

Revised March 23, 2017

RECEIVED:	REVIEWER:	TYPE:	APP NO:
-----------	-----------	-------	---------

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, L.P.**OGRID Number:** 6137**Well Name:** Right Meow 31-30 Fed Com #232H Well**API:** 30-025-47212**Pool:** Sand Dunes; Bone Spring, South**Pool Code:** 53805

**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.**

Kaitlyn A. Luck

Print or Type Name

Signature

November 3 2020

Date

505-954-7286

Phone Number

kaluck@hollandhart.com

e-mail Address



**Kaitlyn A. Luck**  
Phone (505) 954-7286  
KALuck@hollandhart.com

November 3, 2020

**VIA ONLINE FILING**

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.**

Dear Ms. Sandoval:

Devon Energy Production, LP ("Devon") (OGRID No. 6137) seeks administrative approval of an unorthodox well location for its **Right Meow 31-30 Fed Com #232H Well** (API No. 30-025-47212) to be completed within the Sand Dunes; Bone Spring, South Pool (Pool code 53805) underlying the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico, as follows:

- Surface hole location: 165' FSL, and 2,255' FWL (Unit N) of Section 31
- Bottom hole location: 20' FNL, and 2,410' FWL (Unit C) of Section 30
- First take point: 100' FSL, and 2,410' FWL (Unit N) of Section 31
- Last take point: 100' FNL, and 2,410' FWL (Unit C) of Section 30

Since this acreage is governed by the Division's statewide rules, the completed interval for the **Right Meow 31-30 Fed Com #232H Well** is unorthodox because the completed interval is closer than the standard offsets to the eastern boundary of the spacing unit in Section 30. The **Right Meow 31-30 Fed Com #232H Well** encroaches on the adjoining spacing unit located in the SW/4 NE/4 and the W/2 SE/4 of Section 30 (Units G, J, and O). Approval of the unorthodox completed interval will allow Devon to use its preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

**Exhibit A** is the Well Location and Acreage Dedication Plat (Form C-102) showing Devon's plans for the completed interval of the **Right Meow 31-30 Fed Com #232H Well**.

However, due to issues encountered during drilling, the completed interval of the wellbore is at an unorthodox location. **Exhibit B** is a land plat for Sections 30 and 31 that shows the proposed **Right Meow 31-30 Fed Com #232H Well** in relation to the adjoining spacing unit to the east in Section 30. **Exhibit B** also includes an as-drilled map showing the **Right Meow 31-30 Fed Com #232H Well** encroaches on the horizontal spacing unit to the east in Section 30, and this map also reflects the as-drilled footages of the unorthodox well.

Ownership is diverse between the subject spacing unit and the spacing units to the east. **Exhibit C** includes a copy of this application that was sent by certified mail to the affected parties advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application, and proof of mailing. Since federal lands are involved, the Bureau of Land Management was provided notice.

**Exhibit D** is a statement from a Devon's petroleum engineer confirming that Devon's requested unorthodox location is necessary to optimize well spacing, thereby preventing waste.

Your attention to this matter is appreciated.

Sincerely,



Kaitlyn A. Luck  
ATTORNEY FOR DEVON ENERGY PRODUCTION  
COMPANY, L.P.

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720

**District II**  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720

**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170

**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

**OCD - HOBBS**  
**06/01/2020**  
**RECEIVED**

☐ AMENDED REPORT

## WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number <b>30-025-47212</b>		<sup>2</sup> Pool Code <b>53805</b>	<sup>3</sup> Pool Name <b>SAND DUNES;BONE SPRING, SOUTH</b>
<sup>4</sup> Property Code <b>328252</b>	<sup>5</sup> Property Name <b>RIGHT MEOW 31-30 FED COM</b>		<sup>6</sup> Well Number <b>232H</b>
<sup>7</sup> OGRID No. <b>6137</b>	<sup>8</sup> Operator Name <b>DEVON ENERGY PRODUCTION COMPANY, L.P.</b>		<sup>9</sup> Elevation <b>3564.7</b>

### <sup>10</sup> Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	31	23 S	32 E		165	SOUTH	2255	WEST	LEA

## " Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	30	23 S	32 E		20	NORTH	2410	WEST	LEA

<sup>12</sup> Dedicated Acres 640	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
--------------------------------------	-------------------------------	----------------------------------	-------------------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

**17 OPERATOR CERTIFICATION**

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered the division.

