

ID NO. 278968

NSL - 8673

Revised March 23, 2017

RECEIVED:	REVIEWER:	TYPE:	APP NO: pLEL2329839386
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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: Fighting Okra 18-19 Federal 25H **API:** 30-025-47580
Pool: Bobcat Draw; Upper Wolfcamp **Pool Code:** 98094

**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.

October 24, 2023

Date

Paula M. Vance

Print or Type Name

Signature

505-954-7286

Phone Number

PMVance@hollandhart.com

e-mail Address



Paula M. Vance
Associate
Phone (505) 954-7286
 PMVance@hollandhart.com

October 24, 2023

VIA ONLINE FILING

Dylan Fuge, 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

Fighting Okra 18-19 Federal 25H well
 W/2 of Sections 18 and 19, Township 26 South, Range 34 East, Lea County, New Mexico
 Bobcat Draw; Upper Wolfcamp [98094]
 API No. 30-025-47580

Dear Mr. Fuge:

Devon Energy Production Company, L.P. ("Devon") (OGRID No. 6137), pursuant to Division Rules 19.15.16.15(C)(6) and 19.15.15.13 NMAC and applicable rules governing acreage and well location requirements for the Bobcat Draw; Upper Wolfcamp [98094], seeks administrative approval of an unorthodox well location for its **Fighting Okra 18-19 Federal 25H** well (API No. 30-025-47580), in a 640-acre, more or less, spacing unit underlying the W/2 of Sections 18 and 19, Township 26 South, Range 34 East, Lea County, New Mexico.

The **Fighting Okra 18-19 Federal 25H** oil well is an infill well. The **Fighting Okra 18-19 Federal 24H** oil well is the defining well, creating the enlarged spacing unit.

The proposed location for the **Fighting Okra 18-19 Federal 25H** well is as follows:

- Surface location: 500' FNL and 2,420' FWL (Unit C) of Section 18
- First take point: 100' FNL and 2,600' FWL (Unit C) of Section 18
- Last take point: 100' FSL and 2,600' FWL (Unit N) of Section 19
- Bottom location: 20' FSL and 2,600' FWL (Unit N) of Section 19

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	Montana	Utah
Colorado	Nevada	Washington, D.C.
Idaho	New Mexico	Wyoming

Since this acreage is governed by the Division's statewide rules, the completed interval for this well will be unorthodox because it is closer than the standard offsets to the eastern boundary of the spacing unit; thus, encroaching on the E/2 of Section 18 and 19, T26S-R34E.

Devon respectfully requests administrative approval of a non-standard location for the **Fighting Okra 18-19 Federal 25H** well to allow the completed interval to be less than 330 feet from the eastern boundary of the existing 640.00-acre horizontal spacing unit. This well is located in the Bobcat Draw; Upper Wolfcamp [98094]. Due to the current spacing of the producing wells and future wells in these sections, the optimal spacing pattern causes the **Fighting Okra 18-19 Federal 25H** well to be drilled less than 330 feet from the eastern boundary of the spacing unit. Devon requests approval of this non-standard location because it is necessary to avoid causing wasted resources and reducing the production of the wells listed above.

Exhibit A is a Form C-102 showing the Fighting Okra 18-19 Federal 25H well encroaches on the tracts/unit to the east in the E/2 of Sections 18 and 19, T26S-R34E. Additionally, included is a Form C-102 for the Fighting Okra 18-19 Federal 24H well, showing it is the defining well for the enlarged spacing unit.

Exhibit B is a plat for Sections 18 and 19, T26S-R34E, that shows the proposed Fighting Okra 18-19 Federal 25H well in relation to the adjoining tracts/unit to the east. Exhibit B also includes an ownership list for the affected tracts/unit to the east, showing that it is operated by Devon, and lists Chevron U.S.A. Inc. ("Chevron") as the other working interest owner in the offsetting tracts/unit. In addition, the exhibit identifies that these include Federal leases. Accordingly, the "affected persons" ¹ are the applicant, Chevron, and the Bureau of Land Management ("BLM"). Also, included is a copy of Devon's courtesy notification sent to Chevron stating its intent to file this administrative application.

