

ID NO 426301.

NSL - 8870

Revised March 23, 2017

RECEIVED: <b>01/29/25</b>	REVIEWER:	TYPE:	APP NO: <b>pLEL2503041016</b>
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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:** Morgan 25-13 Fed Com 735H Well **API:** 30-015-55642  
**Pool:** Purple Sage; Wolfcamp (Gas) **Pool Code:** 98220

**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 holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<b>FOR OCD ONLY</b>
<input type="checkbox"/> Notice Complete
<input type="checkbox"/> 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.

January 28, 2025

Darin Savage

Print or Type Name

/s/ Darin Savage

Signature

\_\_\_\_\_  
Date

970-385-4401

\_\_\_\_\_  
Phone Number

darin@abadieschill.com

\_\_\_\_\_  
e-mail Address

**SUBMITTED TO THE OIL CONSERVATION DIVISION:**

Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its **Morgan 25-13 Fed Com 735H Well** located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

**TABLE OF CONTENTS**

Administrative Checklist for NSL

- Exhibit A: C-102 Form, specifically identifying the NSL (19.15.15.13C)
- Exhibit B: A statement discussing the reasons for the unorthodox location (19.15.15.13C)
- Exhibit C: Tract map outlining the unit location of the unorthodox well with affected area tracts identified (19.15.15.13C)
- Exhibit D: A list of affected persons and parties, with addresses, entitled to notice of the application, along with a copy of the notice letter sent to affected persons and parties (19.15.15.13C)

**Devon Energy Production Company, L.P.**



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

January 29, 2025

Gerasimos Razatos, Director (Acting)  
 Oil Conservation Division  
 New Mexico Department of Energy  
 Minerals and Natural Resources  
 1220 South Saint Francis Drive  
 Santa Fe, New Mexico 87505

Copy to: Leonard Lowe, Division Technical Examiner

**Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 735H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**

Dear Acting Director Razatos:

Devon Energy Production Company, L.P., (“Devon”), OGRID No. 6137, is seeking administrative approval of an unorthodox well location (“NSL”) for the Morgan 25-13 Fed Com 735H Well (the “735H Well”) (API 30-015-55642) located in the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220) underlying a standard 800-acre, more or less, horizontal spacing unit comprised of the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that has been drilled as follows:

- Surface Location (SL): 2434’ from the North line and 995’ from the West line (Unit E) of Section 25, Township 25 South, Range 31 East;
- Bottom Hole Location (BHL): 20’ from the North line and 630’ from the West line (Unit D) of Section 13, Township 25 South, Range 31 East;
- First Take Point (FTP): 2540’ from the North line and 630’ from the West line (Unit E) of Section 25, Township 25 South, Range 31 East;
- Last Take Point (LTP): 100’ from the North line and 630’ from the West line (Unit D) of Section 13, Township 25 South, Range 31 East.

abadieschill.com

214 McKenzie Street, Santa Fe, New Mexico, 87501

O : 970.385.4401 • F : 970.385.4901

Devon has included as Exhibit B, a letter explaining why this application is needed. This well will produce from the Purple Sage; Wolfcamp (Gas) Pool (Pool Code 98220). Order No. 14262 requires that the first and last take points shall be no closer than a 330' distance from the outer boundary of the horizontal spacing unit.

The unorthodox location encroaches toward SW/4 of Section 12 and the N/2 SW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Devon attests that, on or before submission of this application, it sent notice to the affected persons/parties in (1) the adjoining horizontal spacing unit which covers the SW/4 of Section 25 and the W/2 of Section 36; and (2) the SW/4 of Section 12, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico. Devon has also provided notice to the Bureau of Land Management ("BLM") to the extent that federal leases are involved, pursuant to NMAC 19.15.2.7A(8)(d); said notice as described satisfies all provisions of NMAC 19.15.4.12A(2); copies of the application and required plat maps were furnished. Devon provides herein a sectional map of this area, attached as Exhibit C. Proof of mailing, along with a copy of the notice letter sent to the affected persons, is attached hereto as Exhibit D. Devon has informed us that there is no pooling case associated with this application.

