NSL

Initial

Application

Received: 10/29/20

P.O. No. 9UW5O-201029-NSL000

| NSL - | 8094 | Page 3 | of 11 |
|---------|-------------|--------|-------|
| Revised | l March 23, | 2017 | |

| RECEIVED: | 10/29/20 | REVIEWER: LRL | TYPE: NSL | | 2030355665 |
|---|---|---|---|--|---|
| | 1 | - Geological & 220 South St. Franc | ABOVE THIS TABLE FOR OCD DIVISION US DIL CONSERVATIO & Engineering Bur is Drive, Santa Fe, | N DIVISION eau – , NM 87505 | OF NEW WORK |
| | | TIS MANDATORY FOR ALL ADA REGULATIONS WHICH REQUIRE | MINISTRATIVE APPLICATIONS | FOR EXCEPTIONS TO DIVIS | ION RULES AND |
| Vell Nam ool: <u>Purp</u> | e: <u>Shire 22-15</u> ble Sage; Wol | | <u>ell</u> | API: <u>30-01</u> Pool Code | Imber: <u>6137 5-Pending</u> e: <u>98220</u> YPE OF APPLICATION |
| | | N: Check those whic cing Unit – Simultane | ch apply for [A] ous Dedication | | |
| [| I] Comminglin | y for [1] or [11] ng – Storage – Measu CTB PLC Disposal – Pressure Ir PMX SWD | □pc □ols | □OLM d Oil Recovery □PPR □ | |
| 2) NOTIF A. ■ B C D E. ■ F G | Offset operco Royalty, ove Application Notification Notification Surface owr For all of the | above, proof of not | rs, revenue owners otice approval by SLO approval by BLM | ution is attached, o | FOR OCD ONLY Notice Complete Application Content Complete |
| H. 3) CERTIF admir under | No notice re ICATION: I her istrative appro- stand that no (| • | nformation submitt complete to the b on this application | ed with this applices of my knowled | cation for Ige. I also |

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Darin Savage

Print or Type Name

/s/ Darin Savage

Date

970-385-4401

Phone Number darin@abadieschill.com

October 27, 2020

Signature

e-mail Address

Received by OCD: 10/29/2020 12:32:00 PM





ABADIE I SCHILL PC

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

October 29, 2020

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

Copy to: Leonard Lowe, Division Hearing Examiner

Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Shire 22-15 Fed Com 613H Well located in the W/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

Dear Director Sandoval:

Devon Energy Production Company, L.P., ("Devon"), OGRID No. 6137, is seeking administrative approval of an unorthodox well location ("NSL") for the Shire 22-15 Fed Com 613H Well (the "613H Well") (API 30-015-Pending) to be completed within the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying the W/2 E/2 of Sections 15 and 22, 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 will be drilled as follows:

- Surface Location (SL): 350' from the South line and 1805' from the East line of Section 22, Township 25 South, Range 31 East;
- Bottom Hole Location (BHL): 20' from the North line and 2210' from the East line of Section 15, Township 25 South, Range 31 East;
- First Take Point (FTP): 100' from the South line and 2210' from the East line of Section 22, Township 25 South, Range 31 East;
- Last Take Point (LTP): 100' from the North line and 2210' from the East line of Section 15, Township 25 South, Range 31 East.

Devon has included as Exhibit B a letter explaining why this application is needed. This well will produce from the Purple Sage Wolfcamp Pool (Pool Code 98220). There are special pool rules for this pool under Order No. R-14262, that establish 330' foot setback requirements. The completed interval for the proposed well is closer than 330' from the boundary of the spacing unit.

The unorthodox location will encroach towards the (1) W/2 E/2 of Section 27, Township 25 South, Range 31 East; and (2) the E/2 of Section 10, Township 25 South, Range 31 East.

Devon attests that, on or before submission of this application, it provided notice to the affected persons in the (1) W/2 E/2 of Section 27, Township 25 South, Range 31 East; and (2) the E/2 of Section 10, Township 25 South, Range 31 East; copies of the application and required plat maps were furnished. Devon also provided notice to the Bureau of Land Management to the extent that they own interest with respect to offsetting areas. 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 listed affected persons and parties, is attached hereto as Exhibit D. The development plan for this well is pursuant to a Joint Operating Agreement; therefore, there is no associated pooling case number.

Your consideration in this matter is appreciated.

