State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham

Governor

Melanie A. Kenderdine Deputy Secretary – Designate Gerasimos "Gerry" Razatos Division Director (Acting) Oil Conservation Division



Ben Shelton

Deputy Secretary (Acting)

Darin Savage darin@abadieschill.com

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL - 8871

Devon Energy Production Company, L.P. [OGRID 6137] Morgan 25 13 Federal Com Well No. 736H API No. 30-015-55643

Reference is made to your application received on January 29th, 2025.

Proposed Location

	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	2433 FNL & 2480 FWL	F	25	25S	31E	Eddy
First Take Point	2539 FNL & 1470 FWL	F	25	25S	31E	Eddy
Last Take Point	100 FNL & 1470 FWL	C	13	25S	31E	Eddy
Terminus	20 FNL & 1470 FWL	\mathbf{C}	13	25S	31E	Eddy

Proposed Horizontal Gas Units

Description	Acres	Pool	Pool Code
NW/4 of Section 25	800.0	Purple Sage; Wolfcamp, Gas	98220
W/2 of Section 24			
W/2 of Section 13			

You have requested to complete this horizontal well as a **gas** well described above in the referenced pool or formation. This well is governed by special rules R-14262, for the Purple Sage; Wolfcamp (Gas) Pool and governs wells to be located at least 330 feet from the unit outer boundary of a spacing unit and no closer than 10 feet to any quarter – quarter section line. The completed intervals of horizontal wells are to be located no closer than 330 feet to the exterior boundary of a standard 320 - acre **gas** spacing unit.

Administrative Order NSL - 8871 Devon Energy Production Company, L.P. Page 2 of 2

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 Last Take Points referenced above within the described Horizontal Spacing Unit.

The well's completed interval is as close as 101 feet to the southern boundary and 100 feet to the northern boundary of the horizontal spacing unit. Encroachment will impact the following tract(s).

Section 25, encroachment to the SW/4 Section 12, encroachment to the SW/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.

The Division understands you are seeking this unorthodox location to increase the recovery of natural resources within the Wolfcamp formation underlying the NW/4 of Section 25, the W/2 of Section 24 and the W/2 of Section 13, thereby protecting the correlative rights and the disposition of waste resulting from oil and gas operations.

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.

Date: 3/6/2025

Gerasimos Razatos

Division Director (Acting)

GR/lrl

NSL - 8871

ID NO. 426305 RECEIVED: 01 REVIEWER:

TYPE: APP NO:

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION



pLEL2503042190

Revised March 23, 2017

- Geological & Engineer 1220 South St. Francis Drive, Sa	
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THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPREGULATIONS WHICH REQUIRE PROCESSING AT	LICATIONS FOR EXCEPTIONS TO DIVISION RULES AND
Applicant: <u>Devon Energy Production Company, L.P.</u> Well Name: <u>Morgan 25-13 Fed Com 736H Well</u> Pool: Purple Sage; Wolfcamp (Gas)	OGRID Number: <u>6137</u> API: <u>30-015-55643</u> Pool Code: 98220
SUBMIT ACCURATE AND COMPLETE INFORMATION REGINAL INDICATED BI	QUIRED TO PROCESS THE TYPE OF APPLICATION
1) TYPE OF APPLICATION: Check those which apply for A. Location – Spacing Unit – Simultaneous Dedica NSL NSP _(PROJECT AREA)	
B. Check one only for [1] or [11] [1] Commingling – Storage – Measurement DHC DTB PLC PC [11] Injection – Disposal – Pressure Increase – Er WFX PMX SWD DIPI	OLS OLM Chanced Oil Recovery EOR PPR FOR OCD ONLY
 2) NOTIFICATION REQUIRED TO: Check those which ap A. Offset operators or lease holders B. Royalty, overriding royalty owners, revenue C. Application requires published notice D. Notification and/or concurrent approval by E. Notification and/or concurrent approval by F. Surface owner G. For all of the above, proof of notification or H. No notice required 	owners SLO BLM Notice Complete Application Content Complete
3) CERTIFICATION: I hereby certify that the information administrative approval is accurate and complete the understand that no action will be taken on this applications are submitted to the Division.	o the best of my knowledge. I also
Note: Statement must be completed by an individual	with managerial and/or supervisory capacity.
	January 28, 2025
Darin Savage	Date
Print or Type Name	970-385-4401
/s/ Darin Savage	Phone Number darin@abadieschill.com
Signature	e-mail Address

