## NSL

## Initial

# Application

Received: 07/17/20

Revised March 23, 2017

07/17/20	REVIEWER: LRL	TYPE: NSL	pLEL2020239172

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

### NEW MEXICO OIL CONSERVATION DIVISION



- Geological & Engine	//
1220 South St. Francis Drive,	
ADMINISTRATIVE APPL	
THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE REGULATIONS WHICH REQUIRE PROCESSING	APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND G AT THE DIVISION LEVEL IN SANTA FE
Applicant: Devon Energy Production, L.P.	OGRID Number: 6137
Well Name: Shetland 11-2 Fed State Com #732H Well	API: 30-015-47159
Pool: Purple Sage; Wolfcamp (Gas) Pool	Pool Code: 98220
SUBMIT ACCURATE AND COMPLETE INFORMATION INDICATED	
1) TYPE OF APPLICATION: Check those which apply A. Location – Spacing Unit – Simultaneous Ded  NSL NSP (PROJECT AREA)	
B. Check one only for [1] or [1]  [1] Commingling – Storage – Measurement  DHC DTB PLC PC  [11] Injection – Disposal – Pressure Increase – WFX PMX SWD IPI	□ols □olm
2) NOTIFICATION REQUIRED TO: Check those which  A. Offset operators or lease holders  B. Royalty, overriding royalty owners, revenue  C. Application requires published notice  D. Notification and/or concurrent approval  E. Notification and/or concurrent approval  F. Surface owner  G. For all of the above, proof of notification  H. No notice required	apply.  Ue owners  Application Content Complete  Dy BLM
3) <b>CERTIFICATION:</b> I hereby certify that the informati administrative approval is <b>accurate</b> and <b>complet</b> understand that <b>no action</b> will be taken on this approval to the Division.	le to the best of my knowledge. I also
Note: Statement must be completed by an individ	ual with managerial and/or supervisory capacity.
Kaitlyn A. Luck	July 17, 2020 Date
Print or Type Name	
Thin of type fame	505-954-7286
towhell.	Phone Number
	kaluck@hollandhart.com
Signature	e-mail Address



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

July 17, 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 Shetland 11-2 Fed State Com #732H Well in the W/2 of Sections 2 and 11, 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 **Shetland 11-2 Fed State Com #732H Well** (API No. 30-015-47159) to be completed within the Purple Sage Wolfcamp Pool (98220) underlying the W/2 of Sections 2 and 11, 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> 350 feet from the south line and 2140 feet from the west line (Unit N) of Section 11 to a <u>bottom hole location</u> 20 feet from the north line and 2310 feet from the west line (Unit C) of Section 2. The <u>first take point</u> will be located 100 feet from the south line and 2310 feet from the west line (Unit N) of Section 11, and the <u>last take point</u> will be 100 feet from the north line and 2310 feet from the west line (Unit C) of Section 2.

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 **Shetland 11-2 Fed State Com #732H 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 **Shetland 11-2 Fed State Com #732H Well** encroaches on the drilling and spacing unit to the north in Section 35, Township 25 South, Range 31 East, and to the south in Section 14, Township 26 South, Range 31 East.

**Exhibit B** is a land plat for Sections 2 and 11 that shows the proposed **Shetland 11-2 Fed State Com #732H Well** in relation to the adjoining spacing unit to the north in Section 35 and to the south in Section 14.

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.

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

☐ AMENDED REPORT

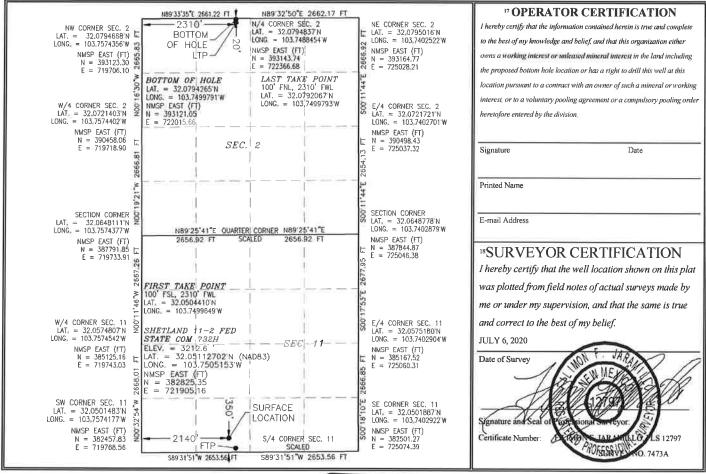
### WELL LOCATION AND ACREAGE DEDICATION PLAT

