NSL

Initial

Application

Received: 08/20/20

Signature

P.O. No. 8DPHD-200820-NSL000

Revised March 23, 2017

| RECEIVED: 08/20/20 REVIEWER: LRL | TYPE: NSL APP NO: pLEL2023458651 |
|---|--|
| NEW MEXICO O - Geological 8 | IL CONSERVATION DIVISION Engineering Bureau – S Drive, Santa Fe, NM 87505 |
| | E APPLICATION CHECKLIST |
| | NISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND PROCESSING AT THE DIVISION LEVEL IN SANTA FE |
| Applicant: Devon Energy Production, L.P. | OGRID Number: 6137 |
| Vell Name: Snapping 12-1 Fed #711H Well | API : 30-015-47130 |
| Ool: Purple Sage; Wolfcamp (Gas) Pool | Pool Code: 98220 |
| | ous Dedication |
| B. Check one only for [1] or [1] [1] Commingling – Storage – Measu DHC DHC DTB PLC [11] Injection – Disposal – Pressure In WFX PMX SWD 2) NOTIFICATION REQUIRED TO: Check those A. Offset operators or lease holders B. Royalty, overriding royalty owners C. Application requires published not D. Notification and/or concurrent a E. Notification and/or concurrent a F. Surface owner G. For all of the above, proof of notin No notice required | PC OLS OLM crease - Enhanced Oil Recovery PPR FOR OCD ONLY which apply. which apply. strevenue owners office oproval by SLO |
| administrative approval is accurate and | formation submitted with this application for complete to the best of my knowledge. I also n this application until the required information and |
| Note: Statement must be completed by | an individual with managerial and/or supervisory capacity. |
| | August 20, 2020 |
| Kaitlyn A. Luck | Date |
| Print or Type Name | |
| Front Live | Phone Number |
| - VVVVV | kaluck@hollandhart.com |

e-mail Address



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

August 20, 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 Snapping 12-1 Fed #711H Well in the W/2 of Section 1 and the NW/4 of Section 12, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

Dear Ms. Sandoval:

Devon Energy Production, LP ("Devon") (OGRID No. 6137) seeks administrative approval of an unorthodox well location for its **Snapping 12-1 Fed #711H Well** (API No. 30-015-47130) to be completed within the Purple Sage Wolfcamp Pool (98220) underlying the W/2 of Section 1 and the NW/4 of Section 12, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

This well will be drilled from a <u>surface location</u> 2475 feet from the north line and 810 feet from the west line (Unit E) of Section 12 to a <u>bottom hole location</u> 20 feet from the north line and 990 feet from the west line (Unit D) of Section 1. The <u>first take point</u> will be located 2576 feet from the north line and 990 feet from the west line (Unit E) of Section 12, and the <u>last take point</u> will be 100 feet from the north line and 990 feet from the west line (Unit D) of Section 1.

Pursuant to Division Order R-14262, this acreage is governed by the Special Rules for the Purple Sage-Wolfcamp Gas Pool which provide for wells in the Wolfcamp formation in Eddy County to be located no closer than 330 feet to the outer boundary of the spacing unit. The completed interval for the **Snapping 12-1 Fed #711H Well** will be unorthodox because it is closer than 330 feet to the northern and southern boundaries of the spacing unit. 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 a Well Location and Acreage Dedication Plat (Form C-102), which shows that the completed interval of the proposed **Snapping 12-1 Fed #711H Well** encroaches on the drilling and spacing unit to the north in Section 36, Township 25 South, Range 31 East, and to the south in the SW/4 of Section 12.

Exhibit B is a land plat for Sections 2 and 11 that shows the proposed **Snapping 12-1 Fed #711H Well** in relation to the adjoining spacing unit to the north in Section 36 and to the south in NW/4 of Section 12.

Ownership is diverse between the subject spacing unit and the affected spacing units to the north and south. **Exhibit C** reflects that a copy of this application with all attachments has been sent by certified mail to each affected person advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

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.

