

NSL - 8810

Revised March 23, 2017

ID NO. 383592

RECEIVED: 09/17/24	REVIEWER:	TYPE:	APP NO: pLEL2426849987
--------------------	-----------	-------	------------------------

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: \_\_\_\_\_ OGRID Number: \_\_\_\_\_  
 Well Name: \_\_\_\_\_ API: \_\_\_\_\_  
 Pool: \_\_\_\_\_ Pool Code: \_\_\_\_\_

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.

Print or Type Name

Signature

Date

Phone Number

e-mail Address



**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 25-36 Fed State Com 832H well  
E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/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-PENDING

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 25-36 Fed State Com 832H well (API No. 30-015-PENDING), in a 319.36-acre, more or less, spacing unit underlying the E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico.

The location for the proposed **Cotton Draw 25-36 Fed State Com 832H well** is as follows:

- Surface location: 200' FNL and 2,445' FWL (Unit C) of Section 25
- First take point: 100' FNL and 1,650' FWL (Unit C) of Section 25
- Last take point: 100' FSL and 1,650' FWL (Lot 2) of irregular Section 36
- Bottom location: 20' FSL and 1,650' FWL (Lot 2) of irregular Section 36

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

The well is a “straddle com” well, i.e. partially overlapping Devon’s Cotton Draw Unit; therefore, it is not part of the Unit or unitized area<sup>1</sup> and is subject to the spacing<sup>2</sup> and setback requirements under the Special Pool Rules for the Purple Sage Wolfcamp (See Division Order R-14262). The proposed first and last take points are less than 330 feet<sup>3</sup> from the northern and southern boundary of the spacing unit and existing offsetting tracts; 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 25-36 Fed State Com 832H** well encroaches on the tracts to the north in the SW/4 of Section 24, T24S-R31E, and the tracts to the south in the NW/4 of Section 1, T25S-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 25-36 Fed State Com 832H well in relation to the adjoining tracts to the north and south. Exhibit B also includes an ownership list for the affected tracts to the north, showing that they are operated by EOG Resources, Inc. (“EOG”), and the tracts to the south, which are operated by Devon and XTO Holdings, LLC (“XTO”) is a working interest owner. In addition, the exhibit identifies that these include federal leases. Accordingly, the “affected persons”<sup>4</sup> 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:

Type	Affected Party	Offsetting Acreage
Operator	EOG	SW/4 of Section 24, T24S-R31E
Federal Mineral Interest	Bureau of Land Management	
Working Interest	XTO	NW/4 of Section 1, T25S-R31E

<sup>1</sup> See 19.15.16.15.B(8) NMAC and 19.15.16.15.C(7) NMAC.

<sup>2</sup> Devon is applying separately for a non-standard spacing unit.

<sup>3</sup> The setback requirement for the Purple Sage Wolfcamp is 330 feet from the outer boundary.

<sup>4</sup> 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.

Federal Mineral Interest	Bureau of Land Management	
-----------------------------	---------------------------	--

Your attention to this matter is appreciated.

Sincerely,



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



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 25-36 Fed State Com 832H  
E2 W2 of Section 25-24S-31E  
E2 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 25-36 Fed State Com 832H Well referenced above. The Cotton Draw 25-36 Fed State Com 832H 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 and last 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,

A handwritten signature in black ink, appearing to read "John Dwyer".

John Dwyer  
Reservoir Engineer

EXHIBIT  
A

C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July, 2024	
		Submittal Type:	<input checked="" type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

WELL LOCATION INFORMATION

API Number	Pool Code 98220	Pool Name Purple Sage; Wolfcamp (Gas)
Property Code	Property Name COTTON DRAW 25-36 FED STATE COM	Well Number 832H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3544.7'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2445' W	32.195054	103.732142	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	1650' W	32.166690	103.734753	EDDY

Dedicated Acres 319.36	Infill or Defining Well Infill	Defining Well API	Overlapping Spacing Unit (Y/N) No	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		100' N	1650' W	32.195328	103.734712	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	1650' W	32.166910	103.734752	EDDY

Spacing Unit Type					Horizontal	Vertical	Ground Floor Elevation:
-------------------	--	--	--	--	------------	----------	-------------------------

