

RECEIVED:	REVIEWER:	TYPE:	APP NO: <b>pLEL2227651905</b>
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
- Geological & Engineering Bureau -  
1220 South St. Francis Drive, Santa Fe, NM 87505

**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** WPX Energy Permian, LLC **OGRID Number:** 246289  
**Well Name:** Clawhammer 33-28-21 Federal Com 415H (infill well) **API:** 30-015-49847  
**Pool:** Purple Sage Wolfcamp Gas pool **Pool Code:** 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
- A. Location – Spacing Unit – Simultaneous Dedication  
☒ NSL ☐ NSP (PROJECT AREA) ☐ NSP (PRORATION UNIT) ☐ SD
- B. Check one only for [ I ] or [ II ]
- [ I ] Commingling – Storage – Measurement  
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM
- [ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery  
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR
- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
- A. ☒ Offset operators or lease holders  
B. ☐ Royalty, overriding royalty owners, revenue owners  
C. ☐ Application requires published notice  
D. ☐ Notification and/or concurrent approval by SLO  
E. ☐ Notification and/or concurrent approval by BLM  
F. ☐ Surface owner  
G. ☒ For all of the above, proof of notification or publication is attached, and/or,  
H. ☐ No notice required

**FOR OCD ONLY**

- ☐ Notice Complete  
☐ Application Content Complete

- 3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Paula M Vance

Print or Type Name

Signature

9/23/2022

Date

505-954-7286

Phone Number

pmvance@hollandhart.com

e-mail Address



**Paula M. Vance**  
**Associate**  
**Phone (505) 954-7286**  
PMVance@hollandhart.com

September 23, 2022

**VIA ONLINE FILING**

Adrienne Sandoval  
Oil Conservation Division  
Energy, Minerals and Natural  
Resources Department  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: WPX Energy Permian, LLC**  
**Request for Administrative Approval of Unorthodox Well Location**

Clawhammer 33-28-21 Federal Com 415H  
All of irregular Section 33, all of Section 28, and the S/2 of Section 21, T26S, R30E  
Eddy County, New Mexico  
Purple Sage Wolfcamp Gas pool [98220]  
API No. 30-015-49847

Dear Ms. Sandoval:

WPX Energy Permian, LLC (OGRID No. 246289), pursuant to Division Rules 19.15.16.15(C)(6) and 19.15.15.13 NMAC and applicable rules governing acreage and well location requirements for the Purple Sage Wolfcamp Gas pool [98220], seeks administrative approval of an unorthodox well location for its **Clawhammer 33-28-21 Federal Com 415H well** (API No. 30-015-49847), in a 1219.08-acre, more or less, spacing unit underlying all of irregular Section 33, all of Section 28, and the S/2 of Section 21, Township 26 South, Range 30 East, Eddy County, New Mexico.

The proposed location is as follows:

**Clawhammer 33-28-21 Federal Com 415H: (INFILL WELL)**

- Surface location: 266' FSL and 1121' FEL (Lot 1) of Section 33
- First take point: 100' FSL and 330' FEL (Lot 1) of Section 33
- Last take point: 2559' FSL and 330' FEL (Unit I) of Section 21
- Bottom hole location: 2609' FSL and 330' FEL (Unit I) of Section 21

The defining well creating this enlarged spacing unit is the **Clawhammer 33-28-21 Federal Com 413H**.

T 505.988.4421 F 505.983.6043  
110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849  
Mail to: P.O. Box 2208, Santa Fe, NM 87504-2208  
www.hollandhart.com

Alaska	Montana	Utah
Colorado	Nevada	Washington, D.C.
Idaho	New Mexico	Wyoming

Since this acreage is governed by the Division's statewide rules, the completed interval for this well will be unorthodox because it is closer than the standard offsets to the northern and southern boundary of the spacing unit – thus encroaching on the N/2 of Section 21, T26S, R30E and the lands south of the spacing unit across the New Mexico and Texas border. As explained in the engineering statement included as **Exhibit A**, approval of the unorthodox, completed interval will allow WPX to use its preferred first and last take points for the horizontal well, which will maximize recovery and prevent waste.

**Exhibit B** is a Form C-102 showing the proposed well encroaches on the spacing unit/tracts to the north in the N/2 of Section 21, T26S, R30E and in the lands south of the spacing unit across the New Mexico and Texas border.

**Exhibit C** is a plat for the N/2 of Section 21, T26S, R30E and for the lands south of the spacing unit across the New Mexico and Texas border, that show the proposed well in relation to the adjoining spacing unit/tracts to the north and south. Exhibit C also includes an ownership list for the affected spacing unit to the north, showing that it is owned by EOG Resources Inc., and to the south, showing that it is owned by Devon and BPX Properties (NA) LP, as the working interest owners. Accordingly, the "affected persons"<sup>1</sup> are EOG Resources Inc., Devon and BPX Properties (NA) LP.

