

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Melanie A. Kenderdine
Cabinet 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 – 9120

**Devon Energy Production Company, L.P. [OGRID 6137]
Belloq 11 2 Federal State Com Well No. 535H
API No. 30-015-56975**

Reference is made to your application received on September 8th, 2025.

Proposed Location

	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	356 FSL & 991 FEL	P	11	23S	31E	Eddy
First Take Point	100 FSL & 2400 FEL	O	11	23S	31E	Eddy
Last Take Point	100 FNL & 2400 FEL	B/2	02	23S	31E	Eddy
Terminus	20 FNL & 2400 FEL	B/2	02	23S	31E	Eddy

Proposed NSL Horizontal Unit

Description	Acres	Pool	Pool Code
W/2 E/2 Section 11	319.78	Livingston Ridge; Bone Spring	39350
W/2 E/2 Section 02			

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)(1)(a) NMAC governs this proposed well and provides that the operator dedicate a horizontal well at 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 - quarter section or equivalent. 19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the

Administrative Order NSL – 9120
Devon Energy Production Company, L.P.
Page 2 of 2

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 330 feet for an oil 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 100 feet for a well within 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 Take Points referenced above, within the described Horizontal Spacing Unit.

This well's completed interval is as close as 240 feet to the western edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 11, encroachment to the E/2 W/2
Section 02, encroachment to the E/2 W/2

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.

The Division understands you are seeking this unorthodox location in order to allow for tighter well spacing within the Bone Spring formation underlying the W/2 E/2 section 11 and the W/2 E/2 Section 02 and thereby increasing recovery of resources and 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 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 the Division deems necessary.



Albert C.S. Chang
Division Director
AC/lrl

Date: 12/10/2025

ID NO. 503776

NSL - 9120

Revised March 23, 2017

RECEIVED: 09/08/25	REVIEWER:	TYPE:	APP NO:
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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: Belloq 11-2 Fed State Com 535H **API:** 30-015-56975
Pool: Livingston Ridge; Bone Spring **Pool Code:** 39350

**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 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

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.

Jaclyn M. McLean

Print or Type Name

Jaclyn M. McLean

Signature

Digitally signed by Jaclyn M. McLean
 Date: 2025.09.08 11:19:44 -06'00'

9/8/2025

Date

505-372-6375

Phone Number

jmclean@hardymclean.com

e-mail Address



September 7, 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**

Belloq 11-2 Fed State Com 535H
W/2 E/2 of irregular Section 2 and the W/2 E/2 of Section 11, Township 23 South, Range
31 East, Eddy County, New Mexico.
Livingston Ridge; Bone Spring Pool (Code 39350)

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 Belloq 11-2 Fed State Com 535H well, in a 319.78-acre, more or less, standard horizontal spacing unit, comprised of the W/2 E/2 of irregular Section 2 and the W/2 E/2 of Section 11, Township 23 South, Range 31 East, Eddy County, New Mexico.

The location for the **Belloq 11-2 Fed State Com 535H** well is as follows:

- Surface Hole Location: 356' FSL and 991' FEL of Section 11
- First Take Point: 100' FSL and 2,400' FEL of Section 11
- Last Take Point: 100' FNL and 2,400' FEL of Section 2
- Bottom Hole Location: 20' FNL and 2,400' FEL of Section 2

The completed intervals of the well will be unorthodox because they are located less than 330' from the eastern boundary of the offsetting spacing unit. As explained in the engineering statement, included as **Exhibit A**, approval of the unorthodox, completed interval is necessary to

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

HardyMcClean.com

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

Hardy McLean LLC
September 7, 2025

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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 Belloq 11-2 Fed State Com 535H well in relation to the offset tracts.

Exhibit C is a plat that shows the Belloq 11-2 Fed State Com 535H well in relation to the adjoining tracts. Devon is the operator of the adjoining spacing unit to the west. For this reason, Devon has provided notice to the State Land Office, Bureau of Land Management, the State of New Mexico Oil Conservation Division, and the working interest owners in the spacing unit to the east of the unorthodox well location.

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.