Exhibit C is a spreadsheet listing all affected persons Devon provided notice and includes tracking information demonstrating that each of the affected persons was sent a copy of this application with all 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. The following are the affected persons:

¹ See NMAC §§ 19.15.2.7.A(8) [defining "affected persons" as, "in the absence of an operator, or with respect to an application wherein the operator of the spacing unit or identified tract is the applicant, each working interest owner"] and 19.15.4.12.A(2)(a).

Type	Affected Party	Location
Operator	Devon Energy Production Company, L.P.	E/2 of Sections 18 and 19
Working Interest	Chevron U.S.A. Inc.	E/2 of Sections 18 and 19
Federal Mineral Interest	Bureau of Land Management	E/2 of Sections 18 and 19

Your attention to this matter is appreciated.

Sincerely,



Paula M. Vance
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 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) 476-3460 Fax: (505) 476-3462

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 SOUTH ST. FRANCIS DR.
Santa Fe, New Mexico 87505

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

☒ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-47580	Pool Code 98094	Pool Name BOBCAT DRAW; UPPER WOLFCAMP
Property Code 315691	Property Name FIGHTING OKRA 18-19 FEDERAL	Well Number 25H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Elevation 3364.5'

Surface Location

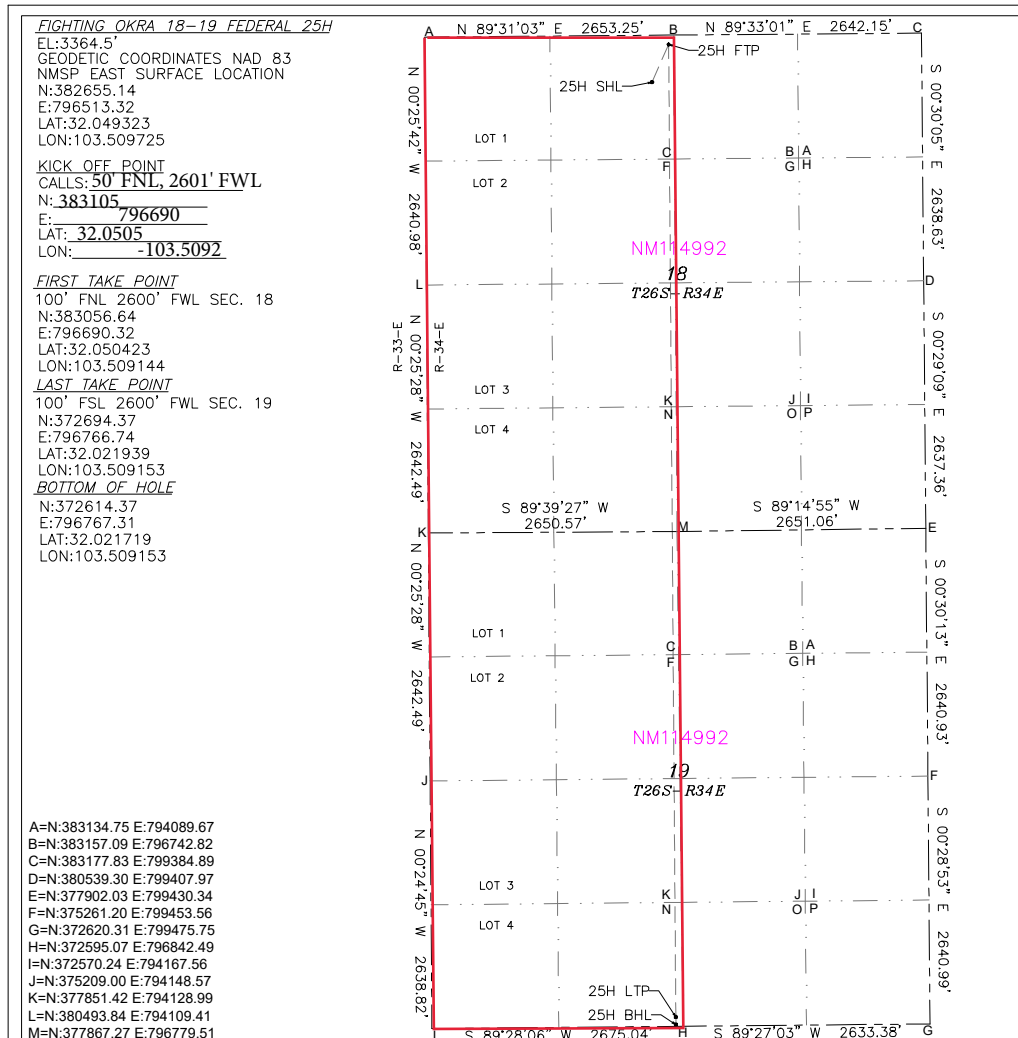
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	18	26-S	34-E		500	NORTH	2420	WEST	LEA