**Exhibit D** is a spreadsheet listing all affected persons and includes tracking information demonstrating that each of the affected persons was sent a copy of this application with all attachments by certified mail advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application. The following are the affected persons:

Type	Affected Party	Location
Operator/ Working Interest	EOG Resources Inc.	N/2 Section 21
Operator/ Working Interest	Devon	Section 5, Blk. 56, Township 1, Loving County, TX
Operator/ Working Interest	BPX Properties (NA) LP	Section 5, Blk. 56, Township 1, Loving County, TX

<sup>1</sup> See NMAC §§ 19.15.2.7.A(8) [defining "affected persons" as, "in the absence of an operator, or with respect to an application wherein the operator of the spacing unit or identified tract is the applicant, each working interest owner"] and 19.15.4.12.A(2)(a).

Your attention to this matter is appreciated.

Sincerely,



Paula M. Vance  
**ATTORNEY FOR**  
**WPX ENERGY PERMIAN, LLC**



Devon Energy Production Company, L.P.  
333 West Sheridan Avenue  
Oklahoma City, OK 73102-5015

September 1, 2022

Mr. Leonard Lowe  
New Mexico Oil Conservation Division  
1220 South Francis Drive  
Santa Fe, New Mexico 87505

RE: Application for Nonstandard Location  
Engineering Statement  
WPX Energy Permian, LLC  
Clawhammer 33-28-21 Fed Com wells 412H, 413H, 414H, 415H, 422H, 423H, 424H, & 425H  
(the "Clawhammer Wells")  
S/2 of Section 21, All of Section 28, and All of Irregular Section 33 -26S-30E  
Eddy County, New Mexico

Dear Mr. Lowe:

WPX Energy Permian, LLC, a wholly owned subsidiary of Devon Energy Corporation, respectfully requests administrative approval of a nonstandard location for each of the Clawhammer Wells referenced above. The Clawhammer Wells are in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is WPX's responsibility as a prudent operator to minimize reserves left in the ground. Decreasing the first and last take point from three hundred and thirty feet (330') to one hundred feet (100') will increase the wells effective lateral length by 460 feet thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

Nikki Ferradas  
Reservoir Engineer

**EXHIBIT A**

## District I

1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720

## District II

811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720

## District III

1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170

## District IV

1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102

Revised August 1, 2011

Submit one copy to appropriate

District Office

☐ AMENDED REPORT

## WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number 30-015-	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Name PURPLE SAGE WOLFCAMP GAS POOL
<sup>4</sup> Property Code	<sup>5</sup> Property Name CLAWHAMMER 33-28-21 FEDERAL COM	<sup>6</sup> Well Number 415H
<sup>7</sup> OGRID No. 246289	<sup>8</sup> Operator Name WPX ENERGY PERMIAN, LLC	<sup>9</sup> Elevation 2,971'

<sup>10</sup> Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
1	33	26 S	30 E		266	SOUTH	1,121	EAST	EDDY