5 Pı	roperty Name	<sup>6</sup> Well Number
SHETLAND 11	1-2 FED STATE COM	732H
8 O	perator Name	<sup>9</sup> Elevation
DEVON ENERGY PRO	ODUCTION COMPANY, L.P.	3212.6
	SHETLAND 1 *0 DEVON ENERGY PR	SHETLAND 11-2 FED STATE COM  SOPERATOR Name  DEVON ENERGY PRODUCTION COMPANY, L.P.

Surface Location

UL or lot no.	Section	Township	Range	Lot ldn	Feet from the	North/South line	Feet from the	East/West line	County
N	11	26 S	31 E		350	SOUTH	2140	WEST	EDDY
			n I	Bottom H	Iole Location	If Different Fr	om Surface	——»	
UL or lot no.	Section	Township	Range	Lot ldn	Feet from the	North/South line	Feet from the	East/West line	County
C	2	26 S	31 E		20	NORTH	2310	WEST	EDDY
12 Dedicated Acre	s <sup>13</sup> Joint	or Infill 14	Consolidation	n 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.



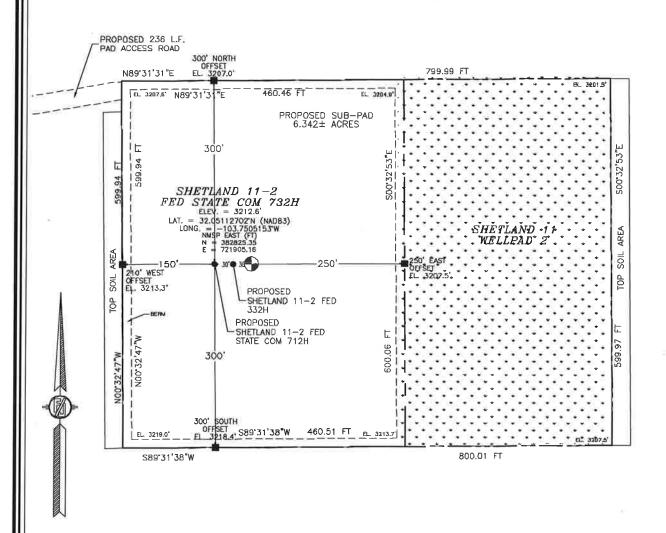


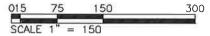
Inten	t	As Dri	led											
API#	ŧ		1											
DE	erator Na VON EN MPANY	NERGY F	PRODUC	CTION	N	l .	erty N			FED S	STA	TE C	OM	Well Number 732H
Kick (	Off Point	(KOP)			,									
UL	Section	Township	Range	Lot	Feet		From N	N/S	Feet		Fron	n E/W	County	
Latitu	ude			l	Longitu	de							NAD	
	Take Poir													
UL N	Section 11	Township 26S	Range 31E	Lot	Feet 100		From N SOUT		Feet 231		From WE:	n E/W ST	County EDDY	
132.0	ode 050441	0			Longitu 103.7		649						NAD 83	
	ake Poin		,											
OL C	Section 2	Township 26S	Range 31E	Lot	Feet 100	NOF	n N/S RTH	Feet 231		From E		Count EDD		
32.0	<sup>ide</sup> 079206	7			Longitud		793					NAD <b>83</b>		
ls this	well the	defining w	ell for the	e Horiz	ontal Sp	acing	Unit?			]				
s this	well an i	nfill well?			]									
	l is yes pl ng Unit.	ease provi	de API if a	availab	le, Oper	ator N	lame :	and w	vell n	umber	for [	Definin	g well fo	r Horizontal
API#														
Oper	rator Nan	ne:				Prope	erty N	ame:						Well Number

KZ 06/29/2018

### SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO SITE MAP

NOTE: LATITUDE AND LONGITUDE COORDINATES ARE SHOWN USING THE NORTH AMERICAN DATUM OF 1983 (NADB3). LISTED NEW MEXICO STATE PLANE EAST COORDINATES ARE GRID (NADB3). BASIS OF BEARING AND DISTANCES USED ARE NEW MEXICO STATE PLANE EAST COORDINATES MODIFIED TO THE SURFACE. ELEVATION VALUES ARE