Devon Energy Production Company LP 405 552 8002 Phone
333 West Sheridan Avenue www.devonenergy.com
Oklahoma City, OK 73102

August 28, 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.
Belloq 11-2 Fed State Com 535H
W2E2 Sections 11 & 2, T23S-R31E
Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, LP ("Devon") respectfully requests administrative approval of a non-standard location for the Belloq 11-2 Fed State Com 535H (the "Well") referenced above. The Well is in the Livingston Ridge; Bone Spring Pool (Pool Code 39350) with first and last take points at roughly 2,400' FEL, in between approved Bone Spring horizontal spacing units. Devon's responsibility as a prudent operator is to minimize reserves left in the ground. Decreasing the perpendicular setback from 330' will allow for tighter well spacing, thereby increasing the ultimate recovery of reserves and thereby preventing the waste of natural resources.

Respectfully,

Devon Energy Production Company, L.P.


Steven Young
Reservoir Engineer

EXHIBIT A

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

WELL LOCATION INFORMATION

API Number 30-015-56975	Pool Code 39350	Pool Name LIVINGSTON RIDGE; BONE SPRING
Property Code	Property Name BELLOQ 11 2 FED STATE COM	Well Number 535H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3,495'
Surface Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		Mineral Owner: ☒ State ☐ Fee ☐ Tribal ☒ Federal

Surface Location

UL P	Section 11	Township 23S	Range 31E	Lot	Ft. from N/S 356' FSL	Ft. from E/W 991' FEL	Latitude 32.312689°	Longitude -103.743235°	County EDDY
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Bottom Hole Location

UL	Section 2	Township 23S	Range 31E	Lot LOT 2	Ft. from N/S 20' FNL	Ft. from E/W 2,400' FEL	Latitude 32.340674°	Longitude -103.747822°	County EDDY
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Dedicated Acres 319.78	Infill or Defining Well Infill	Defining Well API 30-015-45276	Overlapping Spacing Unit (Y/N) N	Consolidation Code CF
Order Numbers.			Well setbacks are under Common Ownership: ☐ Yes ☐ No	

Kick Off Point (KOP)

UL O	Section 11	Township 23S	Range 31E	Lot	Ft. from N/S 50' FSL	Ft. from E/W 2,400' FEL	Latitude 32.311861°	Longitude -103.747796°	County EDDY
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First Take Point (FTP)

UL O	Section 11	Township 23S	Range 31E	Lot	Ft. from N/S 100' FSL	Ft. from E/W 2,400' FEL	Latitude 32.311999°	Longitude -103.747796°	County EDDY
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Last Take Point (LTP)