<sup>11</sup> Bottom Hole Location If Different From Surface

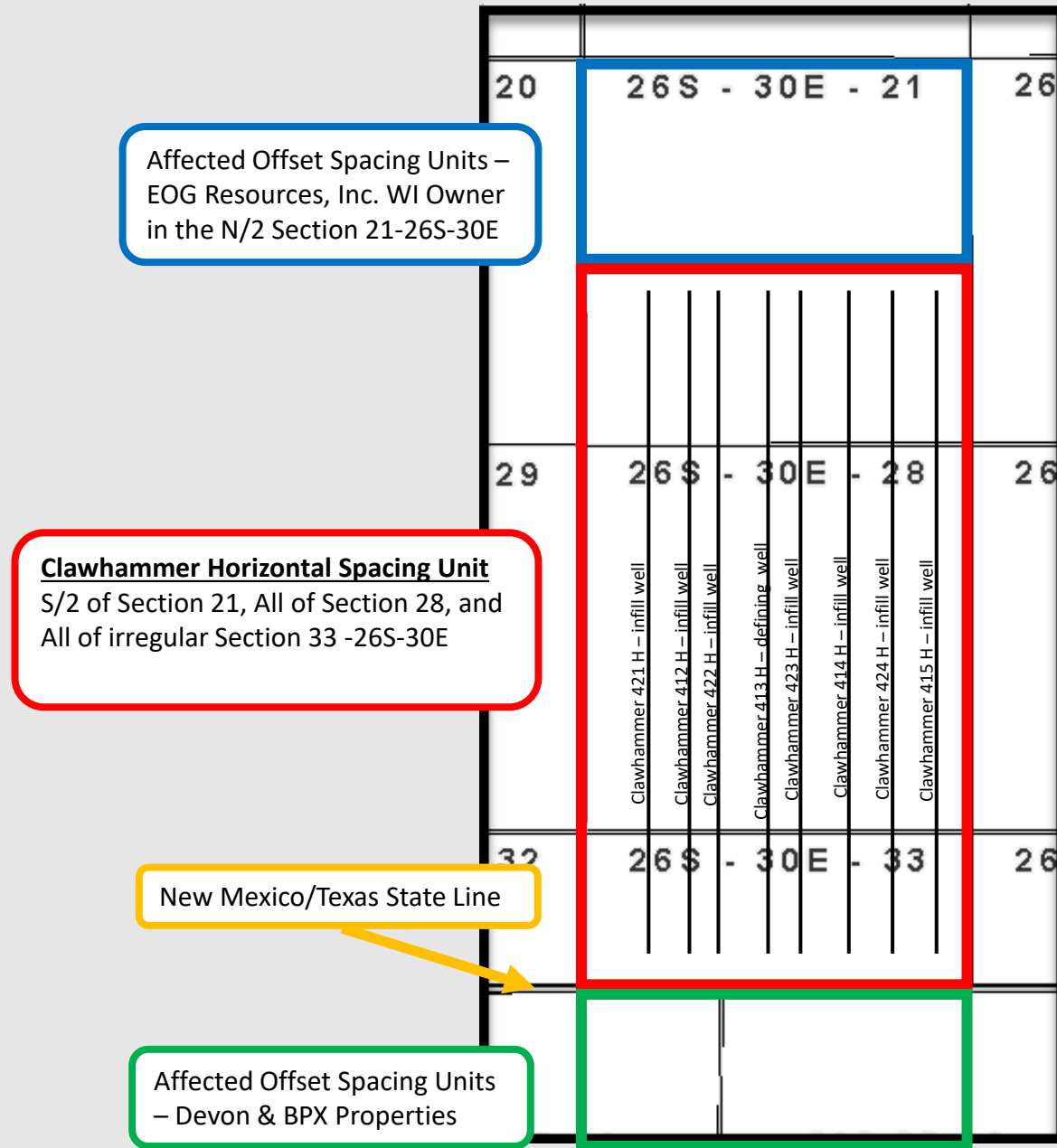
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
I	21	26 S	30 E		2,609	SOUTH	330	EAST	EDDY

<sup>12</sup> Dedicated Acres 1219.08	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
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No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

<p><sup>16</sup></p> <p><b>SHL (NAD83 NME)</b> Y = 364,347.0 X = 681,474.4 LAT. = 32.00865 °N LONG. = 103.881259 °W</p> <p><b>FTP (NAD83 NME)</b> Y = 364,185.0 X = 682,265.8 LAT. = 32.000410 °N LONG. = 103.878708 °W</p> <p><b>CORNER COORDINATES (NAD83 NME)</b> A - Y = 374,218.1 N, X = 682,538.8 E B - Y = 371,558.9 N, X = 682,558.2 E C - Y = 368,899.7 N, X = 682,573.1 E D - Y = 366,240.4 N, X = 682,588.1 E E - Y = 364,086.7 N, X = 682,596.2 E F - Y = 374,209.6 N, X = 681,207.4 E G - Y = 371,550.7 N, X = 681,227.5 E H - Y = 368,892.0 N, X = 681,243.4 E I - Y = 366,233.3 N, X = 681,259.3 E J - Y = 364,080.2 N, X = 681,267.7 E</p> <p><b>SHL (NAD27 NME)</b> Y = 364,289.8 X = 640,288.1 LAT. = 32.000739 °N LONG. = 103.880782 °W</p> <p><b>FTP (NAD27 NME)</b> Y = 364,127.8 X = 641,079.6 LAT. = 32.000285 °N LONG. = 103.878231 °W</p> <p><b>CORNER COORDINATES (NAD27 NME)</b> A - Y = 374,160.6 N, X = 641,352.8 E B - Y = 371,501.5 N, X = 641,372.1 E C - Y = 368,842.3 N, X = 641,387.0 E D - Y = 366,183.1 N, X = 641,401.9 E E - Y = 364,029.5 N, X = 641,410.0 E F - Y = 374,152.1 N, X = 640,021.4 E G - Y = 371,493.3 N, X = 640,041.5 E H - Y = 368,834.7 N, X = 640,057.3 E I - Y = 366,176.0 N, X = 640,073.2 E J - Y = 364,022.9 N, X = 640,081.4 E</p>	<p><b>LOT ACREAGE TABLE</b> LOT 4 - 24.74 ACRES LOT 3 - 24.76 ACRES LOT 2 - 24.78 ACRES LOT 1 - 24.80 ACRES</p> <p><b>SEC. 21</b></p> <p><b>SEC. 28</b> T26S R30E</p> <p><b>SEC. 33</b> GRID AZ. = 104°34'00" HORIZ. DIST. = 807.89'</p> <p>NEW MEXICO TEXAS</p>	<p><b><sup>17</sup> OPERATOR CERTIFICATION</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p><i>Jenny Harms</i> 6-29-22 Signature Date</p> <p><b>JENNY HARMS</b> Printed Name</p> <p><b>JENNY.HARMS@DVN.COM</b> E-mail Address</p> <p><b><sup>18</sup> SURVEYOR CERTIFICATION</b> I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>06-27-2022 Date of Survey</p> <p>Signature and Seal of Professional Surveyor:</p> <p><b>MARK DILLON HARP 23786</b> Certificate Number</p> <p><b>MARK DILLON HARP</b> NEW MEXICO 23786 PROFESSIONAL SURVEYOR</p> <p>MBK/DB 2022020351</p>
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## EXHIBIT B - INFILL WELL