DIRECTIONS TO LOCATION
FROM THE INTERSECTION OF CR. 1 (ORLA HWY.) & MONSANTO
ROAD, GO SOUTH ON CR. 1 4.2 MILES TO A CALICHE ROAD
(ROSS/PIPELINE ROAD), TURN RIGHT AND GO WEST 5.23 MILES,
TURN LEFT AND GO SOUTH 0.95 MILES, TURN LEFT AND GO
EAST 0.6 MILES TO EXISTING PAD 2.5 HETILAND 11, WELLPAD
2. AT THE NORTHEAST EXCELOF PAD 3.5 NOW ROAD SURVEY
EAST 236 TO THE TOTAL TOTAL CONTROL OF THIS
LOCATION.

I. FLINON F. MARKING. NEW EXICO 2008 LEG 2 OF ESSIONAL

YING.

DEVON ENERGY PRODUCTION COMPANY, L.P.

SHETLAND 11-2 FED STATE COM 732H

LOCATED 350 FT. FROM THE SOUTH LINE

AND 2140 FT. FROM THE WEST LINE OF

SECTION 11, TOWNSHIP 26 SOUTH,

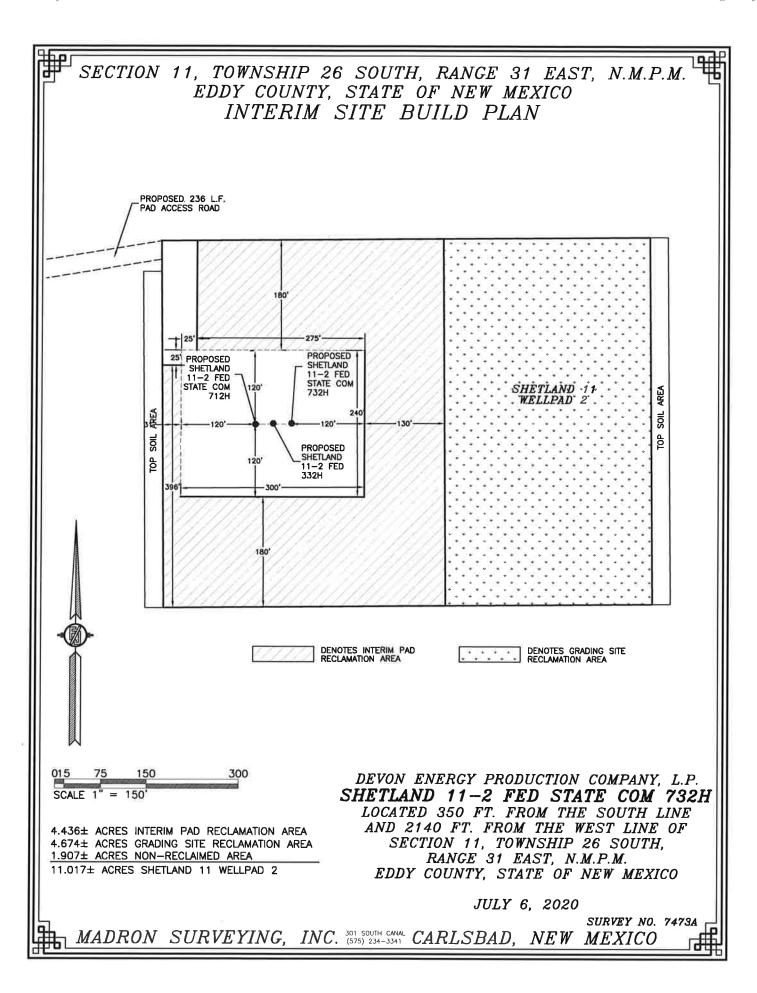
RANGE 31 EAST, N.M.P.M.

