

Revised March 23, 2017

RECEIVED:	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, L.P. **OGRID Number:** 6137
Well Name: Right Meow 31-30 Fed Com #232H Well **API:** 30-025-47212
Pool: Sand Dunes; Bone Spring, South **Pool Code:** 53805

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

FOR OCD ONLY
<input type="checkbox"/> Notice Complete
<input type="checkbox"/> Application Content Complete

- 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

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.

Kaitlyn A. Luck
 Print or Type Name

Signature

November 3 2020
 Date

505-954-7286
 Phone Number

kaluck@hollandhart.com
 e-mail Address



Kaitlyn A. Luck
 Phone (505) 954-7286
 KALuck@hollandhart.com

November 3, 2020

VIA ONLINE FILING

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

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

Dear Ms. Sandoval:

Devon Energy Production, LP (“Devon”) (OGRID No. 6137) seeks administrative approval of an unorthodox well location for its **Right Meow 31-30 Fed Com #232H Well** (API No. 30-025-47212) to be completed within the Sand Dunes; Bone Spring, South Pool (Pool code 53805) underlying the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico, as follows:

- Surface hole location: 165’ FSL, and 2,255’ FWL (Unit N) of Section 31
- Bottom hole location: 20’ FNL, and 2,410’ FWL (Unit C) of Section 30
- First take point: 100’ FSL, and 2,410’ FWL (Unit N) of Section 31
- Last take point: 100’ FNL, and 2,410’ FWL (Unit C) of Section 30

Since this acreage is governed by the Division’s statewide rules, the completed interval for the **Right Meow 31-30 Fed Com #232H Well** is unorthodox because the completed interval is closer than the standard offsets to the eastern boundary of the spacing unit in Section 30. The **Right Meow 31-30 Fed Com #232H Well** encroaches on the adjoining spacing unit located in the SW/4 NE/4 and the W/2 SE/4 of Section 30 (Units G, J, and O). Approval of the unorthodox completed interval will allow Devon to use its preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

Exhibit A is the Well Location and Acreage Dedication Plat (Form C-102) showing Devon’s plans for the completed interval of the **Right Meow 31-30 Fed Com #232H Well**.

However, due to issues encountered during drilling, the completed interval of the wellbore is at an unorthodox location. **Exhibit B** is a land plat for Sections 30 and 31 that shows the proposed **Right Meow 31-30 Fed Com #232H Well** in relation to the adjoining spacing unit to the east in Section 30. **Exhibit B** also includes an as-drilled map showing the **Right Meow 31-30 Fed Com #232H Well** encroaches on the horizontal spacing unit to the east in Section 30, and this map also reflects the as-drilled footages of the unorthodox well.

Ownership is diverse between the subject spacing unit and the spacing units to the east. **Exhibit C** includes a copy of this application that was sent by certified mail to the affected parties advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application, and proof of mailing. Since federal lands are involved, the Bureau of Land Management was provided notice.

Exhibit D is a statement from a Devon's petroleum engineer confirming that Devon's requested unorthodox location is necessary to optimize well spacing, thereby preventing waste.

Your attention to this matter is appreciated.

Sincerely,



Kaitlyn A. Luck
ATTORNEY FOR DEVON ENERGY PRODUCTION
COMPANY, L.P.

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

OCD - HOBBS
06/01/2020
RECEIVED

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-025-47212	² Pool Code 53805	³ Pool Name SAND DUNES;BONE SPRING, SOUTH
⁴ Property Code 328252	⁵ Property Name RIGHT MEOW 31-30 FED COM	
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	
		⁶ Well Number 232H
		⁹ Elevation 3564.7

