NSL

Amended

Application

Received: 07/20/2020

RECEIVED:	REVIEWER:	TYPE:	APP NO:							
7/20/20	KMS	N2F	pK\$20192361 7 6	NSL-8044						

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: Thoroughbred 10-3 Fed Com #734H Well **API:** 30-015-46907 Pool: Purple Sage; Wolfcamp (Gas) Pool Pool Code: 98220 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 NSP (PROJECT AREA) **■**NSL NSP (PRORATION UNIT) B. Check one only for [1] or [1] [1] Commingling – Storage – Measurement DHC DCTB PC [II] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery □ WFX □ PMX SWD | IPI EOR ☐ PPR FOR OCD ONLY 2) **NOTIFICATION REQUIRED TO:** Check those which apply. Notice Complete A. ☐ Offset operators or lease holders B. Royalty, overriding royalty owners, revenue owners **Application** C. ☐ Application requires published notice Content D. Notification and/or concurrent approval by SLO Complete 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. July 17, 2020 Date Kaitlyn A. Luck Print or Type Name 505-954-7286 Phone Number

kaluck@hollandhart.com e-mail Address Signature



July 17, 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 Thoroughbred 10-3 Fed Com #734H Well in the E/2 of Sections 3 and 10, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

Dear Ms. Sandoval:

Devon Energy Production, LP ("Devon") (OGRID No. 6137) requests that this application replace the original application filed on July 8, 2020. In this application, Devon seeks administrative approval of an unorthodox well location for its **Thoroughbred 10-3 Fed Com #734H Well** (API No. 30-015-46907) to be completed within the Purple Sage Wolfcamp Pool (98220) underlying the E/2 of Sections 3 and 10, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

This well will be drilled from a <u>surface location</u> 200 feet from the south line and 1380 feet from the east line (Unit O) of Section 10 to a <u>bottom hole location</u> 20 feet from the north line and 330 feet from the east line (Unit A) of Section 3. The <u>first take point</u> will be located 330 feet from the south line and 330 feet from the east line (Unit O) of Section 10, and the <u>last take point</u> will be 100 feet from the north line and 330 feet from the east line (Unit A) of Section 3.

Pursuant to Division Order R-14262, this acreage is governed by the Special Rules for the Purple Sage-Wolfcamp Gas Pool which provide for wells in the Wolfcamp formation in Eddy County to be located no closer than 330 feet to the outer boundary of the spacing unit. The completed interval for the **Thoroughbred 10-3 Fed Com #734H Well** will be unorthodox because it is closer than 330 feet to the northern boundary of the spacing unit in Section 3. 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 a Well Location and Acreage Dedication Plat (Form C-102), which shows that the completed interval of the proposed **Thoroughbred 10-3 Fed Com #734H Well** encroaches on the drilling and spacing unit to the north in Section 34, Township 25 South, Range 31 East.

Exhibit B is a land plat for Sections 3 and 10 that shows the proposed **Thoroughbred 10-3 Fed Com #734H Well** in relation to the adjoining spacing unit to the north in Section 34, Township 25 South, Range 31 East.

Ownership is diverse between the subject spacing unit and the spacing unit to the north. **Exhibit C** reflects that a copy of this application with all attachments has been sent by certified mail to each affected person advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

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

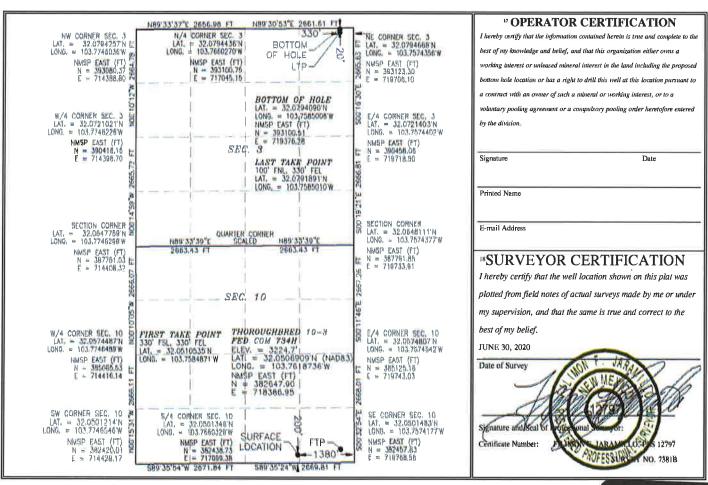
Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

■ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

''	API Numbe	r		⁴ Pool Code	de Pool Name							
⁴ Property 0	Code				5 Property	⁶ Well Number						
		THOROUGHBRED 10-3 FED COM 73										
'OGRID	No.		⁸ Operator Name ⁹ Elevation									
6137 DEVON ENERGY PRODUCTION COMPANY, L.P. 3224.7								3224.7				
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		
0	10	26 S	31 E		200	SOUTH	1380	EAS	ST	EDDY		
" Bottom Hole Location If Different From Surface												
UL or lot no.	Section	Township	ip Range Lot Idn Feet from the North/South line Feet from the East/Wes					East/West line				
A	3	26 S	31 E		20	NORTH	330	EAST		EAST		EDDY
12 Dedicated Acre	s 13 Joint	or Infill 14	Consolidation	1 Code	e 15 Order No.							

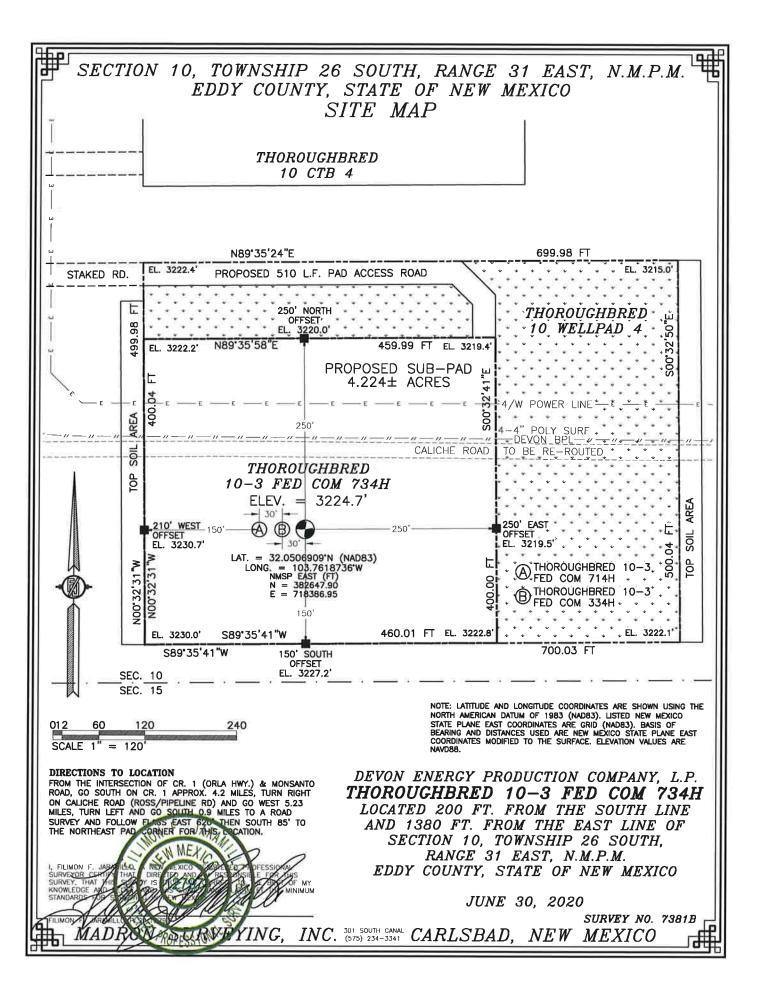
No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.