EDDY COUNTY, STATE OF NEW MEXICO

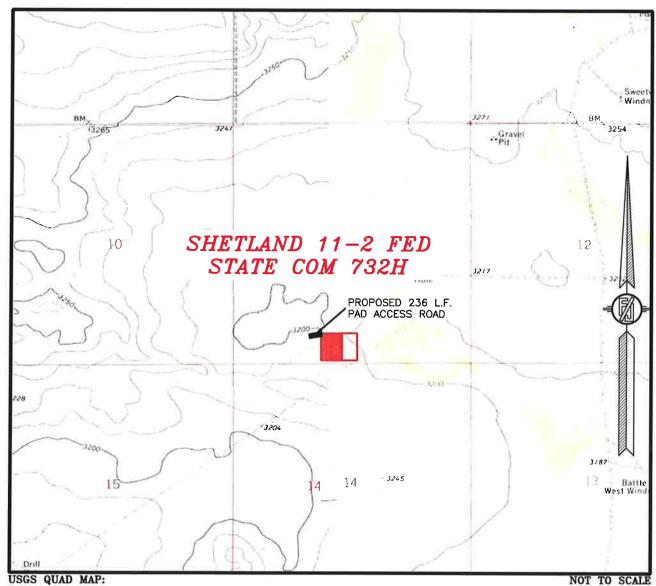
JULY 6, 2020

SURVEY NO. 7473A

INC. 301 SOUTH CANAL CARLSBAD,  $NEW\ MEXICO$ 



### SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO LOCATION VERIFICATION MAP



USGS QUAD MAP: PHANTOM BANKS & PADUCA BREAKS WEST

DEVON ENERGY PRODUCTION COMPANY, L.P.

SHETLAND 11-2 FED STATE COM 732H

LOCATED 350 FT. FROM THE SOUTH LINE

AND 2140 FT. FROM THE WEST LINE OF

SECTION 11, TOWNSHIP 26 SOUTH,

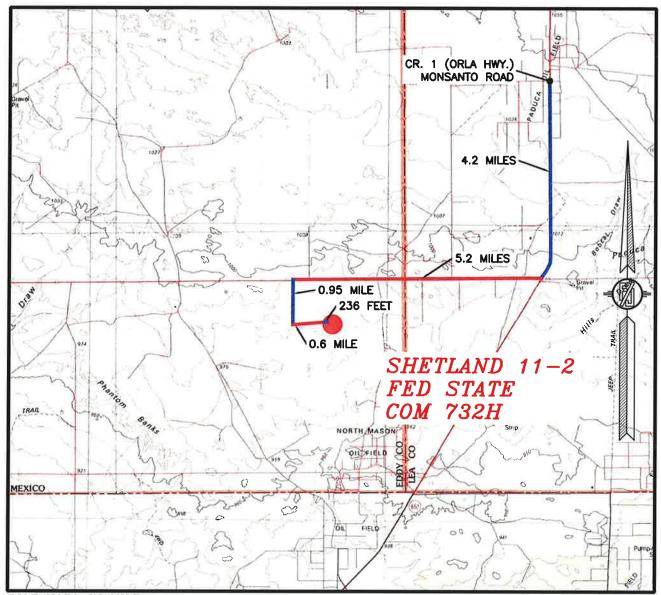
RANGE 31 EAST, N.M.P.M.

EDDY COUNTY, STATE OF NEW MEXICO

JULY 6, 2020

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

### SECTION 11, 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 THE INTERSECTION OF CR. 1 (ORLA HWY.) & MONSANTO ROAD, GO SOUTH ON CR. 1 4.2 MILES TO A CALICHE ROAD (ROSS/PIPELINE ROAD), TURN RIGHT AND GO WEST 5.23 MILES, TURN LEFT AND GO SOUTH 0.95 MILES, TURN LEFT AND GO EAST 0.6 MILES TO EXISTING PAD FOR SHETLAND 11, WELLPAD 2. AT THE NORTHEAST EDGE OF PAD FOLLOW ROAD SURVEY EAST 236' TO THE NORTHWEST PAD CORNER FOR THIS LOCATION.