SUBMITTED TO THE OIL CONSERVATION DIVISION:

Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its **Morgan 25-13 Fed Com 736H Well** located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

TABLE OF CONTENTS

Administrative Checklist for NSL

Exhibit A: C-102 Form, specifically identifying the NSL (19.15.15.13C) Exhibit B: A statement discussing the reasons for the unorthodox location

(19.15.15.13C)

Exhibit C: Tract map outlining the unit location of the unorthodox well with affected

area tracts identified (19.15.15.13C)

Exhibit D: A list of affected persons and parties, with addresses, entitled to notice of

the application, along with a copy of the notice letter sent to affected

persons and parties (19.15.15.13C)

Devon Energy Production Company, L.P.



ABADIE I SCHILL PC

Colorado New Mexico
Louisiana Texas
Nebraska Kansas
Montana Wyoming
Oklahoma California
North Dakota

January 29, 2025

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

Copy to: Leonard Lowe, Division Technical Examiner

Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 736H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dear Acting Director Razatos:

Devon Energy Production Company, L.P., ("Devon"), OGRID No. 6137, is seeking administrative approval of an unorthodox well location ("NSL") for the Morgan 25-13 Fed Com 736H Well (the "736H Well") (API 30-015-55643) located in the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying a standard 800-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that has been drilled as follows:

- Surface Location (SL): 2433' from the North line and 2480' from the West line (Unit F) of Section 25, Township 25 South, Range 31 East;
- Bottom Hole Location (BHL): 20' from the North line and 1470' from the West line (Unit C) of Section 13, Township 25 South, Range 31 East;
- First Take Point (FTP): 2539' from the North line and 1470' from the West line (Unit F) of Section 25, Township 25 South, Range 31 East;
- Last Take Point (LTP): 100' from the North line and 1470' from the West line (Unit C) of Section 13, Township 25 South, Range 31 East.

abadieschill.com

214 McKenzie Street, Santa Fe, New Mexico, 87501

O: 970.385.4401 • F: 970.385.4901

Devon has included as Exhibit B, a letter explaining why this application is needed. This well will produce from the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220). Order No. 14262 requires that the first and last take points shall be no closer than a 330' distance from the outer boundary of the horizontal spacing unit.

The unorthodox location encroaches toward SW/4 of Section 12 and the N/2 SW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Devon attests that, on or before submission of this application, it sent notice to the affected persons/parties in (1) the adjoining horizontal spacing unit which covers the SW/4 of Section 25 and the W/2 of Section 36; and (2) the SW/4 of Section 12, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico. Devon has also provided notice to the Bureau of Land Management ("BLM") to the extent that federal leases are involved, pursuant to NMAC 19.15.2.7A(8)(d); said notice as described satisfies all provisions of NMAC 19.15.4.12A(2); copies of the application and required plat maps were furnished. Devon provides herein a sectional map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to the affected persons, is attached hereto as Exhibit D. Devon has informed us that there is no pooling case associated with this application.

Your consideration in this matter is appreciated.

