

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Melanie A. Kenderdine**  
Deputy Secretary – Designate

**Ben Shelton**  
Deputy Secretary (Acting)

**Gerasimos “Gerry” Razatos**  
Division Director (Acting)  
Oil Conservation Division



Paula M. Vance  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL – 8854**

**Devon Energy Production Company, L.P. [OGRID 6137]**  
**Bent Tree 9 11 State Com Well No. 625H**  
**API No. 30-015-55723**

Reference is made to your application received on January 7<sup>th</sup>, 2025.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	890 FSL & 264 FEL	P	08	21S	27E	Eddy
First Take Point	1640 FSL & 100 FWL	L	09	21S	27E	Eddy
Last Take Point	1640 FSL & 2574 FWL	K	11	21S	27E	Eddy
Terminus	1640 FSL & 2654 FWL	K	11	21S	27E	Eddy

**Proposed Horizontal Units**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
S/2 of Section 09	800	Alacran Hills; Wolfcamp (Gas)	70070
S/2 of Section 10			
SW/4 of Section 11			

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(3)(a) NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal **gas** well a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter section or equivalent. 19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 660 feet for a **gas** well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal

Administrative Order NSL – 8854  
Devon Energy Production Company, L.P.  
Page 2 of 2

well shall be no closer than 330 feet for a **gas** in the horizontal plane, to any outer boundary of the horizontal spacing unit.

The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(5)(a) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of First and/or Last Take Points referenced above within the described Horizontal Spacing Unit.

This well's completed interval is as close as 100 feet to the western and 66 feet to the eastern edge of the proposed horizontal spacing unit. Encroachment will impact the following tract(s).

Section 08, encroachment to the SE/4  
Section 11, encroachment to the SE/4

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in Paragraph (8) Subsection A of 19.15.2.7 NMAC, in all adjoining units towards which the proposed location encroaches.

Division understands you are seeking this unorthodox location to avoid causing wasted resources and reducing production from current and future development within the Wolfcamp formation underlying S/2 of Section 09, S/2 of Section 10 and the SW/4 of Section 11. Thereby preventing waste within the formation all while protecting the correlative rights of affected persons in the encroached tracts.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per Subsection B of 19.15.15.13 NMAC, **Division approves this unorthodox location.**

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as Division deems necessary.



**Gerasimos Razatos**  
Division Director (Acting)  
GR/lrl

**Date:** 2/6/2025

ID NO. 418149

NSL - 8854

Revised March 23, 2017

RECEIVED: <b>01/07/25</b>	REVIEWER:	TYPE:	APP NO: <b>pLEL2501474747</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:** Devon Energy Production Company, L.P. **OGRID Number:** 6137  
**Well Name:** Bent Tree 9-11 State Com #625H well **API:** 30-015-55723  
**Pool:** Alacran Hills; Wolfcamp Gas Pool **Pool Code:** 70070

**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

January 7, 2025

Date

505-954-7286

Phone Number

pmvance@hollandhart.com

e-mail Address



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

January 7, 2025

**VIA ONLINE FILING**

Gerasimos Razatos, Acting Division Director  
 Oil Conservation Division  
 Energy, Minerals and Natural Resources Department  
 1220 South Saint Francis Drive  
 Santa Fe, New Mexico 87505

**Re: Devon Energy Production Company, L.P.**  
**Request for Administrative Approval of an Unorthodox Well Location**

Bent Tree 9-11 State Com #625H well  
 S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East,  
 Eddy County, New Mexico  
 Alacran Hills; Wolfcamp Gas Pool [70070]  
 API No. 30-015-55723

Dear Mr. Razatos:

Devon Energy Production Company, L.P. (“Devon”) (OGRID No. 6137), 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 Alacran Hills; Wolfcamp Gas Pool [70070], seeks administrative approval of an unorthodox well location for its Bent Tree 9-11 State Com #625H well (API No. 30-015-55723), in an 800-acre, more or less, spacing unit underlying the S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East, Eddy County, New Mexico.