¹⁰ Surface Location

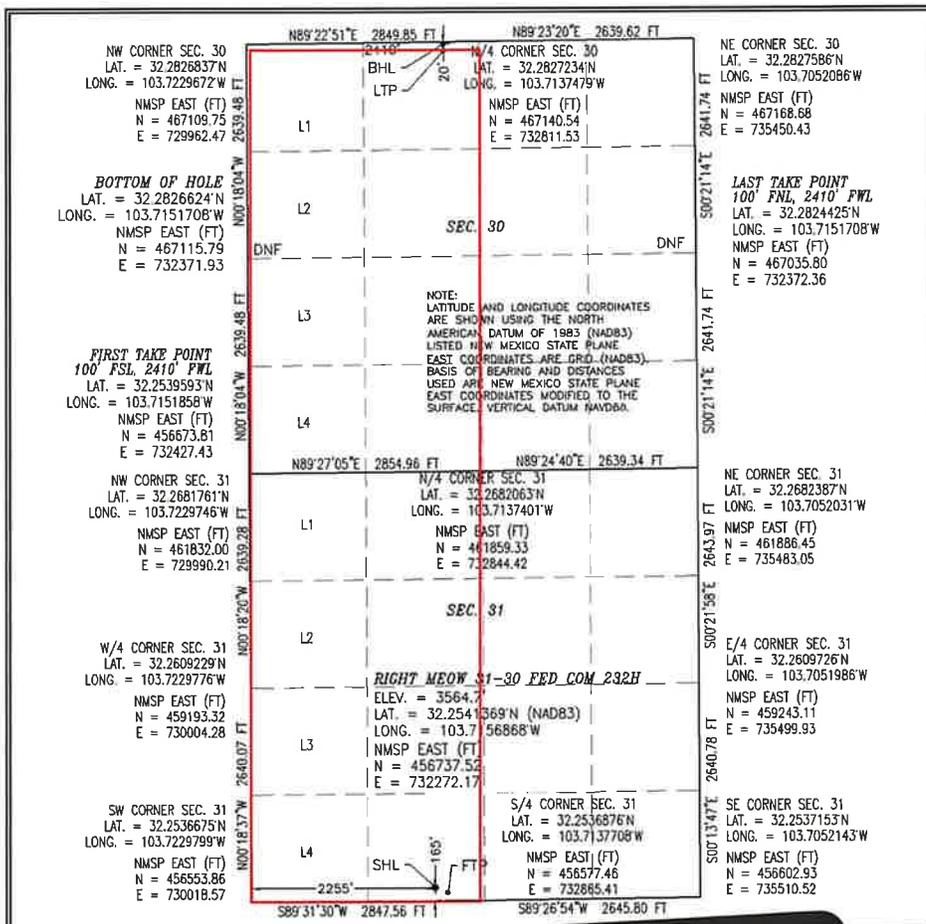
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	31	23 S	32 E		165	SOUTH	2255	WEST	LEA

¹¹ 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
C	30	23 S	32 E		20	NORTH	2410	WEST	LEA

¹² Dedicated Acres 640	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ 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.



¹⁷ OPERATOR CERTIFICATION
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 with the division.
Jenny Harms 10-24-2019
Signature Date
JENNY HARMS
Printed Name
JENNY.HARMS@DVN.COM
E-mail Address

¹⁸ SURVEYOR CERTIFICATION
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.
SEPTEMBER 23, 2019
Date of Survey
William F. Jaramila
Signature and Seal of Professional Surveyor
Certificate Number: *William F. Jaramila* PLS 12797
PROFESSIONAL SURVEYOR NO. 7605



Intent As Drilled

API # 30-025-47212		
Operator Name: DEVON ENERGY PRODUCTION CO., L.P.	Property Name: RIGHT MEOW 31-30 FED COM	Well Number 232H

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
	31	23S	32E		235 FNL		2410 FWL		LEA
Latitude 32.25303400					Longitude -103.71495100				NAD

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
N	31	23S	32E		100	SOUTH	2410	WEST	LEA
Latitude 32.2539593					Longitude 103.7151858				NAD 83

Last Take Point (LTP)

