

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATION OF DEVON ENERGY PRODUCTION
COMPANY, L.P. FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

Case No. _____

APPLICATION

Devon Energy Production Company, L.P., (“Devon”), OGRID No. 6137, through its undersigned attorneys, hereby files this Application with the Oil Conservation Division (“Division” or “OCD”) pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all uncommitted mineral interests in the Wolfcamp formation underlying a nonstandard 1,917.84-acre, more or less, spacing unit comprised of Sections 19, 20, and 21, in Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico. Section 19 is an irregular section with Lots 1-4 as the W/2 W/2 equivalent. In support of its Application, Devon states the following:

1. Devon is a working interest owner in the proposed horizontal spacing unit (“HSU”) and has a right to drill wells thereon.
2. Devon proposes and dedicates to the HSU the **St. Helens 19-21 Fed Com 621H Well, St. Helens 19-21 Fed Com 622H Well, St. Helens 21-19 Fed Com 623H Well, and St. Helens 21-19 Fed Com 624H Well**, as the initial wells, drilled to a sufficient depth to test the Wolfcamp formation.
3. Devon proposes the **St. Helens 19-21 Fed Com 621H Well** horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24, Township 20 South, Range 29 East, to an approximate bottom hole location in the NE/4 NE/4 (Unit A) of Section 21.

4. Devon proposes the **St. Helens 19-21 Fed Com 622H Well** horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24, Township 20 South, Range 29 East, to an approximate bottom hole location in the SE/4 NE/4 (Unit H) of Section 21.

5. Devon proposes the **St. Helens 21-19 Fed Com 623H Well** horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21 to an approximate bottom hole location in Lot 3 (NW/4 SW/4 equivalent) of Section 19.

6. Devon proposes the **St. Helens 21-19 Fed Com 624H Well** horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21 to an approximate bottom hole location in Lot 4 (SW/4 SW/4 equivalent) of Section 19.

7. The spacing unit is nonstandard, and Devon has applied to the Division for administrative approval of the nonstandard spacing unit (“NSP”) and received approval pursuant to Order No. NSP – 2353.

8. Devon has sought in good faith but has been unable to obtain voluntary agreement from all interest owners to participate in the drilling of the wells or in the commitment of their interests to the wells for their development within the proposed HSU.

9. The pooling of all interests in the Wolfcamp formation within the proposed HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

10. In order to provide for its just and fair share of the oil and gas underlying the subject lands, Devon requests that all uncommitted interests in this HSU be pooled and that Devon be designated the operator of the proposed horizontal wells and HSU.

WHEREFORE, Devon requests that this Application be set for hearing on May 7, 2026, before an Examiner of the Oil Conservation Division, and after notice and hearing as required by law, the Division enter an order:

A. Pooling all uncommitted mineral interests in the Wolfcamp formation underlying a nonstandard 1917.84-acre, more or less, spacing unit comprised of the Sections 19, 20, and 21, in Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico.

B. Approving **St. Helens 19-21 Fed Com 621H Well, St. Helens 19-21 Fed Com 622H Well, St. Helens 21-19 Fed Com 623H Well, and St. Helens 21-19 Fed Com 624H Well**, as the wells for the HSU;

C. Designating Devon as operator of this HSU and the horizontal wells to be drilled thereon;

D. Authorizing Devon to recover its costs of drilling, equipping, and completing the wells;

E. Approving actual operating charges and costs of supervision, to the maximum extent allowable, while drilling and after completion, together with a provision adjusting the rates pursuant to COPAS accounting procedures; and

F. Setting a 200% charge for the risk assumed by Devon in drilling and completing the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

ABADIE & SCHILL, PC

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

Application of Devon Energy Production Company, L.P., for Compulsory Pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted mineral interests in the Wolfcamp formation underlying a nonstandard 1,917.84-acre, more or less, spacing unit comprised of the Sections 19, 20, and 21, in Township 20 South, Range 30 East, NMPM, Eddy County, New Mexico. Section 19 is an irregular section with Lots 1-4 as the W/2 W/2 equivalent. The proposed wells dedicated to the horizontal spacing unit are the **St. Helens 19-21 Fed Com 621H Well** horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24, Township 20 South, Range 29 East, to an approximate bottom hole location in the NE/4 NE/4 (Unit A) of Section 21; **St. Helens 19-21 Fed Com 622H Well** horizontally drilled from a surface location in the NE/4 NE/4 (Unit A) of Section 24, Township 20 South, Range 29 East, to an approximate bottom hole location in the SE/4 NE/4 (Unit H) of Section 21; **St. Helens 21-19 Fed Com 623H Well** horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21 to an approximate bottom hole location in Lot 3 (NW/4 SW/4 equivalent) of Section 19; and the **St. Helens 21-19 Fed Com 624H Well** horizontally drilled from a surface location in the SE/4 SE/4 (Unit P) of Section 21 to an approximate bottom hole location in Lot 4 (SW/4 SW/4 equivalent) of Section 19. The wells are orthodox in their locations, as the take points and completed intervals comply with setback requirements under statewide rules. The spacing unit is nonstandard, and Applicant has applied for and received administrative approval of the nonstandard unit. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs thereof; actual operating costs and charges for supervision; the designation of the Applicant as Operator of the wells and unit; and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 16.5 miles northeast of Carlsbad, New Mexico.