UL	Section 2	Township 23S	Range 31E	Lot LOT 2	Ft. from N/S 100' FNL	Ft. from E/W 2,400' FEL	Latitude 32.340455°	Longitude -103.747821°	County EDDY
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Unitized Area or Area of Uniform Interest	Spacing Unit Type ☒ Horizontal ☐ Vertical	Ground Floor Elevation:
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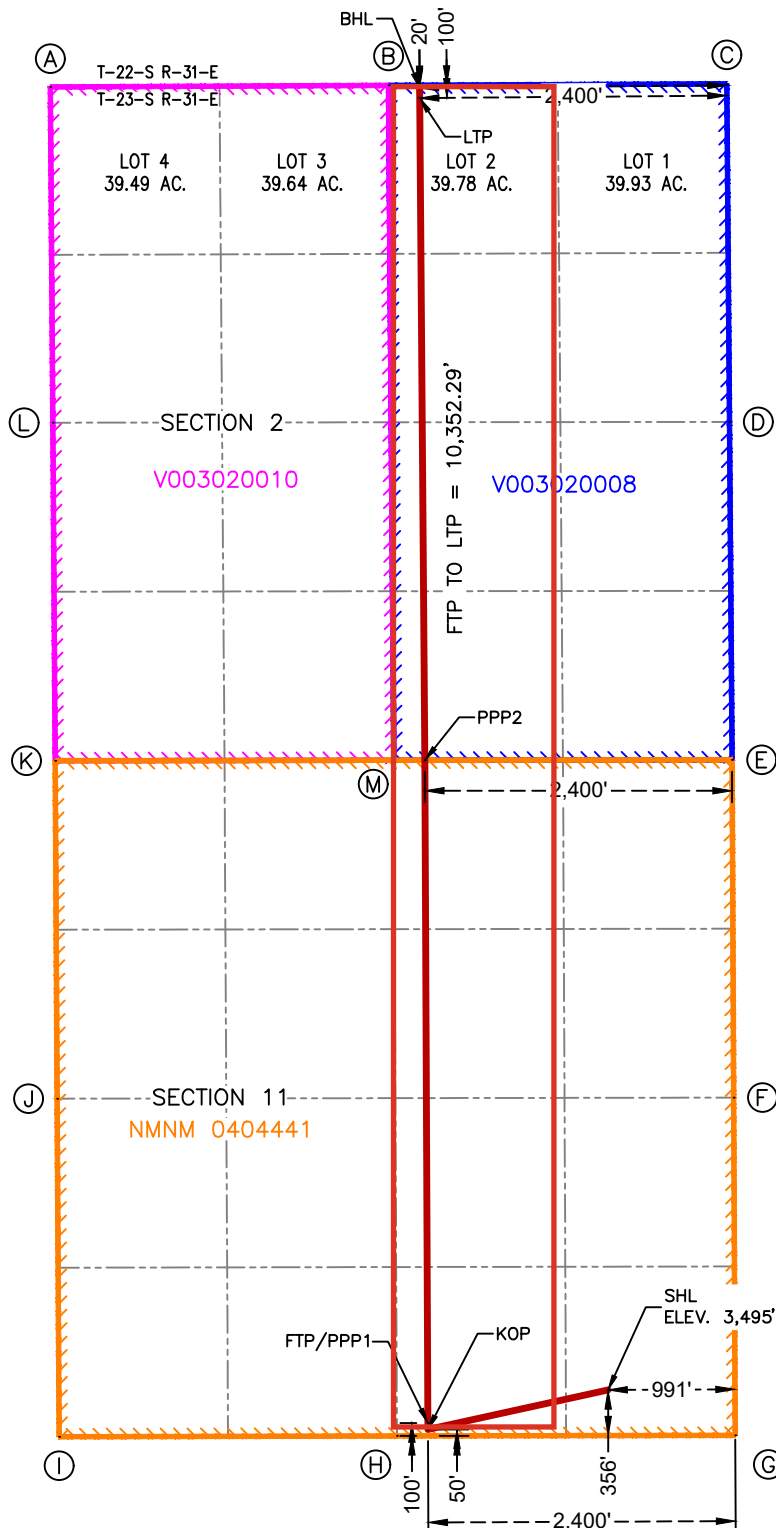
OPERATOR CERTIFICATIONS I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the 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 or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore 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. <i>Lauren Watson</i> 8/26/2025		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.  Date: 6/4/2025	
Signature Lauren Watson		Signature and Seal of Professional Surveyor	
Printed Name lauren.watson@dvn.com		Certificate Number 12177	Date of Survey 6/4/2025
Email Address			

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.

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.

BELLOQ 11 2 FED STATE COM 535H

SURFACE HOLE LOCATION
356' FSL & 991' FEL
ELEV. = 3,495'