*Jenny Harms* 10-24-2019

Signature Date

**JENNY HARMS**

Printed Name

**JENNY.HARMS@DVN.COM**

E-mail Address

**18 SURVEYOR CERTIFICATION**

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

SEPTEMBER 23, 2019

Date of Survey

*William F. Jaramila*

Signature and Seal of the Professional Surveyor

Certificate Number: **WILLIAM F. JARAMILA PLS 12797**

Professional Surveyor No. 7605

**EXHIBIT**

A

Intent ☒ As Drilled ☐

API # <b>30-025-47212</b>		
Operator Name: <b>DEVON ENERGY PRODUCTION CO., L.P.</b>	Property Name: <b>RIGHT MEOW 31-30 FED COM</b>	Well Number <b>232H</b>

Kick Off Point (KOP)

UL	Section <b>31</b>	Township <b>23S</b>	Range <b>32E</b>	Lot	Feet <b>235 FNL</b>	From N/S	Feet <b>2410 FWL</b>	From E/W	County <b>LEA</b>
Latitude <b>32.25303400</b>					Longitude <b>-103.71495100</b>				NAD

First Take Point (FTP)

UL <b>N</b>	Section <b>31</b>	Township <b>23S</b>	Range <b>32E</b>	Lot	Feet <b>100</b>	From N/S <b>SOUTH</b>	Feet <b>2410</b>	From E/W <b>WEST</b>	County <b>LEA</b>
Latitude <b>32.2539593</b>					Longitude <b>103.7151858</b>				NAD <b>83</b>

Last Take Point (LTP)

UL <b>C</b>	Section <b>30</b>	Township <b>23S</b>	Range <b>32E</b>	Lot	Feet <b>100</b>	From N/S <b>NORTH</b>	Feet <b>2410</b>	From E/W <b>WEST</b>	County <b>LEA</b>
Latitude <b>32.2824425</b>					Longitude <b>103.7151708</b>				NAD <b>83</b>

Is this well the defining well for the Horizontal Spacing Unit?

