State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham Governor

Melanie A. Kenderdine Deputy Secretary – Designate

Ben Shelton Deputy Secretary (Acting) **Gerasimos "Gerry" Razatos** Division Director (Acting) Oil Conservation Division



Paula M. Vance pmvance@hollandhart.com

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL – 8855

Devon Energy Production Company, L.P. [OGRID 6137] Bent Tree 9 11 State Com Well No. 626H API No. 30-015-55724

Reference is made to your application received on January 7th, 2025.

Proposed Location

-	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	848 FSL & 343 FEL	Р	08	21S	27E	Eddy
First Take Point	340 FSL & 100 FWL	Μ	09	21S	27E	Eddy
Last Take Point	340 FSL & 2563 FWL	Ν	11	21S	27E	Eddy
Terminus	340 FSL & 2643 FWL	Ν	11	21S	27E	Eddy

Proposed Horizontal Units

Description	Acres	Pool	Pool Code
S/2 of Section 09	800	Alacran Hills; Wolfcamp (Gas)	70070
S/2 of Section 10			
SW/4 of Section 11			

This application was protested on January 15th, 2025. The protest was resolved, the application commenced without any modifications.

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(3)(a) NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal **gas** well a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter section or equivalent. 19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the

Administrative Order NSL – 8855 Devon Energy Production Company, L.P. Page 2 of 2

completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 660 feet for a **gas** well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal well shall be no closer than 330 feet for a **gas** in the horizontal plane, to any outer boundary of the horizontal spacing unit.

The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(5)(a) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of First and/or Last Take Points referenced above within the described Horizontal Spacing Unit.

This well's completed interval is as close as 100 feet to the western and 77 feet to the eastern edge of the proposed horizontal spacing unit. Encroachment will impact the following tract(s).

Section 08, encroachment to the SE/4 Section 11, encroachment to the SE/4

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in Paragraph (8) Subsection A of 19.15.2.7 NMAC, in all adjoining units towards which the proposed location encroaches.

Division understands you are seeking this unorthodox location to avoid causing wasted resources and reducing production from current and future development within the Wolfcamp formation underlying S/2 of Section 09, S/2 of Section 10 and the SW/4 of Section 11. Thereby preventing waste within the formation all while protecting the correlative rights of affected persons in the encroached tracts.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per Subsection B of 19.15.15.13 NMAC, Division approves this unorthodox location.

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as Division deems necessary.

Date: 2/6/2025

Gerasimos Razatos Division Director (Acting) GR/lrl

Received by OCD: 1/7/2025 3:20:10 PM

	NSL - 8855	Revised March 23, 2017						
ID NO. 418152 RECEIVEDO 1 / O T / O T REVIEWER:	TYPE:	APP NO: 1 11 2501 475222						
1/07/25 REVIEWER.	ABOVE THIS TABLE FOR OCD DIVISION U	pLEL2501475332						
- Geolo	XICO OIL CONSERVATIO ogical & Engineering Bu . Francis Drive, Santa Fe	n DIVISION reau –						
	STRATIVE APPLICATION	CHECKLIST						
THIS CHECKLIST IS MANDATORY FO	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.		OGRID Number: 6137						
Well Name: Bent Tree 9-11 State Com #626H we	11	API : <u>30-015-55724</u>						
Pool: Alacran Hills; Wolfcamp Gas Pool		Pool Code: 70070						
_	nultaneous Dedication P(project area) INSP(pro	ration unit) SD						
[II] Injection – Disposal – Pre	- Measurement	pLEL2501475332						
 2) NOTIFICATION REQUIRED TO: Che A. Offset operators or lease B. Royalty, overriding royalt C. Application requires pub D. Notification and/or conc E. Notification and/or conc F. Surface owner G. For all of the above, proc H. No notice required 	holders y owners, revenue owners lished notice urrent approval by SLO urrent approval by BLM	Notice Complete						
3) CERTIFICATION: I hereby certify the administrative approval is accura understand that no action will be notifications are submitted to the	te and complete to the b taken on this application							
Note: Statement must be co	mpleted by an individual with mana	agerial and/or supervisory capacity.						

Paula M. Vance

Print or Type Name

ali

January 7, 2025

Date

505-954-7286

Phone Number

pmvance@hollandhart.com e-mail Address

.

Signature



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

January 7, 2025

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

Bent Tree 9-11 State Com #626H well S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East, Eddy County, New Mexico Alacran Hills; Wolfcamp Gas Pool [70070] API No. 30-015-55724

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 Alacran Hills; Wolfcamp Gas Pool [70070], seeks administrative approval of an unorthodox well location for its Bent Tree 9-11 State Com #626H well (API No. 30-015-55724), in an 800-acre, more or less, spacing unit underlying the S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East, Eddy County, New Mexico.

The location for the proposed **Bent Tree 9-11 State Com #626H well** is as follows:

- Surface location: 848' FSL and 343' FEL (Unit P) of Section 8
- First take point: 340' FSL and 100' FWL (Unit M) of Section 9
- Last take point: 340' FSL and 2,563' FWL (Unit N) of Section 11
- Bottom location: 340' FSL and 2,643' FWL (Unit N) of Section 11

Since this acreage is governed by the Division's statewide rules, the proposed first and last take points for this well will be unorthodox because they are closer than the standard offsets to the eastern and western boundaries of the spacing unit—thus, encroaching on Mewbourne Oil Company's Cholula spacing unit to the east and their Screaming Eagle spacing units to the west. Additionally, Devon has planned their Bent Tree Upper Wolfcamp development with a spacing

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	Mor
Colorado	Nev
Idaho	New

ntana Utah vada Washington, D.C. w Mexico Wyoming pattern that causes the Bent Tree 9-11 State Com #626H well to be drilled less than 660 feet from the southern boundary—thus, encroaching on Mewbourne Oil Company's Utah spacing unit, Devon's Lone Tree Draw 14-13 spacing unit, and undeveloped tracts in the Wolfcamp formation to the south.