Sincerely,

Darin C. Savage Attorney for Applicant

¹² Dedicated Acres

¹³ Joint or Infill

¹⁴ Consolidation Code

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

Α

WELL LOCATION AND ACREAGE DEDICATION PLAT

| 1 | API Number | r | | ² Pool Code | 2 | ³ Pool Name | | | | |
|--|--------------------------------|--|---|------------------------|---------------|------------------------|---------------|------------------------|----------|--------|
| ⁴ Property | Code | | ⁵ Property Name ⁶ Well Number | | | | | Well Number | | |
| | | | SHIRE 22-15 FED COM 613H | | | | | 613H | | |
| ⁷ OGRID | No. | | ⁸ Operator Name ⁹ Elevation | | | | | ⁹ Elevation | | |
| 6137 | | DEVON ENERGY PRODUCTION COMPANY, L.P. 3346.9 | | | | | 3346.9 | | | |
| | ¹⁰ Surface Location | | | | | | | | | |
| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/W | est line | County |
| 0 | 22 | 25 S | 31 E | | 350 | SOUTH | 1805 | EAST EDI | | EDDY |
| 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/W | est line | County |
| В | 15 | 25 S | 31 E | | 20 | NORTH | 2210 | EA | ST | EDDY |

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.

¹⁵ Order No.

| | N89'42'57"E 2652.44 FT N89'37'34"E 2664.18 FT | | ¹⁷ OPERATOR CERTIFICATION |
|--|--|--|---|
| NW CORNER SEC. 15 LAT. = 32.1376857'N | N/4 CORNER SEC. 15 LAT. = 32.1376837'N | NE CORNER SEC. 15 LAT. = 32.1376926'N | I hereby certify that the information contained herein is true and complete to the |
| LONG. = 103.7743767 W 🖿 | LONG. = 103.7658094'W | LONG. = 103.7572043'W | best of my knowledge and belief, and that this organization either owns a |
| NMSP EAST (FT) 응 N = 414274.67 궁 | NMSP EAST (FT) ^{™ L} LTP N = 414287.82 | ₩SP EAST (FT) S N = 414305.21 S E = 719664.53 | working interest or unleased mineral interest in the land including the proposed |
| N = 414274.67 35 E = 714349.16 🖏 | E = 717000.99 BOTTOM OF HOLE | | bottom hole location or has a right to drill this well at this location pursuant to |
| 10'36 [°] W | LAT. = 32.1376303'N LONG. = 103.7643433'W | 6, 80 00 00 00 00 00 00 00 00 00 00 00 00 | a contract with an owner of such a mineral or working interest, or to a |
| 6 | NMSP EAST (FT) N = 414270.78 | | voluntary pooling agreement or a compulsory pooling order heretofore entered |
| LAT. = 32.1303917'N LONG. = 103.7743947'W | E = 717454.9Φ | LÁT. = 32.1304013'N LONG. = 103.7572709'W | by the division. |
| NMSP EAST (FT) N = 411621.21 | LAST TAKE POINT 100' FNL, 2210' FEL | NMSP EAST (FT) N = 411652.64 | |
| E = 714357.34 | LAT. = 32.1374104'N LONG. = 103.7643453'W | E = 719658.11 | Signature Date |
| 2654.06 | NMSP EAST (FT) | 2650.24 | |
| | N = 414190.80 E = 717454.71 | | Printed Name |
| W_95_01.00N | | sooro3'13"w | |
| .000. | | S00' | E-mail Address |
| | N89'46'55"E 2626.60 FT N89'27'26"E 2664.80 FT | | |
| NW CORNER SEC. 22 LAT. = 32.1230977'N | N/4 CORNÉR SEC. 22 LAT. = 32,1230874'N | NE CORNER SEC. 22 LAT. = 32.1231179'N | ¹⁸ SURVEYOR CERTIFICATION |
| LONG. = 103.7744128'W L NMSP EAST (FT) 4 | LONG. = 103.7659304'W | 는 LONG. = 103.7573247'W 응 NMSP EAST (FT) | <i>I hereby certify that the well location shown on this plat was</i> |
| N = 408967.74 | NMSP EAST (FT) N = 408977.73 | Si N = 409002.97 Si E = 719655.63 | |
| E = 714365.52 | E = 716991.53 | | plotted from field notes of actual surveys made by me or under |
| 02,003 | FIRST TAKE POINT 100' FSL, 2210' FEL | 12,22,11 0005 E/4 CORNER SEC. 22 | my supervision, and that the same is true and correct to the |
| W/4 CORNER SEC. 22 | LAT. = 32.1088288'N LONG. = 103.7644796'W | S E/4 CORNER SEC. 22 | best of my belief. |
| LAT. = 32.1158227'N LONG. = 103.7744447'W | SHIRE 22-15 FED COM 613H N = 403793.08 | LAT. = 32.1158546'N LONG. = 103.7573421'W | SEPTEMBER 30, 2020 |
| NMSP EAST (FT) N = 406321.16 | ELEV. = 3346.9 LAT. = 32.1095170'N (NAD83) | NMSP EAST (FT) N = 406360.67 | Date of Survey |
| E = 714369.37 | LONG. = 103.7631719'W | E = 719664.36 | NEW MEX X |
| 47.30 | NMSP EAST (FT) N = 404045.55 | 2654.37 | |
| v 26 | E = 717871.61 S/4 CORNER SEC. 22 | ™ SE CORNER SEC. 22 | A A A THE A A A A |
| SW CORNER SEC. 22 | LAT. = 32.1085528'N | T LAT - 32 1085507'N | A ARCALLE |
| LONG. = 103.7744766'W S NMSP EAST (FT) | NMSP EAST (FT) | LONG. = 103.7573438'W | Signature and Seal of Protessional Surveyor: |
| N = 403674.44 E = 714373.22 | N = 403690.32 FTP 1805'- | N = 403706.91 E = 719678.01 | Certificate Number: PUTRIC LE JAPPAVILEC, PLS 12797 |
| E = /115/3.22 | S89'39'25'W 2652.26 FT S89'38'30'W 2653.78 FT | | TAOFESS (Con |
| | | | EXHIBIT |