☐ NO

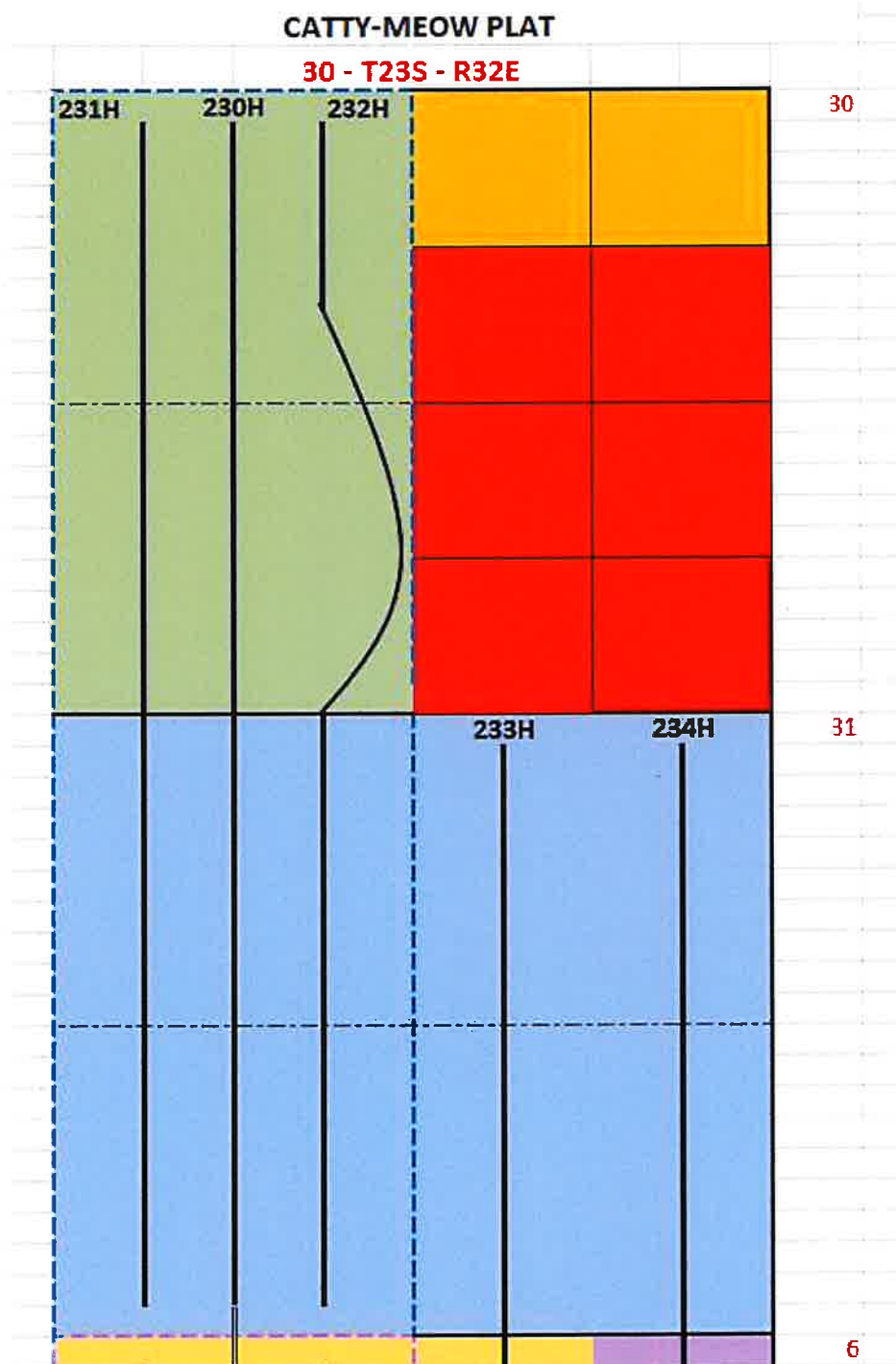
Is this well an infill well?

☐ YES

If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.