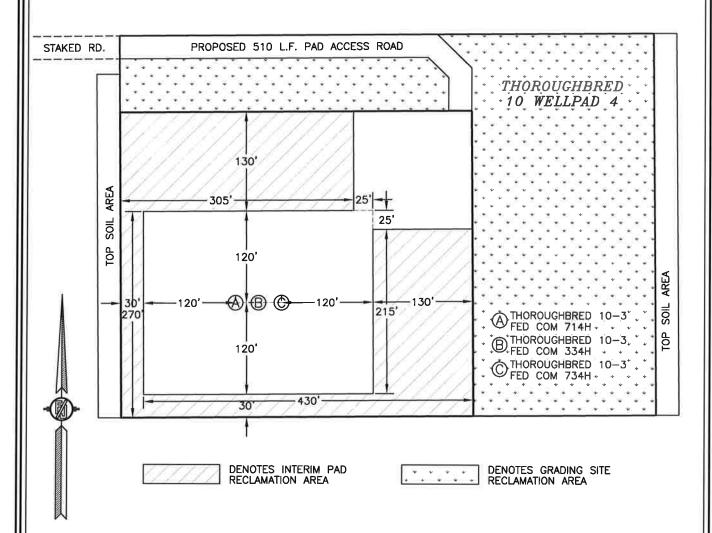
Inten	t T	As Dri	lled										Na.				
API#			7														
Operator Name: DEVON ENERGY PRODUCTION					1	perty I	OM	Well Number 734H									
COMPANY, L.P.						ONO	JGH	BRED 10)-J F		OIVI	7 3411					
Kick C	Off Point	(KOP)															
UL	Section	Township	Range	Lot	Feet		From	N/S	Feet	Froi	m E/W	County					
		·									,						
Latitu	ıde				Longitu	ıde						NAD					
First 1	Гake Poir	nt (FTP)															
UL	Section	Township	Range	Lot	Feet	Feet From N/S Feet From E/				n E/W	County						
P	10	26S	31E		330	ıda	SOU	TH	330	EAS	ST	EDDY	<u>′</u>				
1					Longitu 103.7		1871					83					
Last T	ake Poin	t (LTP)															
UL	Section	Township	Range	Lot	Feet	Feet From N/S Feet From E/W County											
A Latitu	3 Ide	26S	31E		100					EDDY							
	79189	1			_	Longitude NAD 83											
Is this	well the	defining v	vell for the	e Horiz	ontal Sp	oacin	g Unit?										
ls this	well an i	infill well?	ĺ		1												
.5 (1115	Well dir	Well.	ł		J												
E :E:11	l :		-l- ADI (C.		I- 0					•	- ·	11.6					
	ı ıs yes pı 1g Unit.	ease provi	de API if a	availab	ile, Oper	ator	Name	and w	vell numbe	er for	Definir	ng well to	r Horizontal				
API#			1														
Oper	ator Nar	ne:				Pro	perty N	lame:					Well Number				

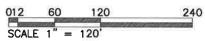
KZ 06/29/2018



SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO INTERIM SITE BUILD PLAN

THOROUGHBRED 10 CTB 4





2.036± ACRES INTERIM PAD RECLAMATION AREA 3.460± ACRES GRADING SITE RECLAMATION AREA 2.539± ACRES NON-RECLAIMED AREA 8.035± ACRES THOROUGHBRED 10 WELLPAD 4

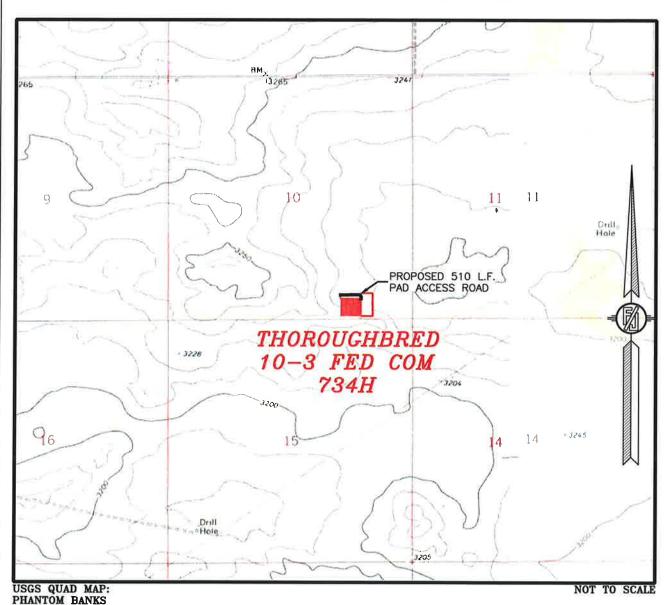
DEVON ENERGY PRODUCTION COMPANY, L.P.
THOROUGHBRED 10-3 FED COM 734H
LOCATED 200 FT. FROM THE SOUTH LINE
AND 1380 FT. FROM THE EAST LINE OF
SECTION 10, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JUNE 30, 2020

