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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



A DIMINISTRATIVE A DE	PLICATION CHECKLIST
	VE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND
Applicant: Devon Energy Production Company, L.P.	OGRID Number: 6137
Vell Name: Cotton Draw 25-36 Fed State Com 627H, 712H, 732H, 822	
Pool: Purple Sage-Wolfcamp Gas Pool	Pool Code: 98220
	N REQUIRED TO PROCESS THE TYPE OF APPLICATION ED BELOW
1) TYPE OF APPLICATION: Check those which app A. Location – Spacing Unit – Simultaneous De NSL NSP(PROJECT AREA)	
B. Check one only for [1] or [1] [1] Commingling – Storage – Measuremer DHC CTB 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, revecting and the concurrent approved to the concurrent app	h apply. In apply. In apply. Notice Complete Application Content Complete Application Content Complete
3) CERTIFICATION: I hereby certify that the informal administrative approval is accurate and complete understand that no action will be taken on this notifications are submitted to the Division.	ete to the best of my knowledge. I also
Note: Statement must be completed by an indiv	vidual with managerial and/or supervisory capacity.
	September 16, 2024
Paula M. Vance	Date
Print or Type Name	
51	505-988-4421
Pakhir	Phone Number
	pmvance@hollandhart.com
Signature	e-mail Address



Paula M. Vance Associate Phone (505) 954-7286 PMVance@hollandhart.com

September 16, 2024

VIA ONLINE FILING

Gerasimos Razatos, Acting 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 a Non-Standard Horizontal Spacing Unit

319.36-acre non-standard horizontal spacing unit

Purple Sage-Wolfcamp Gas Pool [98220]

E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico

Dear Mr. Razatos:

Devon Energy Production Company, L.P. ("Devon") (OGRID No. 6137), pursuant to Division Rules 19.15.16.15,.B(5) and 19.15.15.11.B NMAC and applicable rules governing acreage and well spacing requirements for the Purple Sage-Wolfcamp Gas Pool [98220], seeks administrative approval of a non-standard 319.36-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico. The non-standard spacing unit will be dedicated to the following wells:

- Cotton Draw 25-36 Fed State Com 627H (API No. 30-015-PENDING)
- Cotton Draw 25-36 Fed State Com 712H (API No. 30-015-PENDING)
- Cotton Draw 25-36 Fed State Com 732H (API No. 30-015-PENDING)
- Cotton Draw 25-36 Fed State Com 822H (API No. 30-015-PENDING)
- Cotton Draw 25-36 Fed State Com 832H (API No. 30-015-PENDING)

Exhibit A is a statement from landman, John Dwyer, explaining why approval is necessary.

Exhibit B is a plat showing the proposed non-standard horizontal spacing unit, including the subject state and federal leases. Exhibit B also shows the affected offset acreage for the proposed non-standard horizontal spacing unit. The affected offset acreage comprises the E/2 SE/4 of Section 23, S/2 of Section 24, the E/2 and W/2 W/2 of Section 25, the E/2 E/2 of Section 26, the E/2 NE/4, NE/SE/4, and Lot 4 (E/2 E/2 equivalent) of irregular Section 35, the W/2 NW/4 NW/4 SW/4, and Lot 1 (W/2 W/2 equivalent) and the NE/4, N/2 SE/4, and Lots 3-4 (E/2 equivalent) of irregular Section 36, Township 24 South, Range 31 East, and Lots 1-4 and the S/2 N/2 (N/2 equivalent) of irregular Section 1 and Lot 1 and the SE/4 NE/4 (E/2 NE/4 equivalent) of irregular Section 2, Township 25 South, Range 31 East.

Exhibit C is a Form C-102 for each of the wells within the proposed non-standard horizontal spacing unit.

Exhibit D is a spreadsheet listing all "affected persons" in the affected offset acreage to be noticed. Exhibit D also includes tracking information demonstrating that each of the affected persons was sent a copy of this application with all 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. A copy of this application has been provided to the New Mexico State Land Office ("NMSLO") and Bureau of Land Management ("BLM") and since state and federal and lands are involved.