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

Exhibit B is a Form C-102 showing the **Bent Tree 9-11 State Com #626H** well encroaches on the units to the east in the SE/4 of Section 11 and S/2 of Section 12, T21S-R27E (Mewbourne's Cholula HSU), as well as to the west in the Lots 3-4, E/2 SW/4, and SE/4 (S/2 equivalent) of irregular Section 7 and the S/2 of Section 8, T21S-R27E (Mewbourne's Screaming Eagles HSUs), and to the south in Lots 1-2, E/2 NW/4, and NE/4 (N/2 equivalent) of irregular Section 17 (Mewbourne's Utah HSU), Sections 13 and 14, 21S-27E (Devon's Lone Tree Draw 14-13 HSU), and the tracts comprising the N/2 of Sections 15 and 16, 21S-27E.

Exhibit C is a plat for the subject area, that shows the proposed Bent Tree 9-11 State Com #626H well in relation to the adjoining units to the east, west, and south. Exhibit B also includes an ownership list for the affected units to the east, west, and south, showing that the spacing units to the east and west are both operated by Mewbourne Oil Co. ("Mewbourne"). Mewbourne also operates the Utah spacing unit to the south. Devon is the operator of the Lone Tree Draw 14-13 spacing unit to the south; the other interest owners in the unit are identified in the table below. The tracts to the south include the interest owners identified in the table below. In addition, the exhibit identifies that the offsetting units/tracts include state and federal leases. Accordingly, the "affected persons"¹ are Mewbourne, the other working interest owners in Devon's Lone Tree Draw 14-13 spacing unit, the working interest owners in the tracts to the south, the New Mexico State Land Office ("SLO"), and the Bureau of Land Management ("BLM").

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:

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 Idaho Montana Nevada New Mexico

Utah Washington, D.C. Wyoming

¹ 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.

Туре	Affected Party	Offsetting Acreage			
		SE/4 of Section 11 & S/2 of			
		Section 12 (Cholula HSU); and			
		Lots 3-4, E/2 SW/4, & SE/4 (S/2			
Operator		equivalent) of irregular Section 7			
		& the $S/2$ of Section 8 (Screaming			
-	Mewbourne	Eagles HSUs); and			
		Lots 1-2, E/2 NW/4, and NE/4			
		(N/2 equivalent) of irregular			
		Section 18 & the N/2 of Section			
		17 (Utah HSU)			
Federal		S/2 of 12; and Lots 1-2, E/2			
Mineral Interest	Bureau of Land Management	NW/4, and NE/4 (N/2 equivalent)			
Winerar interest		of irregular Section 18			
		SE/4 of Section 11; Lots 3-4, E/2			
State Mineral Interest		SW/4, and SE/4 (S/2 equivalent)			
	New Mexico State Land Office	of irregular Section 7; S/2 of			
		Section 8; N/2 of Section 17, 16,			
		15, and All of Section 14 & 13			
	COG Operating LLC	N/2 of Secs. 15 & 16			
	Concho Oil & Gas LLC	N/2 of Secs. 15 & 16			
	Tenison Oil Company	N/2 of Secs. 15 & 16 and			
		Secs. 13 & 14			
	Explorers Petroleum Corporation	N/2 of Secs. 15 & 16			
	Yates Energy Corporation	N/2 of Secs. 15 & 16 and			
		Secs. 13 & 14			
	Carolyn B. Yates	N/2 of Secs. 15 & 16			
	Jalapeno Corporation	N/2 of Secs. 15 & 16 and			
		Secs. 13 & 14			
	Aeron A. Yates and John Frances				
Working Interest	Mess, Co-Trustees of the Aeron A.	N/2 of Secs. 15 & 16			
Owner	Yates Children's Trust				
	Carolyn B. Yates and Bruno J.	N/2 of Same 15 $%$ 16			
	Bulovas, Jr., Co-Trustees of the	N/2 of Secs. 15 & 16			
	Steven M. Yates Children's Trust Aeron A. Yates	$N/2 \text{ of } S_{200} = 15 \Re = 16$			
		N/2 of Secs. 15 & 16 N/2 of Secs. 15 & 16			
	EOG Resources	N/2 of Secs. 13 & 16 N/2 of Secs. 13 & 14			
	Dr. Issac A. Kawasaki Frederick Van Vranken Jr.	N/2 of Secs. 13 & 14 N/2 of Secs. 13 & 14			
	Betsy H. Keller	N/2 of Secs. 13 & 14			
	The E. G. Holden Testamentary Trust	N/2 of Secs. 13 & 14			
	Frances B. Bunn, as Trustee of the	N/2 of Secs. 13 & 14			
	Frances B. Bunn, as Trustee of the Frances B. Bunn Revocable Trust	11/2 01 SECS. 13 & 14			
	Trances D. Duini Revocable Ifust				

