and worker who functions very well in groups
- Organized, flexible team player with an eye for detail and aptitude for inventive and effective problem solving
- Field experience working various terrains under demanding conditions
- Skilled at managing multiple tasks
- Ability to transcend the multiple levels of negotiation within the public and regulatory agencies
- Comfortable behind the podium addressing an audience

Activity

Rejection is Redirection 🙌 "A decade ago, I got turned down for a job by the world's biggest beauty company. They said I wasn't a strong

[Join now](#)[Sign in](#)

Amanda Trujillo Davis

Naval Academy Brigade Commander, assuming the highest leadership position within...

Liked by Amanda Trujillo Davis

Today marks what would have been the 106th birthday of actress Hedy Lamarr. She wasn't just a Hollywood actress but she was also the mathematician...

Liked by Amanda Trujillo Davis

[Join now to see all activity](#)

Experience

Environmental Professional

Devon Energy

Oct 2018 - Present · 2 years 2 months

Artesia, New Mexico

Environmental Regulatory Program Specialist

AECOM (incorporating Davis Langdon, An AECOM Company)

Aug 2016 - Oct 2018 · 2 years 3 months

Carlsbad, New Mexico

Senior Environmental Coordinator

Concho

Nov 2013 - Aug 2016 · 2 years 10 months

Environmental Scientist

[Join now](#)[Sign in](#)

Amanda Trujillo Davis

Environmental Scientist

Yates Petroleum Corporation

Jan 2009 - Oct 2013 · 4 years 10 months

Regulatory and Compliance - Developed and maintained a program to retain company compliance standards. This included research and understanding of the published rule and applying it to company operations to meet compliance needs.

Spill Prevention Control and Countermeasure (SPCC) 40 CFR 112

Green House Gas Initiative

State and Federal Spill Rules; Avian Protection Standards/ Threatened and Endangered Species

Education

New Mexico State University

Master of Science (M.S.) · Soil Science and Agronomy, General

2006 - 2008

New Mexico State University

Bachelor of Science (B.S.) · Biology/Biological Sciences, General

2002 - 2008

Volunteer Experience

Volunteer, Event Organizer, Board Member

NM MESA

Oct 2012

Education

New Mexico Mathematics, Engineering, Science Achievement, Inc. (NM MESA) prepares middle and high school students for college majors and careers in mathematics, engineering, science and related fields. NM MESA supports programs



Join now

Sign in

Amanda Trujillo Davis

Groups

Energy People Europe - Oil, Gas, Wind, Solar, LNG, Nuclear Jobs and Recruitment

Women's Environmental Network - Minnesota

Energy People

Environmental Professional Network

View Amanda's full profile

See who you know in common

Get introduced

Contact Amanda directly

[Join to view full profile](#)

People also viewed



Melodie Sanjari

HES Professional

Carlsbad, NM



Tom Bynum

Environmental Health Safety Specialist at J. P. Consultants, LLC.



New Mexico Environment Department - Air Quality Bureau Activity Report

Nov. 20, 2020 9:55 AM*

Staff Members	Agency Interest ID	NSR Permit #	TV Permit #	Activity Type	Owner	Facility Name	County	Received Date	Incomplete Date	Complete Due Date	Complete Date	Public Notice Begins	Proposed to EPA	Issued Deadline
Allie Fullerton	39750	9004		GCP - Oil and Gas	Devon Energy Production Company LP	Devon - Yukon Gold 31 CTB 2	Eddy	10/23/20						11/22/20
Julie Kuhn	39528	8804M1		GCP - Oil and Gas Revision	Devon Energy Production Company LP	Devon - Danger Noodle 29 CTB 1	Lea	10/30/20						11/29/20
Leslee Kimbrell	39753	9011		Notice of Intent	Devon Energy Production Company LP	Devon - Cobber 21 Wellpad 3	Lea	10/23/20						11/22/20
Leslee Kimbrell	39754	9010		Notice of Intent	Devon Energy Production Company LP	Devon - Cobber 21 Wellpad 5	Lea	10/23/20						11/22/20
Vanessa Springer	39785	9029		GCP - Oil and Gas	Devon Energy Production Company LP	Devon - Billiken 6 CTB 1	Lea	11/13/20						12/13/20

*Devon Energy Data Extracted Nov. 24, 2020

New Mexico Environment Department - Air Quality Air Permit Map (APMAP)

Devon Energy Production Company LP

Facilities List downloaded from <https://air.net.env.nm.gov/rsmt/> (Nov. 24, 2020)