Your attention to this matter is appreciated.

Sincerely,

Paula M. Vance

ATTORNEY FOR

Pakhila

DEVON ENERGY PRODUCTION COMPANY, L.P.

¹ See 19.15.2.7.A(8) NMAC [defining "affected persons" as, "in the absence of an operator, or with respect to an application wherein the operator of the spacing unit or identified tract is the applicant, each working interest owner"] and 19.15.4.12.A(2)(a) NMAC.

Devon Energy Corporation 333 W. Sheridan Avenue Oklahoma City, OK 73102 405 228 2448 Phone www.devonenergy.com



August 22, 2024

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

RE: Application for Non-standard Spacing Unit
Engineering Statement
Devon Energy Production Company, L.P.
Cotton Draw 25-36 Fed State Com 627H, 712H, 732H, 822H, & 832H
(the "Cotton Draw Wells")
The E/2W/2 of Sections 25 and 36
Township 24 South, Range 31 East, NMPM ("Unit")
Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. ("Devon") respectfully requests administrative approval of a non-standard spacing unit for the Cotton Draw Wells referenced above.

Devon currently has plans to develop acreage comprised of the W/2 of Sections 25 and 36, T24S-R31E, in the Purple Sage; Wolfcamp (Pool Code 98220). The W/2W/2 of Sections 25 & 36 are fully within the boundaries of Devon's Cotton Draw Federal Unit ("Unit") and will be dedicated to a 319.11-acre spacing unit to conform with federal unit guidelines. Because this spacing unit is wholly within the Unit, it is exempt from Division spacing requirements, per 19.15.16.15.B(8) NMAC. However, the E/2NW/4 of Section 25 is not within the Unit, so wells drilled in the E/2W/2 are not part of the Unit. Thus, a non-standard spacing unit is necessary to conform with the separate spacing required for development of the E/2W/2 of Sections 25 & 36.

The wells drilled in the E/2W/2 of Sections 25 & 36 will be dedicated to Devon's Cotton Draw Wells. The BLM has indicated to Devon that it will approve the corresponding federal Communitization Agreement ("CA") once the spacing is approved by the Division. Approval of the CA will then allow Devon to commingle production from the E/2W/2 (Devon has plans for commingling Bone Spring and Wolfcamp production from overlapping CAs), which will remain separate from Unit production, per BLM requirements.

Having a non-standard spacing unit is necessary to avoid economic waste by eliminating duplication of production facilities, thus optimizing revenue to the owners from production. In

EXHIBIT **A**

page 2

addition, important environmental benefits would be achieved by reducing the impact on the surface area and eliminating emissions into the air that would otherwise result from having separate facilities.

Devon has the responsibility to be a prudent operator, and accordingly, we are requesting approval of the non-standard spacing in order optimize production, and because it is necessary to prevent waste, protect correlative rights, and reduce the environmental impact.