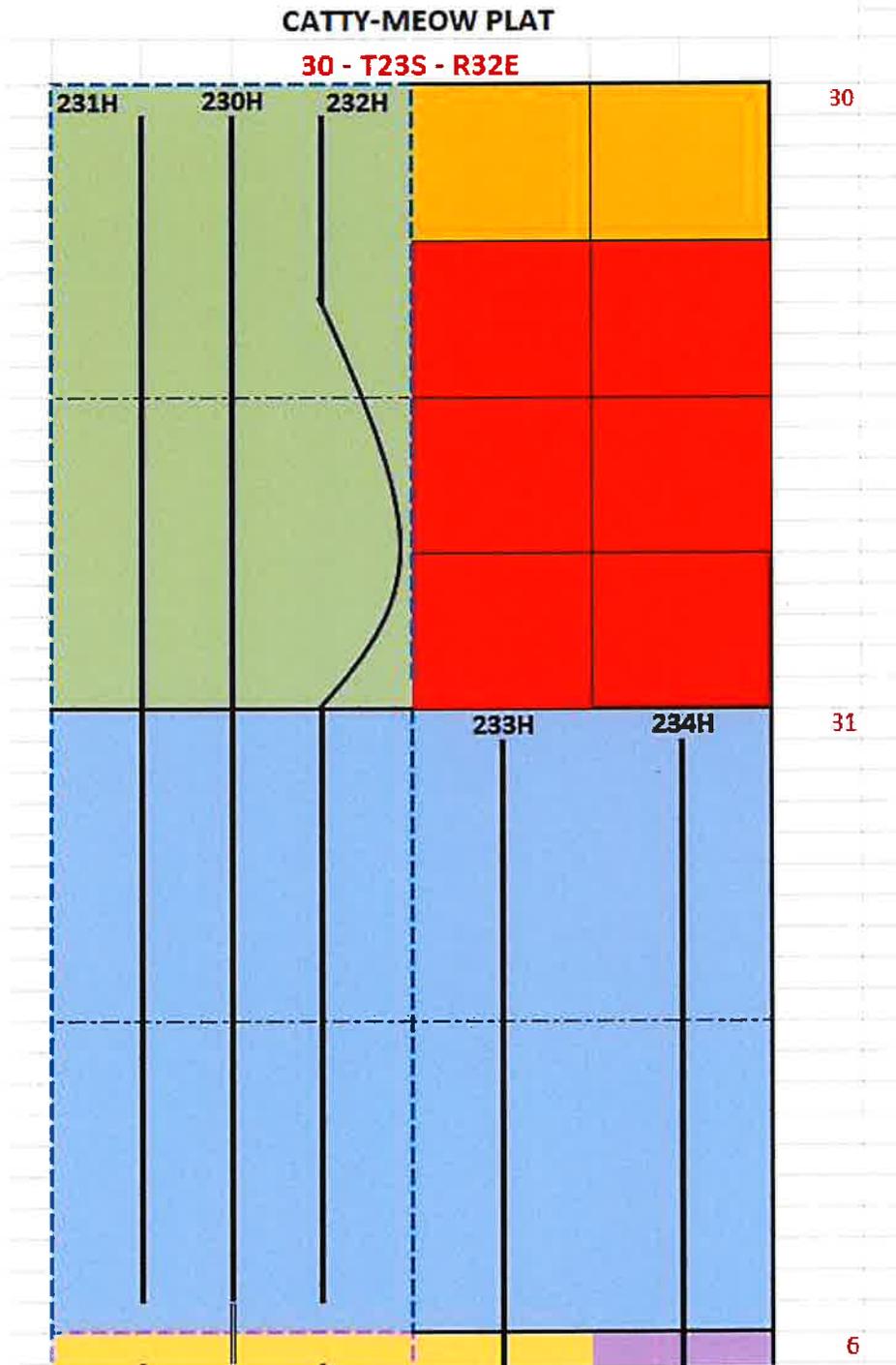
UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
C	30	23S	32E		100	NORTH	2410	WEST	LEA
Latitude 32.2824425					Longitude 103.7151708				NAD 83

Is this well the defining well for the Horizontal Spacing Unit? NO

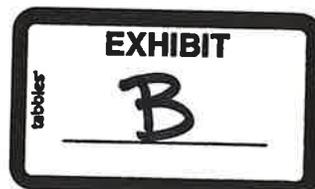
Is this well an infill well? YES

If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.

