

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 Vance  
[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL - 8809**

**Devon Energy Production Company, L.P. [OGRID 6137]  
Cotton Draw 25 36 Unit Well No. 822H  
API No. 30-015-PENDING**

Reference is made to your application received on September 17<sup>th</sup>, 2024.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	200 FNL & 2505 FWL	C	25	24S	31E	Eddy
First Take Point	100 FNL & 2310 FWL	C	25	24S	31E	Eddy
Last Take Point	100 FSL & 2310 FWL	N/2	36	24S	31E	Eddy
Terminus	20 FSL & 2310 FWL	N/2	36	24S	31E	Eddy

**Proposed Horizontal Gas Units**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
E/2 W/2 of Section 25	319.36	Purple Sage; Wolfcamp, Gas	98220
E/2 W/2 of Section 36			

You have requested to complete this horizontal well as a **gas** well described above in the referenced pool or formation. This well is governed by special rules R-14262, for the Purple Sage; Wolfcamp (Gas) Pool and governs wells to be located at least 330 feet from the unit outer boundary of a spacing unit and no closer than 10 feet to any quarter – quarter section line. The completed intervals of horizontal wells are to be located no closer than 330 feet to the exterior boundary of a standard 320 - acre **gas** spacing unit.

Administrative Order NSL - 8809  
Devon Energy Production Company, L. P.  
Page 2 of 2

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 Last Take Points referenced above within the described Horizontal Spacing Unit.

The well's completed interval is as close as 100 feet to the northern boundary of the horizontal spacing unit. Exterior to the Cotton Draw unit. Encroachment will impact the following tract(s).

Section 24, T24S, R31E, encroachment to the SW/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 in order to minimize reserves left in the ground within the Wolfcamp formation underlying the E/2 W/2 of Section 25 and the E/2 W/2 of Section 36, thereby preventing waste.

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.



**Gerasimos Razatos**  
Division Director (Acting)  
GR/lrl

**Date:** 12/11/2024

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/oed/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 414960

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 414960
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	12/24/2024