New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez Governor

John H. Bemis Cabinet Secretary-Designate

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey Division Director Oil Conservation Division



May 31, 2011

Devon Energy Production Company, L.P. Attn: Sam McCurdy 20 North Broadway Oklahoma City, OK 73102-8260

Administrative Order NSL-6379

Re: Cotton Draw Unit Well No. 150H API No. 30-015-38536 330 feet FNL & 660 FEL Unit A, Section 34-24S-31E Eddy County, New Mexico

> Cotton Draw Unit Well No. 153H API No. 30-015-38535 200 feet FNL & 1980 FEL Unit B, Section 3-25S-31E Eddy County, New Mexico

> Cotton Draw Unit Well No. 154H API No. 30-015-38952 200 feet FNL & 660 FEL Unit A, Section 3-25S-31E Eddy County, New Mexico

Cotton Draw Unit Well No. 160H API No. 30-015-38432 200 feet FNL & 2160 FWL Lot 3 (Unit C), Section 2-25S-31E Eddy County, New Mexico

Oil Conservation Division 1220 South St. Francis Drive - Santa Fe, New Mexico 87505 Phone (505) 476-3440 - Fax (505) 476-3462 - <u>www.emnrd.state.nm.us/OCD</u>



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Cotton Draw Unit Well No. 161H API No. 30-015-38433 200 feet FNL & 440 FWL Lot 4 (Unit D), Section 2-25S-31E Eddy County, New Mexico

Dear Mr. McCurdy:

Reference is made to the following:

(a) your application (administrative application reference No. pTGW11-11956915) submitted to the New Mexico Oil Conservation Division (the Division) in Santa Fe, New Mexico on April 29, 2011, and

(b) the Division's records pertinent to this request.

Devon Energy Production Company, L.P. (Devon)[OGRID 6137] has requested to drill the above-referenced wells as horizontal wells in the Delaware formation, at locations that will be unorthodox under Division Rule 16.14.B(2) [19.15.16.14.B(2) NMAC]. The proposed surface locations, points of penetration and termini of the wells are as follows:

Well No. 150H:

Surface Location:	330 feet from the North line and 660 feet from the East line (Unit A) of Section 34, Township 24S, Range 31E, NMPM, Eddy County, New Mexico	
Point of Penetration:	same as surface location	
Terminus	200 feet from the South line and 660 feet from the East line (Unit P) of said section	
Well No. 153H:		
Surface Location:	200 feet from the North line and 1980 feet from the East line (Unit B) of Section 3, Township 25S, Range 31E, NMPM, Eddy County, New Mexico	
Point of Penetration:	same as surface location	
Terminus	400 feet from the South line and 1980 feet from the East line (Unit O) of said section	
Well No. 154H:		

Surface Location: 200 feet from the North line and 660 feet from the East line (Unit A) of Section 3, Township 25S, Range 31E, NMPM, Eddy County, New Mexico

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Point of Penetration:	same as surface location
Terminus	330 feet from the South line and 660 feet from the East line (Unit P) of said section
<u>Well No. 160H:</u>	
Surface Location:	200 feet from the North line and 2160 feet from the West line Lot 3 (Unit C) of Section 2, Township 25S, Range 31E, NMPM, Eddy County, New Mexico
Point of Penetration:	same as surface location
Terminus	200 feet from the South line and 1980 feet from the West line (Unit N) of said section
<u>Well No. 161H:</u>	
Surface Location:	200 feet from the North line and 440 feet from the West line Lot 4 (Unit D) of Section 2, Township 25S, Range 31E, NMPM, Eddy County, New Mexico
Point of Penetration:	same as surface location
Terminus	200 feet from the South line and 660 feet from the West line

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A 160-acre project area comprising four standard 40-acre, more or less, oil spacing units will be dedicated to each of the above wells, as follows:

(Unit M) of said section

Well No. 150H	E/2 E/2 of Section 34-24S-31E	undesignated South Poker Lake Delaware (50386)
Well No. 153H	W/2 E/2 of Section 3-25S-31E	undesignated South Cotton Draw Delaware (96757)
Well No. 154H	E/2 E/2 of Section 3-25S-31E	undesignated South Cotton Draw Delaware
Well No. 160H	E/2 W/2 of Section 2-25S-31E	South Cotton Draw Delaware
Well No. 161H	W/2 W/2 of Section 2-25S-31E	South Cotton Draw Delaware

Locations in these pools are governed by statewide Rule 15.9 [19.15.15.9 NMAC], which provides for 40-acre units, with wells located at least 330 feet from a unit outer boundary. These locations are unorthodox because portions of the producing intervals will be less than 330 feet from the outer boundaries of the project areas, and therefore outside the producing areas.

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Your application has been duly filed under the provisions of Division Rules 15.13 [19.15.15.13 NMAC] and 4.12.A(2) [19.15.4.12.A(2) NMAC].

It is our understanding that you are seeking these locations for engineering reasons, in order to maximize the amount of the target horizon within the producing area that can be penetrated by the lateral portion of each wellbore. It is also understood notice to offsetting operators or owners is unnecessary due to common ownership.

Pursuant to the authority conferred by Division Rule 15.13.B [19.15.15.13.B NMAC], the above-described unorthodox locations are hereby approved.

This approval is subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 5.9 [19.15.5.9 NMAC].

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

Sincerely,

Jami Bailey

Director

JB/db

cc: New Mexico Oil Conservation Division – Artesia New Mexico State Land Office – Santa Fe United States Bureau of Land Management