The location for the proposed **Bent Tree 9-11 State Com #625H well** is as follows:

- Surface location: 890’ FSL and 264’ FEL (Unit P) of Section 8
- First take point: 1,640’ FSL and 100’ FWL (Unit L) of Section 9
- Last take point: 1,640’ FSL and 2,574’ FWL (Unit K) of Section 11
- Bottom location: 1,640’ FSL and 2,654’ FWL (Unit K) of Section 11

Since this acreage is governed by the Division’s statewide rules, the proposed first and last take points for this well will be unorthodox because they are closer than the standard offsets to the eastern and western boundaries of the spacing unit—thus, encroaching on Mewbourne Oil Company’s Cholula spacing unit to the east and their Screaming Eagle spacing units to the west.

**Exhibit A** is an Engineering Statement explaining why approval of the application is necessary.

**Exhibit B** is a Form C-102 showing the **Bent Tree 9-11 State Com #625H** well encroaches on the units to the east in the SE/4 of Section 11 and S/2 of Section 12, T21S-R27E (Mewbourne's Cholula HSU), as well as to the west in Lots 3-4, E/2 SW/4, and SE/4 (S/2 equivalent) of irregular Section 7 and the S/2 of Section 8, T21S-R27E (Mewbourne's Screaming Eagles HSUs).

**Exhibit C** is a plat for the subject area that shows the proposed Bent Tree 9-11 State Com #625H well in relation to the adjoining units to the east and west. Exhibit B also includes an ownership list for the affected HSUs to the east and west, showing that the spacing units are both operated by Mewbourne Oil Co. ("Mewbourne"). In addition, the exhibit identifies that these offsetting spacing units include state and federal leases. Accordingly, the "affected persons"<sup>1</sup> are Mewbourne, the New Mexico State Land Office ("SLO"), and the Bureau of Land Management ("BLM").

**Exhibit D** is a spreadsheet listing all affected persons Devon provided notice 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	Offsetting Acreage
Operator	Mewbourne	SE/4 of Section 11 & S/2 of Section 12 (Cholula HSU); and Lots 3-4, E/2 SW/4, & SE/4 (S/2 equivalent) of irregular Section 7 & the S/2 of Section 8 (Screaming Eagles HSUs)
Federal Mineral Interest	Bureau of Land Management	S/2 of 12
State Mineral Interest	New Mexico State Land Office	SE/4 of Section 11; and Lots 3-4, E/2 SW/4, & SE/4 (S/2 equivalent) of irregular Section 7 and the S/2 of Section 8

<sup>1</sup> See 19.15.2.7.A(8) NMAC [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) NMAC.

Your attention to this matter is appreciated.

Sincerely,



Paula M. Vance  
**ATTORNEY FOR**  
**DEVON ENERGY PRODUCTION COMPANY, L.P.**

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](http://www.hollandhart.com)

Alaska  
Colorado  
Idaho

Montana  
Nevada  
New Mexico

Utah  
Washington, D.C.  
Wyoming



Devon Energy Production Company LP  
333 West Sheridan Avenue  
Oklahoma City, OK 73102

405 228 4214 Phone  
www.devonenergy.com

November 18, 2024

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

RE: Application for Non-Standard Location  
Engineering Statement  
Devon Energy Production Company, L.P.  
Bent Tree 9-11 State Com 625H  
S/2 of Section 9, S/2 of Section 10 & SW/4 of Section 11, T21S-R27E  
Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, LP ("Devon") respectfully requests administrative approval of non-standard location for the Bent Tree 9-11 State Com 625H well referenced above. The well is in the Alacran Hills; Wolfcamp (Gas) Pool (Pool Code 70070). Devon proposes to decrease the first and last tank points from 330 feet to less than 100 feet, which will increase the completed horizontal lateral and the ultimate recovery of reserves. Therefore, approval of this non-standard location is necessary to avoid causing wasted resources and reducing production from current and future well development in the area.

