

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Melanie A. Kenderdine**  
Cabinet Secretary

**Ben Shelton**  
Deputy Secretary

**Erin Taylor**  
Deputy Secretary

**Albert C.S. Chang**  
Division Director  
Oil Conservation Division



Jaclyn M. McLean  
[jmclean@hardymclean.com](mailto:jmclean@hardymclean.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL – 9082**

**Devon Energy Production Company, L.P. [OGRID 6137]  
Thistle Unit Well No. 194H  
API No. 30-025-54375**

Reference is made to your application received on August 14<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	690 FNL & 890 FWL	D	22	23S	33E	Lea
First Take Point	100 FNL & 1760 FWL	D	22	23S	33E	Lea
Last Take Point	100 FSL & 1760 FWL	N	34	23S	33E	Lea
Terminus	20 FSL & 1760 FWL	N	34	23S	33E	Lea

**Proposed Horizontal Units**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
W/2 Section 22	960	Johnson Ranch; Wolfcamp (GAS)	79335
W/2 Section 27			
W/2 Section 34			

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.

Administrative Order NSL - 9082  
Devon Energy Production Company, L.P.  
Page 2 of 2

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

This well's completed interval is as close as 100 feet to the northern and southern edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 15, encroachment to the SW/4  
Section 03, T24S R33E, encroachment to the NW/4

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

Division understands you are seeking this unorthodox location in order to optimize well spacing and improve overall production of wells within the Wolfcamp formation underlying the W/2 of Section 22, W/2 of Section 27 and the W/2 of Section 34. Thereby preventing waste and protecting correlative rights.

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 19.15.15.13 (B) 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.



**Albert C.S. Chang**  
Division Director  
AC/lrl

**Date:** 11/10/2025

Revised March 23, 2017

ID NO. 495991

NSL - 9082

RECEIVED: <b>08/14/25</b>	REVIEWER:	TYPE:	APP NO:
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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:** Thistle Unit 194H**API:** 30-025-54375**Pool:** JOHNSON RANCH;WOLFCAMP (GAS)**Pool Code:** 79335

**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 holdersB. ☐ Royalty, overriding royalty owners, revenue ownersC. ☐ Application requires published noticeD. ☒ Notification and/or concurrent approval by SLOE. ☐ Notification and/or concurrent approval by BLMF. ☐ Surface ownerG. ☒ 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.**

8/14/2025Jaclyn M. McLean

Date

Print or Type Name

505-230-4410

Phone Number

/s/ Jaclyn M. McLeanjmclean@hardymclean.com

Signature

e-mail Address



August 14, 2025

**VIA ONLINE FILING**

Albert Chang  
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 Unorthodox Well Location**

Thistle Unit 194H  
W/2 of Sections 22, 27, and 34, Township 23 South, Range 33 East, Lea County, New Mexico.  
Johnson Ranch; Wolfcamp (Gas) Pool (Code 79335)

Dear Mr. Chang,

In accordance with Division Rules 19.15.16.15(C)(6) and 19.15.15.13 NMAC, Devon Energy Production Company, L.P. ("Devon") (OGRID No. 6137) seeks administrative approval of an unorthodox well location for the Thistle Unit 194H well, in a 960-acre, more or less, standard horizontal spacing unit, comprised of the W/2 of Sections 22, 27, and 34, Township 23 South, Range 33 East, Lea County, New Mexico.

The location for the **Thistle Unit 194H** well is as follows:

- Surface Hole Location: 690' FNL and 890' FWL of Section 22
- First Take Point: 100' FNL and 1760' FWL of Section 22
- Last Take Point: 100' FSL and 1760' FWL of Section 34
- Bottom Hole Location: 20' FSL and 1760' FWL of Section 34

The completed intervals of the well will be unorthodox because they are located less than 330' from the southern and northern boundaries of the offsetting spacing units. As explained in the engineering statement, included as **Exhibit A**, approval of the unorthodox, completed interval

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125 Lincoln Avenue, Suite 223  
Santa Fe, NM 87501  
505-230-4410

HardyMcClean.com

**Writer:**  
Jaclyn M. McLean  
Managing Partner  
jmclean@hardymcClean.com

Hardy McLean LLC  
August 14, 2025

Page 2

is necessary to allow Devon to optimize well spacing and improve overall productivity of the wells. This will prevent waste and protect correlative rights.