<u>District I</u>
1625 N, French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
<u>District II</u>
811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720

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

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

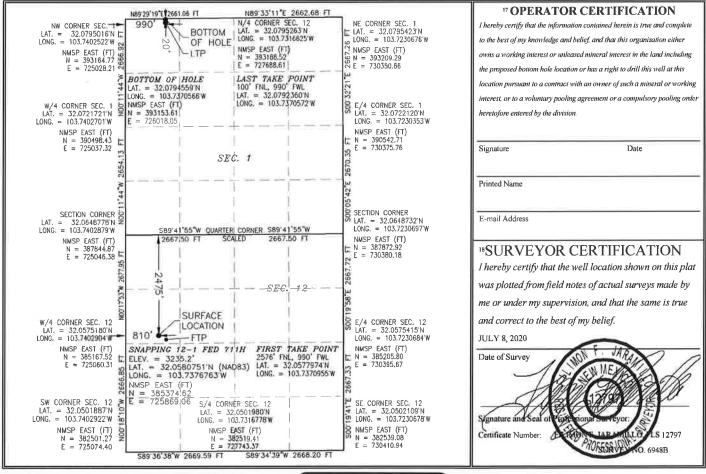
☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

| 1, | API Number | 7 | | ² Pool Code | | | ³ Pool Na | me | | |
|----------------------|------------|----------|-------|------------------------|----------------------|------------------|----------------------|-----------|--------|------------------------|
| | | | | | | | | | | |
| 4 Property (| Code | | | | ⁵ Propert | ty Name | | | 6 7 | Well Number |
| | | | | | SNAPPING | G 12-1 FED | | | | 711H |
| ⁷ OGRID I | No. | | | | ⁸ Operato | or Name | | | | ⁹ Elevation |
| 6137 | 7 | | DEV | ON ENEI | RGY PRODU | JCTION COMPA | NY, L.P. | | | 3235.2 |
| | | | | | 10 Surfa | ce Location | | | | |
| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West | t line | County |

| E | 12 | 26 S | 31 E | | 2475 | NORTH | 810 | WEST | EDDY |
|-------------------|-----------------------|--------------|---------------|----------|---------------|------------------|---------------|----------------|--------|
| | - | | 11 F | 3ottom H | lole Location | If Different Fr | om Surface | | |
| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
| D | 1 | 26 S | 31 E | | 20 | NORTH | 990 | WEST | EDDY |
| 12 Dedicated Acre | s ¹³ Joint | or Infill 14 | Consolidation | n Code | | | 15 Order No. | | |
| | | | | | | | | | |

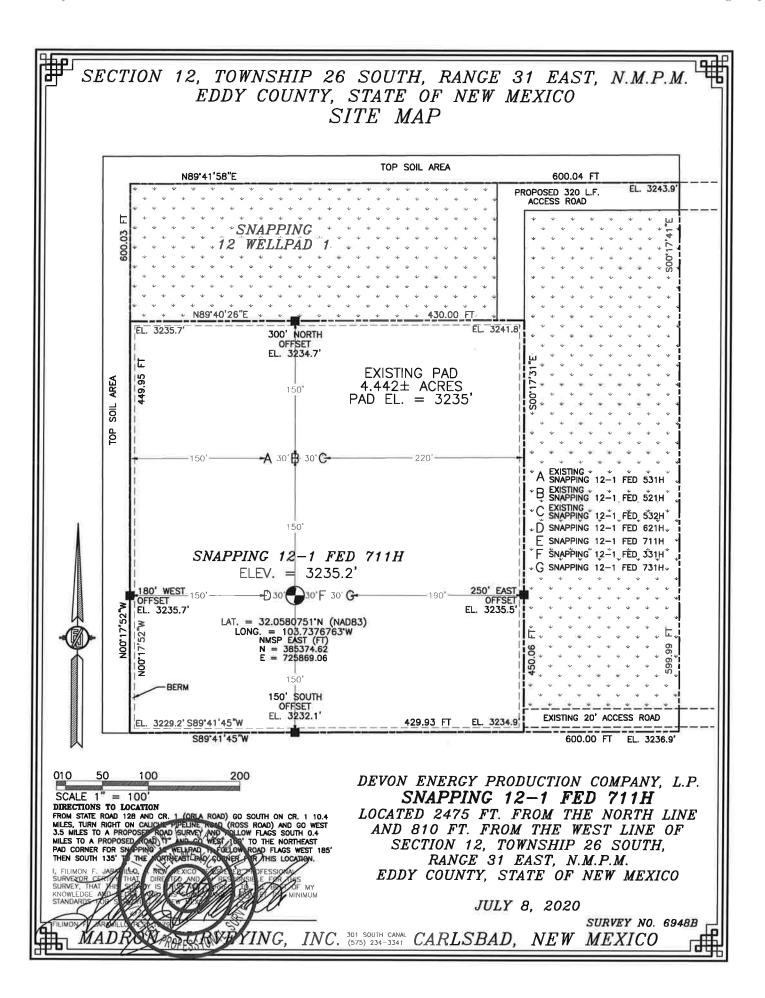
No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