SURVEY NO. 7381B

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO LOCATION VERIFICATION MAP



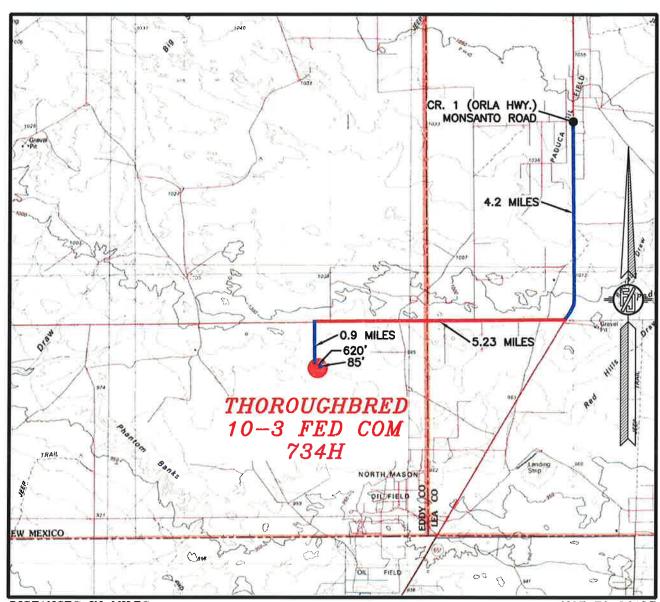
DEVON ENERGY PRODUCTION COMPANY, L.P.
THOROUGHBRED 10-3 FED COM 734H

LOCATED 200 FT. FROM THE SOUTH LINE
AND 1380 FT. FROM THE EAST LINE OF
SECTION 10, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JUNE 30, 2020

SURVEY NO. 7381B MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO VICINITY MAP



DISTANCES IN MILES

NOT TO SCALE

DIRECTIONS TO LOCATION

FROM THE INTERSECTION OF CR. 1 (ORLA HWY.) & MONSANTO ROAD, GO SOUTH ON CR. 1 APPROX. 4.2 MILES, TURN RIGHT ON CALICHE ROAD (ROSS/PIPELINE RD) AND GO WEST 5.23 MILES, TURN LEFT AND GO SOUTH 0.9 MILES TO A ROAD SURVEY AND FOLLOW FLAGS EAST 620' THEN SOUTH 85' TO THE NORTHEAST PAD CORNER FOR THIS LOCATION.

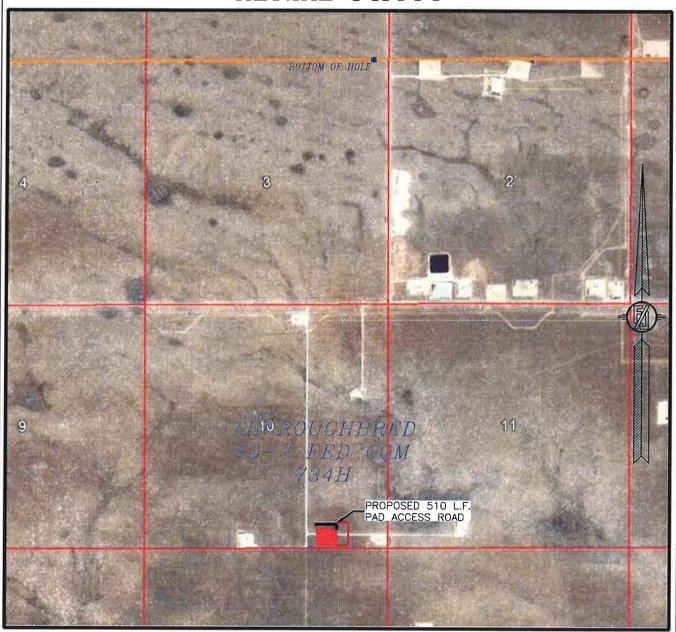
DEVON ENERGY PRODUCTION COMPANY, L.P.
THOROUGHBRED 10-3 FED COM 734H
LOCATED 200 FT. FROM THE SOUTH LINE
AND 1380 FT. FROM THE EAST LINE OF
SECTION 10, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JUNE 30, 2020