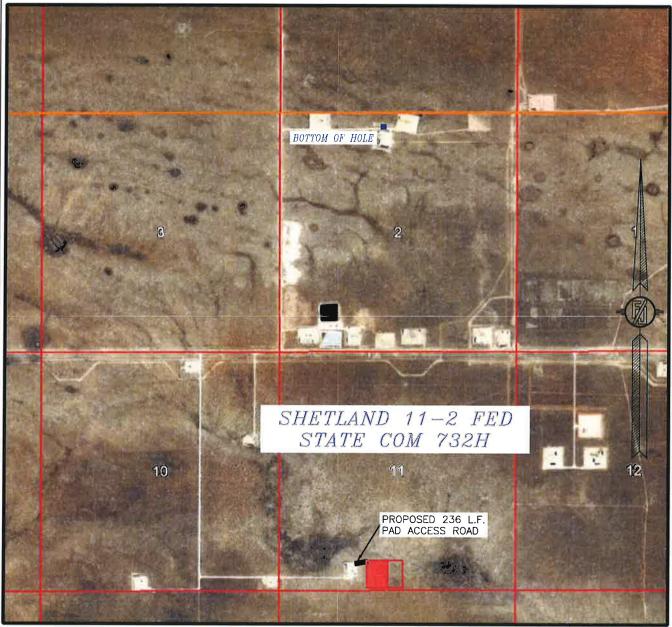
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 11-2 FED STATE COM 732H
LOCATED 350 FT. FROM THE SOUTH LINE
AND 2140 FT. FROM THE WEST LINE OF
SECTION 11, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JULY 6, 2020

SURVEY NO. 7473A

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

### SECTION 11, 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 FEB. 2019

DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 11-2 FED STATE COM 732H

LOCATED 350 FT. FROM THE SOUTH LINE
AND 2140 FT. FROM THE WEST LINE OF
SECTION 11, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

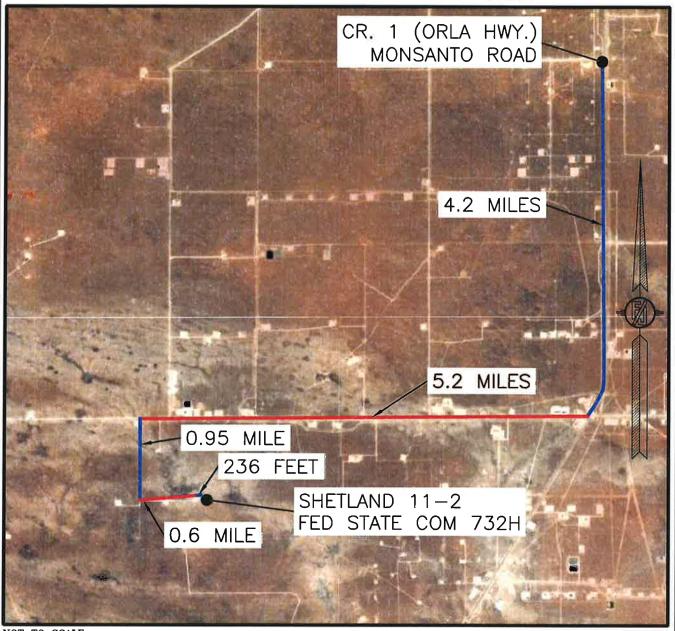
JULY 6, 2020

SURVEY NO. 7473A

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. DDY COUNTY, STATE OF NEW MEXICO

AERIAL ACCESS ROUTE MAP



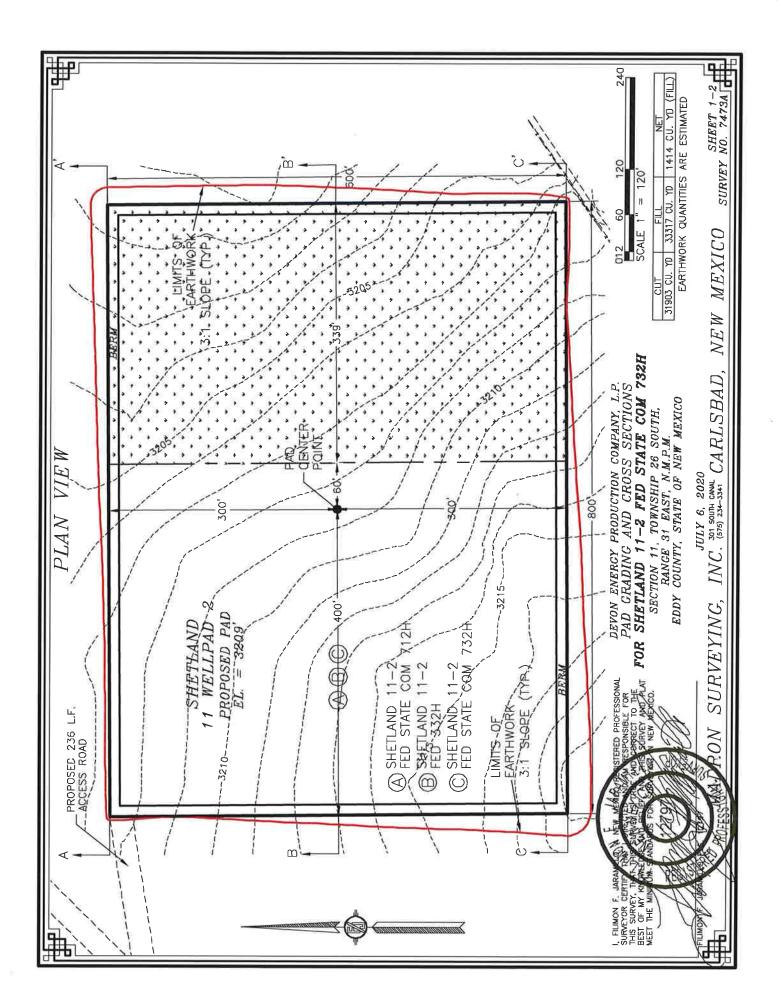
NOT TO SCALE AERIAL PHOTO: GOOGLE EARTH FEB. 2019