API #		
Operator Name:	Property Name:	Well Number

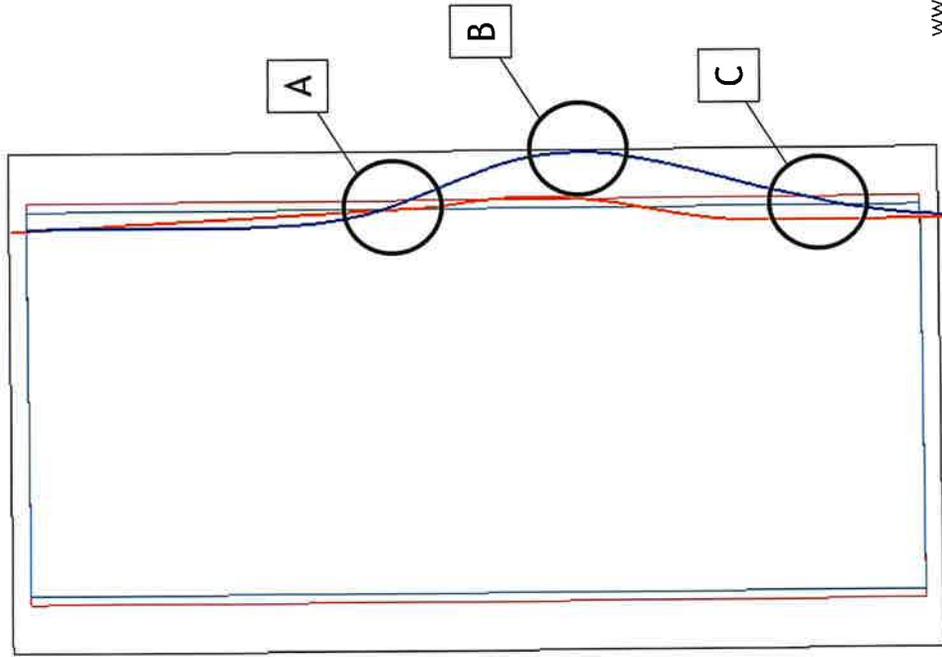


15637978_v1



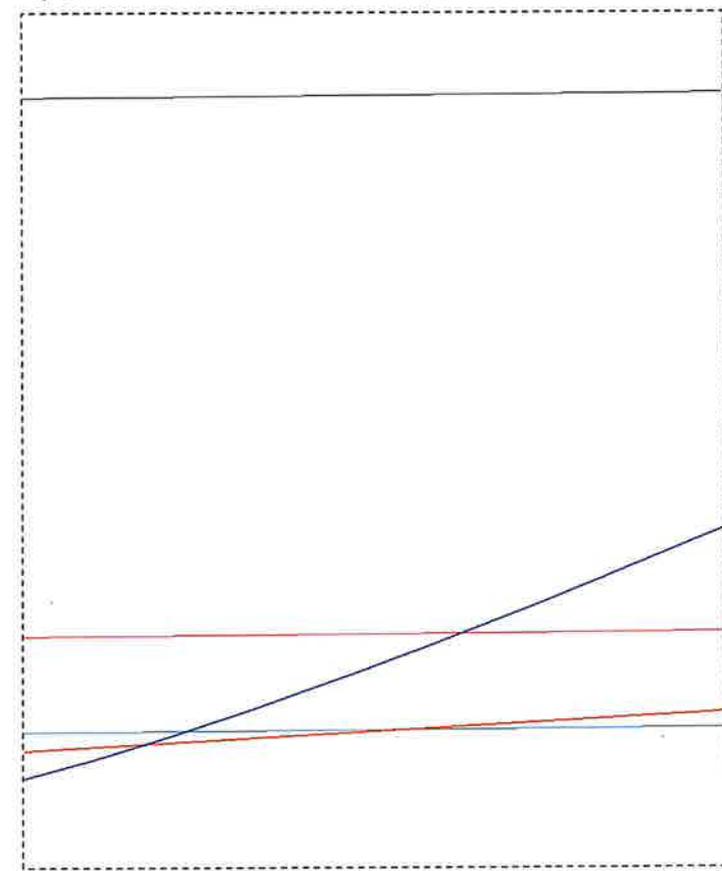
30-23S-32E

High Level Plan View



- Blue Line indicates the well trajectory
- Red Line indicates permitted plan
- Black Box indicates Devon's lease (half section)
- Red Box indicates a 280' E/W offset from the lease line (100' N/S)
- Green Box indicates a 330' E/W offset from the lease line (100' N/S)
- Zoomed in pictures of Window A, B, and C are located on subsequent pages