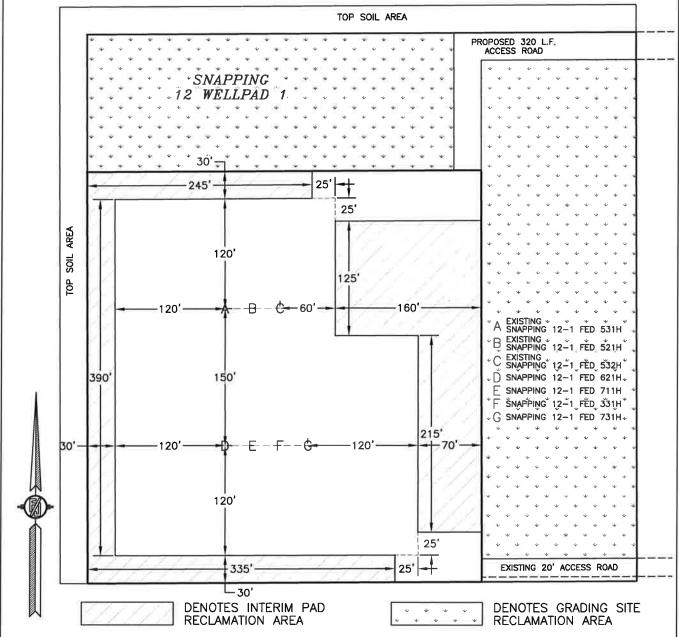


| Inten | t | As Dril | led | | | | | | | | | | | |
|-------------------|-----------------------------|-----------------------|--------------|---------|------------------------|---------------|----------------|-------------|-------------|--------|-------|--------------|----------------|---------------------|
| API# | ŧ | | | | | | | | | | | | | |
| DE\ | rator Na VON EN MPANY | IERGY F | RODUC | CTION | N | | erty N | | | FED | | | | Well Number 711H |
| Kick (| Off Point | (KOP) | | | | | | | 24 | 8 | | | | |
| UL | Section | Township | Range | Lot | Feet | | From N | I/S | Feet | | From | n E/W | County | |
| Latitu | ude | | | | Longitu | ıde | | i | | | | | NAD | |
| | Take Poir | | 1 - | | | | | | | | | - 4 | | |
| UL E | Section 12 | Township 26S | Range 31E | Lot | Feet 2576 | | From N NOR1 | | Feet 990 | | WES | n E/W ST | County EDDY | |
| Latitu 32.0 | ude 057797 | 4 | | | Longitu 103.7 | | 955 | | | | | | NAD 83 | |
| UL D Latitu | Section 1 | t (LTP) Township 26S | Range 31E | Lot | Feet 100 Longitu | NOI | n N/S RTH | Feet 990 | | From E | | Count EDD | | |
| | 0 7 9236 | 0 | | | 103.7 | | 572 | | | | | 83 | | |
| | | defining v | vell for th | e Horiz | zontal Sp | oacing | g Unit? | | | | | | | |
| | ng Unit. | lease provi | de API if a | availab | ole, Oper | ator f | Name : | and w | ell n | umber | for [| Definir | ng well fo | r Horizontal |
| Ope | rator Nar | me: | | | | Prop | erty N | ame: | | | | | | Well Number |
| | | | | | | | | | | | | | | |

KZ 06/29/2018



SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO INTERIM SITE BUILD PLAN



010 50 100 200 SCALE 1" = 100'

1.473± ACRES INTERIM PAD RECLAMATION AREA 3.505± ACRES GRADING SITE RECLAMATION AREA 3.287± ACRES NON-RECLAIMED AREA 8.265± ACRES SNAPPING 12 WELLPAD 1

