Received by OCD: 9/13/2024 4:38:47 PM

ID NO. 383583		NSL - 8802	Revised March 23, 2017
RECEIVED: 09/13/24	REVIEWER:	TYPE:	APP NO: pLEL2426750326
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Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Print or Type Name

Pathur

Signature

Date

Phone Number

e-mail Address

Released to Imaging: 12/20/2024 10:02:59 AM



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

September 13, 2024

VIA ONLINE FILING

Gerasimos Razatos, Acting 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 an Unorthodox Well Location

Cotton Draw Unit 616H well W/2 W/2 of Section 25 and W/2 NW/4, NW/4 SW/4 and Lot 1 (W/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico Purple Sage-Wolfcamp Gas Pool [98220] API No. 30-015-49135

Dear Mr. Razatos:

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 Purple Sage-Wolfcamp Gas Pool [98220], seeks administrative approval of an unorthodox well location for its Cotton Draw Unit 616H well (API No. 30-015-49135), in a 319.11-acre, more or less, spacing unit underlying the W/2 W/2 of Section 25 and W/2 NW/4, NW/4 SW/4 and Lot 1 (W/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico.

The location for the proposed Cotton Draw Unit 616H well is as follows:

- Surface location: 200' FNL and 1,110' FWL (Unit D) of Section 25
- First take point: 100' FNL and 750' FWL (Unit D) of Section 25
- Last take point: 100' FSL and 750' FWL (Lot 1) of irregular Section 36
- Bottom location: 20' FSL and 750' FWL (Lot 1) of irregular Section 36

The well is subject to a unit agreement and the spacing exception under 19.15.16.15.B(8) NMAC applies since the well is wholly within Devon's Cotton Draw Unit; however, the setback

T 505.988.4421 F 505.983.6043		1	
110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849	Alaska	Montana	Utah
	Colorado	Nevada	Washington, D.C.
www.hollandhart.com	Idaho	New Mexico	Wyoming

requirements of the Special Pool Rules for the Purple Sage Wolfcamp (*See* Division Order R-14262) apply to the outer boundary of the unit.¹ The proposed first take point is less than 330 feet² from the northern boundary and existing 160.00-acre offsetting horizontal well spacing unit; therefore, approval of a non-standard well location is required.

Exhibit A is an Engineering Statement explaining why approval of the application is necessary.

Exhibit B is a Form C-102 showing the **Cotton Draw Unit 616H** well encroaches on the unit to the north in the W/2 W/2 of Section 24, T24S-R31E.

Exhibit C is a plat for Sections 24, 25 and 36, T24S-R31E, and the N/2 of Section 1, T25S-R31E, that shows the proposed Cotton Draw Unit 616H well in relation to the adjoining unit to the north. Exhibit B also includes an ownership list for the affected unit to the north, showing that it is operated by EOG Resources, Inc. ("EOG"). In addition, the exhibit identifies that these include federal leases. Accordingly, the "affected persons"³ are EOG and the Bureau of Land Management ("BLM"). Also, included with the exhibit is a waiver letter from EOG.

Exhibit D 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:

Туре	Affected Party	Offsetting Acreage
Operator	EOG	
Federal Mineral Interest	Bureau of Land Management	W/2 W/2 of Section 24

Your attention to this matter is appreciated.

Sincerely,

Pathik

Paula M. Vance 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 Idabo Montana Nevada New Mexico Utah Washington, D.C. Wyoming

¹ See 19.15.16.15.C(7) NMAC.

² The setback requirement for the Purple Sage Wolfcamp is 330 feet from the outer boundary.

³ See 19.15.2.7.A(8) NMAC [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) NMAC.



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

August 8, 2024

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

RE: Application for Nonstandard Location Engineering Statement Devon Energy Production Company, L.P. Cotton Draw Unit 616H W2 W2 of Section 25-24S-31E W2 W2 of Section 36-24S-31E Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. respectfully requests administrative approval of a non-standard location ("NSL") for the Cotton Draw Unit 616H Well referenced above. The Cotton Draw Unit 616H Well is in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Devon's responsibility as a prudent operator to minimize reserves left in the ground. Decreasing the first take point from three hundred and thirty feet (330') to one hundred feet (100') will increase the wells effective lateral length by two hundred thirty feet (230'), which will increase the ultimate recovery of reserves and is thereby necessary to prevent waste of natural resources.