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

October 13, 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. Shire 22-15 Fed Com 613H, 616H, 618H, 716H, 718H, and 733H (the "Shire Wells") E/2 and E/2W/2 of Sections 15 & 22-25S-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 Shire Wells referenced above by decreasing the first and last take points 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 first and last take point will increase the wells effective lateral length by 460 feet thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

Paige Bower

Paige Bowes Reservoir Engineer



Devon Energy Production Company, L.P.

Unorthodox Location Notice Plat

| 25S - 31E - 9 Affected Of Spacing Uni | | 258 - 31E - 11 |
|---|----------------|---|
| 258 - 31E - 16 | 25S - 31E - 15 | 25S - 31E - 14 Standard Horizontal Spacing Unit Shire 22-15 |
| 25S - 31E - 21 | 25S-31E-22 | Fed Com 613H & 733H |
| 25S - 31E - 28 | 25S-31E-27 | ² Affected Offset Spacing Units |

ЕХНІВІТ С

| Туре | Affected Party | Location | Date Letter Sent | Mail Tracking Number | Addresss |
|---------|---------------------------|--|------------------|----------------------|--|
| | | | | | |
| WI | XTO Energy, Inc. | T25S R31E Section 10: Units A, B, G, H, I, J, O, & P | 10/29/20 | 70201810000040153239 | Attn: Vincent Cuccerre 22777 Springwoods Village PKWY Spring, TX 77389 |
| | | | | | |
| Royalty | Bureau of Land Management | T25S R31E Section 27: Units B, G, J, & O | 10/29/20 | 70201810000040153222 | 620 E. Greene Street Carlsbad, NM 88220-6292 |

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Received by OCD: 10/29/2020 12:32:00 PM



ABADIE I SCHILL PC

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

October 29, 2020

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

NOTICE TO AFFECTED PERSONS/PARTIES RE: APPLICATIONS FOR ADMINISTRATIVE APPROVAL OF UNORTHODOX WELL LOCATIONS

1) Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Shire 22-15 Fed Com 613H Well located in the W/2 E/2 of Sections 15 and 22, 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 Shire 22-15 Fed Com 616H Well located in the E/2 W/2 of Sections 15 and 22, 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 Shire 22-15 Fed Com 618H Well located in the E/2 E/2 of Sections 15 and 22, 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 Shire 22-15 Fed Com 716H Well located in the E/2 W/2 of Sections 15 and 22, 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 Shire 22-15 Fed Com 718H Well located in the E/2 E/2 of Sections 15 and 22, 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 Shire 22-15 Fed Com 733H Well located in the W/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

To the Parties/Persons this may concern:

Enclosed in this notice are copies of the above referenced applications filed with the New Mexico Oil Conservation Division on the date referenced above. You are being notified in your capacity as a person or party in an adjoining section or unit pursuant to our request for approval of an unorthodox location 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 applications filed for administrative approval by the Division. Email correspondence for this matter can be sent to the Division at OCD.Engineer@state.nm.us.

If you have any questions concerning this application, please contact:

Verl Brown Supervising Landman Devon Energy Production Company, L.P. (405) 228-8804 Verl.Brown@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.

Waiver

hereby waives objection to the above referenced Application for an Unorthodox Location for the Shire 22-15 Fed Com 613H Well located in the W/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

Dated:

Signature: _____

Application for an Unorthodox Location for the Shire 22-15 Fed Com 616H Well located in the E/2 W/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

| Dated: | Signature: |
|--------|------------|
| | |

hereby waives objection to the above referenced Application for an Unorthodox Location for the Shire 22-15 Fed Com 618H Well located in the E/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico

Dated:

| Signature: | |
|------------|--|
|------------|--|

Application for an Unorthodox Location for the Shire 22-15 Fed Com 716H Well located in the E/2 W/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

Signature: _____

hereby waives objection to the above referenced

Application for an Unorthodox Location for the Shire 22-15 Fed Com 718H Well located in the E/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

Dated: _____

Signature: _____

hereby waives objection to the above referenced Application for an Unorthodox Location for the Shire 22-15 Fed Com 733H Well located in the W/2 E/2 of Sections 15 and 22, Township 25 South, Range 31 East NMPM, Eddy County, New Mexico.

Dated:

Signature: _____