**EXHIBIT C**

<b>Company Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip</b>	
EOG Resources Inc.	5509 Champions Dr	Midland	TX	79706	
BPX Properties (NA) LP	1700 Platte Street, Suite 150	Denver	CO	80202	Attn: Kevin Woods

## **EXHIBIT D**





**Paula M. Vance**  
**Associate**  
**Phone (505) 954-7286**  
PMVance@hollandhart.com

September 20, 2022

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO: ALL AFFECTED PERSONS**

**Re: WPX Energy Permian, LLC**  
**Request for Administrative Approval of Unorthodox Well Location**

Clawhammer Fed Com #412H, #413H, #414H, #415H, #421H, #422H, #423H and #424H  
All of irregular Section 33, all of Section 28, and the S/2 of Section 21, T26S, R30E  
Eddy County, New Mexico  
Purple Sage Wolfcamp Gas pool [98220]  
API Nos. 30-015-49831, 30-015-49832, 30-015-49839, 30-015-49847, 30-015-49845, 30-015-49844, 30-015-49843, 30-015-49842

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Ryan Cloer  
WPX Energy Permian, LLC  
(405) 228-2448  
Ryan.Cloer@divn.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Paula M. Vance".

Paula M. Vance  
**ATTORNEY FOR**  
**WPX ENERGY PERMIAN, LLC**



\$6.57 + (weight) =

# Shipment Confirmation Acceptance Notice

## A. Mailer Action

**Note to Mailer:** The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

WPX\_Clawhammer NSL

Shipment Date: 09/20/2022

Shipped From:

Name: HOLLAND &amp; HART LLP (1)

Address: 110 N GUADALUPE ST # 1

City: SANTA FE

State: NM ZIP+4® 87501

Type of Mail	Volume
Priority Mail Express®*	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	2
Total	2

\*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

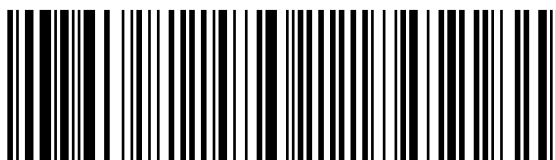
## B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.  
Leave form with customer or in customer's mail receptacle.

### USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0039 4244 32



## Firm Mailing Book For Accountable Mail

Name and Address of Sender <b>HOLLAND &amp; HART LLP (1)</b> <b>110 N GUADALUPE ST # 1</b> <b>SANTA FE NM 87501</b>		Check type of mail or service <input type="checkbox"/> Adult Signature Required <input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Collect on Delivery (COD) <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Priority Mail		<b>Affix Stamp Here</b> <i>(for additional copies of this receipt).</i> <b>Postmark with Date of Receipt.</b>												
USPS Tracking/Article Number	Addressee (Name, Street, City, State, & ZIP Code™)	Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee		
1. <b>9214 8901 9403 8390 3140 93</b>	EOG Resources Inc 5509 Champions Dr Midland TX 79706	0.57	4.00	Handling Charge - if Registered and over \$50,000 in value							2.00					
2. <b>9214 8901 9403 8390 3141 09</b>	BPX Properties (NA) LP Attn: Kevin Woods 1700 Platte Street Suite 150 Denver CO 80202	0.57	4.00								2.00					
Total Number of Pieces Listed by Sender <b>2</b>	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiving employee)														

**District I**

1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**

811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**

1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 147589

**CONDITIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 147589
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
Ilowe	NSL - 8446 is approved. The approved Order can be retrieved at the following OCD website link. <a href="https://ocdimage.emnrd.nm.gov/imaging/AEOrderCriteria.aspx">https://ocdimage.emnrd.nm.gov/imaging/AEOrderCriteria.aspx</a>	10/3/2022