API #		
Operator Name:	Property Name:	Well Number

KZ 06/29/2018

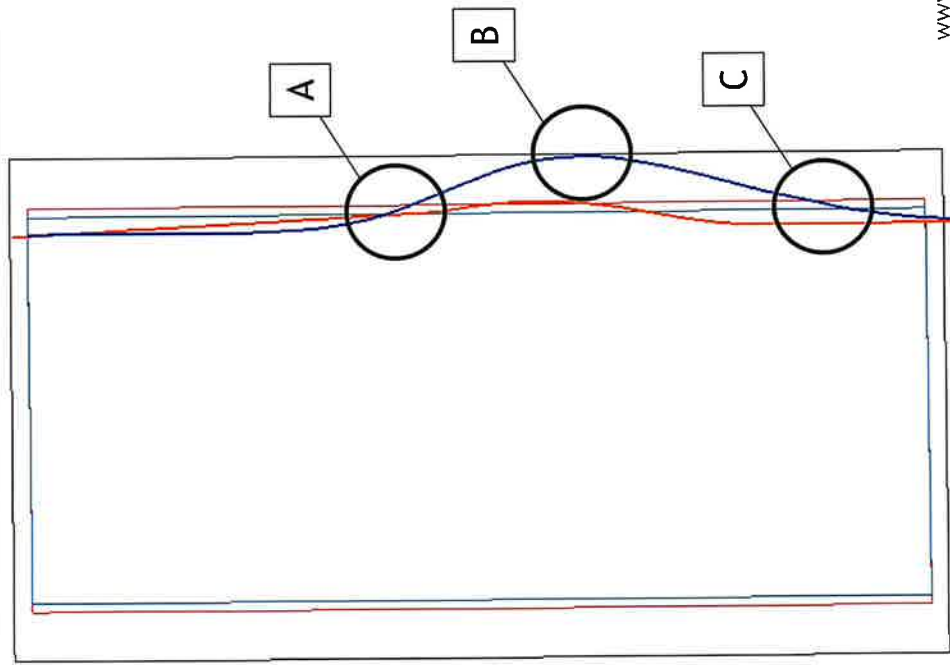


15637978\_v1





# 30-23S-32E High Level Plan View



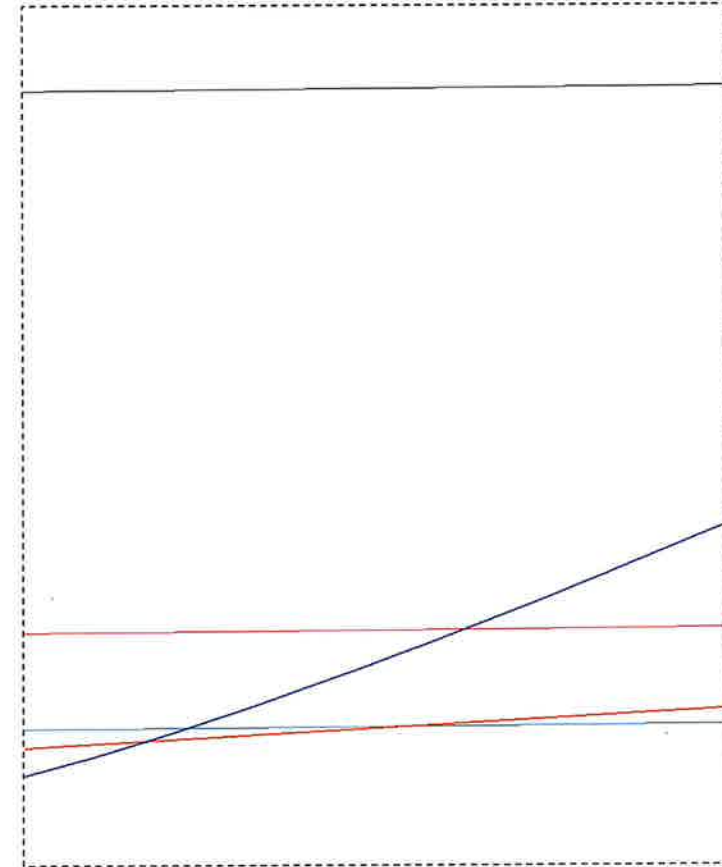
NYSE: DVN

www.dxonenergy.com

- Blue Line indicates the well trajectory
- Red Line indicates permitted plan
- Black Box indicates Devon's lease (half section)
- Red Box indicates a 280' E/W offset from the lease line (100' N/S)
- Green Box indicates a 330' E/W offset from the lease line (100' N/S)
- Zoomed in pictures of Window A, B, and C are located on subsequent pages

30-23S-32E

Window A



### Actual Well Trajectory

- Intersection of 280' offset at:  
18240.43' MD; 10352.19' TVD; 273.56' E/W; 8129.59' N/S
- Intersection of 330' offset at:  
18392.44' MD; 10348.26' TVD; 222.42' E/W; 8272.08' N/S