Sincerely, John Dwyer, Reservoir Engineer

John Dwyer

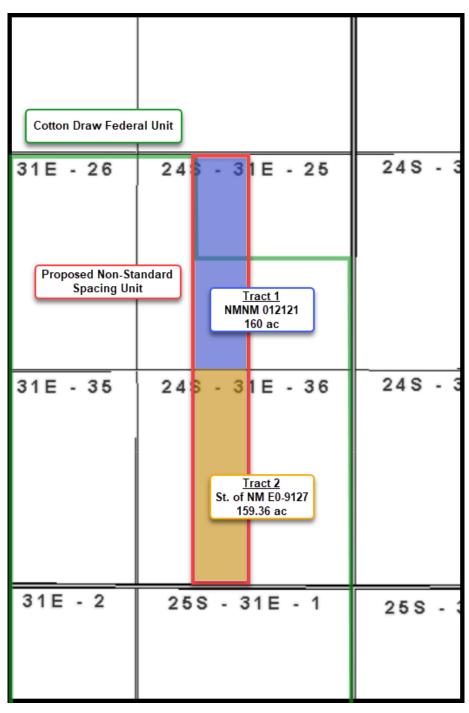
Cotton Draw 25-36 Fed State Com Area

Proposed Non-Standard Horizontal Spacing Unit

E2W2 of Sections 25 & 36 Township 24 South, Range 31 East Eddy County, NM



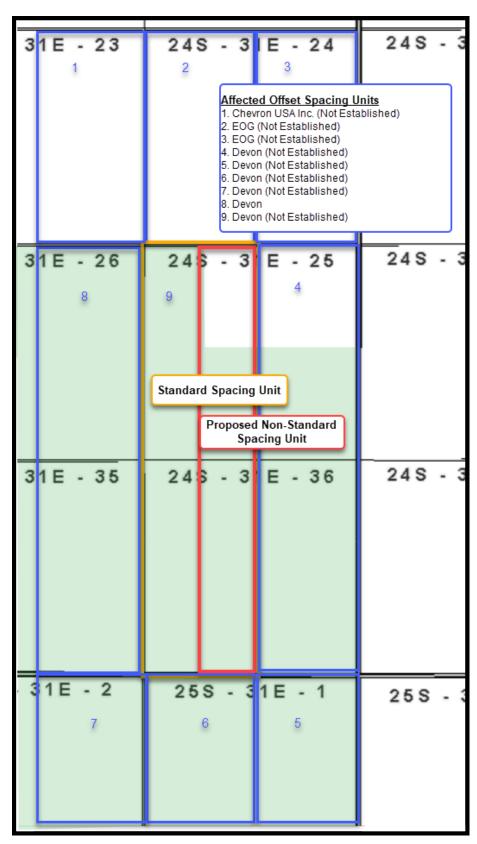
Purple Sage Wolfcamp [98220]



Wells: Cotton Draw 25-36 Fed State Com 627H, 712H, 732H, 822H, & 832H

Cotton Draw 25-36 Fed State Com Area

Proposed Non-Standard Horizontal Spacing Unit

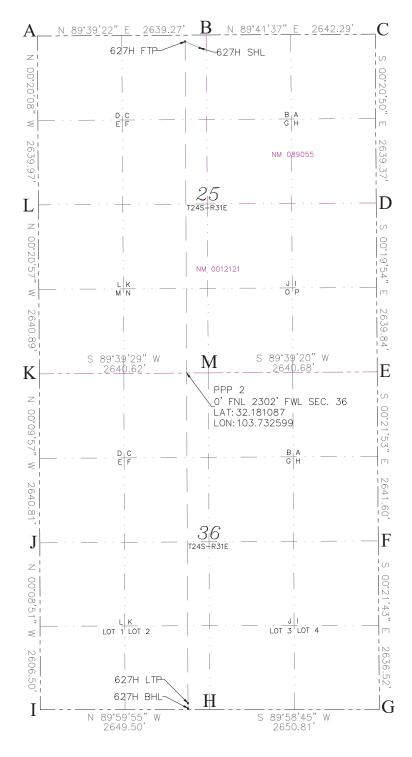


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API N	umber		Pool Cod		EEE EGG/11	Pool Name	11			
				220		Purple Sage; W	/olfcamp	(Gas)		
Prope	rty Code		Property		TTON DRAW	25-36 FED STATE	COM		Well Number 627H	
OGRID	No.		Operator		TION DIVA	20 00 PED BIATE	COM		Ground Level	Elevation
	6137			DEVO	N ENERGY P	PRODUCTION COMPA	ANY, L.P.		3544.4'	
Surfac	e Owner:	□State □	Fee □Tril	oal ⊠Fe	deral	Mineral Owner:	□State	□Fee □	Tribal □Federal	
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UL	Section	Township	Range	Lot	Ft. from N		Latitude		Longitude	County
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		lessee or owner on the target pool			part of the well's				23261	
completed interval will be located or obtained a compulsory pooling order from the division.					\	70 Aller	1 E			
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Signa	ture		Date			Signature and Seal	of Profes	ssional	Surveyor ONAL	
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Email	Address					23261	07/20	~ 4		

EXHIBIT **C**

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.