Sincerely,

Darin C. Savage Attorney for Applicant

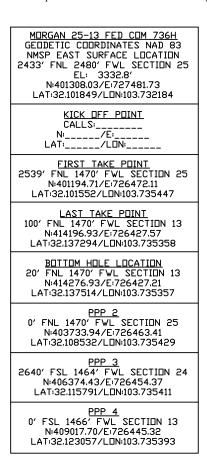
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					Logt To	ake Point (LTP)				
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C	13	25-S	31-E	Loc	100' N	1470' W	32.137		103.735358	EDDY
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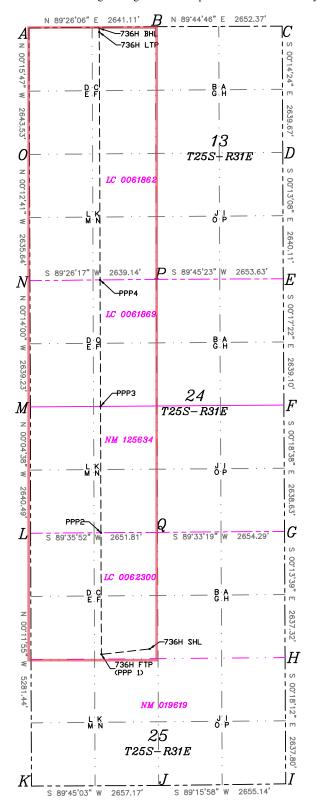


ACREAGE DEDICATION PLATS

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:414282.44 E:724957.17 B= N:414308.48 E:727598.15 C= N:414320.23 E:730250.50 D= N:411680.59 E:730261.56 F= N:409040.49 E:730271.65 E:730284.99 F= N:406401.43 G= N:403762.83 E:730299.28 H= N:401125.54 E:730309.76 I= N:398487.77 E:730323.72 J= N:398453.76 E:727668.80 K= N:398442.20 E:725011.65 L= N:403723.61 E:724993.33 M= N:406364.11 E:724989.78 E:724979.03 N= N:409003.32 □= N:411638.94 E:724969.31 P= N:409029,21 E:727618.04 Q= N:403742.23 E:727645.07



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

January 15, 2024

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

RE: Application for Nonstandard Location

Engineering Statement

Devon Energy Production Company, L.P.

Morgan 25-13 Fed Com 616H, 625H, 627H, 715H, 716H, 735H, 736H, 737H, 825H, 826H, 835H,

836H, & 837H (the "Wells") W2 of Section 13 & 24-25S-31E NW4 of Section 25-25S-31E Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. respectfully requests administrative approval of a non-standard location ("NSL") for each of the Wells referenced above. The Wells are in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Devon'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,

John Dwyer

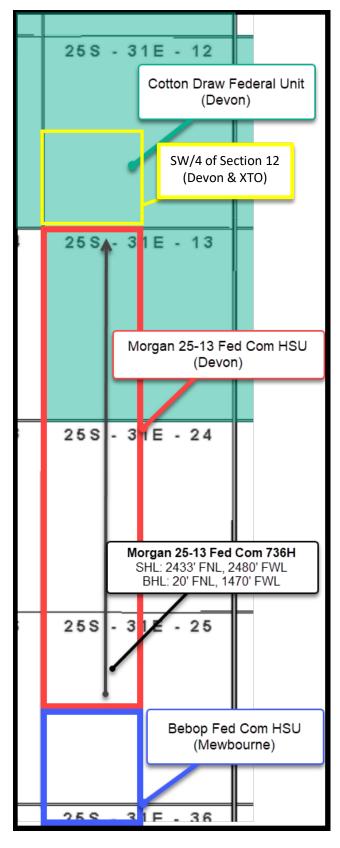
Reservoir Engineer



Non-Standard Location Application

Offset Operator Plat

Morgan 25-13 Fed Com 736H





USPSArticleNumber	DateMailed ReferenceNumber	Name1	Address1	Address2	Citv	State	Zip
9314869904300130954451	1/29/25 4188.79 - NSL - Morgan Bureau of Land Management 620 E. Greene Street	Bureau of Land Management	620 E. Greene Street		Carlsbad	Z Z	88220-6292
9314869904300130954475	1/29/25 4188.79 - NSL - Morgan Mewbourne Oil Company	Mewbourne Oil Company	500 West Texas Ave	Suite 1020	Midland	×	79701
9314869904300130954482	1/29/25 4188.79 - NSL - Morgan XTO Energy Holdings, LLC	XTO Energy Holdings, LLC	22777 Springwoods Village Pkwy		Spring	X	77389