### Permitted Well Trajectory

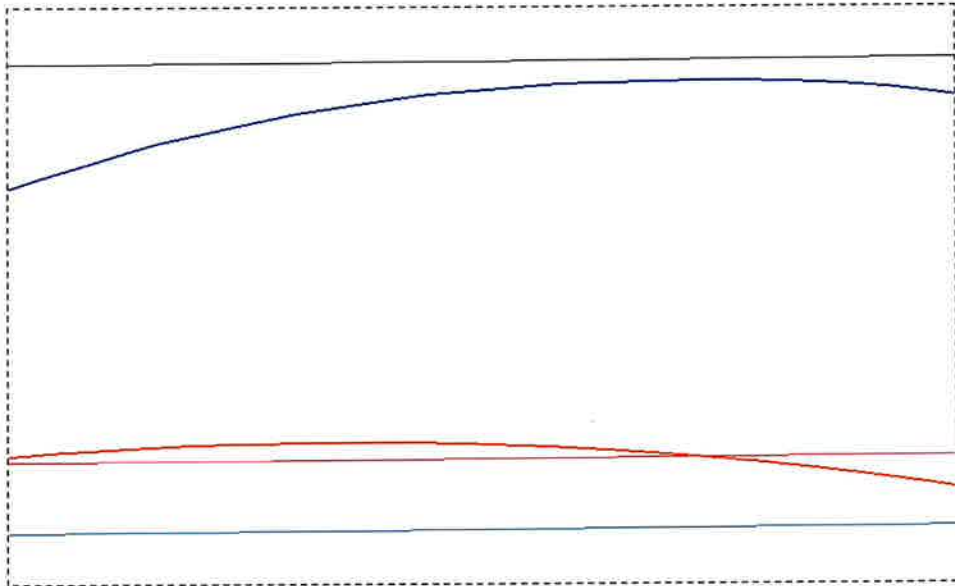
- Intersection of 280' offset at:  
18280.56' MD; 10418.00' TVD; 276.60' E/W; 7681.60' N/S
- Intersection of 330' offset at:  
18762.28' MD; 10418.00' TVD; 223.23' E/W; 8159.84' N/S

NYSE: DVN

www.dxonenergy.com



30-23S-32E  
Window B



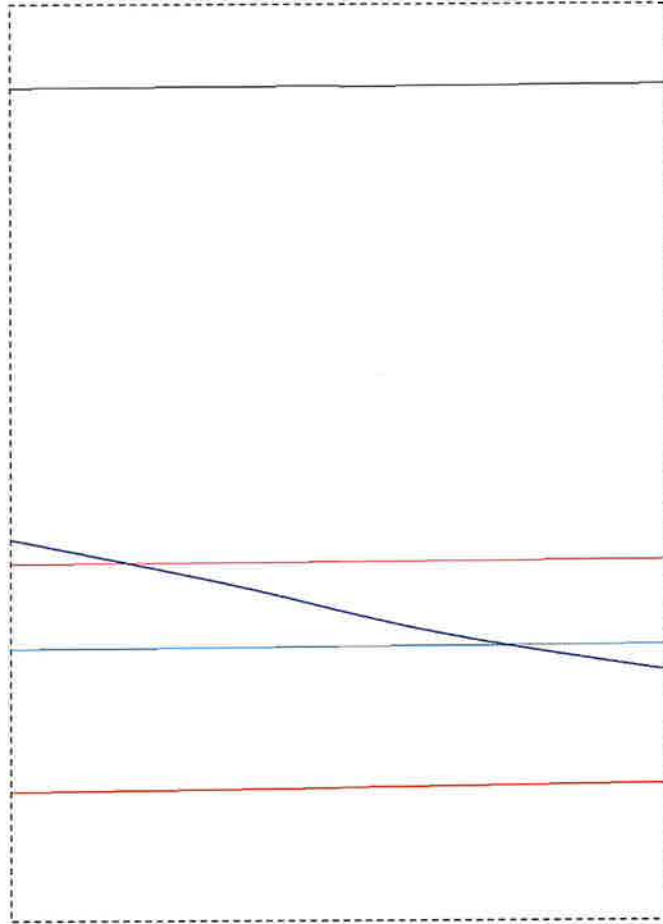
NYSE: DVN

**Actual Well Trajectory**

- Well trajectory does **NOT** cross lease line, and closest approach is at:  
17219.22' MD; 10362.21' TVD; 544.68' E/W; 7159.05' N/S

[www.devonenergy.com](http://www.devonenergy.com)

30-23S-32E  
Window C



### Actual Well Trajectory

- Intersection of 280' offset at:  
15913.99' MD; 10346.59' TVD; 287.99' E/W; 5877.31' N/S
- Intersection of 330' offset at:  
15686.24' MD; 10340.62' TVD; 239.44' E/W; 5654.93' N/S