Your consideration in this matter is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darin C. Savage', written over a horizontal line.

Darin C. Savage  
Attorney for Applicant



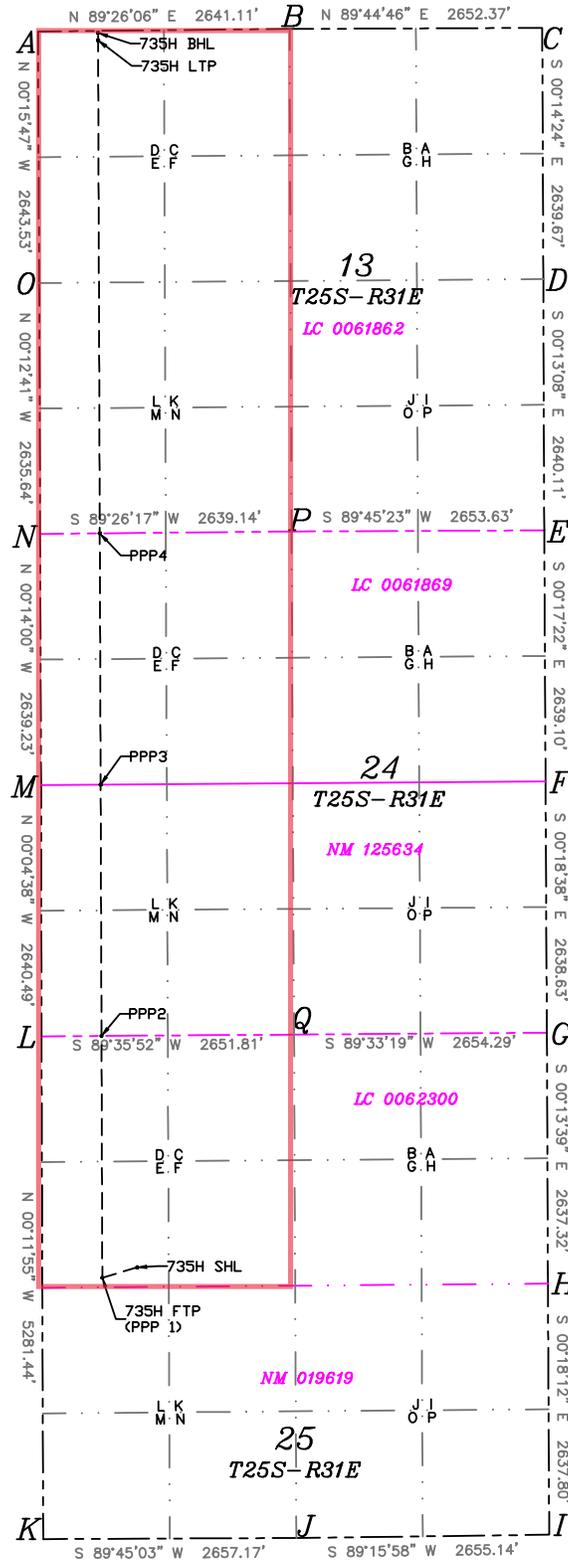
ACREAGE DEDICATION PLATS

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.

<p><b>MORGAN 25-13 FED COM 735H</b>                  GEODETIC COORDINATES NAD 83                  NMSP EAST SURFACE LOCATION                  2434' FNL 995' FWL SECTION 25                  EL: 3337.1'                  N:401296.60/E:725996.76                  LAT:32.101840/LON:103.736980</p>
<p><b>KICK OFF POINT</b>                  CALLS: _____                  N: _____/E: _____                  LAT: _____/LON: _____</p>
<p><b>FIRST TAKE POINT</b>                  2540' FNL 630' FWL SECTION 25                  N:401187.96/E:725632.13                  LAT:32.101547/LON:103.738159</p>
<p><b>LAST TAKE POINT</b>                  100' FNL 630' FWL SECTION 13                  N:414188.65/E:725587.60                  LAT:32.137284/LON:103.738071</p>
<p><b>BOTTOM HOLE LOCATION</b>                  20' FNL 630' FWL SECTION 13                  N:414268.65/E:725587.23                  LAT:32.137504/LON:103.738071</p>
<p><b>PPP 2</b>                  0' FNL 630' FWL SECTION 25                  N:403728.04/E:725623.43                  LAT:32.108529/LON:103.738142</p>
<p><b>PPP 3</b>                  2640' FSL 624' FWL SECTION 24                  N:406368.51/E:725614.39                  LAT:32.115787/LON:103.738124</p>
<p><b>PPP 4</b>                  0' FSL 626' FWL SECTION 13                  N:409009.46/E:725605.34                  LAT:32.123047/LON:103.738106</p>