30-23S-32E
Window A



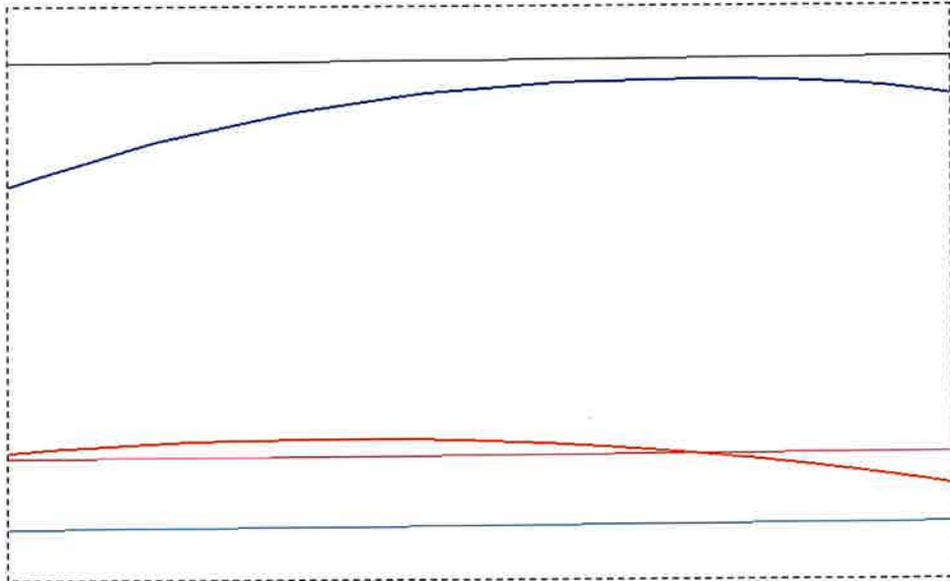
Actual Well Trajectory

- Intersection of 280' offset at:
18240.43' MD; 10352.19' TVD; 273.56' E/W; 8129.59' N/S
- Intersection of 330' offset at:
18392.44' MD; 10348.26' TVD; 222.42' E/W; 8272.08' N/S

Permitted Well Trajectory

- Intersection of 280' offset at:
18280.56' MD; 10418.00' TVD; 276.60' E/W; 7681.60' N/S
- Intersection of 330' offset at:
18762.28' MD; 10418.00' TVD; 223.23' E/W; 8159.84' N/S

30-23S-32E
Window B



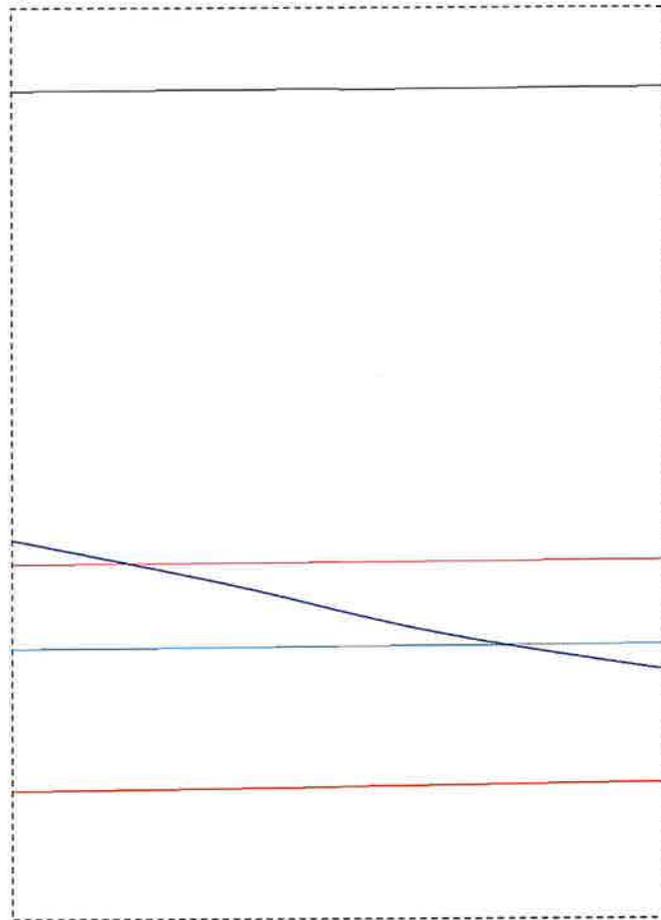
Actual Well Trajectory

- Well trajectory does NOT cross lease line, and closest approach is at:
17219.22' MD; 10362.21' TVD; 544.68' E/W; 7159.05' N/S

www.devonenergy.com

NYSE: DVN

30-23S-32E
Window C



Actual Well Trajectory

- Intersection of 280' offset at:
15913.99' MD; 10346.59' TVD; 287.99' E/W; 5877.31' N/S
- Intersection of 330' offset at:
15686.24' MD; 10340.62' TVD; 239.44' E/W; 5654.93' N/S

Permitted Well Trajectory (crossing not shown in window)