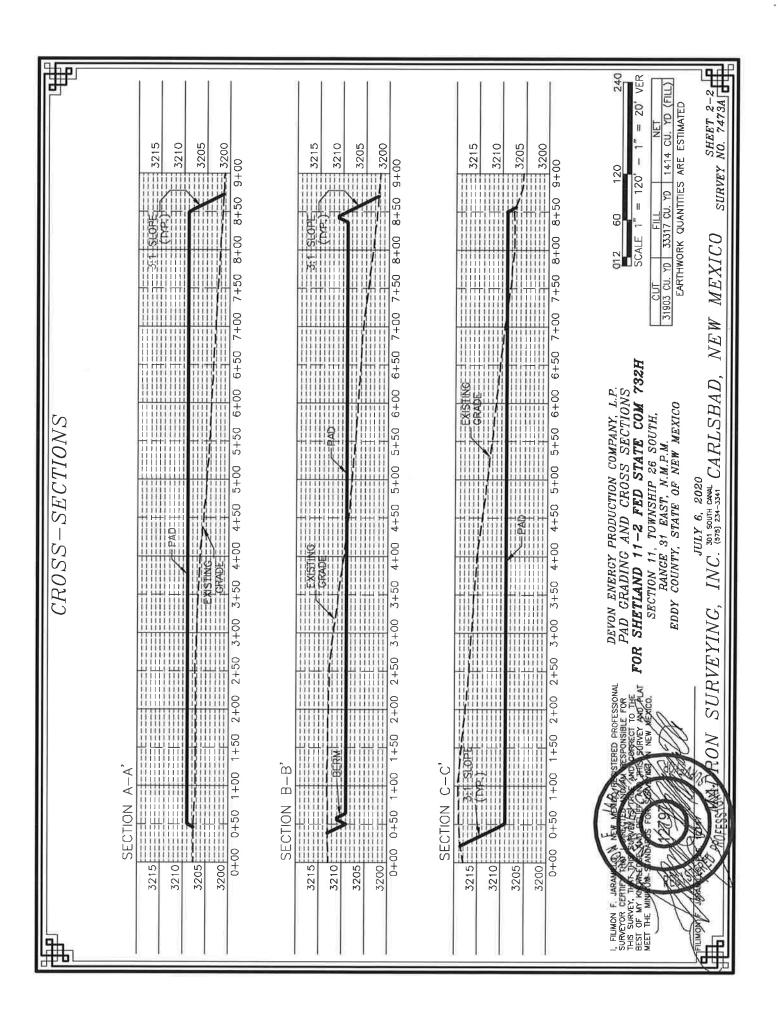
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 11-2 FED STATE COM 732H

LOCATED 350 FT. FROM THE SOUTH LINE
AND 2140 FT. FROM THE WEST LINE OF
SECTION 11, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