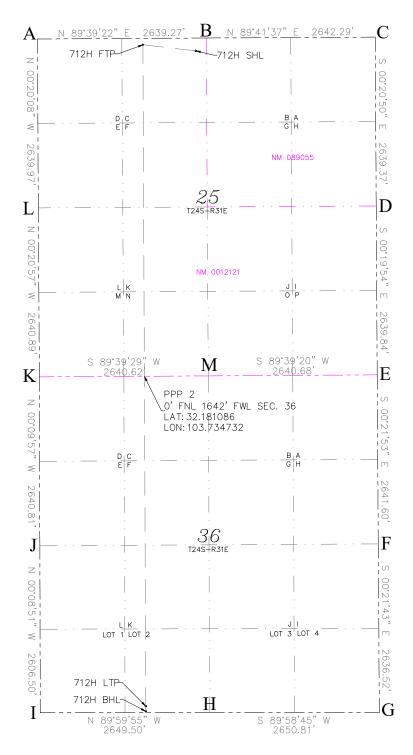


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Duana	rty Code		98220 Property			Purpl	e Sage;	Wolfcam	p (Gas)	
Proper	rty Code		Property		TTON DRAW	25-36 FE	D STATE	СОМ		712H	
OGRID	No. 6137		Operator		N ENERGY F	RODUCTIO	N COMPA	ANY, L.P.		Ground Level 3544.8'	Elevation
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	36	24-S	31-E	2	100' S	165	0' W	32.166	910	103.734752	EDDY
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OPERAT	OR CERTI	FICATIONS				SURVEYOR	CERTIFIC	ATIONS			
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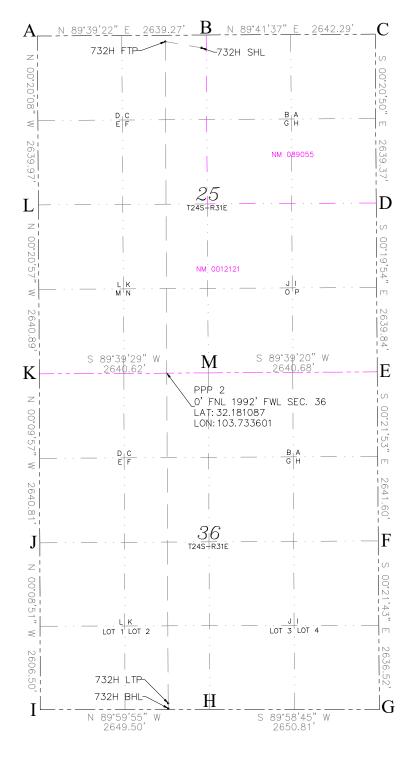


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ODEDA	יייים מחים	FICATIONS					SURVEYOR CERTIFIC	TATIONS			
OPERATOR CERTIFICATIONS  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, 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.					e best at this and is	I hereby certify that the wo of actual surveys made by correct to the best of my b	ell location sho me or under so		and that the same is true a		
If this well is a horizontal well, I further certify that this organization has received to 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.					l rell's n the	Cinnature and Cash	of Duefe		P. 23261	4	
Signa	uure		Date				Signature and Seal of Professional Surveyor ONAL				
Printe	ed Name						Certificate Number	Date of	Survey		
Email	Address						23261	07/20	24		