Respectfully,

**Devon Energy Production Company, L.P.**

A handwritten signature in black ink, appearing to read "Keevin Barnes", written over a horizontal line.

Keevin Barnes  
Reservoir Engineer

EXHIBIT  
**A**



C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>		Revised July, 2024	
			Submittal Type:	<input checked="" type="checkbox"/> Initial Submittal
				<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled		

## WELL LOCATION INFORMATION

API Number	Pool Code 70070	Pool Name Alacran Hills; Wolfcamp (Gas)
Property Code	Property Name BENT TREE 9-11 STATE COM	Well Number 625H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3248.6'
Surface Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

## Surface Location

UL P	Section 8	Township 21-S	Range 27-E	Lot	Ft. from N/S 890' S	Ft. from E/W 264' E	Latitude 32.489924	Longitude 104.204287	County EDDY
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## Bottom Hole Location

UL K	Section 11	Township 21-S	Range 27-E	Lot	Ft. from N/S 1640' S	Ft. from E/W 2654' W	Latitude 32.492031	Longitude 104.160507	County EDDY
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Dedicated Acres 800	Infill or Defining Well DEFINING	Defining Well API	Overlapping Spacing Unit (Y/N) NO	Consolidation Code
Order Numbers Pending - NSL; R-23417			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

## Kick Off Point (KOP)

UL L	Section 9	Township 21-S	Range 27-E	Lot	Ft. from N/S 1641' S	Ft. from E/W 56' W	Latitude 32.4919	Longitude 104.2033	County EDDY
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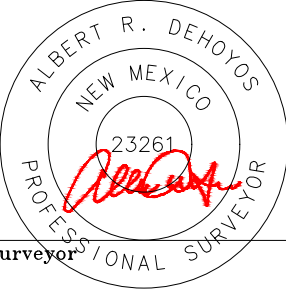
## First Take Point (FTP)

UL L	Section 9	Township 21-S	Range 27-E	Lot	Ft. from N/S 1640' S	Ft. from E/W 100' W	Latitude 32.491985	Longitude 104.203103	County EDDY
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## Last Take Point (LTP)

UL K	Section 11	Township 21-S	Range 27-E	Lot	Ft. from N/S 1640' S	Ft. from E/W 2574' W	Latitude 32.492030	Longitude 104.160766	County EDDY
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Spacing Unit Type Horizontal Vertical HORIZONTAL				Ground Floor Elevation:
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<b>OPERATOR CERTIFICATIONS</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.  If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.		<b>SURVEYOR CERTIFICATIONS</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 supervision, and that the same is true and correct to the best of my belief.	
Signature 	Date 10/21/24		
Printed Name Shandee Thomas Email Address Shandee.Thomas@dvn.com			
		Signature and Seal of Professional Surveyor	
		Certificate Number 23261	Date of Survey 05/2024