JULY 6, 2020

SURVEY NO. 7473A
MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO

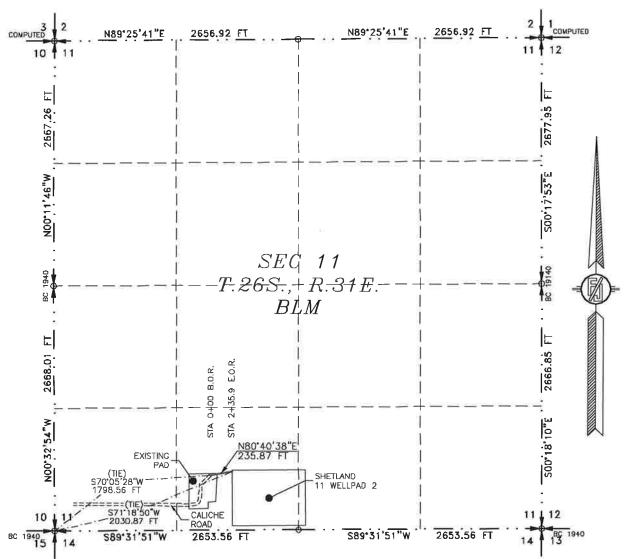




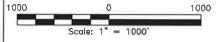
### ACCESS ROAD PLAT (AA000297614)

ACCESS ROAD FOR SHETLAND 11 WELLPAD 2 (SHETLAND 11-2 FED STATE COM 712H, FED 332H, FED STATE COM 732H) DEVON ENERGY PRODUCTION COMPANY, L.P. CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. EDDY COUNTY, STATE OF NEW MEXICO

JULY 6, 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 S (676)

### 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 SURVEYIN ATE OF NEW MEXICO.

ERTIFICATE IS EXECUTED AT CARLSBAD,

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

SURVEY NO. 7473A

*NEW MEXICO* 

### ACCESS ROAD PLAT (AA000297614)

ACCESS ROAD FOR SHETLAND 11 WELLPAD 2
(SHETLAND 11-2 FED STATE COM 712H, FED 332H, FED STATE COM 732H)
DEVON ENERGY PRODUCTION COMPANY, L.P.
CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING
SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO

### JULY 6, 2020 DESCRIPTION

A STRIP OF LAND 30 FEET WIDE CROSSING BUREAU OF LAND MANAGEMENT LAND IN SECTION 11, 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 SE/4 SW/4 OF SAID SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., WHENCE THE SOUTHWEST CORNER OF SAID SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS S70'05'28"W, A DISTANCE OF 1798.56 FEET;

THENCE N80'40'38"E A DISTANCE OF 235.87 FEET THE TERMINUS OF THIS CENTERLINE SURVEY, WHENCE THE SOUTHWEST CORNER OF SAID SECTION 11, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS S71'18'50"W, A DISTANCE OF 2030.87 FEET;

SAID STRIP OF LAND BEING 235.87 FEET OR 14.29 RODS IN LENGTH, CONTAINING 0.162 ACRES MORE OR LESS AND BEING ALLOCATED BY FORTIES AS FOLLOWS:

SE/4 SW/4 235.87 L.F. 14.29 RODS 0.162 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 St. (575)

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.