**Exhibit B** is a Form C-102 showing the location of the Thistle Unit 194H well in relation to the offset tracts.

**Exhibit C** is a plat that shows the Thistle Unit 194H well in relation to the adjoining tracts. Devon is the operator and 100% working interest owner of the adjoining spacing unit to the north (W/2 Section 15, Township 23 South, Range 33 East). EOG is the offset operator of the adjoining spacing unit to the south (W/2 of Section 3, Township 23 South, Range 33 East). For this reason, Devon provided notice to the State Land Office and EOG, which are the mineral owner and offset operator of the unorthodox well locations to the north and south of the spacing unit.

**Exhibit D** is a list that identifies all affected persons who were sent a copy of this application and 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, along with the date notice was sent, and a copy of the notice letter to affected persons.

Thank you for your attention to this matter. Please let me know if you require additional information.

Very truly yours,

HARDY MCLEAN LLC

/s/ Jaclyn M. McLean

Jaclyn M. McLean

ATTORNEYS FOR DEVON ENERGY PRODUCTION  
COMPANY, L.P.



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

405 228 8788 Phone  
www.devonenergy.com

August 13, 2025

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.  
Thistle Unit 192H, 193H, 194H & 198H  
W/2 of Section 22, 27 & 34-T23S-R33E  
Lea County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, LP ("Devon") respectfully requests administrative approval of non-standard location for the Thistle Unit 192H, 193H, 194H & 198H wells (the "New Wells"). The New Wells were assigned the Johnson Ranch; Wolfcamp (Gas) Pool (Pool Code 79338) by the NMOCD. Devon has drilled multiple offsetting Thistle Wolfcamp wells ("Offset Wells") in the sections located directly to the west, within the boundary of the Thistle Federal Exploratory Unit, and with the same planned TVD as the New Wells. These Offset Wells were assigned an oil pool and produce with gas-oil ratios (GOR) below than the NMOCD' definition of a gas well, therefore the Offset Wells were able to maximize GPI by utilizing oil pool setbacks at the heel and toe.

Devon expects the New Wells to produce with a GOR similar to the Offset Wells, therefore Devon proposes to decrease the first and last tank points from 330 feet to 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 "Curtis Johnston".

Curtis Johnston  
Advising Reservoir Engineer

**EXHIBIT A**

<b>C-102</b>  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>	<b>EXHIBIT B</b>		Revised July 9, 2024
		Submittal Type:	<input type="checkbox"/> Initial Submittal	
			<input checked="" type="checkbox"/> Amended Report	
		<input type="checkbox"/> As Drilled		

**WELL LOCATION INFORMATION**

API Number 30-025-54375	Pool Code 79335	Pool Name JOHNSON RANCH;WOLFCAMP (GAS)
Property Code 30884	Property Name THISTLE UNIT	Well Number 194H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3710.2
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 D	Section 22	Township 23 S	Range 33 E	Lot	Ft. from N/S 690 NORTH	Ft. from E/W 890 WEST	Latitude 32.2955759°N	Longitude 103.5658794°W	County LEA
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**Bottom Hole Location**

UL N	Section 34	Township 23 S	Range 33 E	Lot	Ft. from N/S 20 SOUTH	Ft. from E/W 1760 WEST	Latitude 32.2539509°N	Longitude 103.5630489°W	County LEA
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Dedicated Acres 960	Infill or Defining Well Infill	Defining Well API 30-025-48096	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers. Approved Wolfcamp PA: NMNM88526B			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL C	Section 22	Township 23 S	Range 33 E	Lot	Ft. from N/S 50 NORTH	Ft. from E/W 1760 WEST	Latitude 32.2973310°N	Longitude 103.5630646°W	County LEA
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**First Take Point (FTP)**