Utah Washington, D.C. Wyoming

Perry R. Bass, c/o Kelly, Hart &	N/2 of Secs. 15 & 16
Hallman	
Saratoga Royalty, LP	N/2 of Secs. 15 & 16
MRC Delaware Resources, LLC	N/2 of Secs. 15 & 16
Broughton Petroleum, Inc	N/2 of Secs. 15 & 16
Alpha Energy Partners II, LLC	N/2 of Secs. 15 & 16
Milestone Energy Corp	N/2 of Secs. 15 & 16
Dusty Sanderson	N/2 of Secs. 15 & 16
Greg Golladay	N/2 of Secs. 15 & 16
Northann Oil & Coo. Inc.	N/2 of Secs. 15 & 16 and
Northern Oil & Gas, Inc	Secs. 13 & 14
J. Cleo Thompson and James Cleo	N/2 of Secs. 15 & 16
Thompson, Jr., LP	
American Standard Oil Corp	N/2 of Secs. 15 & 16
Black Shale Minerals, LLC	N/2 of Secs. 15 & 16
GPC Oil and Gas Corporation	N/2 of Secs. 15 & 16
Southwest Royalties Inc	N/2 of Secs. 13 & 14
Morris E Schertz	N/2 of Secs. 13 & 14
Coleman Martin	N/2 of Secs. 13 & 14
Pontem Energy Partners I LP	N/2 of Secs. 13 & 14
Savitar Alpha Energy LLC	N/2 of Secs. 13 & 14
Astra Energy Holding LLC	N/2 of Secs. 13 & 14
Argo Energy Partners Ltd	N/2 of Secs. 15 & 16
McCombs Energy Ltd	N/2 of Secs. 15 & 16
Triton Oil & Gas Corp	N/2 of Secs. 15 & 16
Rock Products Inc	N/2 of Secs. 15 & 16

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

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Devon Energy Production Company LP 333 West Sheridan Avenue Oklahoma City, OK 73102 405 228 4214 Phone www.devonenergy.com

November 18, 2024

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

RE: Application for Non-Standard Location Engineering Statement
Devon Energy Production Company, L.P.
Bent Tree 9-11 State Com 626H
S/2 of Section 9, S/2 of Section 10 & SW/4 of Section 11, T21S-R27E
Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, LP ("Devon") respectfully requests administrative approval of non-standard location for the Bent Tree 9-11 State Com 626H well referenced above. The well is in the Alacran Hills; Wolfcamp (Gas) Pool (Pool Code 70070). Devon has planned their Bent Tree Upper Wolfcamp development with at least 440 feet of spacing between each well to efficiently drain this development area. This spacing pattern causes the 622H well to be drilled less than 660 feet from the southern boundary. Additionally, Devon proposes to decrease the first and last tank points from 330 feet to less than 100 feet, which will increase the completed horizontal lateral and the ultimate recovery of reserves. Therefore, approval of this non-standard location is necessary to avoid causing wasted resources and reducing production from current and future well development in the area.

Respectfully,

Devon Energy Production Company, L.P.

un

Keevin Barnes Reservoir Engineer



<u>C-102</u>			State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION					Rev	vised July, 2024		
	lectronically Permitting			001				011		Initial Submittal	
									Submittal Type:	Amended Repor	t
										As Drilled	
				W	ELL LOC	CATI	ON INFORMATIC	N			
API N	umber		Pool Cod			P	Pool Name	10 (C		
Prope	rty Code		700 Property				Alacran Hills; W	1	Gas)	Well Number	
OGRID	No		Operator	Name	BENT 7	FREE	9-11 STATE CO	М		626H Ground Level	Flevetion
	6137		operator		N ENERG	Y PF	RODUCTION COMPA	ANY, L.P.		3250.2'	mevation
Surfac	e Owner:	🛛 State 🗆	Fee □Trib	al 🗆 Fe	deral		Mineral Owner:	⊠State	□Fee □'	「ribal □Federal	
						~ •					
UL	Section	Township	Range	Lot	Ft. fron		ace Location S Ft. from E/W	Latitude		Longitude	County
P	8	21-S	27-E	Lot	848'		343' E	32.489		104.204545	EDDY
-							h Hole Location				
UL	Section	Township	Range	Lot	Ft. fron			Latitude		Longitude	County
N	11	21-S	27-E		340'		2643' W	32.488	457	104.160533	EDDY
Dedicat	ed Acres	Infill or Def	ining Well	Defining	Well API	Overl	apping Spacing Uni	t (Y/N)	Consolid	ation Code	
800		DEFINI	NG			NC	C				
Order	Numbers]	Pending - N	SL, R-234	17		Well	setbacks are under	Common	Ownersh	ip: □Yes ⊠No	
					Kio	ŀr ∩ff	Point (KOP)				
UL	Section	Township	Range	Lot	Ft. from		· · · ·	Latitude		Longitude	County
M	9	21-S	27-E	200	341' \$		53' W	32.4883	3	104.2033	EDDY
		-1 -2	-, -			-	ke Point (FTP)	0211000			LDD1
UL	Section	Township	Range	Lot	Ft. fron		· · · · ·	Latitude		Longitude	County
M	9	21-S	27–E		340'	\mathbf{S}	100' W	32.488	411	104.203110	EDDY
					Las	st Tal	ke Point (LTP)				
UL	Section	Township	Range	Lot	Ft. fron	n N/3	S Ft. from E/W	Latitude		Longitude	County
N	11	21-S	27–E		340'	\mathbf{S}	2563' W	32.488	456	104.160792	EDDY
					Spac		Unit Type Horizon HORIZONTAL	tal Verti	cal (round Floor Ele	vation:
I hereby		e information con				e best	SURVEYOR CERTIFIC		own on this r	lat was plotted from fiel	ld notes
organizat including location mineral i	tion either own the proposed pursuant to a c nterest, or to a	belief, and, if the s a working inter- bottom hole loc- contract with an or voluntary pooli- be division	erest or unlease ation or has a r owner of a wor	d mineral in ight to drill t king interest	terest in the la this well at thi t or unleased	and is	of actual surveys made by correct to the best of my be		upervision, a		and DEHOLOLOS
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.				l ell's				PROT	CO HUNCA		
S :	tunc		Dat-			,	Signature and Seal	of Drof-	eeionel C	1 Constant	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Signa	12	Thamas	Date 1()/21/24			Signature and Seal	oi rroie	ssional S	urveyor ³ /ONAL	5
Print	ed Name						Certificate Number	Date of	Survey		
1	handee Th	iomas									
	Address	homa	n				23261	05/20	24		
	snandee. I	homas@dv	n.com								

ACREAGE DEDICATION PLATS

N:541946.74/E:581046.80

LAT:32.489808/LON:104.204545

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.