Sincerely,

John Lyn

John Dwyer Reservoir Engineer

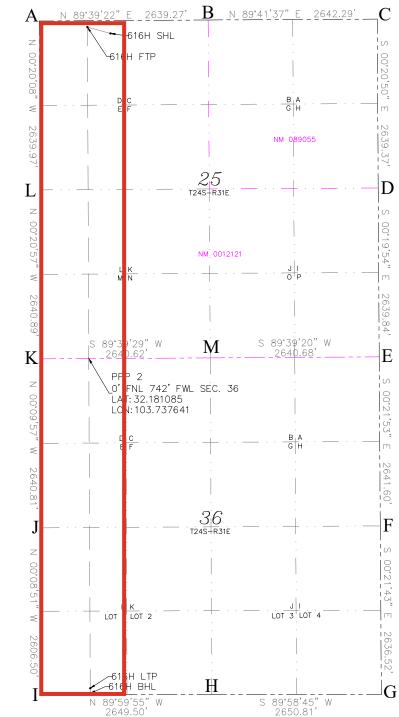


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Spacing Unit Type Horizontal Vertical Ground Floor Elevation: OPERATOR CERTIFICATIONS Interest or contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land neluding the proposed bottom hole location or has a right to drill this well at this organization as a right to drill this well at this organization has received the arectofore entered by the division. SURVEYOR CERTIFICATIONS If this well is a horizontal well, I further certify that this organization has received the 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. Signature Date Signature Date Signature and Seal of Professional Surveyr ONAL SURVEYOR CErtificate Number Printed Name Certificate Number Date of Survey	01		-								e	•
OPERATOR CERTIFICATIONS Interesty 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 neluding the proposed bottom hole location or has a right to drill this well at this ocation pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order hereit 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 tivision. Signature Signature Signature and Seal of Professional Surveyor ONAL SURVEYOR CERTIFICATIONS Printed Name Certificate Number Date of Survey					-							
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 ocation pursuant to a contract with an owner of a working interest or unleased mineral interest or to a voluntary pooling agreement or a compulsory pooling order 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. Signature Date Printed Name Certificate Number Date of Survey						Spacin	ng Unit	t Type Horizon	tal Verti	cal (Fround Floor Ele	vation:
In y how correct and of here, and, in the work so a volucation direction and work with the land nereding the proposed bottom hole location or has a right to drill this well at this ocation pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.If this well is a horizontal well, I further certify that this organization has received the completed interval will be located or obtained a compulsory pooling order from the livision.If 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 livision.Signature and Seal of Professional Surveyer/ O_{NAL} SURPrinted NameCertificate NumberDate of Survey	I hereby	certify that the	e information con				est Li			wn on this	lat was plotted from Fal	d notes
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 itivision. Signature Date Printed Name Certificate Number Date of Survey	organiza includin location mineral heretofo	tion either own g the proposed pursuant to a c interest, or to a re entered by t	ns a working inte bottom hole loc contract with an of a voluntary pooli he division.	erest or unlease ation or has a r owner of a wor ng agreement o	d mineral in ight to drill t king interest or a compuls	terest in the land this well at this or unleased ory pooling orde	er	actual surveys made by	me or under s		nd that the same is true	and
Printed Name Certificate Number Date of Survey	consent interest i	of at least one in each tract (in ed interval will	lessee or owner n the target pool	of a working in or formation) i	terest or unlender the second se	eased mineral part of the well's	's				$\mathcal{P} \setminus \mathcal{P} \setminus \mathcal{P}$	L LOG
	Signa	ature		Date			Sig	nature and Seal	of Profe	ssional S	urveyor/ONAL	JUP"
Email Address 23261 07/2024	Print	ed Name					Cert	tificate Number	Date of	Survey		
	Emai	l Address					_	23261	07/20	24		
									1			

ACREAGE DEDICATION PLATS

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.

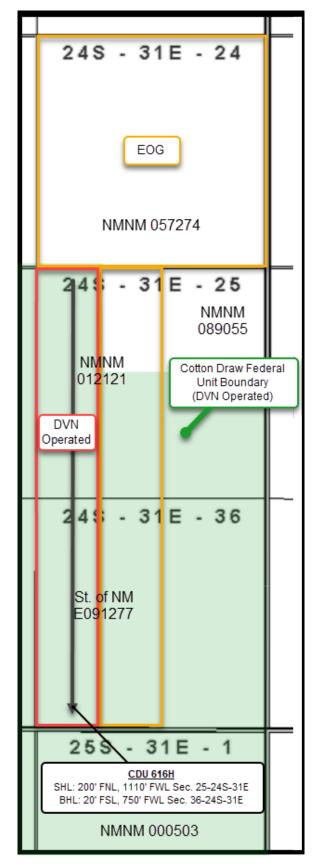


 $\begin{array}{l} A= N:435400.07 \quad E:724859.41 \\ B= N:435415.91 \quad E:727498.63 \\ C= N:435430.04 \quad E:730140.88 \\ D= N:432790.73 \quad E:730156.88 \\ E= N:430150.93 \quad E:730172.17 \\ F= N:427509.39 \quad E:730188.98 \\ G= N:424872.92 \quad E:730205.63 \\ H= N:424871.96 \quad E:727554.82 \\ I= N:424872.01 \quad E:724905.32 \\ J= N:427478.51 \quad E:724898.61 \\ K= N:430119.30 \quad E:72489.97 \\ L= N:432760.15 \quad E:724874.87 \\ M= N:430135.06 \quad E:727531.54 \\ \end{array}$