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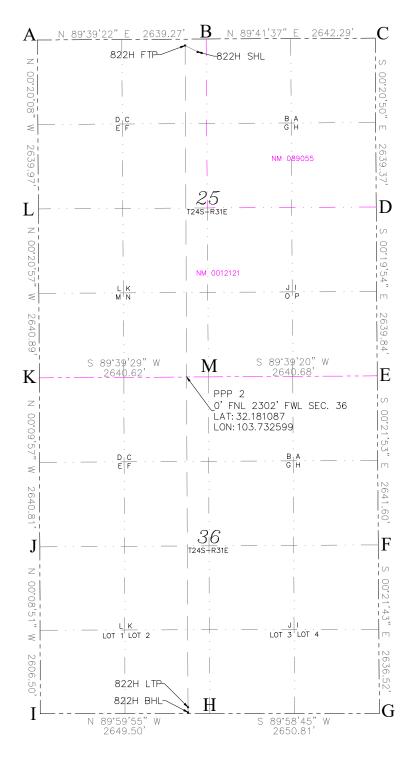


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<u>C-10</u>	)2		Energy,	Minera	State of ls & Natura		exico ources Depa	rtment		Rev	ised July, 2024
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API N	umber		Pool Code		EEE EGG/11	Pool N		11			
			982			Purp	le Sage; Wo	olfcamp (	Gas)		
Proper	rty Code		Property		TTON DRAW	25_36	FED STATE	COM		Well Number 822H	
OGRID	No. 6137		Operator	Name			TION COMPA			Ground Level	Elevation
Surfac	e Owner:	□State □	 Fee ∏Trib						□Fee □'	Tribal ∏Federal	
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UL	Section	Township	Range	Lot	Ft. from N		from E/W	Latitude		Longitude	County
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UL	Section	Township	Range	Lot	Ft. from N	/S Ft.	from E/W	Latitude		Longitude	County
					First T	ake Poi	int (FTP)				
UL	Section	Township	Range	Lot	Ft. from N	·	from E/W	Latitude		Longitude	County
C	25	24-S	31-E		100' N	;	2310' W	32.195	328	103.732578	EDDY
					Last T	ake Poi	nt (LTP)				
UL	Section	Township	Range	Lot	Ft. from N	<b>'</b>	from E/W	Latitude		Longitude	County
	36	24-S	31-E	2	100' S	;	2310' W	32.166	900	103.732619	EDDY
					Spacing	Unit T	ype Horizon	tal Verti	eal (	Ground Floor Ele	vation:
OPERAT	OR CERTI	FICATIONS				SURVE	YOR CERTIFIC	ATIONS			
					omplete to the best onal well, that this	I hereby	certify that the we	ll location sho	wn on this p	olat was plotted from fiel	d notes
organizat	ion either owr	s a working inte	rest or unleased	d mineral in	terest in the land	of actua		me or under st		and that the same is true	and
		bottom hole loca ontract with an o				Confect	to the best of my be	ilei.		DI R. DA	·//
mineral in	nterest, or to a	voluntary pooli			ory pooling order					&EK MEN	40,05
	e entered by the								/	A FM MEXIC	
		tal well, I further lessee or owner of			on has received the eased mineral	e				(27261)	_
interest in	each tract (ir	the target pool	or formation) ir	n which any	part of the well's					7 2320	1 2
division.	a intervai wiii	be located or or	tained a compt	lisory poolii	ng order from the				/	7 Alles	
						G: t		.f. D., .f.			1874
Signat	ture		Date			Signat	ure and Seal	or Profes	ssional S	Surveyor ONAL	
Printe	ed Name					Certific	cate Number	Date of	Survey		
<u> </u>	4.1.1					,	22261	07/20	24		
Email	Address						23261	07/20	<b>54</b>		

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.