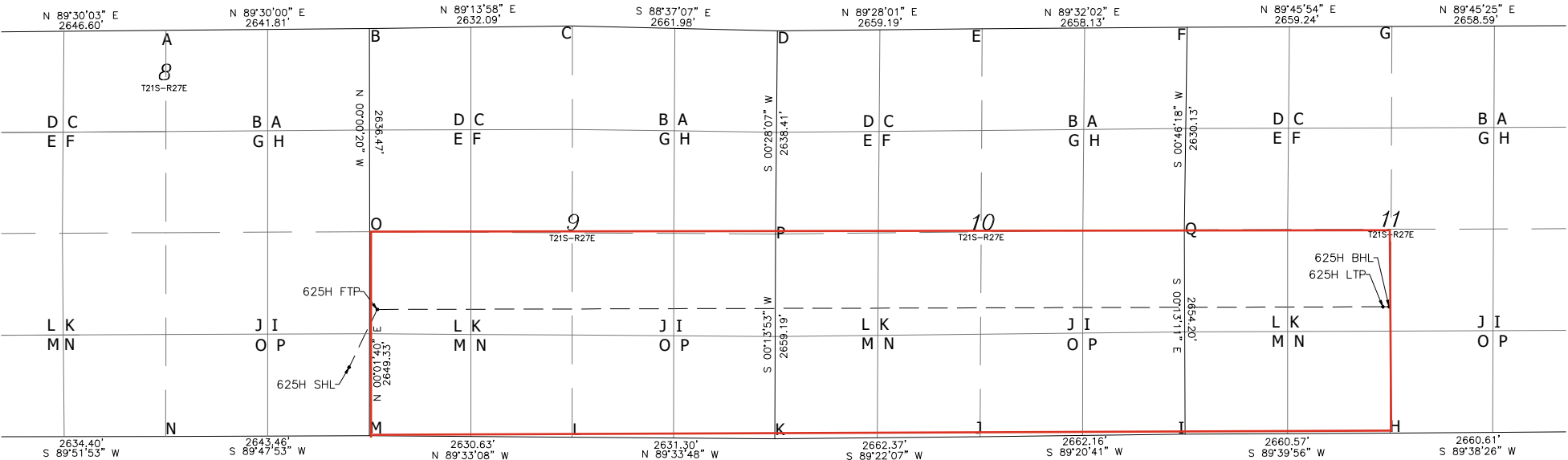
**EXHIBIT  
B**



ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



A= N:546362.89 E:578748.97
B= N:546385.95 E:581390.68
C= N:546421.19 E:584022.53
D= N:546357.03 E:586683.74
E= N:546381.76 E:589342.82
F= N:546403.39 E:592000.86
G= N:546414.30 E:594660.07
H= N:541134.84 E:594636.14
I= N:541119.31 E:591975.61
J= N:541088.86 E:589313.63
K= N:541059.53 E:586651.42
L= N:541079.59 E:584020.20
M= N:541100.14 E:581369.65
N= N:541090.83 E:578746.21
O= N:543749.48 E:581390.93
P= N:543718.70 E:586662.16
Q= N:543773.50 E:591965.44

<b>SURFACE HOLE LOCATION</b> GEODETIC COORDINATES NAD 83 NMSP EAST SURFACE LOCATION 890' FSL 264' FEL SECTION 8 EL:3248.6' N:541989.29/E:581126.11 LAT:32.489924/LON:104.204287	<b>KICK OFF POINT</b> CALLS: 1641' FSL 56' FWL N:542740.3/E: 581445 LAT:32.4919 /LON: 104.2033	<b>FIRST TAKE POINT</b> 1640' FSL 100' FWL SECTION 9 N:542739.41/E:581490.44 LAT:32.491985/LON:104.203103	<b>LAST TAKE POINT</b> 1640' FSL 2574' FWL SECTION 11 N:542774.33/E:594543.57 LAT:32.492030/LON:104.160766	<b>BOTTOM HOLE LOCATION</b> 1640' FSL 2654' FWL SECTION 11 N:542774.80/E:594623.57 LAT:32.492031/LON:104.160507
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## Bent Tree 9-11 State Com 625H – NSL Offset Tract Map