NAD 83 X = 723,638.68'
NAD 83 Y = 477,990.56'
NAD 83 LAT = 32.312689°
NAD 83 LONG = -103.743235°

KICK-OFF POINT
50' FSL & 2,400' FEL

NAD 83 X = 722,231.45'
NAD 83 Y = 477,681.57'
NAD 83 LAT = 32.311861°
NAD 83 LONG = -103.747796°

FIRST TAKE POINT &
PENETRATION POINT 1
100' FSL & 2,400' FEL

NAD 83 X = 722,231.22'
NAD 83 Y = 477,731.57'
NAD 83 LAT = 32.311999°
NAD 83 LONG = -103.747796°

PENETRATION POINT 2
0' FNL & 2,400' FEL

NAD 83 X = 722,207.14'
NAD 83 Y = 482,910.68'
NAD 83 LAT = 32.326235°
NAD 83 LONG = -103.747782°

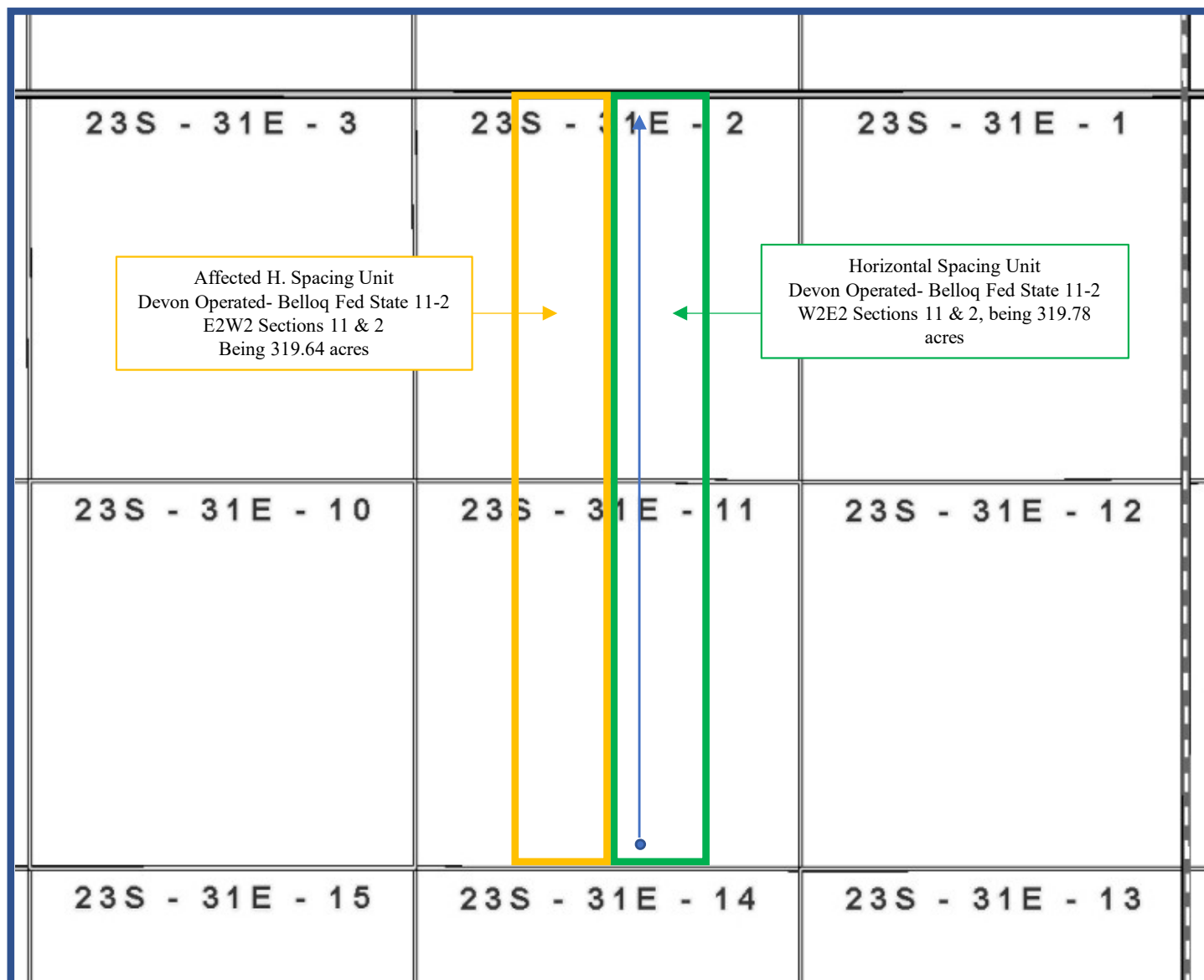
LAST TAKE POINT
100' FNL & 2,400' FEL

NAD 83 X = 722,166.77'
NAD 83 Y = 488,083.65'
NAD 83 LAT = 32.340455°
NAD 83 LONG = -103.747821°

BOTTOM HOLE LOCATION
20' FNL & 2,400' FEL

NAD 83 X = 722,166.14'
NAD 83 Y = 488,163.64'
NAD 83 LAT = 32.340674°
NAD 83 LONG = -103.747822°

CORNER COORDINATES NEW MEXICO EAST - NAD 83	
POINT	NORTHING/EASTING
A	IRON PIPE W/ BRASS CAP N:488,170.14' E:719,281.91'
B	CALCULATED CORNER N:488,182.51' E:721,923.94'
C	IRON PIPE W/ BRASS CAP N:488,194.88' E:724,565.97'
D	IRON PIPE W/ BRASS CAP N:485,553.70' E:724,586.82'
E	IRON PIPE W/ BRASS CAP N:482,913.36' E:724,607.28'
F	IRON PIPE W/ BRASS CAP N:480,274.46' E:724,619.43'
G	IRON PIPE W/ BRASS CAP N:477,636.02' E:724,631.58'
H	IRON PIPE W/ BRASS CAP N:477,631.12' E:721,989.07'
I	IRON PIPE W/ BRASS CAP N:477,624.81' E:719,350.58'
J	IRON PIPE W/ BRASS CAP N:480,266.04' E:719,334.92'
K	IRON PIPE W/ BRASS CAP N:482,906.14' E:719,319.63'
L	IRON PIPE W/ BRASS CAP N:485,547.22' E:719,301.45'
M	IRON PIPE W/ BRASS CAP N:482,910.41' E:721,965.14'