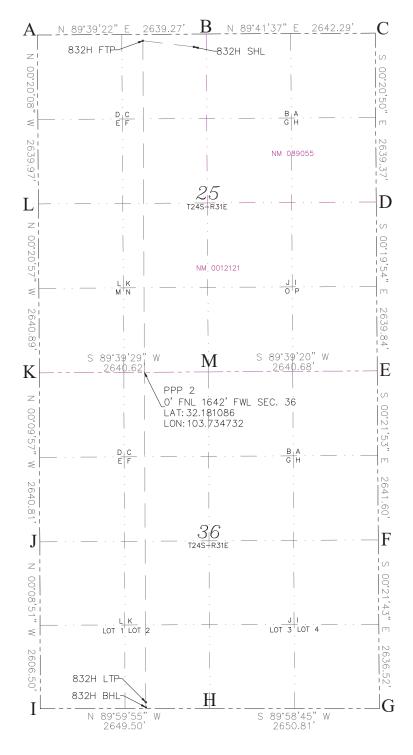


A=N:435400.07 E:724859.41 B=N:435415.91 E:727498.63 C=N:435430.04 E:730140.88 D=N:432790.73 E:730156.88 E=N:430150.93 E:730172.17 F=N:427509.39 E:730172.17 F=N:424872.92 E:730205.63 H=N:424872.96 E:727554.82 I=N:424872.01 E:724905.32 J=N:427478.51 E:724898.61 K=N:430119.30 E:724890.97 L=N:432760.15 E:724874.87 M=N:430135.06 E:727531.54

<u>C-10</u>	02		Energy,	Minera			w Mexico Resources Depa:	rtment		Rev	rised July, 2024
	lectronically						ON DIVISIO			✓ 1	
Via OCD	Permitting								Submittal	☑ Initial Submittal	
									Type:	☐ Amended Repor	τ
				***	ELL LOCAT	CION	NI INIEODMATIO	NT.		As Diffied	
ADI N	umber		Pool Code		ELL LOCAT		N INFORMATIO	IN			
				220		100	Purple Sage; W	Volfcamp	(Gas)		
Proper	rty Code		Property		TTON DRAW	25	-36 FED STATE	COM		Well Number 832H	
OGRID	No. 6137		Operator	Name			DUCTION COMPA			Ground Level	Elevation
Surfac	e Owner:	□State □	∟ Fee □Trib				Mineral Owner:		□Fee □		
					C	of o o	e Location				
UL	Section	Township	Range	Lot	Ft. from N		Ft. from E/W	Latitude		Longitude	County
C	25	24-S	31-E		200' N	, -	2445' W	32.195	054	103.732142	EDDY
					Rotto	m I	Hole Location				
UL	Section	Township	Range	Lot	Ft. from N		Ft. from E/W	Latitude		Longitude	County
	36	24-S	31-E	2	20' S		1650' W	32.166	390	103.734753	EDDY
Dedicate	ed Acres I	nfill or Def	ining Well	Defining	Well API Ove	rlap	pping Spacing Unit	(Y/N)	Consolid	lation Code	
31	9.36	Infill				Ν	10				
Order 1	Numbers				Wel	ll se	etbacks are under	Common	Ownersh	ip: □Yes □No	
					Viale 0	ee n	Daint (VOD)				
UL	Section	Township	Range	Lot	Ft. from N		Point (KOP)  Ft. from E/W	Latitude		Longitude	County
01	Beetion	10 wiisinp	Nange	Дос	l c. Hom i	', 5	16. 110111 11/11	Lacreage		Longitude	Councy
					First T	ľa ke	Point (FTP)				
UL	Section	Township	Range	Lot	Ft. from N		Ft. from E/W	Latitude		Longitude	County
C	25	24-S	31-E		100' N		1650' W	32.195	328	103.734712	EDDY
					Last T	ake	Point (LTP)				
UL	Section	Township	Range	Lot	Ft. from N		Ft. from E/W	Latitude		Longitude	County
	36	24-S	31-E	2	100' S		1650' W	32.166	910	103.734752	EDDY
					Spacing	Uni	it Type Horizont	al Vertic	eal (	Ground Floor Ele	vation:
I		FICATIONS					URVEYOR CERTIFICA	ATIONS			
					omplete to the best onal well, that this	,   I h	hereby certify that the wel				
		ns a working inte bottom hole loca			terest in the land		f actual surveys made by represent to the best of my be		ipervision, a		
location p	oursuant to a c	ontract with an o	owner of a worl	king interest	or unleased		,			ERT R. DE	40
	nterest, or to a e entered by tl		ng agreement o	r a compuls	ory pooling order					MEX.	40,00
If this we	ll is a horizon	tal well I furthe	r certify that thi	s organizati	on has received the	e			/	/ X/ \$5.00	0
consent o	f at least one l	lessee or owner o	of a working in	terest or unl	eased mineral					23261	
					part of the well's ng order from the				\	PR / Pelus	1 0 B
division.							\				
Signat	ture		Date			Sig	gnature and Seal	of Profes	sional S	Surveyor, ONAL	304
										1772	
Printe	ed Name					Cei	rtificate Number	Date of S	Survey		
Email	Address					_	23261	07/20	24		
								,			