SURVEY NO. 7381B

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. LEDDY COUNTY, STATE OF NEW MEXICO AERIAL PHOTO



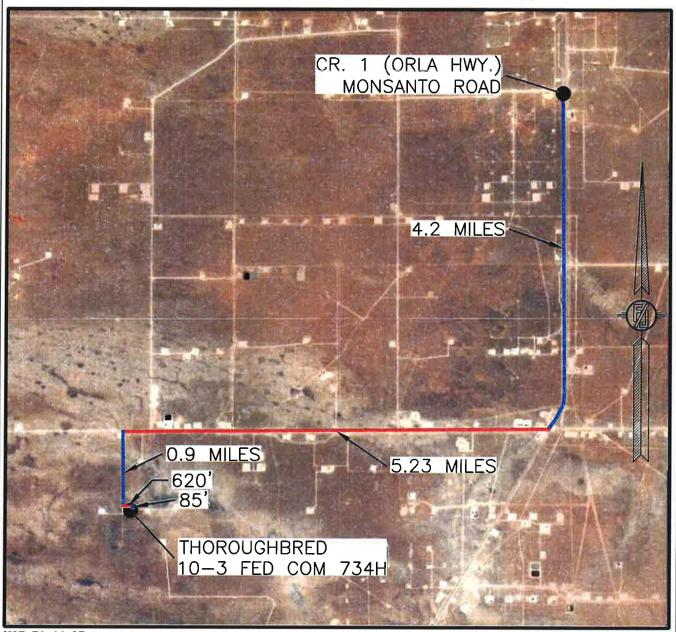
NOT TO SCALE AERIAL PHOTO: GOOGLE EARTH FEB. 2019

DEVON ENERGY PRODUCTION COMPANY, L.P.
THOROUGHBRED 10-3 FED COM 734H

LOCATED 200 FT. FROM THE SOUTH LINE
AND 1380 FT. FROM THE EAST LINE OF
SECTION 10, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JUNE 30, 2020

SURVEY NO. 7381B MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
AERIAL ACCESS ROUTE MAP