A=	N:414282.44	E:724957.17
B=	N:414308.48	E:727598.15
C=	N:414320.23	E:730250.50
D=	N:411680.59	E:730261.56
E=	N:409040.49	E:730271.65
F=	N:406401.43	E:730284.99
G=	N:403762.83	E:730299.28
H=	N:401125.54	E:730309.76
I=	N:398487.77	E:730323.72
J=	N:398453.76	E:727668.80
K=	N:398442.20	E:725011.65
L=	N:403723.61	E:724993.33
M=	N:406364.11	E:724989.78
N=	N:409003.32	E:724979.03
O=	N:411638.94	E:724969.31
P=	N:409029.21	E:727618.04
Q=	N:403742.23	E:727645.07





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

January 15, 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.  
Morgan 25-13 Fed Com 616H, 625H, 627H, 715H, 716H, 735H, 736H, 737H, 825H, 826H, 835H,  
836H, & 837H (the "Wells")  
W2 of Section 13 & 24-25S-31E  
NW4 of Section 25-25S-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 each of the Wells referenced above. The Wells are 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 460 feet thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

A handwritten signature in black ink that reads "John Dwyer". The signature is written in a cursive, flowing style.

John Dwyer  
Reservoir Engineer

EXHIBIT  
**B**

Non-Standard Location Application

Offset Operator Plat

Morgan 25-13 Fed Com 735H

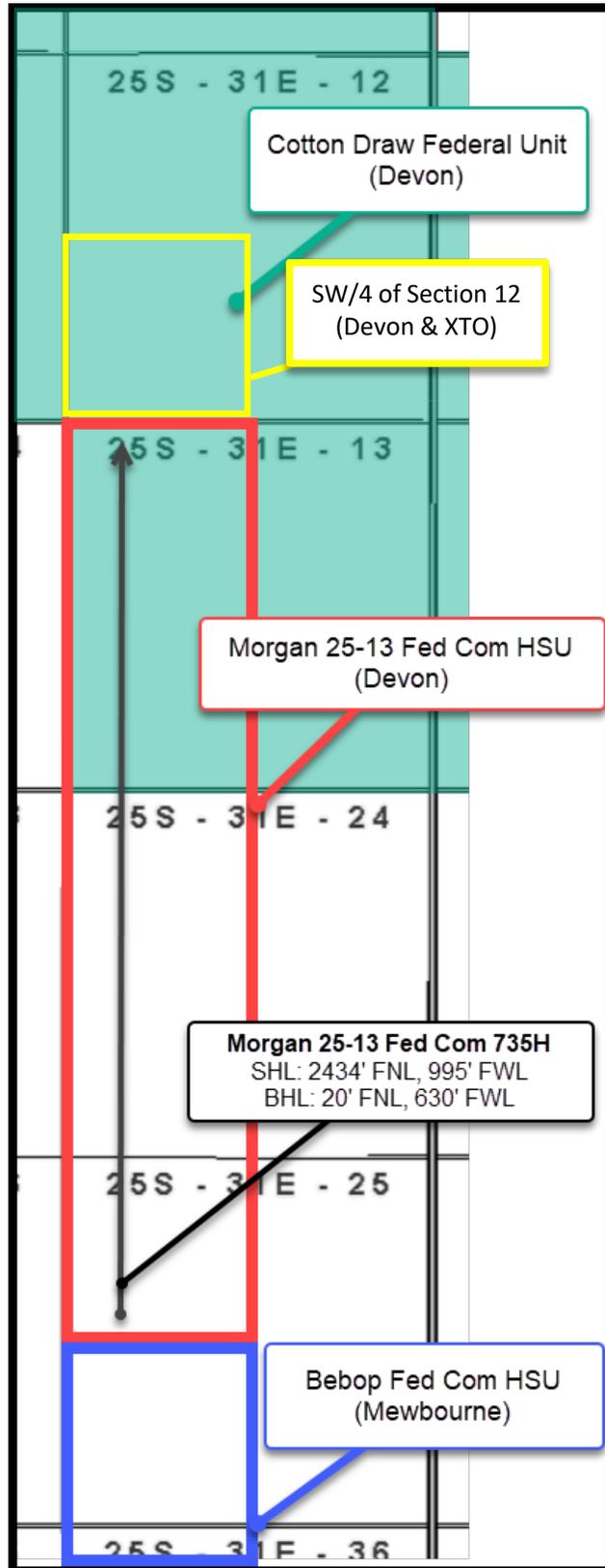


EXHIBIT  
C

USPSArticleNumber	DateMailed	ReferenceNumber	Name1	Address1	Address2	City	State	Zip
9314869904300130954451	1/29/25	4188.79 - NSL - Morgan	Bureau of Land Management	620 E. Greene Street		Carlsbad	NM	88220-6292
9314869904300130954475	1/29/25	4188.79 - NSL - Morgan	Mowbourne Oil Company	500 West Texas Ave	Suite 1020	Midland	TX	79701
9314869904300130954482	1/29/25	4188.79 - NSL - Morgan	XTO Energy Holdings, LLC	22777 Springwoods Village Pkwy		Spring	TX	77389





For the Pursuit of Energy

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

January 29, 2025

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**NOTICE TO AFFECTED PERSONS/PARTIES**

**RE: APPLICATIONS FOR ADMINISTRATIVE  
APPROVAL OF UNORTHODOX WELL LOCATION**

- 1) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 616H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 2) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 625H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 3) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 627H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 4) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 715H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 5) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 716H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 6) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 735H Well**

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located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

- 7) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 736H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 8) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 737H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 9) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 825H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 10) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 826H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 11) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 835H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 12) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 836H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**
- 13) **Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 837H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.**