UL C	Section 22	Township 23 S	Range 33 E	Lot	Ft. from N/S 100 NORTH	Ft. from E/W 1760 WEST	Latitude 32.2971936°N	Longitude 103.5630646°W	County LEA
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**Last Take Point (LTP)**

UL N	Section 34	Township 23 S	Range 33 E	Lot	Ft. from N/S 100 SOUTH	Ft. from E/W 1760 WEST	Latitude 32.2541707°N	Longitude 103.5630490°W	County LEA
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Unitized Area or Area of Uniform Interest Thistle Unit: NMNM088526X, 3520 acs.	Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation:
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**OPERATOR CERTIFICATIONS**

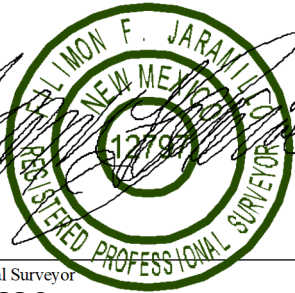
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest run leased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order here to fore 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.

Rebecca Deal  
Signature  
Date 7/31/2025  
Rebecca Deal, Regulatory Analyst  
Printed Name  
rebecca.deal@dmn.com  
Email Address

**SURVEYOR CERTIFICATIONS**

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.

  
Signature and Seal of Professional Surveyor  
FILIMON F. JARAMILLO

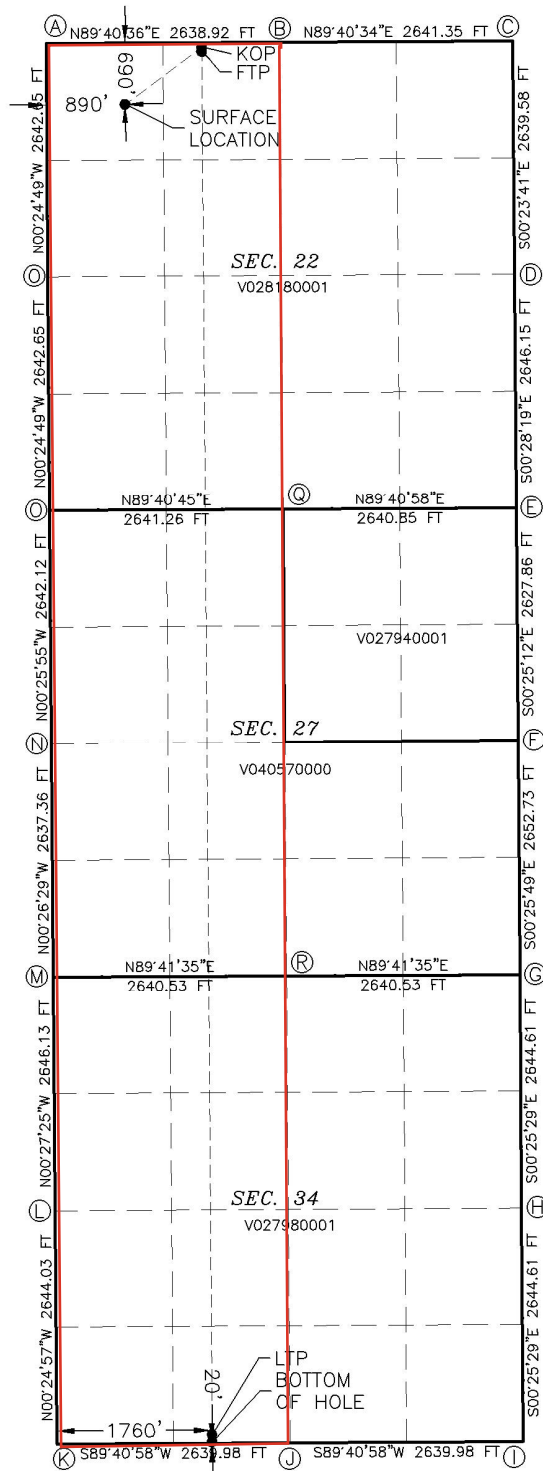
Certificate Number  
PLS 12797  
Date of Survey  
JULY 22, 2025  
SURVEY NO. 10297A

Note: 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.



