State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Melanie A. Kenderdine
Cabinent Secretary

Ben Shelton
Deputy Secretary

Erin Taylor
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division

Jaclyn M. McLean
jmclean@hardymclean.com

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL – 9080

Devon Energy Production Company, L.P. [OGRID 6137]
Thistle Unit Well No. 192H
API No. 30-025-54363

Reference is made to your application received on August 14th, 2025.

Proposed Location

	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	690 FNL & 830 FWL	D	22	23S	33E	Lea
First Take Point	100 FNL & 500 FWL	D	22	23S	33E	Lea
Last Take Point	100 FSL & 500 FWL	M	34	23S	33E	Lea
Terminus	20 FSL & 500 FWL	M	34	23S	33E	Lea

Proposed Horizontal Units

Description	Acres	Pool	Pool Code
W/2 Section 22 W/2 Section 27 W/2 Section 34	960	Johnson Ranch; Wolfcamp (GAS)	79335

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(3)(a) NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal **gas** well a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter section or equivalent.

19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 660 feet for a **gas** well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal well shall be no closer than 330 feet for a **gas** in the horizontal plane, to any outer boundary of the horizontal spacing unit.

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.

This well's completed interval is as close as 100 feet to the northern and southern edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 15, encroachment to the SW/4
Section 03, T24S R33E, encroachment to the NW/4

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in 19.15.2.7(A)(8) NMAC, in all adjoining units towards which the proposed location encroaches. Encroachment towards the western boundary is located within the Thistle Unit where notice is not required.

Division understands you are seeking this unorthodox location in order to optimize well spacing and improve overall production of wells within the Wolfcamp formation underlying the W/2 of Section 22, W/2 Section 27 and the W/2 Section 34. Thereby preventing waste and protecting correlative rights.

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 19.15.15.13 (B) 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.

Albert Chang

Albert C.S. Chang
Division Director
AC/lrl

Date: 11/10/2025

Revised March 23, 2017

ID NO. 495980

NSL - 9080

RECEIVED: 08/14/25	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 Company, L.P. **OGRID Number:** 6137
Well Name: Thistle Unit 192H **API:** 30-025-54363
Pool: JOHNSON RANCH;WOLFCAMP (GAS) **Pool Code:** 79335

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

FOR OCD ONLY
☐ Notice Complete
☐ Application Content Complete

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

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.

Jaclyn M. McLean
Print or Type Name

Jaclyn M. McLean
Digitally signed by Jaclyn M. McLean
Date: 2025.08.14 05:30:58 -06'00'
Signature

8/14/2025
Date

505-230-4410
Phone Number

jmclean@hardymclean.com
e-mail Address

Hardy | McLean LLC
ENERGY AND NATURAL RESOURCES ATTORNEYS

August 14, 2025

VIA ONLINE FILING

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

Re: Devon Energy Production Company, L.P.
Request for Administrative Approval of Unorthodox Well Location

Thistle Unit 192H
W/2 of Sections 22, 27, and 34, Township 23 South, Range 33 East, Lea County, New Mexico.
Johnson Ranch; Wolfcamp (Gas) Pool (Code 79335)

Dear Mr. Chang,

In accordance with Division Rules 19.15.16.15(C)(6) and 19.15.15.13 NMAC, Devon Energy Production Company, L.P. ("Devon") (OGRID No. 6137) seeks administrative approval of an unorthodox well location for the Thistle Unit 192H well, in a 960-acre, more or less, standard horizontal spacing unit, comprised of the W/2 of Sections 22, 27, and 34, Township 23 South, Range 33 East, Lea County, New Mexico.

The location for the **Thistle Unit 192H** well is as follows:

- Surface Hole Location: 690' FNL and 830' FWL of Section 22
- First Take Point: 100' FNL and 500' FWL of Section 22
- Last Take Point: 100' FSL and 500' FWL of Section 34
- Bottom Hole Location: 20' FSL and 500' FWL of Section 34

The completed intervals of the well will be unorthodox because they are located less than 330' from the southern and northern boundaries of the offsetting spacing units. As explained in the engineering statement, included as **Exhibit A**, approval of the unorthodox, completed interval

125 Lincoln Avenue, Suite 223
Santa Fe, NM 87501
505-230-4410

HardyMclean.com

Writer:
Jaclyn M. McLean
Managing Partner
jmclean@hardymclean.com

Received by OCD: 8/14/2025 9:36:23 AM

is necessary to allow Devon to optimize well spacing and improve overall productivity of the wells. This will prevent waste and protect correlative rights.

Exhibit B is a Form C-102 showing the location of the Thistle Unit 192H well in relation to the offset tracts.