To the Parties/Persons this may concern:

Enclosed in this notice is the above-referenced applications filed with the New Mexico Conservation Division on the date referenced above. You are being notified in your capacity as a person or party in an adjoining tract or unit pursuant to our request for approval of an unorthodox locations of the above-referenced wells. Any objections that you have to one or more of these applications must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division

receives the application filed for administrative approval by the Division. These Applications would have been filed with, and received by, the Division either on the date of this letter as referenced above, or no later than two (2) days after the date referenced above. Email correspondence for this matter can be sent to the Division at [OCD.Engineer@emnr.dnm.gov](mailto:OCD.Engineer@emnr.dnm.gov).

If you have any questions concerning these applications, please contact:

Ryan Cloer  
Landman  
Devon Energy Production Company, L.P.  
(405) 228-2448  
[Ryan.Cloer@devon.com](mailto:Ryan.Cloer@devon.com)

If you have no objections to these applications, please sign the waiver as indicated below and return the original to the address listed on this letterhead. Your assistance and cooperation in this matter are appreciated.

Sincerely,



Darin C. Savage

Attorney for Devon Energy  
Production Company, L.P.

*(See waiver on separate page below)*

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 616H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

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

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 625H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

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

Waiver

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Dated: \_\_\_\_\_

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

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 715H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

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

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 716H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

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Dated: \_\_\_\_\_

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

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Dated: \_\_\_\_\_

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

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 737H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

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

Waiver

\_\_\_\_\_ hereby waives objection to the above referenced Application filed by Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Morgan 25-13 Fed Com 825H Well located in the W/2 of Sections 13 and 24 and the NW/4 of Section 25, all in Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

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

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Dated: \_\_\_\_\_

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

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Dated: \_\_\_\_\_

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

Waiver

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Dated: \_\_\_\_\_

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

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 426301

**CONDITIONS**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 426301
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	1/30/2025