- Intersection of 280' offset at:
17745.62' MD; 10418.00' TVD; 279.79' E/W; 7147.44' N/S
- Intersection of 330' offset at:
17408.15' MD; 10418.00' TVD; 231.95' E/W; 6813.52' N/S



Kaitlyn A. Luck
Phone (505) 954-7286
KALuck@hollandhart.com

November 3, 2020

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO:

EOG Resources
Attn: Wendy Dalton, Land Manager
5509 Champions Drive
Midland, TX 79706

Bureau of Land Management
301 Dinosaur Trail
Santa Fe, New Mexico 87508

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

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:

Katie Dean
Devon Energy
(405) 552-6659
Katie.Dean@dvn.com

Sincerely,

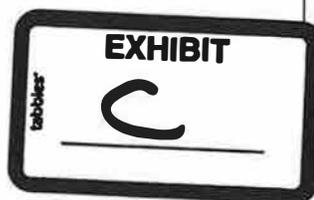
Kaitlyn A. Luck
ATTORNEY FOR DEVON ENERGY PRODUCTION COMPANY, L.P.

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

Alaska
Colorado
Idaho

Montana
Nevada
New Mexico

Utah
Washington, D.C.
Wyoming





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.

Devon - Right Meow 232H NSL
CM# 41132.0002

Shipment Date: 10/30/2020
 Shipped From:
 Name: HOLLAND & 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.

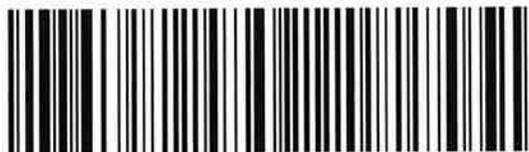
B. USPS Action

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 0025 0436 85



Firm Mailing Book For Accountable Mail

Name and Address of Sender
 Holland & Hart LLP (1)
 110 N Guadalupe St # 1
 Santa Fe NM 87501

Check type of mail or service

- Adult Signature Required
- Adult Signature Restricted Delivery
- Certified Mail
- Certified Mail Restricted Delivery
- Collect on Delivery (COD)
- Insured Mail
- Priority Mail
- Priority Mail Express
- Registered Mail
- Return Receipt for Merchandise
- Signature Confirmation
- Signature Confirmation Restricted Delivery

Affix Stamp Here
 (for additional copies of this receipt).
Postmark with Date of Receipt.

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. 9214 8901 9403 8324 0387 12	EOG Resources Attn: Wendy Dallon Land Manager 5509 Champions Drive Midland TX 79706	0.80	3.55								1.70			
2. 9214 8901 9403 8324 0387 29	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	0.80	3.55								1.70			
				Handling Charge - if Registered and over \$50,000 in value				Adult Signature Required	Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling

Total Number of Pieces Listed by Sender: 2

Total Number of Pieces Received at Post Office: 2

Postmaster, Per (Name of receiving employee)

Complete in Ink

Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.



Devon Energy Corporation
333 W. Sheridan Avenue
Oklahoma City, OK 73102

405 235 3611 Phone
www.devonenergy.com

October 29, 2020

VIA ONLINE FILING

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

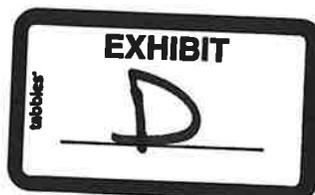
RE: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

Dear Ms. Sandoval,

Devon Energy Production Company, L.P. respectfully requests administrative approval of an unorthodox well location for its **Right Meow 31-30 Fed Com #232H Well** (API No. 30-025-47212) to be completed within the Sand Dunes; Bone Spring, South Pool (Pool code 53805) underlying the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico. It is Devon's responsibility as a prudent operator to use industry best practices/standards for wellbore trajectory planning in order to optimize well spacing, thereby preventing waste. An existing vertical well resulted in the need to steer the subject wellbore for anti-collision considerations and collision avoidance to achieve satisfactory separation factors. While steering the subject well bore along a trajectory to obtain satisfactory separation factors, the well path crossed over the East hardline.

Sincerely,

Jonathan Fisher
Supervisor - Drilling Engineering



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 11049

CONDITIONS OF APPROVAL

Operator:		OGRID:	Action Number:	Action Type:
DEVON ENERGY PRODUCTION COMPAN		6137	11049	NSL
333 West Sheridan Ave.		Oklahoma City, OK73102		
OCD Reviewer		Condition		
llowe		None		