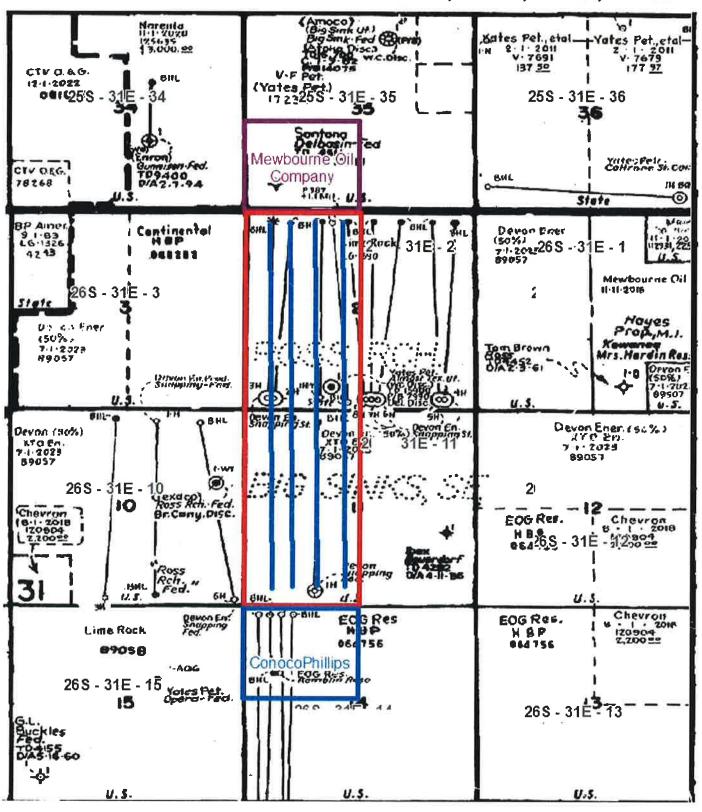
CERTIFICATE IS EXECUTED AT CARLSBAD,

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

SURVEY NO. 7473A

AD, NEW MEXICO

### Affected Tracts Shetland 11-2 Fed State Com 611H, 711H, 712H, 732H







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

July 17, 2020

### <u>VIA CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

### TO AFFECTED PARTIES:

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Shetland 11-2 Fed State Com #732H Well in the W/2 of Sections 2 and 11, 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.





CM# 41132.0002

### **Shipment Confirmation Acceptance Notice**

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 - Shetland 611H, 613H, 711H, 712H, 732H NSL

Shipment Date: 07/17/2020

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	4
Total	4

<sup>\*</sup>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
- Scan or enter the barcode/label number from PS Form 5630
- Confirm the volume count message by selecting Yes or No 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 0023 0575 16

UNITED STATES
POSTAL SERVICE®

Nome and Address of Control		ĸ			ш	Firm Mailing Book For Accountable Mail	iling [	300k F	or Ac	coun	table	Mail
Holland & Hart LLP (1) 110 N Guadalupe St # 1 Santa Fe NM 87501	Check type of mail or service    Adult Signature Required   Priority Mail Express     Adult Signature Restricted Delivery   Registered Mail     Certified Mail Restricted Delivery   Merchandise     Collect on Delivery (COD)   Signature Confirmation     Insured Mail   Restricted Delivery   Afginature Confirmation     Insured Mail   Restricted Delivery     Priority Mail   Restricted Delivery     Collect on Delivery (COD)   Signature Confirmation     Collect on Delivery (COD)   Signature Confirmation     Collect on Delivery (COD)   Signature Confirmation     Collect on Delivery (COD)   Collect (COD)   Collect (COD)     Collect (COD)   COD (COD)   COD (COD)     COD (COD)   COD (COD)   COD (COD)   COD (COD)     COD (COD)   COD (COD)   COD (COD)   COD (COD)   COD (COD)     COD (COD)	Affix (if issue certifica addition Postm	Affix Stamp Here (if issued as an international certificate of mailing or for additional copies of this receipt). Postmark with Date of Receip	Affix Stamp Here (if issued as an international certificate of mailing or for additional copies of this receipt). Postmark with Date of Receipt.								
	Addressee (Name, Street, City, State, & ZIP Code <sup>TM</sup> )	Postage (E	(Extra Handling Service) Charge Fee	ng Actual Value e if Registered	Insured	Due Sender if	ASR A Fee	ASRD RD Fee Fee	RR Fee	SC	SCRD	SH Fee
1. 9214 8901 9403 8316 8330 11	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	1.90	3.55 911			8			1.70			
	State Land Office 310 Old Sanla Fe Trail Sanla Fe NM 87501	1.90	3.55 Isv ni 000						1.70		Very	
<ol> <li>9214 8901 9403 8316 8330 35</li> </ol>	ConocoPhilips Company 600 N Dairy Ashlord Houston TX 77079	1.90	3.55 03\$ 19V				bea	Delivery	1.70	uo	ilad bat	
			Handling Charge - if Registered and				eA erutsngië tlubA	Adult Signature Restrict Vilad bestricted Deliv	Return Receip	mrifnoD erutsngi2	Signature Confirmation Res	Special Handlin
S N N	Postmaster, Per (Name of receiving employee)											
PS Form <b>3877</b> , April 2015 (Page 1 of 1) PSN 7530-02-000-9098	Complete in Ink	cy Notice:	For more	Privacy Notice: For more information on USPS privacy policies, visit usps.com/privacypolicy.	n USPS	privacy	policie	s, visit	usps.c	om/pr	vacyp	olicy.



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

July 15, 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.

Shetland 11-2 Fed State Com 611H, 711H, 712H, 732H

Shetland 2-11 State Fed Com 613H

Sections 10 & 3-26S-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 Shetland 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

Parge Bowes