Exhibit C is a plat that shows the Thistle Unit 192H well in relation to the adjoining tracts. Devon is the operator and 100% working interest owner of the adjoining spacing unit to the north (W/2 Section 15, Township 23 South, Range 33 East). EOG is the offset operator of the adjoining spacing unit to the south (W/2 of Section 3, Township 23 South, Range 33 East). For this reason, Devon has provided notice to the State Land Office and EOG, which are the mineral owner and offset operator of the unorthodox well locations to the north and south of the spacing unit.

Exhibit D is a list that identifies all affected persons who were sent a copy of this application and attachments by certified mail advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application, along with the date notice was sent, and a copy of the notice letter to affected persons.

Thank you for your attention to this matter. Please let me know if you require additional information.

Very truly yours,

HARDY MCLEAN LLC

/s/ Jaclyn M. McLean
Jaclyn M. McLean

ATTORNEYS FOR DEVON ENERGY PRODUCTION COMPANY, L.P.

Released to Imaging: 11/12/2025 1:20:14 PM

devon

Devon Energy Production Company LP
333 West Sheridan Avenue
Oklahoma City, OK 73102

405 228 8788 Phone
www.devonenergy.com

August 13, 2025

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

RE: Application for Non-Standard Location
Engineering Statement
Devon Energy Production Company, L.P.
Thistle Unit 192H, 193H, 194H & 198H
W/2 of Section 22, 27 & 34-T23S-R33E
Lea County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, LP ("Devon") respectfully requests administrative approval of non-standard location for the Thistle Unit 192H, 193H, 194H & 198H wells (the "New Wells"). The New Wells were assigned the Johnson Ranch; Wolfcamp (Gas) Pool (Pool Code 79338) by the NMOCD. Devon has drilled multiple offsetting Thistle Wolfcamp wells ("Offset Wells") in the sections located directly to the west, within the boundary of the Thistle Federal Exploratory Unit, and with the same planned TVD as the New Wells. These Offset Wells were assigned an oil pool and produce with gas-oil ratios (GOR) below than the NMOCD' definition of a gas well, therefore the Offset Wells were able to maximize GPI by utilizing oil pool setbacks at the heel and toe.

Devon expects the New Wells to produce with a GOR similar to the Offset Wells, therefore Devon proposes to decrease the first and last tank points from 330 feet to 100 feet, which will increase the completed horizontal lateral and the ultimate recovery of reserves. Therefore, approval of this non-standard location is necessary to avoid causing wasted resources and reducing production from current and future well development in the area.

Respectfully,

Devon Energy Production Company, L.P.

Curtis Johnston
Advising Reservoir Engineer

EXHIBIT A

Devon Public

C-102	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July 9, 2024
Submit Electronically Via OCD Permitting		Submittal Type: ☒ Initial Submittal ☐ Amended Report ☐ As Drilled

WELL LOCATION INFORMATION

API Number	Pool Code	Pool Name	
30-025-54363	79335	JOHNSON RANCH;WOLFCAMP (GAS)	
Property Code	Property Name		Well Number
	THISTLE UNIT		192H
OGRID No. 6137	Operator Name	DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3709.8
Surface Owner: ☒State ☐Fee ☐Tribal ☐Federal		Mineral Owner ☒State ☐Fee ☐Tribal ☐Federal	

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
D	22	23 S	33 E		690 NORTH	830 WEST	32.2955761°N	103.5660735°W	LEA

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
M	34	23 S	33 E		20 SOUTH	500 WEST	32.2539565°N	103.5671238°W	LEA

Dedicated Acres	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
960acs	Infill	30-025-48096	Y	U
Order Numbers. Approved Wolfcamp PA: NMNM88526B			Well setbacks are under Common Ownership: ☒Yes ☐No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	22	23S	33E		50 FNL	500 FWL	32.2972	-103.5672	LEA

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
D	22	23 S	33 E		100 NORTH	500 WEST	32.2971988°N	103.5671414°W	LEA

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
M	34	23 S	33 E		100 SOUTH	500 WEST	32.2541763°N	103.5671238°W	LEA

Unitized Area or Area of Uniform Interest	Spacing Unit Type ☒Horizontal ☐Vertical	Ground Floor Elevation:
Thistle Unit: NMNM088526X, 3520 acs.		

OPERATOR CERTIFICATIONS

I hereby certify that the information contained herein is true and complete to the best ofmy knowledge and belief, and, if the well is a vertical or directional well, 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 a working interest run leased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order here to fore entered by the division.

If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.

Rebecca Deal

Signature Date

Rebecca Deal, Regulatory Analyst 1/20/2025

Printed Name

rebecca.deal@dvn.com

Email Address

SURVEYOR CERTIFICATIONS

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.