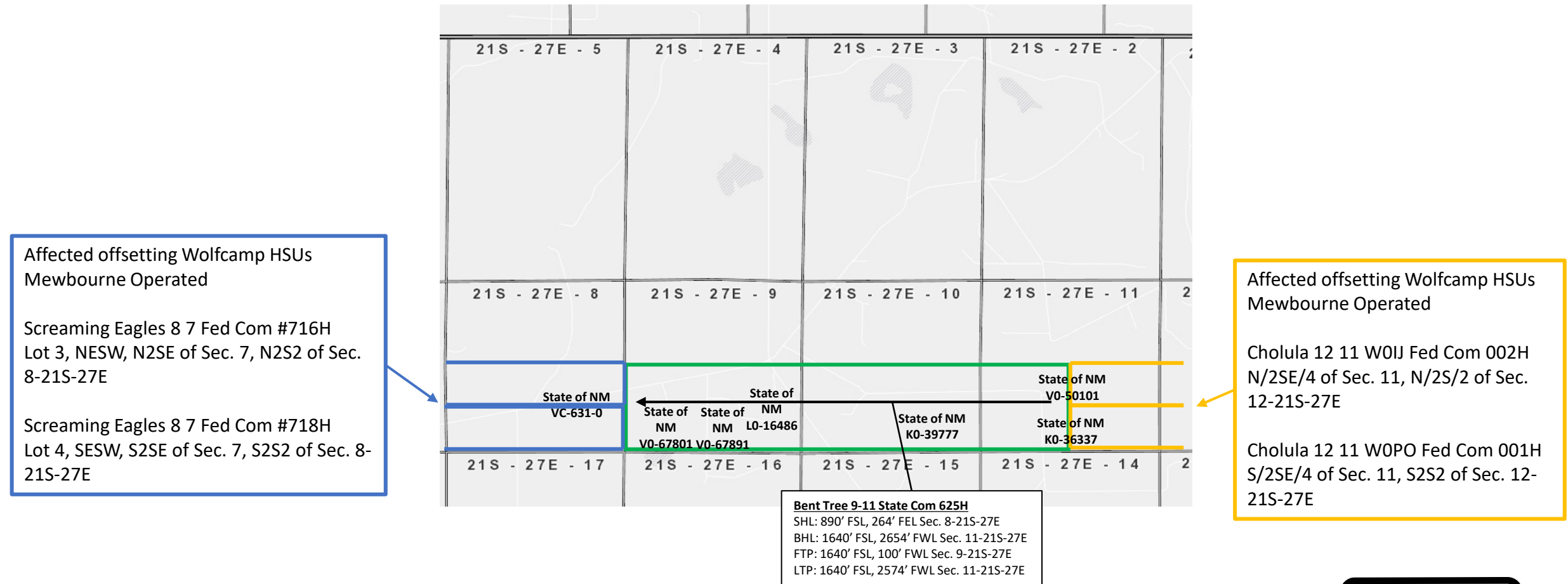


EXHIBIT  
C

Mewbourne Oil Company  
New Mexico State Land Office  
Bureau of Land Management

500 West Texas, Suite 1020  
310 Old Santa Fe Trail  
620 E. Greene Street

Midland  
Santa Fe  
Carlsbad

TX  
NM  
NM

79701  
87501  
88220-6292

EXHIBIT  
D



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

December 18, 2024

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

**TO: ALL AFFECTED PERSONS**

**Re: Devon Energy Production Company, L.P**  
**Request for Administrative Approval of an Unorthodox Well Location**

Bent Tree 9-11 State Com 625H well  
S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East,  
Eddy County, New Mexico  
Alacran Hills; Wolfcamp Gas Pool [70070]  
API No. 30-015-55723

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 the date this application is received by 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:

Jake Nourse  
Devon Energy Production Company, L.P.  
(405) 228-2856  
[Jake.Nourse@dvn.com](mailto:Jake.Nourse@dvn.com)

Sincerely,

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

Paula M. Vance  
**ATTORNEY FOR**  
**DEVON ENERGY PRODUCTION COMPANY, L.P**

Devon - Bent Tree 625H - NSL  
Postal Delivery Report

9214 8901 9403 8392 3194 09	MEWBOURNE OIL COMPANY 500 WEST TEXAS SUITE 1020 MIDLAND TX 79701	Delivered Signature Received
9214 8901 9403 8392 3194 16	NEW MEXICO STATE LAND OFFICE 310 OLD SANTA FE TRAIL SANTA FE NM 87501	Delivered Signature Received
9214 8901 9403 8392 3194 23	BUREAU OF LAND MANAGEMENT 620 E GREENE STREET CARLSBAD NM 88220-6292	Delivered Signature Received

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 418149

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 418149
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	1/9/2025