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
N	19	26-S	34-E		20	SOUTH	2600	WEST	LEA

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
640			Pending NSL

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



OPERATOR CERTIFICATION

I hereby certify that the information 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 mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Rebecca Deal 10/18/2023
Signature Date

Rebecca Deal, Regulatory Analyst
Printed Name

rebecca.deal@dvn.com
E-mail Address

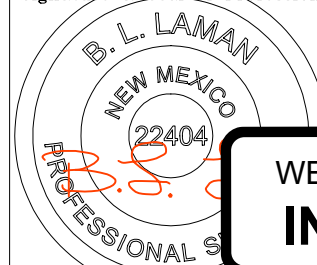
SURVEYOR CERTIFICATION

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.

07/2023

Date of Survey

Signature & Seal of Professional Surveyor



Certificate No. 22404

WELL TYPE
INFILL

EXHIBIT
A

Intent ☒ As Drilled ☐

API # 30-025-47580		
Operator Name: DEVON ENERGY PRODUCTION COMPANY, LP.	Property Name: FIGHTING OKRA 18-19 FEDERAL	Well Number 25H

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
	18	26S	34E		50	FNL	2601	FEL	LEA
Latitude 32.0505					Longitude -103.5092				NAD 83

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
C	18	26-S	34-E		100	NORTH	2600	WEST	LEA
Latitude 32.050423					Longitude 103.509144				NAD 83

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
N	19	26-S	34-E		100	SOUTH	2600	WEST	LEA
Latitude 32.021939					Longitude 103.509153				NAD 83

Is this well the defining well for the Horizontal Spacing Unit? ☐ NIs this well an infill well? ☐ Y

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

API #		
Operator Name: DEVON ENERGY PRODUCTION COMPANY, L.P.	Property Name: FIGHTING OKRA 18 19 FED	Well Number 24H

KZ 06/29/2018

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

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1000 RIO BRAZOS RD., AZTEC, NM 87410
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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, New Mexico 87505

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

☒ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-025-47579	Pool Code 98347	Pool Name WC-025 G-10 S263418C;LWR WOLFCAMP
Property Code 315691	Property Name FIGHTING OKRA 18-19 FEDERAL	Well Number 24H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Elevation 3362.5'