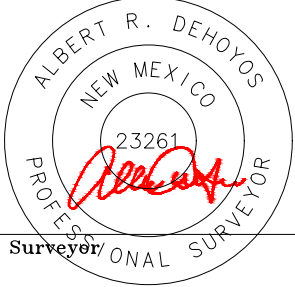
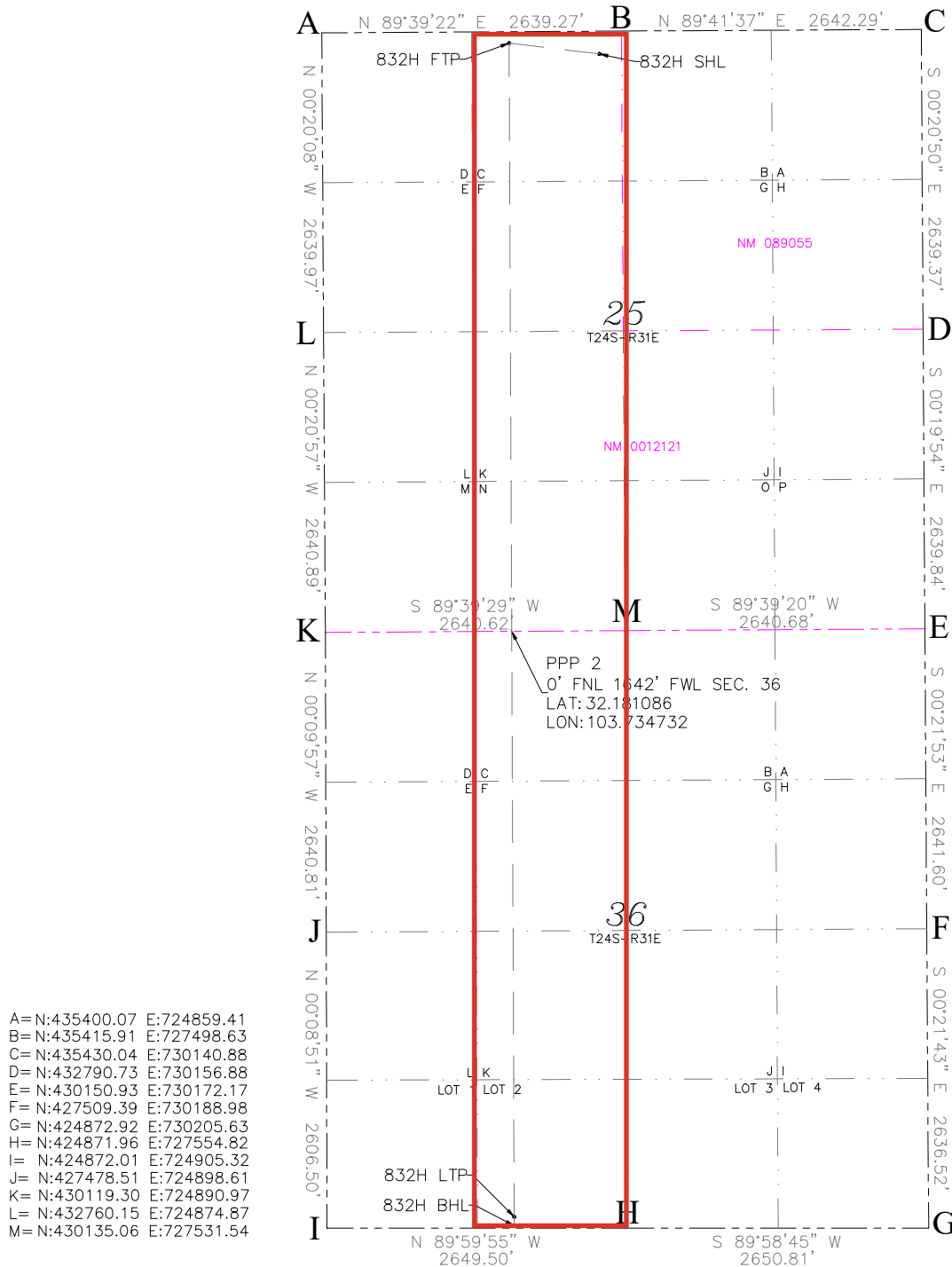
<b>OPERATOR CERTIFICATIONS</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location 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.  If this well is a horizontal well, I further certify that this organization has received the 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 division.		<b>SURVEYOR CERTIFICATIONS</b> I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.	
Signature	Date		
Printed Name			
Email Address		Certificate Number 23261	Date of Survey 07/2024