### Permitted Well Trajectory (crossing not shown in window)

- Intersection of 280' offset at:  
17745.62' MD; 10418.00' TVD; 279.79' E/W; 7147.44' N/S
- Intersection of 330' offset at:  
17408.15' MD; 10418.00' TVD; 231.95' E/W; 6813.52' N/S



**Kaitlyn A. Luck**  
Phone (505) 954-7286  
KALuck@hollandhart.com

November 3, 2020

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

**TO:**

**EOG Resources**  
**Attn: Wendy Dalton, Land Manager**  
**5509 Champions Drive**  
**Midland, TX 79706**

**Bureau of Land Management**  
**301 Dinosaur Trail**  
**Santa Fe, New Mexico 87508**

**Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.**

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 this date with the applicant and 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:

Katie Dean  
Devon Energy  
(405) 552-6659  
Katie.Dean@devon.com

Sincerely,

Kaitlyn A. Luck  
**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  
Idaho

Montana  
Nevada  
New Mexico

Utah  
Washington, D.C.  
Wyoming



## Shipment Confirmation Acceptance Notice

### A. Mailer Action

**Note to Mailer:** The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

Devon - Right Meow 232H NSL  
CM# 41132.0002

Shipment Date: 10/30/2020

Shipped From:

Name: HOLLAND & HART LLP (1)

Address: 110 N GUADALUPE ST # 1

City: SANTA FE

State: NM ZIP+4® 87501

Type of Mail	Volume
Priority Mail Express®	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	2
Total	2

\*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

### B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.  
Leave form with customer or in customer's mail receptacle.

USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0025 0436 85



## Firm Mailing Book For Accountable Mail

Name and Address of Sender		Check type of mail or service										Affix Stamp Here (for additional copies of this receipt). Postmark with Date of Receipt.									
		<input type="checkbox"/> Adult Signature Required <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery (COD) <input type="checkbox"/> Insured Mail <input type="checkbox"/> Priority Mail										<input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Registered Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Signature Confirmation Restricted Delivery									
USPS Tracking/Article Number	Addressee (Name, Street, City, State, & ZIP Code™)	Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee							
1. 9214 8801 9403 8324 0387 12	EOG Resources Altn: Wendy Dallon Land Manager 5509 Champions Drive Midland TX 79706	0.80	3.55								1.70										
2. 9214 8801 9403 8324 0387 29	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	0.80	3.55								1.70										
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiving employee)																			



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

405 235 3611 Phone  
www.devonenergy.com

October 29, 2020

**VIA ONLINE FILING**

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**RE: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Right Meow 31-30 Fed Com #232H Well in the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico.**

Dear Ms. Sandoval,

Devon Energy Production Company, L.P. respectfully requests administrative approval of an unorthodox well location for its **Right Meow 31-30 Fed Com #232H Well** (API No. 30-025-47212) to be completed within the Sand Dunes; Bone Spring, South Pool (Pool code 53805) underlying the W/2 of Sections 30 and 31, Township 23 South, Range 32 East, N.M.P.M., Lea County, New Mexico. It is Devon's responsibility as a prudent operator to use industry best practices/standards for wellbore trajectory planning in order to optimize well spacing, thereby preventing waste. An existing vertical well resulted in the need to steer the subject wellbore for anti-collision considerations and collision avoidance to achieve satisfactory separation factors. While steering the subject well bore along a trajectory to obtain satisfactory separation factors, the well path crossed over the East hardline.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Fisher", written over a horizontal line.

Jonathan Fisher  
Supervisor - Drilling Engineering





**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS  
  
Action 11049

CONDITIONS OF APPROVAL

Operator: DEVON ENERGY PRODUCTION COMPAN333 West Sheridan Ave. Oklahoma City, OK73102			OGRID: 6137	Action Number: 11049	Action Type: NSL
OCD Reviewer			Condition		
llowe			None		