I= N:541119.31 E:591975.61

J= N:541088.86 E:589313.63 K= N:541059.53 E:586651.42 L= N:541039.53 E:586651.42 L= N:541079.59 E:584020.20 M= N:541100.14 E:581389.65 N= N:541090.83 E:578746.21 O= N:543749.48 E:581390.93 P= N:543718.70 E:586662.16 Q= N:543773.50 E:591965.44

Bent Tree 9-11 State Com 626H – NSL Offset Tract Map

Affected offsetting Wolfcamp HSUs	21S - 27E - 5	SHL: 848' FSL, 3 BHL: 340' FSL, 2	21 S - 27 E - 3	21S - 27E - 2	21	
Mewbourne Operated Screaming Eagles 8 7 Fed Com #716H Lot 3, NESW, N2SE of Sec. 7, N2S2 of Sec. 8-21S-27E	21S - 27E - 8		100' FWL Sec. 9-21S-27E 2,563' FWL Sec. 11-21S-27E 2 S - 27E - 10	21S - 27E - 11	215	Affected offsetting Wolfcamp HSUs Mewbourne Operated - Cholula 12 11 WOIJ Fed Com 002H N/2SE/4 of Sec. 11, N/2S/2 of Sec. 12-21S-27E
Screaming Eagles 8 7 Fed Com #718H Lot 4, SESW, S2SE of Sec. 7, S2S2 of Sec. 8- 21S-27E	State of NM VC-631-0	State of State of State of NM NM NM V0-67801 V0-67891 L0-16486	State of NM K0-39777	State of NM V0-50101 <u>Stat</u> e of NM K0-3 <mark>6</mark> 337		Cholula 12 11 W0PO Fed Com 001H S/2SE/4 of Sec. 11, S2S2 of Sec. 12- 21S-27E
Utah 17 18 Federal Com #714 N/2 of Secs. 17 & 18-21S-27E	21S - 27E - 17 State of NM L0-50365	21S 27E 16 State of NM State of NM V0-19811 LG-56691 State of NM State of NM L0-46776 OG-60271	State of State of NM NM State of State of NM L0-23514 NM NM K0-39777 OG-58093 OG-60271	State of NM	215	Affected offsetting Wolfcamp HSU Devon Operated Lone Tree Draw 14 13 State Com
EXHIBIT		Affected offsetting Wo No existing Wolfcamp	HSU			621H All of Secs. 14 & 13-21S-27E *WI Owners shown on Slide 2
Release to Imaging: 2/10/2025 10:30:55 AM		N/2 of Secs. 15 & 16-2 *WI Owners shown or				

.

List of Affected WI Owners

Tract 1: N/2 of Secs. 15 & 16 – WI OwnersCOG Operating, LLCTenison Oil CompanyYates Energy CorporationConcho Oil & Gas, LLCPerry R. Bass, c/o Kelly, Hart & HallmanSaratoga Royalty, LPMRC Delaware Resources, LLCBroughton Petroleum, IncJalapeno CorporationAlpha Energy Partners II, LLCMilestone Energy CorpExplorers Petroleum Corporation	DVN Operated Offset HSU - Lone Tree Draw 14 13 State Com 621H – WI OwnersSouthwest Royalties IncYates Energy CorporationTenison Oil CompanyJ Frederick Van Vranken JrFrances B Bunn Revocable Living Trust dated May 18, 1982, AndrewR Bunn and Robin Bunn Martin, Successor Co-TrusteesE G Holden Testamentary TrustJalapeno Corporation

Aeron A. Yates	2843 Seccomb St	Fort Collins	CO	80526
Aeron A. Yates and John Frances Mess, Co-Trustees of				
the Aeron A. Yates Children's Trust	2843 Seccomb St	Fort Collins	CO	80526
Alpha Energy Partners II, LLC	P.O. Box 10701	Midland	ТХ	79702
American Standard Oil Corp	400 W Illinois Ave., Suite 950	Midland	ТХ	79705
Astra Energy Holding LLC	6465 Greenwood Plaza Blvd	Centennial	CO	80111
Betsy H. Keller	2505 Green St	San Francisco	CA	94123
Black Shale Minerals, LLC	5006 State Highway 31 North	Longview	ТХ	75603
Broughton Petroleum, Inc	1225 N Loop West, Suite 1055	Houston	ТХ	77008
Bureau of Land Management	620 E. Greene Street	Carlsbad	NM	88220-6292
Carolyn B. Yates	50 Orchard Pine Place	The Woodlands	ТХ	77382
Carolyn B. Yates and Bruno J. Bulovas, Jr., Co-Trustees				
of the Steven M. Yates Children's Trust	50 Orchard Pine Place	The Woodlands	ТХ	77382
COG Operating LLC	600 W Illinois Ave	Midland	ТХ	79701
Coleman Martin	8833 Ensley Court	Leawood	KS	66206-1652
Concho Oil & Gas LLC	600 W Illinois Ave	Midland	ТХ	79701
Dr. Issac A. Kawasaki	1232 S. King St.	Honolulu	HI	76814
Dusty Sanderson	7802 Bennington Dr	Amarillo	ТХ	79119
E. G. Holden Testamentary Trust	8758 Chalk Hill Rd	Healdsburg	CA	95448
EOG Resources	5509 Champions Dr	Midland	ТХ	79706
Explorers Petroleum Corporation	P.O. Box 1933	Roswell	NM	88202
Frances B. Bunn, as Trustee of the Frances B. Bunn				
Revocable Trust dated May 18, 1982	3493 Makiki Heights Dr	Honolulu	HI	96822
Frederick Van Vranken Jr.	17 Nonquitt Ave	South Dartmouth	MA	02748
GPC Oil and Gas Corporation	P.O. Box 50982	Midland	ТХ	79710
Greg Golladay	3503 Edgewood	Amarillo	ТХ	79109
J. Cleo Thompson and James Cleo Thompson, Jr., LP	2363 Reagan Street, Suite 100	Dallas	ТХ	75219
Jalapeno Corporation	P.O. Box 1608	Albuquerque	NM	87103
Mewbourne Oil Company	500 West Texas, Suite 1020	Midland	ТΧ	79701
Milestone Energy Corp	5910 S University Blvd., C18432	Greenwood Village	CO	80121