Surface Location

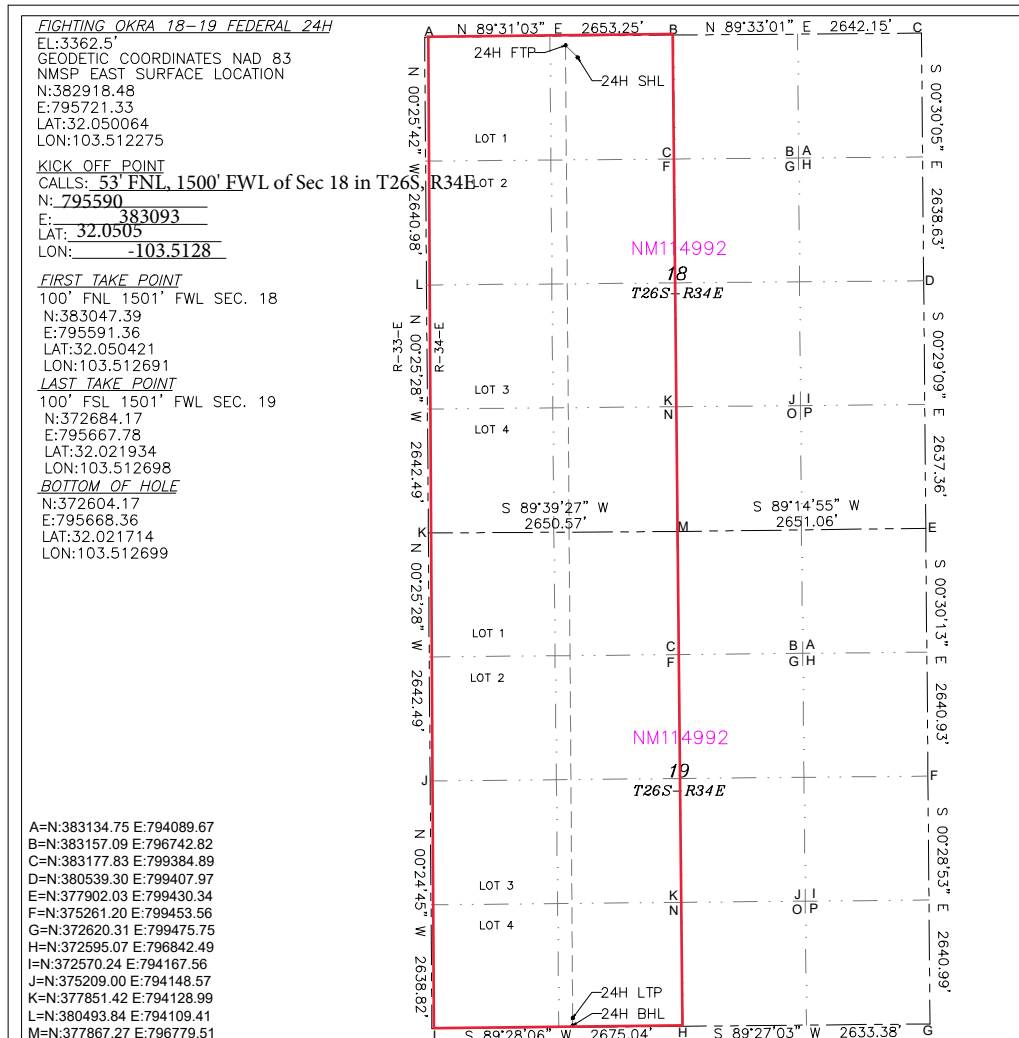
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	18	26-S	34-E		230	NORTH	1630	WEST	LEA

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
N	19	26-S	34-E		20	SOUTH	1501	WEST	LEA

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
640			

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



OPERATOR CERTIFICATION

I hereby certify that the information 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 mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Rebecca Deal 8/29/2023
Signature Date

Rebecca Deal, Regulatory Analyst
Printed Name

rebecca.deal@dmv.com
E-mail Address

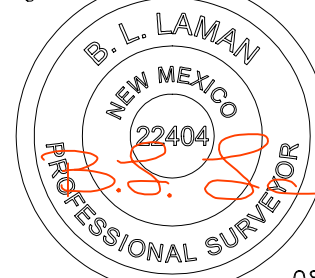
SURVEYOR CERTIFICATION

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.