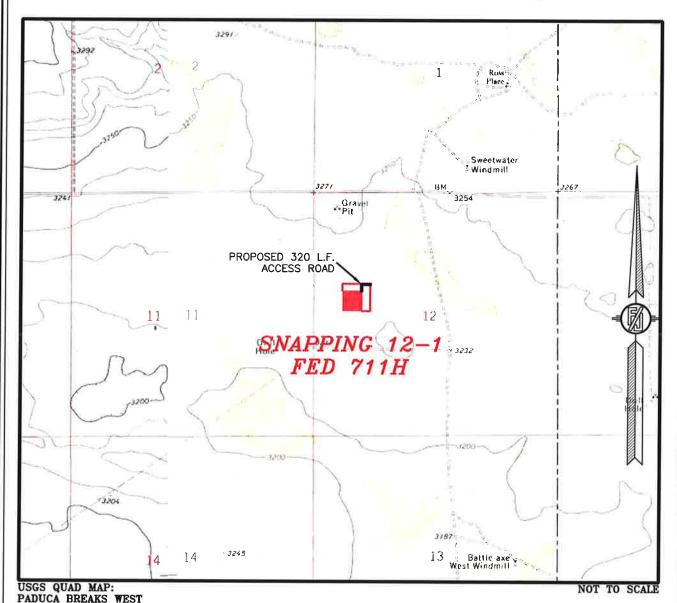
DEVON ENERGY PRODUCTION COMPANY, L.P.
SNAPPING 12-1 FED 711H

LOCATED 2475 FT. FROM THE NORTH LINE
AND 810 FT. FROM THE WEST LINE OF
SECTION 12, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JULY 8, 2020

SURVEY NO. 6948B

SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO LOCATION VERIFICATION MAP



DEVON ENERGY PRODUCTION COMPANY, L.P.

SNAPPING 12-1 FED 711H

LOCATED 2475 FT. FROM THE NORTH LINE

AND 810 FT. FROM THE WEST LINE OF

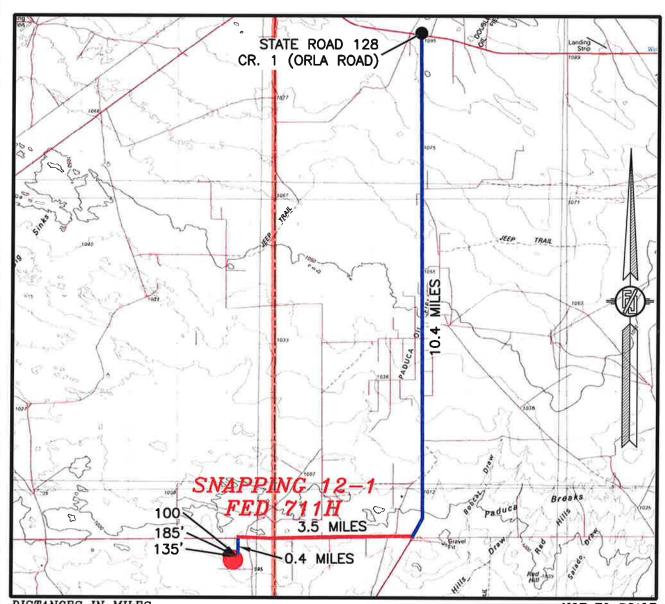
SECTION 12, TOWNSHIP 26 SOUTH,

RANGE 31 EAST, N.M.P.M.

JULY 8, 2020

EDDY COUNTY, STATE OF NEW MEXICO

SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO VICINITY MAP



DISTANCES IN MILES

NOT TO SCALE

DIRECTIONS TO LOCATION

FROM STATE ROAD 128 AND CR. 1 (ORLA ROAD) GO SOUTH ON CR. 1 10.4 MILES, TURN RIGHT ON CALICHE PIPELINE ROAD (ROSS ROAD) AND GO WEST 3.5 MILES TO A PROPOSED ROAD SURVEY AND FOLLOW FLAGS SOUTH 0.4 MILES TO A PROPOSED ROAD "T" AND GO WEST 100' TO THE NORTHEAST PAD CORNER FOR SNAPPING 12 WELLPAD 1, FOLLOW ROAD FLAGS WEST 185' THEN SOUTH 135' TO THE NORTHEAST PAD CORNER FOR THIS LOCATION.

DEVON ENERGY PRODUCTION COMPANY, L.P.

