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



Darin Savage darin@abadieschill.com

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL – 8873

Devon Energy Production Company, L.P. [OGRID 6137] Morgan 25 13 Federal Com Well No. 825H API No. 30-015-55682

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

Proposed Location

	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	2434 FNL & 935 FWL	Е	25	25S	31E	Eddy
First Take Point	2540 FNL & 330 FWL	Е	25	25S	31E	Eddy
Last Take Point	100 FNL & 330 FWL	D	13	25S	31E	Eddy
Terminus	20 FNL & 330 FWL	D	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 - 8873 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 100 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.

Gerasimos Razatos Division Director (Acting) GR/lrl

Date: 3/6/2025

ID NO. 426312		NSL - 8873	Revised March 23, 2	2017
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Applicant: <u>Devon Ene</u>			OGRID Number: <u>6137</u>	
Well Name: <u>Morgan 2</u> Pool: <u>Purple Sage; Wo</u> l		825H Well	API: <u>30-015-55682</u> Pool Code: 98220	
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C. Application D. Notification E. Notification F. Surface own	ators or lease ho erriding royalty of requires publish and/or concurr and/or concurr ner e above, proof o	olders owners, revenue own ned notice rent approval by SLC rent approval by BLN	ners D Notice Comple Application Content Complete	
administrative appro	oval is accurate action will be to	and complete to that ken on this applicat	mitted with this application for ne best of my knowledge. I also tion until the required information and	
Note: State	ement must be comp	eted by an individual with n	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

Page 3 of 19

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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 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.

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
	(19.15.13C)
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.

Received by OCD: 1/29/2025 1:57:42 PM



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 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.

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 825H Well (the "825H Well") (API 30-015-55682) 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): 2434' from the North line and 935' from the West line (Unit E) of Section 25, Township 25 South, Range 31 East;
- Bottom Hole Location (BHL): 20' from the North line and 330' from the West line (Unit D) of Section 13, Township 25 South, Range 31 East;
- First Take Point (FTP): 2540' from the North line and 330' from the West line (Unit E) of Section 25, Township 25 South, Range 31 East;
- Last Take Point (LTP): 100' from the North line and 330' from the West line (Unit D) of Section 13, Township 25 South, Range 31 East.

a b a d i e s c h i l l . c o m 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

EXHIBIT

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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.

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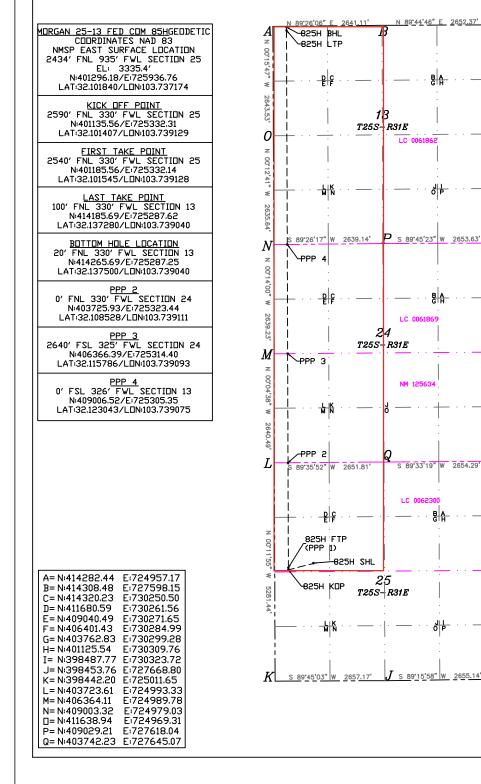
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Devon Energy Production Company, L.P. 333 West Sheridan Avenue Oklahoma City, OK 73102-5015

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 Lyen

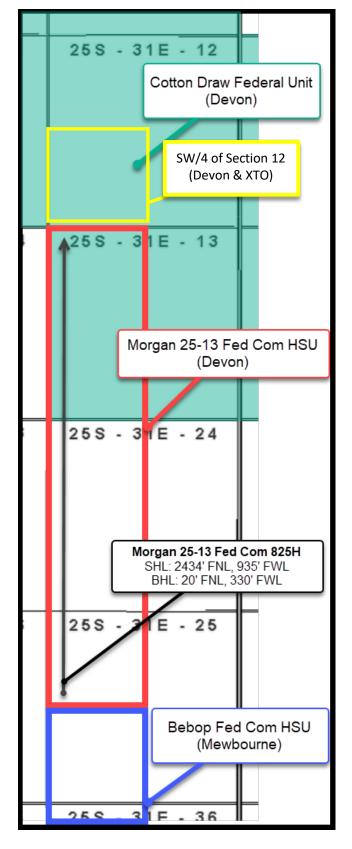
John Dwyer Reservoir Engineer



Non-Standard Location Application

Offset Operator Plat

Morgan 25-13 Fed Com 825H





9314869904300130954482	9314869904300130954475	9314869904300130954451	USPSArticleNumber
1/29/25 4188.79 - NSL - Morgan XTO Energy Holdings, LLC	1/29/25 4188.79 - NSL - Morgan Mewbourne Oil Company	1/29/25 4188.79 - NSL - Morgan Bureau of Land Management 620 E. Greene Street	DateMailed ReferenceNumber
XTO Energy Holdings, LLC	Mewbourne Oil Company	Bureau of Land Management	Name1
22777 Springwoods Village Pkwy	500 West Texas Ave	620 E. Greene Street	Address1
	Suite 1020		Address2
Spring	Midland	Carlsbad	2 City
X	X	NM	State
77389	79701	88220-6292	Zip

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EXHIBI

Received by OCD: 1/29/2025 1:57:42 PM





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

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

2

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)

hereby waives objection to the above referenced Application filed by 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.

Dated:

Signature:

Waiver

Application filed by 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.

Dated:		
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Signature: _____

Waiver

Application filed by 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.

Dated: _____

Signature: _____

Waiver

Application filed by 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.

Dated: _____

Signature: _____

hereby waives objection to the above referenced Application filed by 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.

Dated:

Signature:

Waiver

Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 735H 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.

Dated:	
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Signature: _____

<u>Waiver</u>

Application filed by 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.

Dated: _____

Signature:

Waiver

Application filed by 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.

Dated: _____

Signature:

Application filed by 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.

Dated:

Signature:

Waiver

hereby waives objection to the above referenced Application filed by 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.

Dated:			
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Signature: _____

Waiver

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Dated: _____

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Dated: _____

Signature:

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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

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	426312
	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By		Condition Date
llowe	None	1/30/2025

Page 19 of 19