NMED ID	Company	Facility	City	County	Allowed CO tons/y	Allowed NO2 tons/y	Allowed SO2 tons/y	Allowed VOC tons/y	Allowed PM tons/y	Allowed PB tons/y	Allowed HAP tons/y
31989	Devon Energy Production Company LP	Devon - Spud Muffin 31 CTB 2 and Harroun Trust 31 5H Battery	Malaga	Eddy	59.1	27.6	0	94.1	0.43	0	0
31990	Devon Energy Production Company LP	Devon - Spud Muffin 31 CTB 1 & Harroun Trust	Malaga	Eddy	47.83	22.893	0.0366	96.719	0.766	0	0
35528	Devon Energy Production Company LP	Devon - Cotton Draw Unit 25 Bone Spring CTB	Loving	Eddy	44.4	21.2	0.22	99.1	0.6	0	0
37996	Devon Energy Production Company LP	Devon Energy - Seawolf 1-12 CTB 1	Jal	Lea	62.5	29.7	0	112.3	0	0	0
38008	Devon Energy Production Company LP	Devon - Todd-Apache 6 CTB 1	Loving	Lea	36.7	17.5	0.16	99.7	0.53	0	0
38015	Devon Energy Production Company LP	Devon - Thistle Unit 22 CTB 2	Jal	Lea	60.7	28.9	0.3	92	0.9	0	0
38021	Devon Energy Production Company LP	Devon - Rio Blanco 4 CTB 1	Jal	Lea	60.3	29.3	0	99.2	0.9	0	0
38029	Devon Energy Production Company LP	Devon - Gaucho 21 Wellpad 2	Jal	Lea	31.2	14.9	0	95.9	0	0	0
38039	Devon Energy Production Company LP	Devon Energy - Lusitano 27 CTB 6	Loving	Eddy	45.4	22	0.0032	99.3	0.46	0	0
38259	Devon Energy Production Company LP	Devon - Fighting Okra 18 CTB 4	Jal	Lea	36.5	18.2	0.26	107	0.44	0	0
38356	Devon Energy Production Company LP	Devon - Maldives 15 CTB 1	Malaga	Eddy	43.58	20.45	0.012	94.67	0.45	0	0
38506	Devon Energy Production Company LP	Devon - Tomb Raider 1 CTB 3	Loving	Eddy	69	35	0.26	96	1.2	0	0
38572	Devon Energy Production Company LP	Devon - Stray Cat 8 CTB 2	Loving	Eddy	67.5	32.2	0	93.9	0	0	0
38624	Devon Energy Production Company LP	Devon - North Thistle 3 CTB 1	Jal	Lea	91.8	18.5	0	97.5	0	0	0
38648	Devon Energy Production Company LP	Devon - Alley Cat 17 CTB 3	Loving	Eddy	74.24	35	0.0268	294.252	1.028	0	0
38658	Devon Energy Production Company LP	Devon - Snapping 12 CTB 2	Loving	Eddy	88.9	39.9	0	97.3	0	0	0
38688	Devon Energy Production Company LP	Devon - Gaucho Unit 30CTB 1	Jal	Lea	72.5	32.9	0.3	98.7	0.15	0	0
38704	Devon Energy Production Company LP	Devon - Big Cat 16 CTB 9	Malaga	Eddy	85.1	41.8	0	98.2	1.6	0	0
38711	Devon Energy Production Company LP	Devon - Flagler 8 CTB 3	Jal	Lea	44.4	21.2	0	97.1	0	0	0
38713	Devon Energy Production Company LP	Devon - Flagler 8 CTB 1	Jal	Lea	44.4	21.2	0	97.1	0	0	0
38765	Devon Energy Production Company LP	Devon - Marwari 28 CTB 2	Jal	Lea	67.1	30.8	0.3	98.3	0.3	0	0
38766	Devon Energy Production Company LP	Devon - Marwari 28 CTB 1	Malaga	Lea	53.85	25.81	0.36	97.89	0.42	0	0
38781	Devon Energy Production Company LP	Devon - Mean Green 23 CTB 2	Jal	Lea	63.2	29.1	0.25	97	0.27	0	0
38845	Devon Energy Production Company LP	Devon - Tomb Raider 12-1 CTB 1	Malaga	Eddy	57.56	27.87	0.036	100.75	1.164	0	0
38846	Devon Energy Production Company LP	Devon - Tomb Raider 1 CTB 1	Malaga	Eddy	38.9	18.5	0	100.6	0.31	0	0
38848	Devon Energy Production Company LP	Devon - Belloq 11 CTB 1	Malaga	Eddy	62.7	30.79	0.055	99.4	1.58	0	0
38860	Devon Energy Production Company LP	Devon - North Thistle 15 CTB 2	Eunice	Lea	93.4	18.8	0.33	94.6	0.78	0	0
38897	Devon Energy Production Company LP	Devon - Chiles 28 Wellpad 1	Eunice	Lea	52.6	25.1	0.19	85.1	0.56	0	0
38906	Devon Energy Production Company LP	Devon - Bell Lake 19 CTB 3	Jal	Lea	31.72	16.6	0.24	101.1	0.53	0	0
38958	Devon Energy Production Company LP	Devon - Thistle Unit 33 CTB 1	Jal	Lea	90.3	14.5	0	89.7	0	0	0