Signature and Seal of Professional Surveyor

FILIMON F. JARAMILLO

CertificateNumber	Dateof Survey
PLS 12797	OCTOBER 8, 2024
	SURVEY NO. 10295

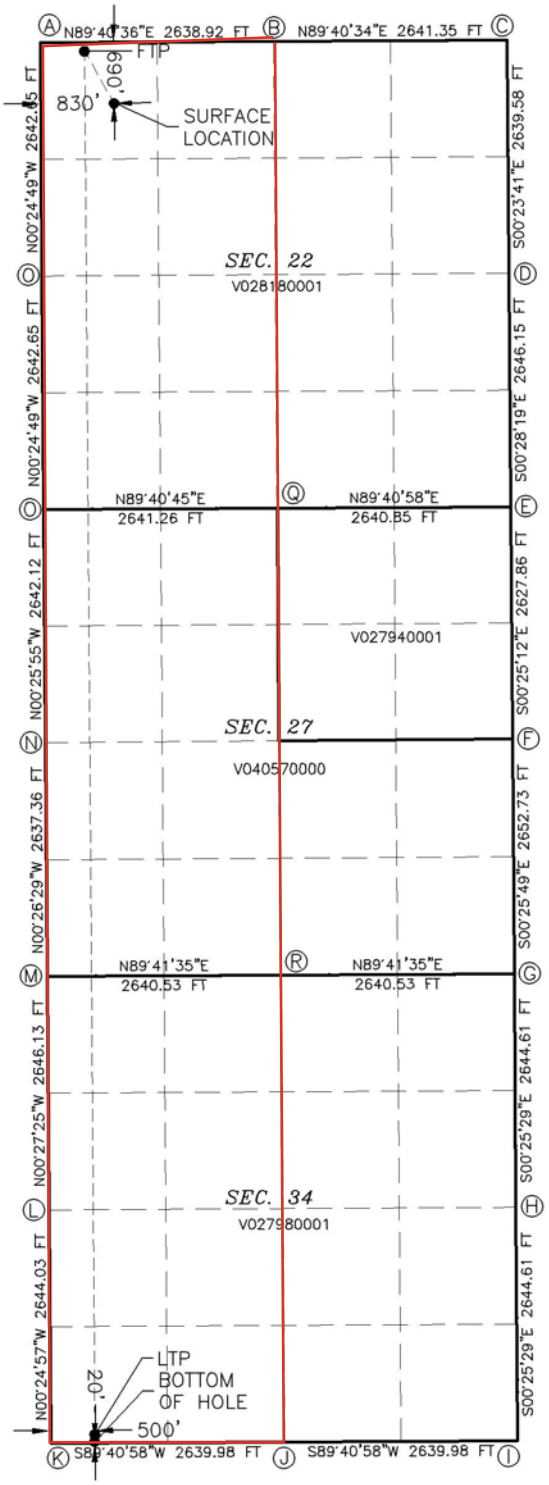
Note: No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

EXHIBIT B

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.



THISTLE UNIT 192H
EL. = 3709.8

GEODETIC COORDINATES
NAD 83 NMSP EAST
SURFACE LOCATION
690' FNL, 830' FWL
N.=472111.32
E.=778415.78
LAT.=32.2955761°N
LONG.=103.5660735°W