ABADIE I SCHILL PC

Colorado New Mexico
Louisiana Texas
Nebraska Kansas
Montana Wyoming
Oklahoma California
North Dakota

January 29, 2025

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

NOTICE TO AFFECTED PERSONS/PARTIES

RE: APPLICATIONS FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX WELL LOCATION

- 1) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 616H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 2) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 625H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 3) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 627H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 4) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 715H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 5) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 716H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 6) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 735H Well

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214 McKenzie Street, Santa Fe, New Mexico, 87501

O: 970.385.4401 • F: 970.385.4901

- located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 7) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 736H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 8) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 737H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 9) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 825H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 10) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 826H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 11) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 835H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 12) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 836H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.
- 13) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 837H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

To the Parties/Persons this may concern:

Enclosed in this notice is the above-referenced applications filed with the New Mexico Conservation Division on the date referenced above. You are being notified in your capacity as a person or party in an adjoining tract or unit pursuant to our request for approval of an unorthodox locations of the above-referenced wells. Any objections that you have to one or more of these applications must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division

receives the application filed for administrative approval by the Division. These Applications would have been filed with, and received by, the Division either on the date of this letter as referenced above, or no later than two (2) days after the date referenced above. Email correspondence for this matter can be sent to the Division at OCD.Engineer@emnrd.nm.gov.

If you have any questions concerning these applications, please contact:

Ryan Cloer Landman Devon Energy Production Company, L.P. (405) 228-2448 Ryan.Cloer@dvn.com

If you have no objections to these applications, please sign the waiver as indicated below and return the original to the address listed on this letterhead. Your assistance and cooperation in this matter are appreciated.

Sincerely,

Darin C. Savage

Attorney for Devon Energy Production Company, L.P.

(See waiver on separate page below)

	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced lection Company, L.P., for administrative approval of 13 Fed Com 616H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced action Company, L.P., for administrative approval of 13 Fed Com 625H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	<u>Waiver</u>
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced action Company, L.P., for administrative approval of 13 Fed Com 627H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced action Company, L.P., for administrative approval of 13 Fed Com 715H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:

	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced ction Company, L.P., for administrative approval of 13 Fed Com 716H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced ction Company, L.P., for administrative approval of 13 Fed Com 735H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	<u>Waiver</u>
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced ction Company, L.P., for administrative approval of 13 Fed Com 736H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25-	hereby waives objection to the above referenced ction Company, L.P., for administrative approval of 13 Fed Com 737H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:

	Waiver
unorthodox well location for its Morgan 25	hereby waives objection to the above referenced action Company, L.P., for administrative approval of -13 Fed Com 825H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25	hereby waives objection to the above referenced action Company, L.P., for administrative approval of -13 Fed Com 826H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	<u>Waiver</u>
Application filed by Devon Energy Produ unorthodox well location for its Morgan 25	hereby waives objection to the above referenced action Company, L.P., for administrative approval of -13 Fed Com 835H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:
	Waiver
unorthodox well location for its Morgan 25	hereby waives objection to the above referenced action Company, L.P., for administrative approval of -13 Fed Com 836H Well located in the W/2 of Sections in Township 25 South, Range 31 East, NMPM, Eddy
Dated:	Signature:

	Waiver
unorthodox well location for	hereby waives objection to the above reference Energy Production Company, L.P., for administrative approval of its Morgan 25-13 Fed Com 837H Well located in the W/2 of Section Section 25, all in Township 25 South, Range 31 East, NMPM, Edd
Dated:	Signature:

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 426305

CONDITIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	426305
	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Create By		Condition Date
llowe	None None	1/30/2025