07/2023

Date of Survey

Signature & Seal of Professional Surveyor



Certificate No. 22404

WELL TYPE
DEFINING

Intent ☒ As Drilled ☐

API #		
Operator Name: DEVON ENERGY PRODUCTION COMPANY, LP.	Property Name: FIGHTING OKRA 18-19 FEDERAL	Well Number 24H

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
	18	26S	34E		53	FNL	1500	FWL	LEA
Latitude 32.0505					Longitude -103.5128				NAD 83

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
C	18	26-S	34-E		100	NORTH	1501	WEST	LEA
Latitude 32.050421					Longitude 103.512691				NAD 83

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
N	19	26-S	34-E		100	SOUTH	1501	WEST	LEA
Latitude 32.021934					Longitude 103.512698				NAD 83

Is this well the defining well for the Horizontal Spacing Unit? ☒Is this well an infill well? ☐

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

KZ 06/29/2018

Owner	Type	Location	Date Letter Sent
CHEVRON USA INC	WI*	Sections 18 & 19 T26 R34E	10/17/2023
DEVON ENERGY	WI*	Sections 18 & 19 T26 R34E	Operator & Applicant

*Ownership is the same/continuous throughout all of 18 & 19.

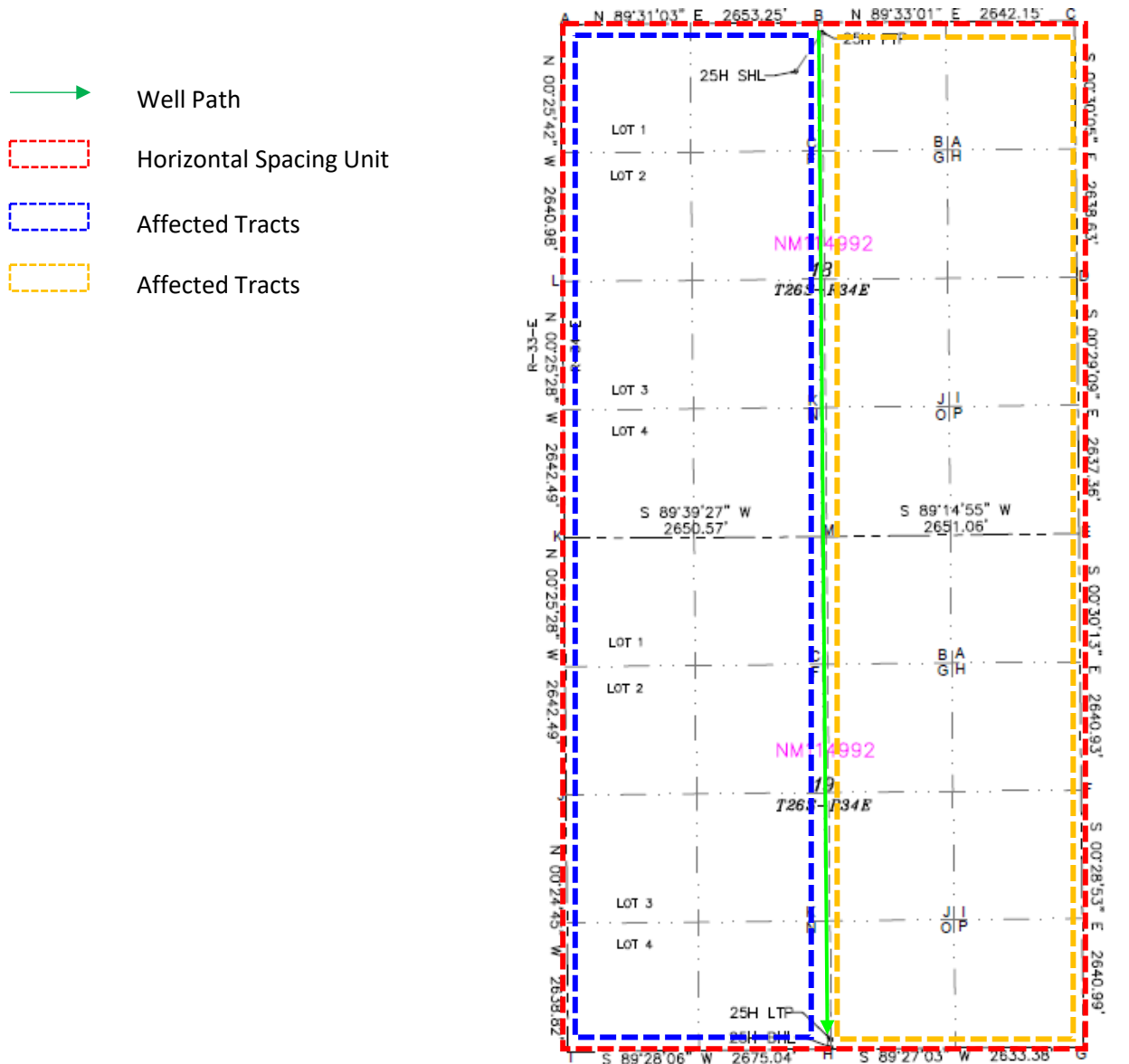


EXHIBIT
B



Devon Energy Production Company LP

405 228-2896 Phone

333 West Sheridan Avenue

www.devonenergy.com

Oklahoma City, OK 73102

October 19, 2023

**VIA CERTIFIED MAIL RRR &
VIA EMAIL: ScottSabrsula@chevron.com**

Chevron U.S.A., Inc.
1400 Smith Street
Houston, TX 77002

Re: Notice of Non-Standard Location Application(s)
Fighting Okra 18-19 FED 25H
Sections 18 & 19, Township 26 South, Range 34 East
Lea County, New Mexico

To Whom It May Concern:

Devon Energy Production Company, L.P. ("Devon") has proposed well(s) for development of the Wolfcamp underlying Sections 18 & 19, Township 26 South, Range 34 East, Lea County, New Mexico. This letter is to advise you that this proposed development plan will require Devon seek a Non-Standard Locations ("NSL") for optimum well spacing and development.

Devon is seeking an NSL for the Fighting Okra 18-19 FED 25H, to be drilled near or approaching the sections center line as a Bone Springs horizontal in the W/2 of Sections 18, & 19, Township 26 South, Range 34 East, Lea County, New Mexico. A plat has been attached for your reference per the Fighting Okra 18-19 FED 25H.