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Chevron U.S.A. Inc.	1400 Smith Street	Houston	TX	77000
EOG Resources, Inc.	Attn: Chloe Sawtelle, 5509 Champions Drive	Midland	TX	79706
XTO Energy, Inc.	Attn: Matthew Fletcher, 22777 Springwoods Village Pkwy	Spring	TX	77389
Bureau of Land Management	301 Dinosaur Trail	Santa Fe	NM	87508
State of New Mexico Commissioner of Public Lands Land				
Office	310 Old Santa Fe Trail	Santa Fe	NM	87504
New Mexico Oil Conservation Division	1220 South St. Francis Dr.	Santa Fe	NM	87505

EXHIBIT **D** 



Paula M. Vance Associate Phone (505) 954-7286 PMVance@hollandhart.com

September 11, 2024

# VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

**Re:** Devon Energy Production Company, L.P.

Request for Administrative Approval of a Non-Standard Horizontal Spacing Unit

319.36-acre non-standard horizontal spacing unit Purple Sage-Wolfcamp Gas Pool [98220] E/2 W/2 of Section 25 and E/2 NW/4, NE/4 SW/4 and Lot 2 (E/2 W/2 equivalent) of irregular 36, Township 24 South, Range 31 East, Eddy County, New Mexico

Dear Mr. Razatos:

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 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, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Ryan Cloer Devon Energy Production Company, L.P. (405) 228-2448 Ryan.Cloer@dvn.com

Sincerely,

Paula M. Vance **ATTORNEY FOR** 

DEVON ENERGY PRODUCTION COMPANY, L.P.

### Devon - Cotton Draw 25-36 -NSL Postal Delivery Report

9414811898765484284551	Chevron U.S.A. Inc.	1400 Smith St	Houston	TX	77002-7327	Your package is moving within the USPS network and is on track to be delivered by the expected delivery date. It is currently in transit to the next facility.  Your package is moving within
9414811898765484284568	EOG Resources, Inc.	5509 Champions Dr Attn Chloe Sawtelle	Midland	TX	79706-2843	the USPS network and is on track to be delivered by the expected delivery date. It is currently in transit to the next facility.
9414811898765484284520	Xto Energy, Inc. Attn Matthew Fletcher,	22777 Springwoods Village Pkwy	Spring	TX	77389-1425	Your item was delivered to an individual at the address at 9:31 am on September 14, 2024 in SPRING, TX 77389. Your package is moving within
9414811898765484284599	Bureau of Land Management	301 Dinosaur Trl	Santa Fe	NM	87508-1560	the USPS network and is on track to be delivered by the expected delivery date. It is currently in transit to the next
9414811898765484284544	State of New Mexico Commissioner of Public Lands Land Office	310 Old Santa Fe Trl	Santa Fe	NM	87501-2708	We were unable to deliver your package at 9:16 am on September 14, 2024 in SANTA FE, NM 87501 because the business was closed. We will redeliver on the next business day. No action needed.
9414811898765484284582	New Mexico Oil Conservation Division	1220 S St Francis Dr	Santa Fe	NM	87505-4225	We were unable to deliver your package at 8:45 am on September 14, 2024 in SANTA FE, NM 87505 because the business was closed. We will redeliver on the next business day. No action needed.

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

Action 383885

#### **CONDITIONS**

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	383885
	Action Type:
	[UF-NSP] Non-Standard Proration (NSP)

#### CONDITIONS

1		Condition	Condition Date
	llowe	None	9/16/2024