EXHIBIT  
B

## 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.

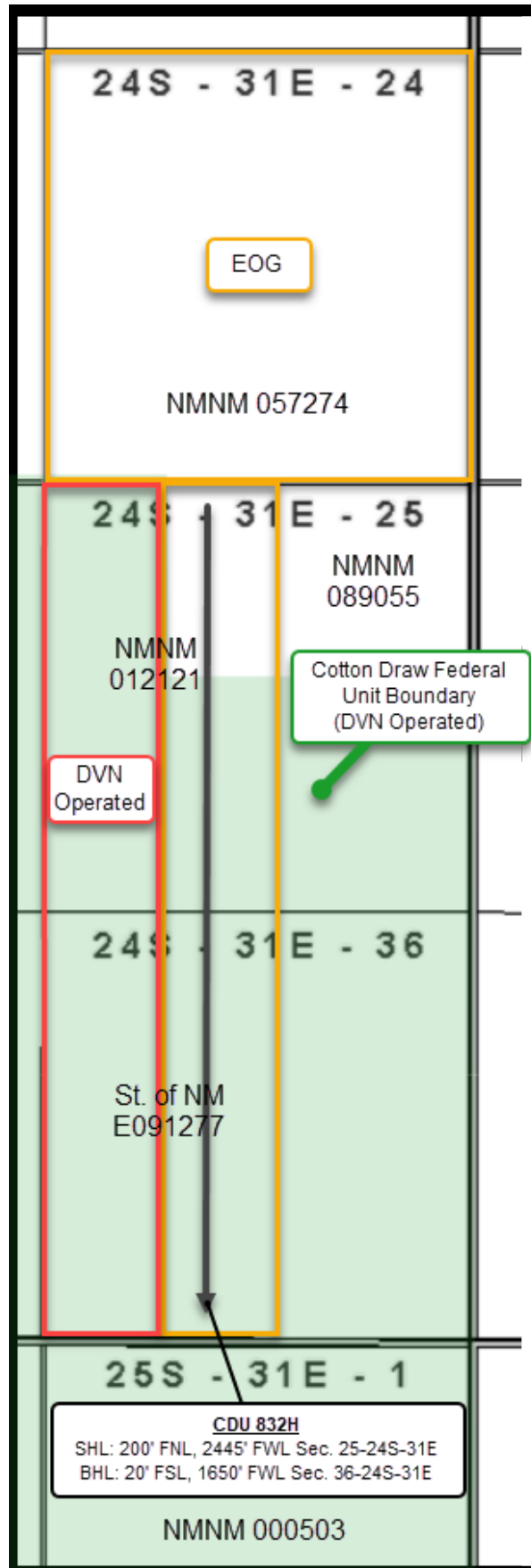
Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



Non-Standard Location Application

Offset Operator Plat

Cotton Draw 25-36 Fed State Com 832H



EXHIBIT

C





Devon Energy Corporation  
333 W. Sheridan Avenue  
Oklahoma City, OK 73102-8260

405 228 2448 Phone  
www.devonenergy.com

August 12<sup>th</sup>, 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:

1. 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,

A handwritten signature in blue ink that reads "Ryan Cloer". The signature is fluid and cursive, with the first name "Ryan" and last name "Cloer" clearly distinguishable.

Ryan Cloer  
Landman

Pg. 2

Re: NSL Location - Cotton Draw Wells - Sec. 25 & 36 - 24S - 31E

EOG Resources, Inc.

Agreed to and accepted this 29<sup>th</sup> day of August, 2024.

Signature: \_\_\_\_\_

Name: Matthew W. Smith

Title: Land Manager + Agent + Attorney in fact <sup>mlg  
mws</sup>

Devon Energy Production Company, L.P.

Agreed to and accepted this 29 day of August, 2024.

Signature: \_\_\_\_\_

Name: David M. Korell

Title: Manager, Land

Re: NSL Location - Cotton Draw Wells - Sec. 25 & 36 - 24S - 31E

Pg. 3

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

Bureau of Land Management	301 Dinosaur Trail	Santa Fe	NM	87508
Bureau of Land Management	620 E Greene St.	Carlsbad	NM	88220
XTO Holdings, LLC	Attn: Matthew Fletcher, 22777 Springwoods Village Pkwy	Spring	TX	77389





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

September 5, 2024

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO: ALL AFFECTED PERSONS**

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

Cotton Draw 25-36 Fed State Com 832H well  
E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/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-PENDING

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  
[Ryan.Cloer@dvn.com](mailto:Ryan.Cloer@dvn.com)

Sincerely,

A handwritten signature in blue ink, appearing to read 'Paula M. Vance'.

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](http://www.hollandhart.com)

Alaska  
Colorado  
Idaho

Montana  
Nevada  
New Mexico

Utah  
Washington, D.C.  
Wyoming

Devon - Cotton Draw 25-26 Fed State Com 832 - NSL  
Postal Delivery Report

9214 8901 9403 8376 6633 51	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
9214 8901 9403 8376 6642 59	XTO HOLDINGS LLC ATTN: MATTHEW FLETCHER 22777 SPRINGWOODS VILLAGE PKWY SPRING TX 77389	Delivered Signature Received

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

Action 383592

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 383592
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	9/24/2024