Non-Standard Location Application

Offset Operator Plat

Cotton Draw Unit 616H





Devon Energy Corporation 333 W. Sheridan Avenue Oklahoma City, OK 73102-8260 405 228 2448 Phone www.devonenergy.com

August 12th, 2024

EOG Resources, Inc. Attn: Chloe Sawtelle 5509 Champions Drive Midland, Texas 79706

Re: NSL Location - Cotton Draw Wells Sections 25 & 36, T24S-R31E Eddy County, NM

Ms. Sawtelle,

Devon Energy Production Company, L.P. ("Devon") has applied for an unorthodox well location for the Cotton Draw wells listed on Exhibit "A" (collectively referred to as "Cotton Draw Wells") located in the W2 of Sections 25 & 36, T24S-R31E, Eddy County, New Mexico.

In exchange for EOG Resources, Inc.'s ("EOG") cooperation on this matter, Devon proposes the following agreement:

- EOG hereby agrees not to protest or cause to be protested the unorthodox location for the Cotton Draw Wells, so long as such Wells are permitted and completed in the Purple Sage; Wolfcamp (Gas) Pool (98220) and each of the Cotton Draw Wells has a first take point or last take point no closer than 100' from the following section line:
 - i. The north line of Section 25, T24S-R31E, Eddy County, NM
- 2. Devon hereby agrees not to protest or cause to be protested the unorthodox location for ten wells that EOG may permit in the Purple Sage; Wolfcamp (Gas) Pool (98220) Section 24, Township 24 South, Range 31 East, Eddy County, New Mexico, in the future, so long as each well has a first take point or last take point no closer than 100' from the following section lines:
 - i. The south line of Section 24, T24S-R31E, Eddy County, NM
- 3. This agreement shall be binding upon and shall inure to the benefit of the parties hereto and to their respective heirs, devisees, legal representatives, successors, and assigns.

If you are in agreement with these terms, please indicate your acceptance and agreement by executing in the space below. Should you have any questions, please feel free to contact me.

Sincerely, Ryan Close

Ryan Cloer Landman

Pg. 2

Re: NSL Location - Cotton Draw Wells - Sec. 25 & 36 - 245 - 31E

\wedge
EOG Resources, Inc.
Agreed to and accepted this 29th day of <u>August</u> , 2024.
Signature:
Name: Matthew W. Smith
Title: Land Manager + agent + a Horney in fact

Devon Energy Production Company, L.P.

Agreed to and accepted this 29 day of _	August	, 2024.
Signature: Anland		
Signature:		
AL		

Name: David M. Korell

Title: Manager, Land

Exhibit "A"

- 1. Cotton Draw Unit #615H
- 2. Cotton Draw Unit #616H
- 3. Cotton Draw Unit #617H
- 4. Cotton Draw Unit #618H
- 5. Cotton Draw Unit #625H
- 6. Cotton Draw 25-36 Fed State Com #627H
- 7. Cotton Draw 25-36 Fed State Com #712H
- 8. Cotton Draw 25-36 Fed State Com #732H
- 9. Cotton Draw 25-36 Fed State Com #822H
- 10. Cotton Draw 25-36 Fed State Com #627H

					D
Bureau of Land Management	301 Dinosaur Trail	Santa Fe	NM	87508	
Bureau of Land Management	620 E Greene St.	Carlsbad	NM	88220	

EXHIBIT



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

September 5, 2024

<u>VIA CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

TO: ALL AFFECTED PERSONS

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

Cotton Draw Unit 616H well W/2 W/2 of Section 25 and W/2 NW/4, NW/4 SW/4 and Lot 1 (W/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico Purple Sage-Wolfcamp Gas Pool [98220] API No. 30-015-49135

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:

Ryan Cloer Devon Energy Production Company, L.P. (405) 228-2448 <u>Ryan.Cloer@dvn.com</u>

Sincerely,

Pathil

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

Released to Imaging: 12/20/2024 10:02:59 AM

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Devon - Cotton Draw Unit 616 - NSL

Postal Delivery Report

9214 8901 9403 8376 6633 53	BUREAU OF LAND MANAGEMENT 301 DINOSAUR TRAIL SANTA FE NM 87508	Delivered Signature Received
9214 8901 9403 8376 6633 68	BUREAU OF LAND MANAGEMENT 620 E GREENE ST CARLSBAD NM 88220	Delivered Signature Received

Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

COMMENTS

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

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	383583
	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

Created By	Comment	Comment Date
llowe	Initial application received on the 13th, C-102 correct was needed. Update was received on 09/17. 20 days started from 09/17.	12/20/2024

COMMENTS

COMMENTS

Action 383583

Sante Fe Main Office 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

Operator:	OGRID:
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	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	9/23/2024

Page 15 of 15

Action 383583