NOT TO SCALE AERIAL PHOTO: GOOGLE EARTH FEB. 2019

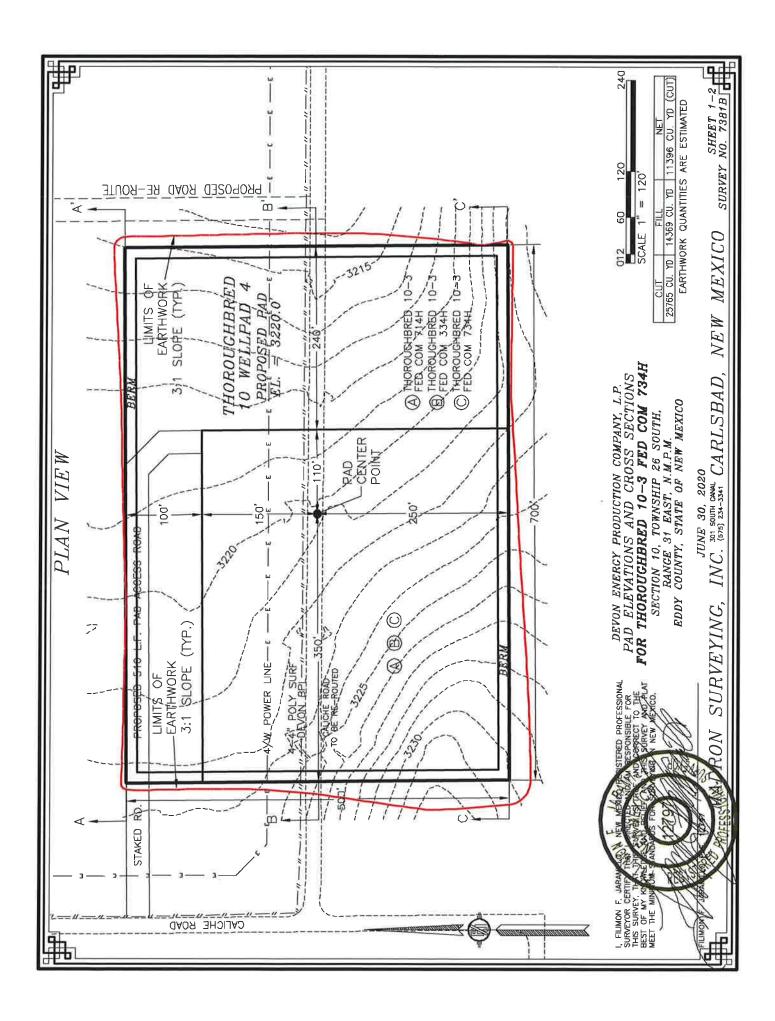
DEVON ENERGY PRODUCTION COMPANY, L.P.
THOROUGHBRED 10-3 FED COM 734H

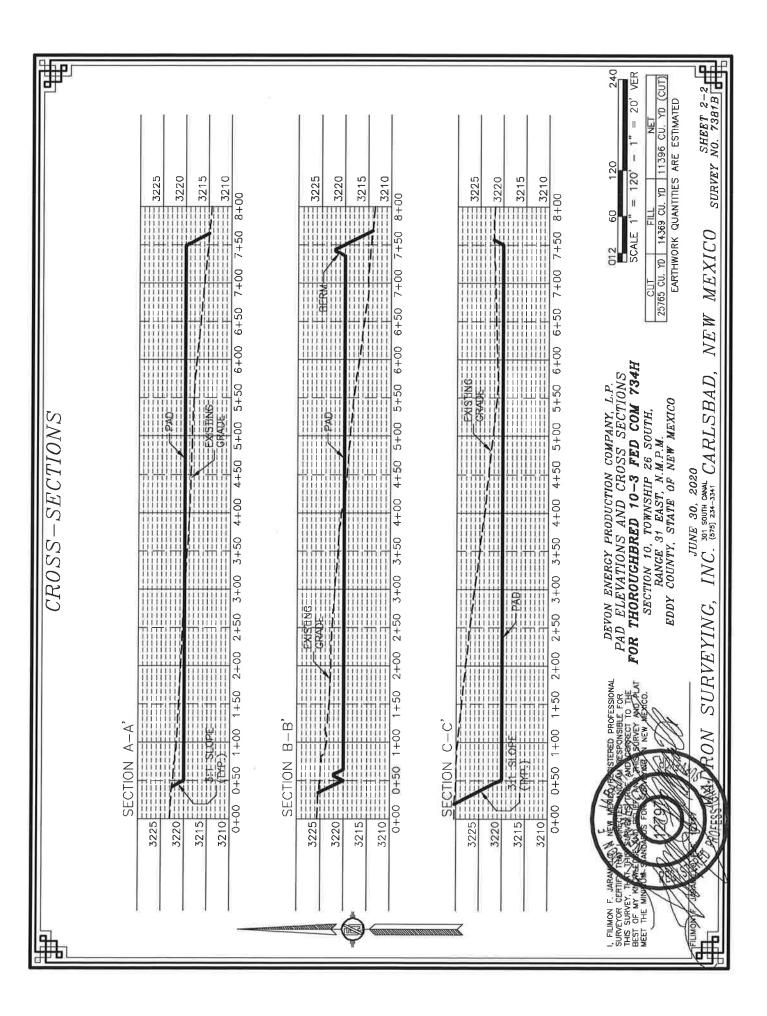
LOCATED 200 FT. FROM THE SOUTH LINE
AND 1380 FT. FROM THE EAST LINE OF
SECTION 10, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JUNE 30, 2020

SURVEY NO. 7381B

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

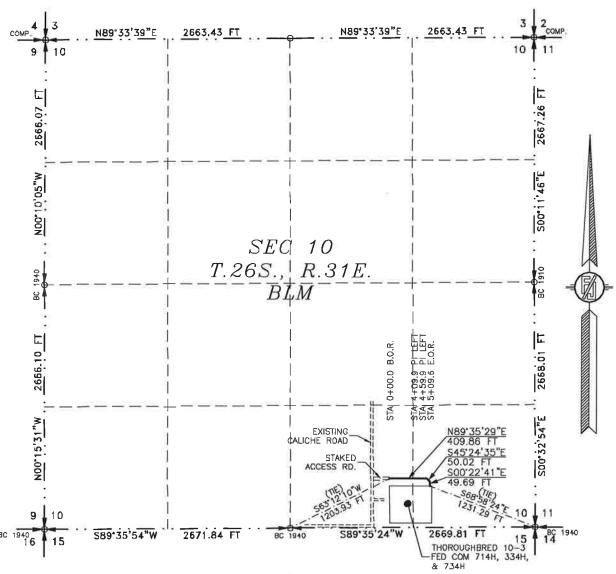




ACCESS ROAD PLAT

PAD ACCESS ROAD FOR THOROUGHBRED 10-3 FED COM 714H, 334H, & 734H

DEVON ENERGY PRODUCTION COMPANY, L.P. CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO JUNE 30, 2020



SEE NEXT SHEET (2-2) FOR DESCRIPTION



GENERAL NOTES

1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.