KICK OFF POINT
CALLS 50' FNL, 500' FWL, _____
N.= 472749
E.= 778081
LAT. = 32.2972
LONG. = -103.5672

FIRST TAKE POINT
100' FNL, 500' FWL
N.=472699.33
E.=778081.60
LAT.=32.2971988°N
LONG.=103.5671414°W

LAST TAKE POINT
100' FSL, 500' FWL
N.=457047.87
E.=778198.79
LAT.=32.2541763°N
LONG.=103.5671238°W

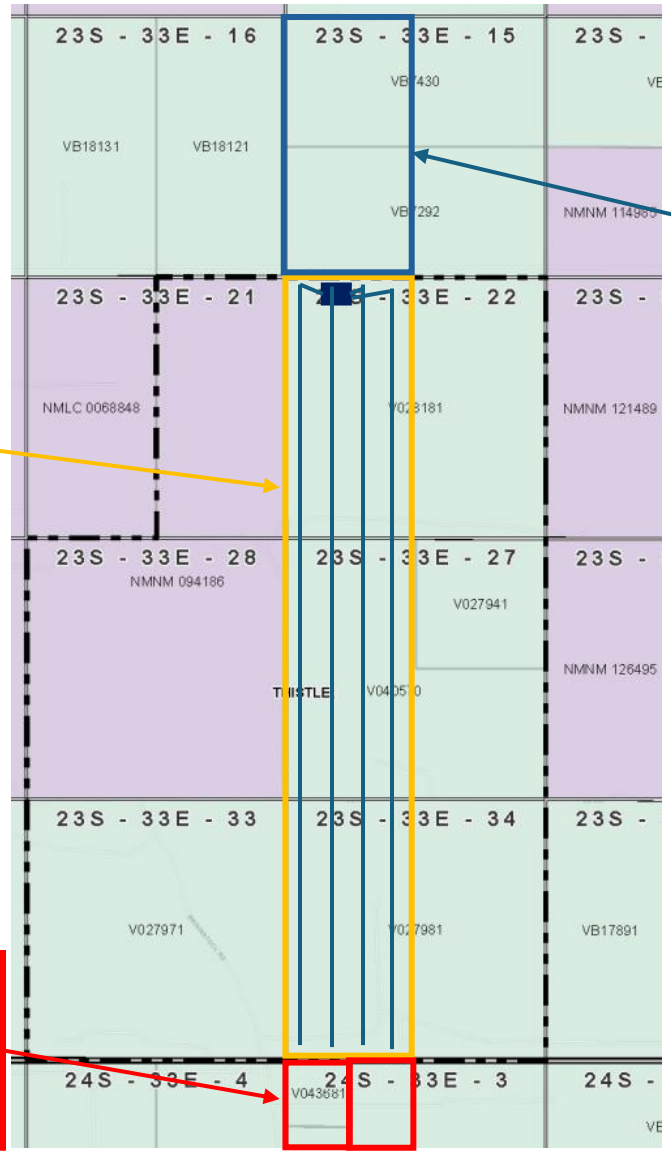
BOTTOM OF HOLE
20' FSL, 500' FWL
N.=456967.89
E.=778199.37
LAT.=32.2539565°N
LONG.=103.5671238°W

CORNER COORDINATES TABLE
NAD 83 NMSP EAST

A	N.=472796.48	E.=777580.98
B	N.=472811.37	E.=780219.33
C	N.=472826.30	E.=782860.12
D	N.=470187.30	E.=782878.31
E	N.=467541.76	E.=782900.10
F	N.=464914.49	E.=782919.36
G	N.=462262.37	E.=782939.28
H	N.=459618.35	E.=782958.87
I	N.=456974.34	E.=782978.47
J	N.=456959.74	E.=780339.05
K	N.=456945.13	E.=777699.63
L	N.=459588.56	E.=777680.44
M	N.=462234.08	E.=777659.34
N	N.=464870.84	E.=777639.03
O	N.=467512.36	E.=777619.12
P	N.=470154.42	E.=777600.05
Q	N.=467527.14	E.=780259.81
R	N.=462248.22	E.=780299.31

LEGEND
SECTION LINE
QUARTER LINE
LEASE LINE
WELL PATH

Thistle Unit 192H, 193H, 194H & 198H: NSL



Affected Offsetting Tract
Devon-operated 100% WI, State Minerals
Parseltonge 15 10 State Com 20H, 21H, 22H & 29H
W2 of Section 15

Horizontal Spacing Unit
Thistle Unit 192H, 193H, 194H & 198H
W2 of Sections 22, 27 & 34
Being 960 acres
Horizontal Spacing Unit fully included in
Thistle Wolfcamp PA covering entire unit area,
i.e. Area of Common Interest

Affected Offsetting Tracts
EOG-operated, State Minerals
Neptune 10 State Com 702H, 703H,
704H, & 705H
W2 of Section 3

EXHIBIT C

Notice Chart

Entity	Address	City	State	Zip	Date Notice Sent	Tracking No.
New Mexico SLO (mineral owner)	310 Old Santa Fe Trail	Santa Fe	NM	87501	08/14/2025	9414836208551286167439
EOG Resources (offset operator)	5509 Champions Dr	Midland	TX	79706	08/14/2025	9414836208551286167446

EXHIBIT D

Hardy | McLean LLC
ENERGY AND NATURAL RESOURCES ATTORNEYS

August 14, 2025

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

Re: Devon Energy Production Company, L.P.
Requests for Administrative Approval of Unorthodox Well Locations

Enclosed are copies of administrative applications requesting approval of unorthodox well locations for Devon Energy Production Company, L.P.'s Thistle Unit wells. Administrative applications for the unorthodox well locations were filed with the New Mexico Oil Conservation Division on this date. Any objection to these applications must be filed in writing within twenty (20) days from the date this application is received by 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, these applications may be approved administratively by the Division.

If you have any questions about this application, please contact David Broussard, Landman – Delaware Basin, with Devon Energy at david.broussard@dvn.com.

Sincerely,

HARDY MCLEAN LLC

/s/ Jaclyn M. McLean
Jaclyn M. McLean

ATTORNEYS FOR DEVON ENERGY PRODUCTION, L.P.

125 Lincoln Avenue, Suite 223
Santa Fe, NM 87501
505-230-4410

HardyMclean.com

Writer:
Jaclyn M. McLean
Managing Partner
jmclean@hardymclean.com

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

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 495980
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	8/19/2025