Morris E Schertz	P.O. Box 2588	Roswell	NM	88202-2588
MRC Delaware Resources, LLC	5400 LBJ Freeway, Suite 1500	Dallas	ТΧ	752403
Northern Oil & Gas, Inc	4350 Baker Road, Suite 400	Minnetonka	MN	55343
Perry R. Bass, c/o Kelly, Hart & Hallman	201 Main Street, Suite 2500	Fort Worth	ТΧ	76102
Pontem Energy Partners I LP	9001 Airport Freeway, Suite 825	North Richland Hills	ТΧ	76180
Saratoga Royalty, LP	P.O. Box 141356	Dallas	ТΧ	75214
Savitar Alpha Energy LLC	6465 Greenwood Plaza Blvd	Centennial	CO	80111
Southwest Royalties Inc	P.O. Box 53570	Midland	ТΧ	79710-3570
State of New Mexico Land Office	310 Old Santa Fe Trail	Santa Fe	NM	87501
Tenison Oil Company	209 S. Danville Dr., Suite B-201	Abilene	ТΧ	79605
Yates Energy Corporation	P.O. Box 2323	Roswell	NM	88202



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

December 19, 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

Bent Tree 9-11 State Com #626H well S/2 of Sections 9 and 10 and the SW/4 of Section 11, Township 21 South, Range 27 East, Eddy County, New Mexico Alacran Hills; Wolfcamp Gas Pool [70070] API No. 30-015-55724

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:

Jake Nourse Devon Energy Production Company, L.P. (405) 228-2856 Jake.Nourse@dvn.com

Sincerely,

DEDIL

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 M Colorado N Idaho N

Montana Nevada New Mexico

Utah Washington, D.C. Wyoming

	Devon - Bent Tree 626H - NSL			
	Postal Delivery Report			
5	2843 Seccomb St	Fort Collins	со	80526-6211
and John Frances Mess, Co-				
e Aeron A. Yates Childrens				
	2843 Seccomb St	Fort Collins	CO	80526-6211
	DO D 10701	Midland	TV	70702 7704
Partners II, LLC	PO Box 10701	Midiand	ТΧ	79702-7701

.

						ALBUQUERQUE, NM 87101
						on December 31, 2024 at
						6:30 pm. The item is
						currently in transit to the
9414811898765459861688	Aeron A. Yates	2843 Seccomb St	Fort Collins	со	80526-6211	destination.
						Your package will arrive later
	Aeron A. Yates and John Frances Mess, Co-					than expected, but is still on
	Trustees of the Aeron A. Yates Childrens					its way. It is currently in
9414811898765459861152	Trust	2843 Seccomb St	Fort Collins	CO	80526-6211	transit to the next facility.
						Your item was picked up at
						the post office at 12:03 pm
						on December 27, 2024 in
9414811898765459861169	Alpha Energy Partners II, LLC	PO Box 10701	Midland	ТΧ	79702-7701	MIDLAND, TX 79701.
						Your item departed our
						USPS facility in
						ALBUQUERQUE, NM 87101
						on December 30, 2024 at
						7:34 pm. The item is
						currently in transit to the
9414811898765459861145	American Standard Oil Corp	400 W Illinois Ave Ste 950	Midland	ТΧ	79701-4641	destination.
						Your package will arrive later
						than expected, but is still on
						its way. It is currently in
9414811898765459861350	Astra Energy Holding LLC	6465 Greenwood Plaza Blvd	Greenwood Village	CO	80111-4905	transit to the next facility.
						Your item was delivered to
						an individual at the address
						at 1:05 pm on December 24,
						2024 in SAN FRANCISCO, CA
9414811898765459861305	Betsy H. Keller	2505 Green St	San Francisco	CA	94123-4628	
						Your item was returned to
						the sender at 7:35 am on
						December 26, 2024 in
						LONGVIEW, TX 75603
						because the forwarding
0444044000705450004304	Plack Shale Minerale, U.C.	FOOC Chata Ulahuran 24 Marth		TV	75,000	order for this address is no
9414811898765459861381	Black Shale Minerals, LLC	5006 State Highway 31 North	Longview	ТΧ	/5603	longer valid.

Your item departed our

USPS facility in

						We were unable to deliver
						your package at 1:53 pm on
						December 28, 2024 in
						HOUSTON, TX 77008
						because the business was
						closed. We will redeliver on
						the next business day. No
9414811898765459861015	Broughton Petroleum, Inc	1225 North Loop W Ste 1055	Houston	тх	77008-1756	action needed.
						Your item was delivered to
						an individual at the address
						at 1:44 pm on December 23,
						2024 in CARLSBAD, NM
9414811898765459861022	Bureau of Land Management	620 E Greene St	Carlsbad	NM	88220-6292	88220.
						Your item was delivered to
						an individual at the address
						at 2:06 pm on December 24,
9414811898765459861091	Carolyn B. Yates	50 Orchard Pines Pl	The Woodlands	ТΧ	77382-5601	2024 in SPRING, TX 77382.
						Your item was delivered to
	Carolyn B. Yates and Bruno J. Bulovas, Jr.,					an individual at the address
	Co-Trustees of the Steven M. Yates					at 2:06 pm on December 24,
9414811898765459861084	Childrens Trust	50 Orchard Pines Pl	The Woodlands	ТΧ	77382-5601	2024 in SPRING, TX 77382.
						Your item has been
						delivered and is available at
						a PO Box at 8:12 am on
						December 27, 2024 in
9414811898765459861411	COG Operating LLC	600 W Illinois Ave	Midland	ТΧ	79701-4882	MIDLAND, TX 79701.
						Your item was delivered to
						an individual at the address
						at 10:47 am on December
						24, 2024 in LEAWOOD, KS
9414811898765459861428	Coleman Martin	8833 Ensley Ct	Leawood	KS	66206-1652	1
						Your item has been
						delivered and is available at
						a PO Box at 8:12 am on
						December 27, 2024 in
9414811898765459861442	Concho Oil & Gas LLC	600 W Illinois Ave	Midland	ТΧ	79701-4882	MIDLAND, TX 79701.