SNAPPING 12-1 FED 711H

LOCATED 2475 FT. FROM THE NORTH LINE

AND 810 FT. FROM THE WEST LINE OF

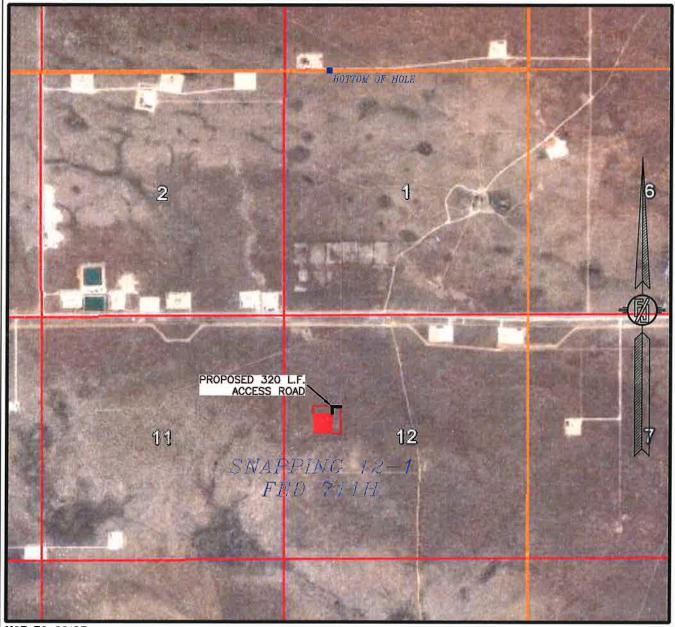
SECTION 12, TOWNSHIP 26 SOUTH,

RANGE 31 EAST, N.M.P.M.

EDDY COUNTY, STATE OF NEW MEXICO

JULY 8, 2020

SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO AERIAL PHOTO



NOT TO SCALE AERIAL PHOTO: GOOGLE EARTH NOV. 2015

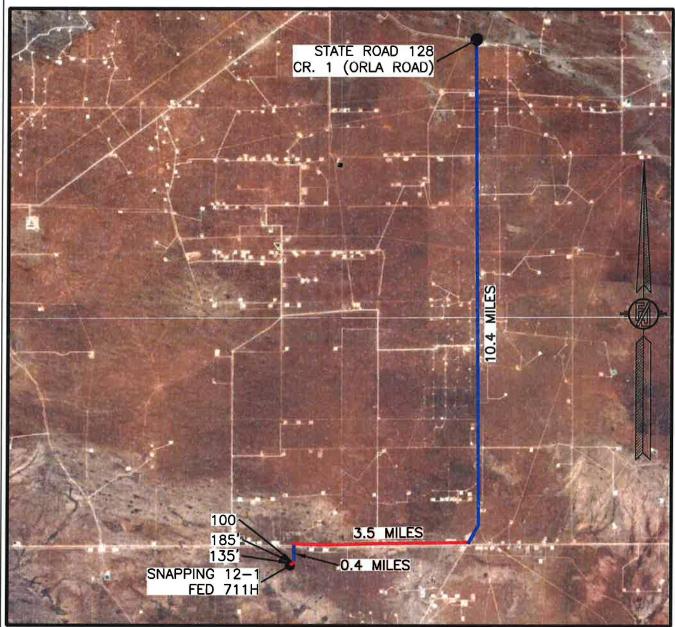
DEVON ENERGY PRODUCTION COMPANY, L.P. SNAPPING 12-1 FED 711H

LOCATED 2475 FT. FROM THE NORTH LINE AND 810 FT. FROM THE WEST LINE OF SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO

JULY 8, 2020

SURVEY NO. 6948B MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO AERIAL ACCESS ROUTE MAP