Belloq 11-2 Fed State Com 535H: NSL**EXHIBIT C**

Notice Chart								
Type	Owner Name	Attention/Trustee	Address	City	State	Zip Code	Date Notice Sent	Tracking Nos.
Working Interest	Joe N. Gifford		PO Box 51187	Midland	TX	79710-1187	9/8/2025	9414836208551287126985
Working Interest	Genevieve Tarlton Dougherty FBO	Mary Patricia Dougherty Trust	PO Box 131239	Spring	TX	77393-1239	9/8/2025	9414836208551287126961
Working Interest	Tek Properties Ltd	Thomas E. Kelly	4705 Miramont Circle	Bryan	TX	77802	9/8/2025	9414836208551287126978
Working Interest	Round Hill Royalty Limited Partnership		PO Box 25128	Dallas	TX	75225	9/8/2025	9414836208551287126954
Working Interest	Mary Margaret Olson Trust	Leonard M. Olson, John B. Olson, Katherine M. Froelich, Joseph L. Olson Co-Ttees	6031 W Interstate-20 Ste 251	Arlington	TX	76017	9/8/2025	9414836208551287126992
Working Interest	Nancy Stallworth Thomas Marital Trust	JP Morgan Chase Bank N.K. & Nancy Thomas Co-Ttees	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127005
Working Interest	Donald C. Allman Trust UA Dated 10-26-68	JPMorgan Chase Bank NA Ttee	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127012
Working Interest	George Allman Jr. Trust UA DTD 10-26-68	JPMorgan Chase Bank NA Ttee	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127029
Working Interest	Mary Elizabeth Schram Trust UA DTD 10-26-68	JPMorgan Chase Bank NA Ttee	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127036
Working Interest	Michelle Allman Grantor Trust UA DTD 12-31-87	JPMorgan Chase Bank NA & Michelle Allman Co-Ttee	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127043
Working Interest	Theresa Allman Smith Grantor Trust UA DTD 12-31-87	JPMorgan Chase Bank NA & Theresa Allman Smith Co-Ttees	PO Box 2605	Fort Worth	TX	76113	9/8/2025	9414836208551287127050
Working Interest	Catherine Grace Revocable Trust Dec 4	Susan Serna Co-Ttee, Stephen Grace Co-Ttee, Cynthia Grace Co-Ttee	2705 W Marquis Cir	Arlington	TX	76016	9/8/2025	9414836208551287127067
Working Interest	Otto & Doris Schroeder Family Trust	Otto E. Schroeder III Trustee	500 Hawk Court	Coppell	TX	75019	9/8/2025	9414836208551287127074
Working Interest	Mabee Flynt Lease Trust	Attn: Bert Simpson	15611 Wildwood Trace	Magnolia	TX	77354	9/8/2025	9414836208551287127111
Working Interest	Nancy Thomas		106 Maple Valley Rd	Houston	TX	77056	9/8/2025	9414836208551287127081
Working Interest	Alfred F. Schram Sr. Estate		2731 Shawn Dr	Denison	TX	75020	9/8/2025	9414836208551287127128
Working Interest	Schram Family Living Trust		2731 Shawn Dr	Denison	TX	75020	9/8/2025	9414836208551287127098
NMOCD	New Mexico Oil Conservation Division		1220 South St. Francis Dr.	Santa Fe	NM	87505	9/8/2025	9414836208551287127142
BLM	Bureau of Land Management		620 E. Greene Street	Carlsbad	NM	88220-6292	9/8/2025	9414836208551287127104
NMSLO	New Mexico State Land Office		310 Old Santa Fe Trail, P.O. Box 1148	Santa Fe	NM	87504	9/8/2025	9414836208551287127135



September 8, 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 Belloq 11-2 Fed State Com 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 Aaron L. Young, Advising Landman, with Devon Energy at aaron.young@dvn.com.

Sincerely,

HARDY MCLEAN LLC

/s/ Jaclyn M. McLean
Jaclyn M. McLean

ATTORNEYS FOR DEVON ENERGY PRODUCTION, L.P.

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Santa Fe, NM 87501
505-230-4410

HardyMcClean.com

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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

Action 503776

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 503776
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	9/22/2025