.

						Your item was delivered to
						an individual at the address
						at 8:58 am on December 23,
						2024 in HONOLULU, HI
9414811898765459861510	Dr. Issac A. Kawasaki	1232 S King St	Honolulu	н		96814.
						Your item has been
						delivered to an agent and
						left with an individual at the
						address at 11:32 am on
						December 23, 2024 in
9414811898765459861527	Dusty Sanderson	7802 Bennington Dr	Amarillo	тх	79119-4994	AMARILLO, TX 79119.
						This is a reminder to arrange
						for redelivery of your item or
						your item will be returned to
9414811898765459861589	E. G. Holden Testamentary Trust	8758 Chalk Hill Rd	Healdsburg	CA	95448-9542	sender.
						Your item was picked up at a
						postal facility at 8:34 am on
						December 24, 2024 in
9414811898765459889217	EOG Resources	5509 Champions Dr	Midland	тх	79706-2843	MIDLAND, TX 79701.
						Your item was picked up at
						the post office at 1:04 pm on
						December 26, 2024 in
9414811898765459889224	Explorers Petroleum Corporation	PO Box 1933	Roswell	NM	88202-1933	ROSWELL, NM 88201.
						Your item was delivered to
						an individual at the address
	Frances B. Bunn, as Trustee of the Frances					at 1:13 pm on December 23,
	B. Bunn Revocable Trust dated May 18,					2024 in HONOLULU, HI
9414811898765459889811	1982	3493 Makiki Heights Dr	Honolulu	HI	96822	96822.
						Your item arrived at our
						PROVIDENCE RI
						DISTRIBUTION CENTER
						destination facility on
						December 31, 2024 at 11:20
						am. The item is currently in
9414811898765459889828	Frederick Van Vranken Jr.	17 Nonquitt Ave	South Dartmouth	MA	02748-5038	transit to the destination.

			1		1	1
						This is a reminder to pick up your item before January 7,
						2025 or your item will be
						returned on January 8, 2025.
						Please pick up the item at
						the MIDLAND, TX 79710
9414811898765459889842	GPC Oil and Gas Corporation	PO Box 50982	Midland	тх	79710-0982	Post Office.
						Your item was delivered to
						an individual at the address
						at 3:32 pm on December 23,
						2024 in AMARILLO, TX
9414811898765459889873	Greg Golladay	3503 Edgewood Dr	Amarillo	ТΧ	79109-4035	79109.
						Your item was delivered to
						an individual at the address
						at 12:01 pm on December
	J. Cleo Thompson and James Cleo					31, 2024 in DALLAS, TX
9414811898765459889767	Thompson, Jr., LP	2363 Reagan St Ste 100	Dallas	ТΧ	75219-3286	75219.
						Your item was picked up at
						the post office at 12:01 pm
						on December 23, 2024 in
9414811898765459889743	Jalapeno Corporation	PO Box 1608	Albuquerque	NM	87103-1608	ALBUQUERQUE, NM 87102.
						Your item was delivered to
						an individual at the address
						at 11:46 am on December
						26, 2024 in MIDLAND, TX
9414811898765459889736	Mewbourne Oil Company	500 W Texas Ave Ste 1020	Midland	ТΧ	79701-4279	
						Your item was delivered to
						the front desk, reception
						area, or mail room at 11:32
						am on December 23, 2024 in
9414811898765459889958	Milestone Energy Corp	5910 S University Blvd unit C18432	Greenwood Village	со	80121-2879	LITTLETON, CO 80121.
						Your item was picked up at
						the post office at 12:10 pm
						on December 24, 2024 in
9414811898765459889996	Morris E Schertz	PO Box 2588	Roswell	NM	88202-2588	ROSWELL, NM 88201.