2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SHEET: 1-2

MADRON SURVEYING, INC. 301 S

SURVEYOR CERTIFICATE

I, FILIMON F. JARAMILLO, A NEW MEXICO PROFESSIONAL SURVEYOR NO. 12797. HEREBY CERTIFY THAT I HAVE CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR LAND NEW MEXICO.



MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO 88220 Phone (575) 234-3341

SURVEY NO. 7381B

NEW MEXICO

ACCESS ROAD PLAT

PAD ACCESS ROAD FOR THOROUGHBRED 10-3 FED COM 714H, 334H, & 734H

DEVON ENERGY PRODUCTION COMPANY, L.P. CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO JUNE 30, 2020

DESCRIPTION

A STRIP OF LAND 30 FEET WIDE CROSSING BUREAU OF LAND MANAGEMENT LAND IN SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., EDDY COUNTY, STATE OF NEW MEXICO AND BEING 15 FEET EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE SURVEY:

BEGINNING AT A POINT WITHIN THE SW/4 SE/4 OF SAID SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., WHENCE THE SOUTH QUARTER CORNER OF SAID SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS S63'12'10"W, A DISTANCE OF 1203.93 FEET; THENCE N89'35'29"E A DISTANCE OF 409.86 FEET TO AN ANGLE POINT OF THE LINE HEREIN DESCRIBED; THENCE S45'24'35"E A DISTANCE OF 50.02 FEET TO AN ANGLE POINT OF THE LINE HEREIN DESCRIBED; THENCE S00°22'41"E A DISTANCE OF 49.69 FEET THE TERMINUS OF THIS CENTERLINE SURVEY, WHENCE THE SOUTHEAST CORNER OF SAID SECTION 10, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS S68'58'24"E, A

SAID STRIP OF LAND BEING 509.57 FEET OR 30.88 RODS IN LENGTH, CONTAINING 0.351 ACRES MORE OR LESS AND BEING ALLOCATED BY FORTIES AS FOLLOWS:

SW/4 SE/4

257.08 L.F.

15.58 RODS

0.177 ACRES

SE/4 SE/4

DISTANCE OF 1231.29 FEET;

252.49 L.F.

15.30 RODS

0.174 ACRES

SURVEYOR CERTIFICATE

GENERAL NOTES

- 1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.
- 2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SHEET: 2-2

MADRON SURVEYING, INC. (575) 2

!, FILIMON F. JARAMILLO, A NEW MEXICO PROFESSIONAL SURVEYOR NO. 12797, HEREBY CERTIFY THAT I HAVE CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR LAND SURVEYING IN THE NEW MEXICO.

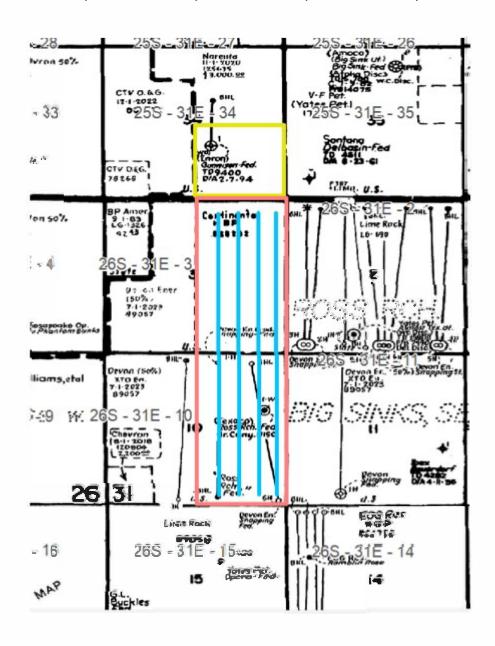
CERTIFICATE IS EXECUTED AT CARLSBAD,

UNE 2020 MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO 88220

Phone (575) 234-3341 SURVEY NO. 7381B

NEW MEXICO

Affected Tract Map Thoroughbred 10-3 Fed Com #623H, #713H, #714H, #733H, #734H





July 17, 2020

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES:

Application of Devon Energy Production, LP, for administrative approval of an Re: unorthodox well location for its Thoroughbred 10-3 Fed Com #734H Well in the E/2 of Sections 3 and 10, Township 26 South, Range 31 East, N.M.P.M., Eddy 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:

Tim Prout **Devon Energy** (405) 552-6113 Tim.Prout@dvn.com

Sincerely,

Kaitlyn A. Luck

ATTORNEY FOR DEVON ENERGY PRODUCTION

COMPANY, L.P.