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.



THISTLE UNIT 194H  
EL=3710.2

GEODETIC COORDINATES  
NAD 83 NMSP EAST  
SURFACE LOCATION  
690' FNL, 890' FWL  
N.=472111.68  
E.=778475.76  
LAT.=32.2955759°N  
LONG.=103.5658794°W

KICK OFF POINT  
50' FNL, 1760' FWL  
N.=472756.43  
E.=779340.97  
LAT.=32.2973310°N  
LONG.=103.5630646°W

FIRST TAKE POINT  
100' FNL, 1760' FWL  
N.=472706.44  
E.=779341.33  
LAT.=32.2971936°N  
LONG.=103.5630646°W

LAST TAKE POINT  
100' FSL, 1760' FWL  
N.=457054.84  
E.=779458.53  
LAT.=32.2541707°N  
LONG.=103.5630490°W

BOTTOM OF HOLE  
20' FSL, 1760' FWL  
N.=456974.87  
E.=779459.11  
LAT.=32.2539509°N  
LONG.=103.5630489°W

# CORNER COORDINATES TABLE NAD 83 NMSP EAST

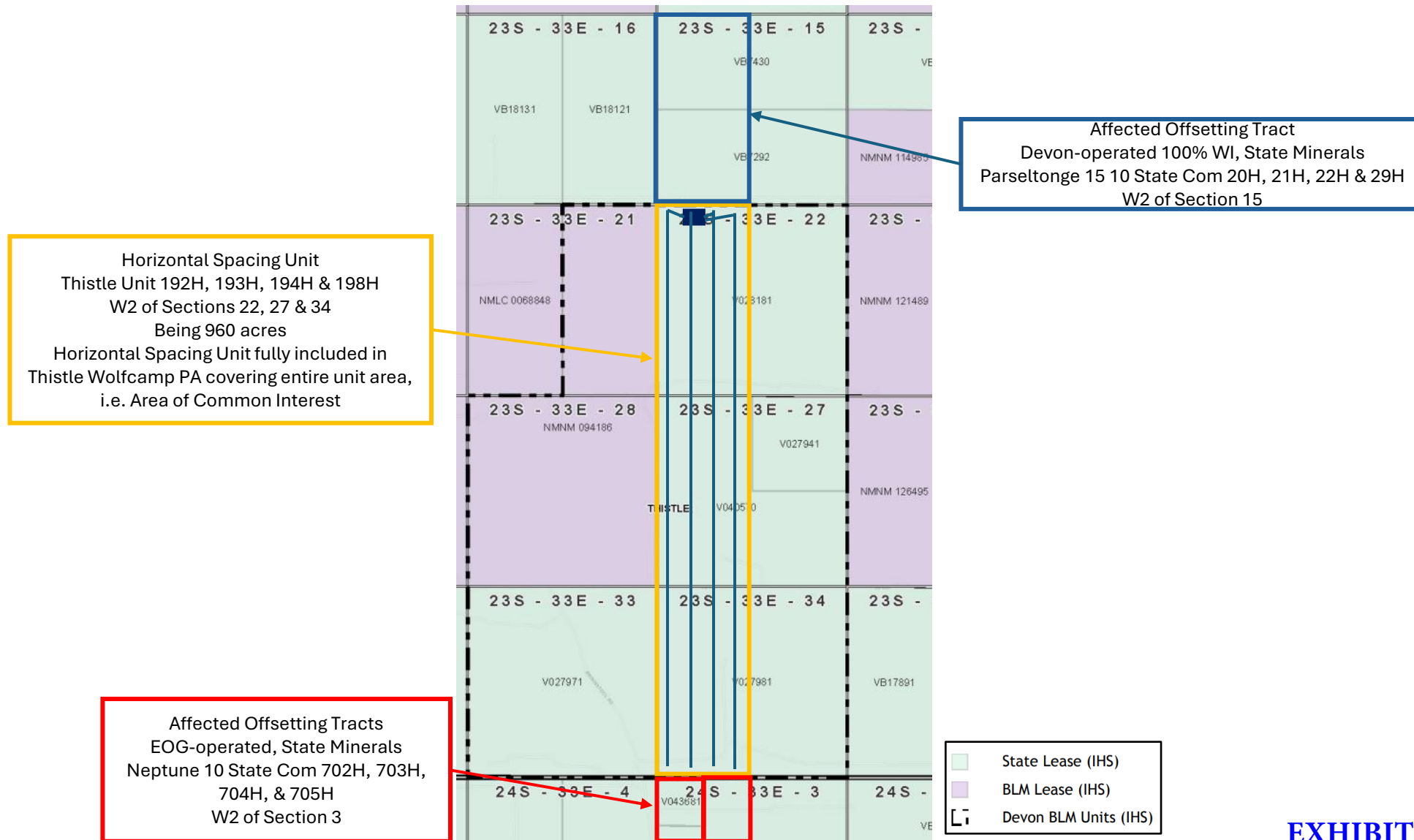
A	-	N.=472796.48	E.=777580.98
B	-	N.=472811.37	E.=780219.33
C	-	N.=472826.30	E.=782860.12
D	-	N.=470187.30	E.=782878.31
E	-	N.=467541.76	E.=782900.10
F	-	N.=464914.49	E.=782919.36
G	-	N.=462262.37	E.=782939.28
H	-	N.=459618.35	E.=782958.87
I	-	N.=456974.34	E.=782978.47
J	-	N.=456959.74	E.=780339.05
K	-	N.=456945.13	E.=777699.63
L	-	N.=459588.56	E.=777680.44
M	-	N.=462234.08	E.=777659.34
N	-	N.=464870.84	E.=777639.03
O	-	N.=467512.36	E.=777619.12
P	-	N.=470154.42	E.=777600.05
Q	-	N.=467527.14	E.=780259.81
R	-	N.=462248.22	E.=780299.31