						Your item was delivered to
						an individual at the address
						at 10:13 am on December
						26, 2024 in DALLAS, TX
9414811898765459889972	MRC Delaware Resources, LLC	5400 Lbj Fwy Ste 1500	Dallas	тх	75240-1017	
						Your item was delivered to
						the front desk, reception
						area, or mail room at 9:20
						am on December 27, 2024 in
9414811898765459889606	Northern Oil & Gas, Inc	4350 Baker Rd Ste 400	Minnetonka	MN	55343-8628	HOPKINS, MN 55343.
						Your item was delivered to
						the front desk, reception
						area, or mail room at 9:42
						am on December 27, 2024 in
9414811898765459889637	Perry R. Bass, c/o Kelly, Hart & Hallman	201 Main St Ste 2500	Fort Worth	тх	76102-3129	FORT WORTH, TX 76102.
						Your item was delivered to
						an individual at the address
						at 11:38 am on December
						30, 2024 in NORTH
9414811898765459889163	Pontem Energy Partners I LP	9001 Airport Fwy Ste 825	North Richland Hills	тх	76180-7795	RICHLAND HILLS, TX 76180.
						Your item has been
						delivered and is available at
						a PO Box at 8:48 am on
						December 26, 2024 in
9414811898765459889149	Saratoga Royalty, LP	PO Box 141356	Dallas	тх	75214-1356	DALLAS, TX 75214.
5414011050705455005145			Dunus		75214 1550	
						Your package will arrive later
						than expected, but is still on
						its way. It is currently in
9414811898765459889316	Savitar Alpha Epergy LLC	6465 Greenwood Plaza Blvd	Greenwood Village	со	80111-4005	transit to the next facility.
5414811858705455885510			Greenwood village	0	80111-4909	Your item has been
						delivered and is available at
						a PO Box at 7:17 am on
						December 24, 2024 in
9414811898765459889309	Southwest Royalties Inc	PO Box 53570	Midland	тх	70710 2570	MIDLAND, TX 79705.
3414011030/03433083309		r 0 box 35370		17	/3/10-33/0	Your item was picked up at a
						postal facility at 7:44 am on
						December 30, 2024 in
0414011000765450000000	State of New Mexico Land Office	210 Old Santa Fa Trl	Santa Fa		97501 3709	
9414811898765459889330	State of New Mexico Land Office	310 Old Santa Fe Trl	Santa Fe	NM	0/501-2/08	SANTA FE, NM 87501.

.

						This is a reminder to arrange
						for redelivery of your item or
						your item will be returned to
9414811898765459889064	Tenison Oil Company	209 S Danville Dr Ste B-201	Abilene	ТΧ	79605-1464	sender.
						Your item was picked up at
						the post office at 10:31 am
						on December 26, 2024 in
9414811898765459889088	Yates Energy Corporation	PO Box 2323	Roswell	NM	88202-2323	ROSWELL, NM 88201.

.



NSL

Application

History

Released to Imaging: 2/10/2025 10:30:55 AM

From:	Paula M. Vance
To:	Lowe, Leonard, EMNRD
Cc:	Anna Williamson
Subject:	[EXTERNAL] RE: PROTEST of NSL APPLICATION - Devon Energy Prod. Co Bent Tree 9 11 State Com Well No. 626H_01/15/25
Date:	Wednesday, January 15, 2025 4:54:19 PM
Attachments:	Application of Devon Energy for Unorthodox Well Location.msg 2025.01.15 Razatos Letter.pdf

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Mr. Lowe,

The objection was withdrawn this afternoon. Please see attached email and letter.

Let us know if you need anything else. Thanks.

Paula Vance Associate, Holland & Hart LLP

pmvance@hollandhart.com | T: (505) 954-7286 | M: (337) 280-9055 CONFIDENTIALITY NOTICE: This message is confidential and may be privileged. If you believe that this email has been sent to you in error, please reply to the sender that you received the message in error; then please delete this email.

From: Lowe, Leonard, EMNRD <Leonard.Lowe@emnrd.nm.gov>

Sent: Wednesday, January 15, 2025 4:29 PM

To: Paula M. Vance < PMVance@hollandhart.com>

Cc: Anna Williamson <awilliamson@cilawnm.com>

Subject: PROTEST of NSL APPLICATION - Devon Energy Prod. Co. - Bent Tree 9 11 State Com Well No.

626H 01/15/25

Importance: High

External Email

Paula Vance,

Re: Bent Tree 9 11 State Com Well No. 626H

Non Standard Location Administrative Application

The OCD was notified that **Broughton Petroleum Inc.** has protested your NSL application for an Unorthodox location of the above subject well. This party has been identified as an affected person for their specific location.

Therefore, you are being notified that if **Devon Energy Production Company L.P.** wishes for this application to be considered, it must either go to hearing or may be reviewed administratively if the protest is withdrawn as a result of a negotiated resolution within the parties involved.

The NSL application will be retained by OCD, but suspended from further administrative review.

Please contact the OCD once a decision regarding this application is determined within the next 30

SEALY H. CAVIN, JR. ^{+*} SCOTT S. MORGAN

†Also Admitted in Texas

*Also Admitted in Colorado

CAVIN & MORGAN, P.A. Attorneys & Counselors at Law 40 First Plaza NW

SUITE 610 ALBUQUERQUE, NEW MEXICO 87102 TELEPHONE (505) 243-5400

MAILING ADDRESS P.O. BOX 1216 ALBUQUERQUE, NM 87103-1216

NMOILGASLAW@CILAWNM.COM WWW.CILAWNM.COM

January 15, 2025

VIA U.S. POSTAL SERVICE AND EMAIL

Gerasimos Razatos, Acting Division Director Oil Conservation Division Energy, Minerals and Natural Resources Department 1220 South Saint Francis Drive Santa Fe, NM 87505 gerasimos.razatos@emnrd.nm.gov

Re: Objection to the Application for Administrative Approval of Unorthodox Well Location for Devon Energy Production Company, L.P.'s Bent Tree 9-11 State Com #626H well (API 30-015-55724) – Alacran Hills; Wolfcamp Gas Pool (70070).

Dear Mr. Razatos:

By letter dated January 10, 2025, we filed the above-described objection on behalf of Broughton Petroleum, Inc. At this time, an agreement has been reached between the parties and Broughton hereby withdraws its objection to this application.

Please let me know if you have any questions or concerns.

Sincerely,

CAVIN & MORGAN, P.A.

Scott S. Morgan

Attorneys for Broughton Petroleum Inc.

SSM/aw

cc.

Paula M. Vance Attorney for Devon Energy Production Company, L.P. via email to PMVance@hollandhart.com

Leonard Lowe via email to Leonard.Lowe@emnrd.nm.gov

From:	Anna Williamson
To:	Razatos, Gerasimos, EMNRD
Cc:	Paula M. Vance; leonard.lowe@enmnrd.nm.gov
Subject:	Application of Devon Energy for Unorthodox Well Location
Date:	Wednesday, January 15, 2025 3:31:02 PM
Attachments:	2025.01.15 Razatos Letter.pdf

External Email

Please see the attached correspondence from Mr. Morgan. A hard copy will follow by mail.