Shipment Confirmation Acceptance Notice

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 - Thoroughbred 623, 713, 714, 733, 734 Amended App - BLM CM# 41132.0002

Shipment Date: 07/17/2020

Shipped From:

Name: HOLLAND & HART LLP (1)

Address: 110 N GUADALUPE ST # 1

City:_SANTA FE

ZIP+4® _87501 State:_NM

Type of Mail	Volume
Priority Mail Express®*	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	1
Total	1

^{*}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:

- Home screen > Mailing/Shipping > More
 Select Shipment Confirm
 Scan or enter the barcode/label number from PS Form 5630
- Confirm the volume count message by selecting Yes or No
 Select Pay and End Visit to complete transaction

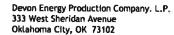
USPS EMPLOYEE: Please scan upon pickup or receipt of mail. Leave form with customer or in customer's mail receptacle.

USPS SCAN AT ACCEPTANCE

9275 0901 1935 6200 0023 0571 03



Name and Address of	Sender	Check type of mail or service														
Holland & Hart LLP (1)	☐ Adult Signature Required	□ Priority Mail Express														
	☐ Adult Signature Restricted Delivery ☐ Registered Mail			Affix Stamp Here (if issued as an international												
110 N Guadalupe St # 1 Santa Fe NM 87501																
Santa i e ivivi oi s	01	☐ Certified Mail Restricted Delivery	Merchandise	certificate of mailing or for additional copies of this receipt).												
		☐ Collect on Delivery (COD)	☐ Signature Confirmation	ado	litional co	pies of this	s receipt).									
		□ Insured Mail □ Signature Confirmation □ Priority Mail Restricted Delivery			stmark w	ith Date o	of Receipt.									
USPS Tracking	/Article Number	Addressee (Name, Street, City	. State. & ZIP Code™)	Postage	(Extra	Handling	Actual Value	Insured	Due	ASR	ASRD	RD	RR	SC	SCRD	SH
				Service)	Charge	if Registered	Value	Sender if	Fee	Fee	Fee	Fee	Fee	Fee	Fee	
				Fee				COD								
l. 9214 8901 9403 8316	8323 28	Bureau of Land Management 301 Dinosaur Trail Sar	nta Fe NM 87508	2.05	3.55								1.70			
						Φ										
						lue										
						8										
						프										
						0									ery	
						00									\geq	
						50,					er				0	
						€)					eliv					
						<u>-</u>				ired	<u>e</u>				9	
						\ \				Ë				ion	cted	
						0				edu	ec	e	Ţ		Restri	Jg
				1		and				e	ct	Deliver	eipt	onfirma	S	
				1						8	Ŧ	0	ece	Ę	~	pu
				1		eq				ure	estricted		Se l	0	UQ	Handling
						gister				atı	n	estricted		0		
						St				Signati	ē	Ct	eturn	G	9	<u>a</u>
						5				50	tt	Ţ	eti	ţ	Ξ	60
				-		Re				+	nature	D S	2	nature	nfirmati	Special
						-				<u> </u>	.0	~		Sig	0	0,
										Ad	S			S	C	
						<u>0</u>					dult				Ire	
						arg					P				atur	
											4					
						O									Sig	
				-		ing									0)	
						=										
						Handli									-	
				-		<u>a</u>										
				-												
				-												
Total Number of Pieces	Total Number of Pieces	Postmaster, Per (Name of re	eceiving employee)					<u> </u>								
Listed by Sender	Received at Post Office	r Ostiliastel, Fel (Naille Ol 16	conving employee)													
1																





July 6, 2020

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

RE:

Application for Nonstandard Locations

Engineering Statement

Devon Energy Production Company, L.P.

Thoroughbred 10-3 Fed Com 621H, 623H, 711H, 713H, 714H, 733H, 732H & 734H wells

Sections 10 & 3-26S-31E Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. respectfully requests administrative approval of a non-standard location for each of the Thoroughbred wells referenced above by decreasing the last take point(s) from 330 feet to 100 feet from the horizontal plane outer boundary. The wells are located in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Devon's responsibility as a prudent operator to maximize lateral length and to minimize reserves left in the ground. Decreasing the last take point will increase the wells effective lateral length by 230 feet thereby increasing ultimate recovery of reserves and preventing waste of natural resources.

Sincerely,

Paige Bowes

Reservoir Engineer

Paige Bower