39014	Devon Energy Production Company LP	Devon - Lusitano 27 CTB 3	Malaga	Eddy	54.92	26.31	0.26	94.31	0.42	0	0
39070	Devon Energy Production Company LP	Devon - Chincoteague 8 CTB 1	Malaga	Lea	48.1	23.2	0.3	98.1	0.4	0	0
39073	Devon Energy Production Company LP	Devon - Grumpy Cat 15 CTB 2	Malaga	Lea	78.3	37.3	0.26	90.4	1.2	0	0
39110	Devon Energy Production Company LP	Devon - Lone Tree Draw 14 CTB 1	La Huerta	Eddy	45.3	21.1	0	86.9	0	0	0
39140	Devon Energy Production Company LP	Devon - Arena Roja 15 CTB 2	Jal	Lea	60.3	27.8	0.01	94.6	0.3	0	3.5
39145	Devon Energy Production Company LP	Devon - Green Wave 20 CTB 3	Jal	Lea	45.4	22.2	0	95.8	0	0	0
39162	Devon Energy Production Company LP	Devon - Jayhawk 7 CTB 3	Jal	Lea	50.72	24.44	0.015	98.57	0.43	0	0
39163	Devon Energy Production Company LP	Devon - Jayhawk 6 CTB 2	Jal	Lea	54.38	27.46	0.107	98.076	1.38	0	0
39193	Devon Energy Production Company LP	Devon - Todd 36 CTB 1	Malaga	Eddy	69.54	33.16	0.0206	95.959	0.928	0	0
39295	Devon Energy Production Company LP	Devon - Todd 36 CTB 3	Malaga	Eddy	66.44	33.36	0.046	102.42	1.66	0	0
39296	Devon Energy Production Company LP	Devon - Red Bull 29 CTB 2	Jal	Lea	36.84	17.38	0.0077	100.3	0.22	0	0
39363	Devon Energy Production Company LP	Devon - Green Wave 20 CTB 9	Jal	Lea	28.21	14.57	0	99.56	2.99	0	0
39389	Devon Energy Production Company LP	Devon - Chincoteague 8 CTB 2	Malaga	Lea	68	30.3	0.5	99.2	0.3	0	0
39449	Devon Energy Production Company LP	Devon - Blue Krait 23 CTB 2	Jal	Lea	34.27	17.68	0	98.77	0.48	0	0
39482	Devon Energy Production Company LP	Devon - Boundary Raider 7 CTB 2	Malaga	Lea	74.4	36.5	0	98.4	1.3	0	0
39488	Devon Energy Production Company LP	Devon - Uraninite 32 CTB 2	La Huerta	Eddy	51.91	25.23	0.2588	98.423	0.704	0	0
39495	Devon Energy Production Company LP	Devon - Papas Fritas 27 CTB 1	Malaga	Eddy	53.29	26.05	0.2327	98.733	1.25	0	0
39496	Devon Energy Production Company LP	Devon - Papas Fritas 27 CTB 2	Malaga	Eddy	59.26	28.7	0.2527	97.643	1.2	0	0
39522	Devon Energy Production Company LP	Devon - Cobber 21 CTB 2	Jal	Lea	22.69	12.06	0.0304	101.306	0.65	0	0
39528	Devon Energy Production Company LP	Devon - Danger Noodle 29 CTB 1	Jal	Lea	53.19	26.35	0.1986	98.403	1.37	0	0
39536	Devon Energy Production Company LP	Devon - Aleutian 10 CTB 3	Malaga	Eddy	42.41	22.91	0.0689	81.526	1.498	0	0
39615	Devon Energy Production Company LP	Devon - Thoroughbred 10 CTB 3	Malaga	Eddy	34.46	17.42	0.31	98.81	0.79	0	0
39627	Devon Energy Production Company LP	Devon - Right Meow 31 CTB 5	Malaga	Lea	35.46	17.85	0.26	98.56	0.62	0	0
39647	Devon Energy Production Company LP	Devon - Hot Potato 26 CTB 1	Malaga	Eddy	29.15	13.95	0.29	95.78	0.3	0	0
39657	Devon Energy Production Company LP	Devon - Hot Potato 26 CTB 2	Malaga	Eddy	0	0	0	0	0	0	0
39720	Devon Energy Production Company LP	Devon - Shetland 2 CTB 2	Malaga	Eddy	52.19	23.55	0.12	87.89	0.15	0	0
39722	Devon Energy Production Company LP	Devon - Shetland 11 CTB 1	Malaga	Eddy	38.46	18.06	0.13	97.68	0.3	0	0
39735	Devon Energy Production Company LP	Devon - Railsplitter 15 CTB 6	Jal	Lea	30.44	15.48	0.022	98.92	0.37	0	0
39750	Devon Energy Production Company LP	Devon - Yukon Gold 31 CTB 2	Malaga	Eddy	38.91	18.28	0.026	64.71	0.36	0	0
39785	Devon Energy Production Company LP	Devon - Billiken 6 CTB 1	Jal	Lea	0	0	0	0	0	0	0
39793	Devon Energy Production Company LP	Devon - Galapagos 14 CTB 2	Malaga	Eddy	0	0	0	0	0	0	0
39794	Devon Energy Production Company LP	Devon - Bell Lake 24 CTB 3	Malaga	Lea	0	0	0	0	0	0	0