Let me know if you have any questions.

Anna

Anna M. Williamson Legal Assistant Cavin & Morgan, PA P.O. Box 1216 Albuquerque, NM 87103-1216 Phone: 505-243-5400

Fax: 505-243-1700

This email together with any attachments is for the sole use of the intended recipient(s) and may contain information that is confidential and privileged. If you are not the intended recipient(s), please advise the sender immediately by reply email and delete the email you received.

5/25
5,

Paula Vance,

Re: Bent Tree 9 11 State Com Well No. 626H Non Standard Location Administrative Application

The OCD was notified that **Broughton Petroleum Inc.** has protested your NSL application for an Unorthodox location of the above subject well. This party has been identified as an affected person for their specific location.

Therefore, you are being notified that if **Devon Energy Production Company L.P.** wishes for this application to be considered, it must either go to hearing or may be reviewed administratively if the protest is withdrawn as a result of a negotiated resolution within the parties involved.

The NSL application will be retained by OCD, but suspended from further administrative review.

Please contact the OCD once a decision regarding this application is determined within the next 30 days. If no update is given by the 30 day date, the application will be cancelled/rejected.

01/07/25, Application was received. Application has not been reviewed. 01/15/25, Protest Notice Date 02/08/25, 30 day concludes

Protestant contact information:

Broughton Petroleum, Inc's Representative

Anna M. Williamson

Legal Assistant

Cavin & Morgan, PA

P.O. Box 1216

Albuquerque, NM 87103-1216

Phone: 505-243-5400

Fax: 505-243-1700

Please call or e-mail with any questions regarding this matter.

Leonard R. Lowe

Engineering Bureau OCD - EMNRD 5200 Oakland Blvd. Albuquerque, N.M. 87113 Cell Number: 505-584-8351 http://www.emnrd.state.nm.us/ocd/

From: Anna Williamson <awilliamson@cilawnm.com>
Sent: Wednesday, January 15, 2025 3:33 PM
To: Lowe, Leonard, EMNRD <Leonard.Lowe@emnrd.nm.gov>
Subject: [EXTERNAL] Fw: Application of Devon Energy for Unorthodox Well Location

You don't often get email from awilliamson@cilawnm.com. Learn why this is important

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

I am resending this email separately as I received a delivery error when I included you in the original email.

Anna

Anna M. Williamson

Legal Assistant

Cavin & Morgan, PA

P.O. Box 1216

Albuquerque, NM 87103-1216

Phone: 505-243-5400

Fax: 505-243-1700

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From: Anna Williamson
Sent: Wednesday, January 15, 2025 3:30 PM
To: gerasimos.razatos@emnrd.nm.gov <gerasimos.razatos@emnrd.nm.gov>
Cc: Paula M. Vance <pmvance@hollandhart.com>; leonard.lowe@enmnrd.nm.gov
<leonard.lowe@enmnrd.nm.gov>
Subject: Application of Devon Energy for Unorthodox Well Location

Please see the attached correspondence from Mr. Morgan. A hard copy will follow by mail.

Let me know if you have any questions.

Anna

Anna M. Williamson

Legal Assistant

Cavin & Morgan, PA

P.O. Box 1216

Albuquerque, NM 87103-1216

Phone: 505-243-5400

Fax: 505-243-1700

This email together with any attachments is for the sole use of the intended recipient(s) and may contain information that is confidential and privileged. If you are not the intended recipient(s), please advise the sender immediately by reply email and delete the email you received.

SEALY H. CAVIN, JR. ^{+*} SCOTT S. MORGAN

†Also Admitted in Texas

*Also Admitted in Colorado

CAVIN & MORGAN, P.A. Attorneys & Counselors at Law 40 First Plaza NW

SUITE 610 ALBUQUERQUE, NEW MEXICO 87102 TELEPHONE (505) 243-5400

MAILING ADDRESS P.O. BOX 1216 ALBUQUERQUE, NM 87103-1216

NMOILGASLAW@CILAWNM.COM WWW.CILAWNM.COM

January 15, 2025

VIA U.S. POSTAL SERVICE AND EMAIL

Gerasimos Razatos, Acting Division Director Oil Conservation Division Energy, Minerals and Natural Resources Department 1220 South Saint Francis Drive Santa Fe, NM 87505 gerasimos.razatos@emnrd.nm.gov

Re: Objection to the Application for Administrative Approval of Unorthodox Well Location for Devon Energy Production Company, L.P.'s Bent Tree 9-11 State Com #626H well (API 30-015-55724) – Alacran Hills; Wolfcamp Gas Pool (70070).

Dear Mr. Razatos:

By letter dated January 10, 2025, we filed the above-described objection on behalf of Broughton Petroleum, Inc. At this time, an agreement has been reached between the parties and Broughton hereby withdraws its objection to this application.

Please let me know if you have any questions or concerns.

Sincerely,

CAVIN & MORGAN, P.A.

Scott S. Morgan

Attorneys for Broughton Petroleum Inc.

SSM/aw

cc.

Paula M. Vance Attorney for Devon Energy Production Company, L.P. via email to PMVance@hollandhart.com

Leonard Lowe via email to Leonard.Lowe@emnrd.nm.gov 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

COMMENTS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	418152
	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

COMMENTS

Created By	Comment	Comment Date
llowe	Application was protested by Broughton Petroleum Inc. 01/15/25	1/15/2025
llowe	Protest was withdrawn 01/15/25. PN pending. Moving forward with processing.	2/4/2025

Page 30 of 31

-

Action 418152

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:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	418152
	Action Type:
	[UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	1/9/2025

Page 31 of 31

Action 418152