## LEGEND

— · — · — · — · —	SECTION LINE
— — — — —	QUARTER LINE
— — — — —	LEASE LINE
— — — — —	WELL PATH



### Thistle Unit 192H, 193H, 194H & 198H: NSL



## EXHIBIT C

**Notice Chart**

Entity	Address	City	State	Zip	Date Notice Sent	Tracking No.
New Mexico SLO (mineral owner)	310 Old Santa Fe Trail	Santa Fe	NM	87501	08/14/2025	9414836208551286167 439
EOG Resources (offset operator)	5509 Champions Dr	Midland	TX	79706	08/14/2025	9414836208551286167 446

**EXHIBIT D**



August 14, 2025

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

**TO: ALL AFFECTED PERSONS**

**Re: Devon Energy Production Company, L.P.**  
**Requests for Administrative Approval of Unorthodox Well Locations**

Enclosed are copies of administrative applications requesting approval of unorthodox well locations for Devon Energy Production Company, L.P.'s Thistle Unit wells. Administrative applications for the unorthodox well locations were filed with the New Mexico Oil Conservation Division on this date. Any objection to these applications must be filed in writing within twenty (20) 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, these applications may be approved administratively by the Division.

If you have any questions about this application, please contact David Broussard, Landman – Delaware Basin, with Devon Energy at david.broussard@dvn.com.

Sincerely,

HARDY MCLEAN LLC

/s/ Jaclyn M. McLean  
Jaclyn M. McLean

ATTORNEYS FOR DEVON ENERGY PRODUCTION, L.P.

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125 Lincoln Avenue, Suite 223  
Santa Fe, NM 87501  
505-230-4410

HardyMcClean.com

**Writer:**  
Jaclyn M. McLean  
Managing Partner  
jmclean@hardymcClean.com

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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 495991

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 495991
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	8/20/2025