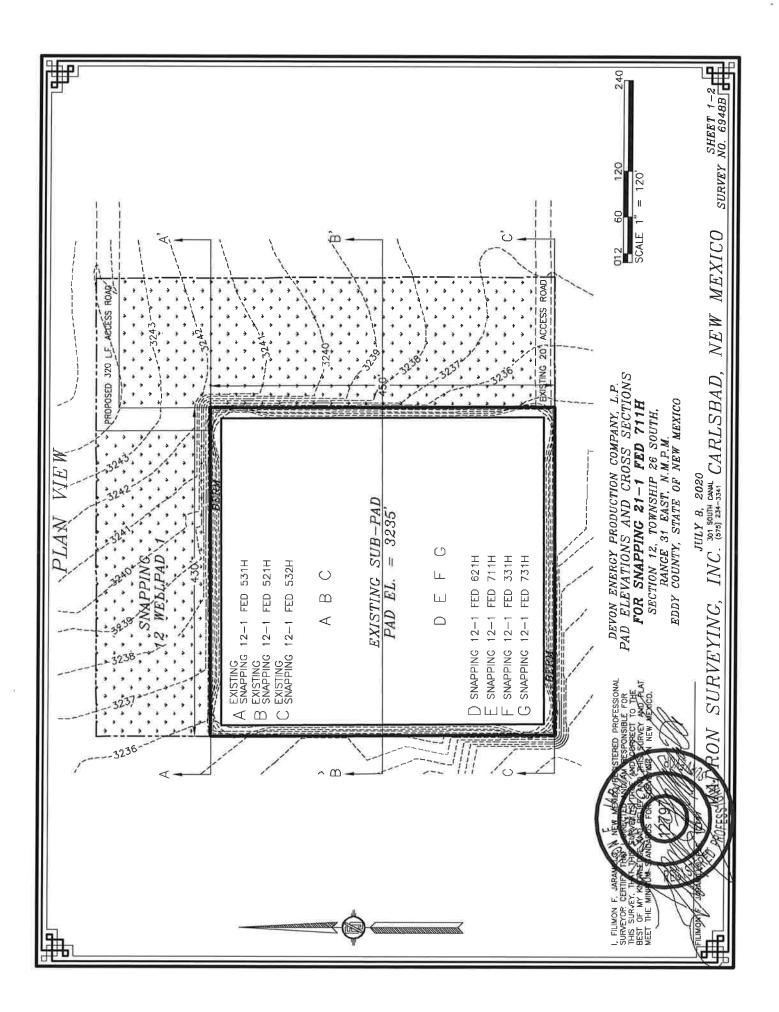
NOT TO SCALE AERIAL PHOTO: GOOGLE EARTH NOV. 2015

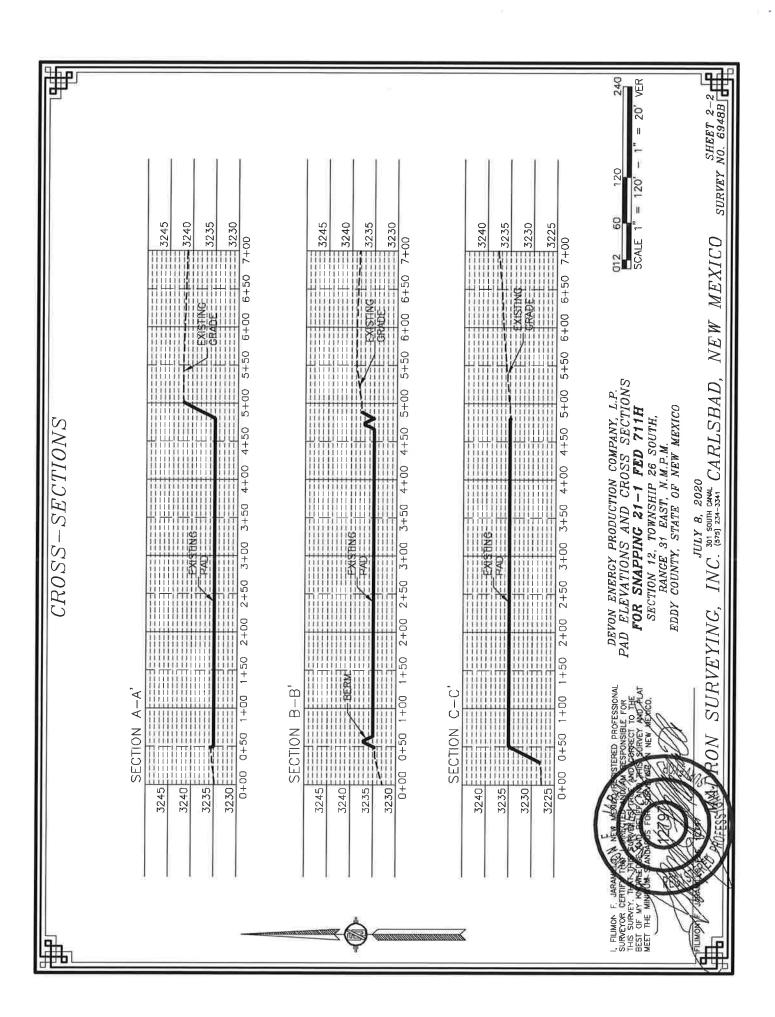
DEVON ENERGY PRODUCTION COMPANY, L.P. SNAPPING 12-1 FED 711H

LOCATED 2475 FT. FROM THE NORTH LINE AND 810 FT. FROM THE WEST LINE OF SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO

JULY 8, 2020

SURVEY NO. 6948B

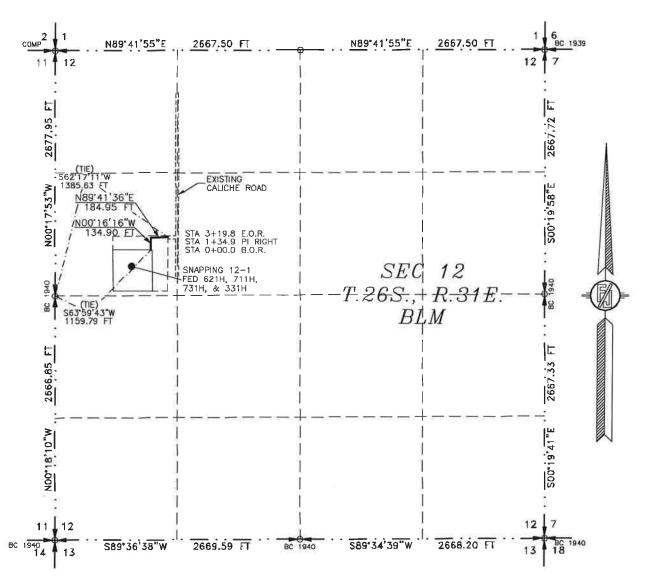




ACCESS ROAD PLAT

ACCESS ROAD FOR SNAPPING 12-1 FED 621H, 711H, 731H, & 331H

DEVON ENERGY PRODUCTION COMPANY, L.P.
CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING
SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
JULY 8, 2020



SEE NEXT SHEET (2-2) FOR DESCRIPTION



GENERAL NOTES

1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.

2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SHEET: 1-2

MADRON SURVEYING, INC. 301 St. (575)

SURVEYOR CERTIFICATE

I, FILIMON F. JARAMILLO, A NEW MEXICO PROFESSIONAL SURVEYOR NO. 12797, HEREBY CERTIFY THAT I HAVE CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR LAND SURVEYING IN THE STANDARDS FOR LAND SURVEYING IN THE STANDARDS FOR LAND

IN THE WILL CERTIFICATE IS EXECUTED AT CARLSBAD.

W MANGE THE WILL BY SET UL 2020

MADRON SURVEYING, INC.

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO 88220 Phone (575) 234-3341

SURVEY NO. 6948B NEW MEXICO

ACCESS ROAD PLAT

ACCESS ROAD FOR SNAPPING 12-1 FED 621H, 711H, 731H, & 331H

DEVON ENERGY PRODUCTION COMPANY, L.P.

CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING

SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.

EDDY COUNTY, STATE OF NEW MEXICO

JULY 8, 2020

DESCRIPTION

A STRIP OF LAND 30 FEET WIDE CROSSING BUREAU OF LAND MANAGEMENT LAND IN SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., EDDY COUNTY, STATE OF NEW MEXICO AND BEING 15 FEET EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE SURVEY:

BEGINNING AT A POINT WITHIN THE SW/4 NW/4 OF SAID SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., WHENCE THE WEST QUARTER CORNER OF SAID SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS \$63*59'43"W, A DISTANCE OF 1159.79 FEET;

THENCE NOO'16'16"W A DISTANCE OF 134.90 FEET TO AN ANGLE POINT OF THE LINE HEREIN DESCRIBED; THENCE N89'41'36"E A DISTANCE OF 184.95 FEET THE TERMINUS OF THIS CENTERLINE SURVEY, WHENCE THE WEST QUARTER CORNER OF SAID SECTION 12, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS \$62'17'11"W, A DISTANCE OF 1385.63 FEET:

SAID STRIP OF LAND BEING 319.85 FEET OR 19.38 RODS IN LENGTH, CONTAINING 0.220 ACRES MORE OR LESS AND BEING ALLOCATED BY FORTIES AS FOLLOWS:

SW/4 NW/4 319.85 L.F. 19.38 RODS 0.220 ACRES

SURVEYOR CERTIFICATE

GENERAL NOTES

- 1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.
- 2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SHEET: 2-2

MADRON SURVEYING, INC. 301 SO

I, FILIMON F. JARAMILLO, A NEW MEXICO PROFESSIONAL SURVEYOR NO. 12797, HEREBY CERTIFY THAT I HAVE CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR LAND SURVEYING IN THE STANDARDS FOR LAND SURVEYING IN THE STANDARDS FOR LAND

MANUEL ME CONTINUE CERTIFICATE IS EXECUTED AT CARLSBAD,

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO 88220 Phone (575) 234-3341

SURVEY NO. 6948B

BAD, NEW MEXICO



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O-BIIL

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(Dig Sink Ut.)
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964756

ConocoPhillips

EOG Res.