To expedite approval of the NSL(s), we ask that you contact the undersigned timely with questions and/or concerns at (405) 228-2896 or via email at Daniel.Brunzman@devon.com.

Regards,

Devon Energy Production Company, L.P.

A handwritten signature in blue ink, appearing to read "D. Brunzman", with a long horizontal flourish extending to the right.

Daniel J. Brunzman
Advising Landman

Chevron U.S.A., Inc.	1400 Smith Street	Houston	TX	77002
Bureau of Land Management	301 Dinosaur Trail	Santa Fe	NM	87508





Paula M. Vance
Associate
Phone (505) 954-7286
PMVance@hollandhart.com

October 24, 2023

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

Re: Devon Energy Production Company, L.P
Request for Administrative Approval of Unorthodox Well Location

Fighting Okra 18-19 Federal 25H well
W/2 of Sections 18 and 19, Township 26 South, Range 34 East, Lea County, New Mexico
Bobcat Draw; Upper Wolfcamp [98094]
API No. 30-025-47580

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 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, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Daniel J. Brunsman
Devon Energy Production Company, L.P.
(405) 228-2896
Daniel.Brunsman@dvn.com

Sincerely,

A handwritten signature in blue ink that appears to read "Paula M. Vance".

Paula M. Vance
ATTORNEY FOR
DEVON ENERGY PRODUCTION COMPANY, L.P

Devon - Fighting Okra NSL
Postal Delivery Report

Tracking Number	Recipient	Status
921489019403833489303	Chevron U S A Inc 1400 Smith Street Houston TX 77002	In-Transit
921489019403833489304	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	In-Transit
921489019403833516188	Chevron U S A Inc ATTN: Land Department 6301 Deauville Blvd Midland TX 79706	In-Transit

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
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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 278968

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 278968
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	10/25/2023