H BP 265

31E - 13

HBT

25 S

31E <u>- 3</u>6

Style



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

August 20, 2020

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES:

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Snapping 12-1 Fed #711H Well in the W/2 of Section 1 and the NW/4 of Section 12, Township 26 South, Range 31 East, N.M.P.M., Eddy 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:

Tim Prout
Devon Energy
(405) 552-6113
Tim.Prout@dvn.com

Sincerely,

Kaitlyn A. Luck

Attorney for Devon Energy Production

COMPANY, L.P.



EXHIBIT

15211033_v1



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.

| Shipment Date: | 08/20/2020 |
|----------------|-----------------|
| Shipped From: | |
| Name | |
| Address | 6747 E 50th Ave |
| City | Commerce City |
| State CC | 7in+4® 80022 |

| Type of Mail | Volume |
|--------------------------------|--------|
| Priority Mail Service® | 0 |
| Priority Mail Express Service® | 0 |
| Library Mail Service® | 0 |
| International Mail® | 0 |
| First-Class Package Service® | 2 |
| Parcel Select® | 0 |
| Other | 0 |
| Total Volume | 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

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

USPS SCAN AT ACCEPTANCE

9475 7112 0108 0919 0053 39

| User | User Date Name | Name | Delivery Address | City | ST Zip | ST Zip Mail Service | USPS # | Label Ref. |
|----------|----------------|------------------------------|---|---------|-----------|--------------------------|------------------------|--|
| <u>□</u> | Mailed | | | | | | | |
| 31557 | 7 08/20/2 | 31557 08/20/2 ConocoPhillips | 600 N Dairy Ashford Rd Houston | | TX 77079- | Certified with Return | 9414811898765829691426 | TX 77079- Certified with Return 9414811898765829691426 69163 - Devon - Snapping 12-1 |
| | 020 | O20 Company | | | 1100 | 1100 Receipt (Signature) | | NSLs - Notice List - 1 |
| 31557 | 7 08/20/2 | Mewbourne Oil | 31557 08/20/2 Mewbourne Oil 500 W Texas Ave Ste Midland | Midland | TX 79701- | Certified with Return | 9414811898765829691402 | TX 79701- Certified with Return 9414811898765829691402 69163 - Devon - Snapping 12-1 |
| | 020 | O20 Company | 1020 | | 4279 | 4279 Receipt (Signature) | | NSLs - Notice List - 2 |

| User | User Date Name | Name | Delivery Address | City | ST Zip | ST Zip Mail Service | USPS # | Label Ref. |
|----------|----------------|------------------------------|---|---------|----------|--------------------------|------------------------|--|
| <u>□</u> | Mailed | | | | | | | |
| 31557 | 7 08/20/2 | 31557 08/20/2 ConocoPhillips | 600 N Dairy Ashford Rd Houston | | TX 77075 | 9- Certified with Return | 9414811898765829691426 | TX 77079- Certified with Return 9414811898765829691426 69163 - Devon - Snapping 12-1 |
| | 070 | O20 Company | | | 1100 | 1100 Receipt (Signature) | | NSLs - Notice List - 1 |
| 31557 | 7 08/20/2 | Mewbourne Oil | 31557 08/20/2 Mewbourne Oil 500 W Texas Ave Ste Midland | Midland | TX 7970 | 1- Certified with Return | 9414811898765829691402 | TX 79701- Certified with Return 9414811898765829691402 69163 - Devon - Snapping 12-1 |
| | 070 | O20 Company | 1020 | | 4279 | 4279 Receipt (Signature) | | NSLs - Notice List - 2 |



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

July 23, 2020

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

RE:

Application for Nonstandard Locations

Engineering Statement

Devon Energy Production Company, L.P. Snapping 12-1 Fed 621H, 711H & 712H

Sections 12 & 1-26S-31E Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. respectfully requests administrative approval of a non-standard location for each of the Snapping wells referenced above by decreasing the first and last take point(s) from 330 feet to 100 feet from the horizontal plane outer boundary. The wells are located in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Devon's responsibility as a prudent operator to maximize lateral length and to minimize reserves left in the ground. Decreasing the last take point will increase the wells effective lateral length by 460 feet thereby increasing ultimate recovery of reserves and preventing waste of natural resources.

Sincerely,

Paige Bowes

Reservoir Engineer

