

Revised March 23, 2017

ID NO. 383885

NSP - 2227

RECEIVED: 09/16/24	REVIEWER:	TYPE:	APP NO: pLEL2426060520
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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: Cotton Draw 25-36 Fed State Com 627H, 712H, 732H, 822H & 832H API: 30-015-PENDING  
 Pool: Purple Sage-Wolfcamp Gas Pool Pool Code: 98220

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 holdersB. ☐ Royalty, overriding royalty owners, revenue ownersC. ☐ Application requires published noticeD. ☒ Notification and/or concurrent approval by SLOE. ☒ Notification and/or concurrent approval by BLMF. ☐ Surface ownerG. ☐ 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.

September 16, 2024

Date

Paula M. Vance

Print or Type Name

Signature

505-988-4421

Phone Number

pmvance@hollandhart.com

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.

T 505.988.4421 F 505.983.6043  
110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849  
Mail to: P.O. Box 2208, Santa Fe, NM 87504-2208  
www.hollandhart.com

Alaska	Montana	Utah
Colorado	Nevada	Washington, D.C.
Idaho	New Mexico	Wyoming

**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”<sup>1</sup> 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**  
**DEVON ENERGY PRODUCTION COMPANY, L.P.**

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<sup>1</sup> 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, NMPPM ("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**

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**

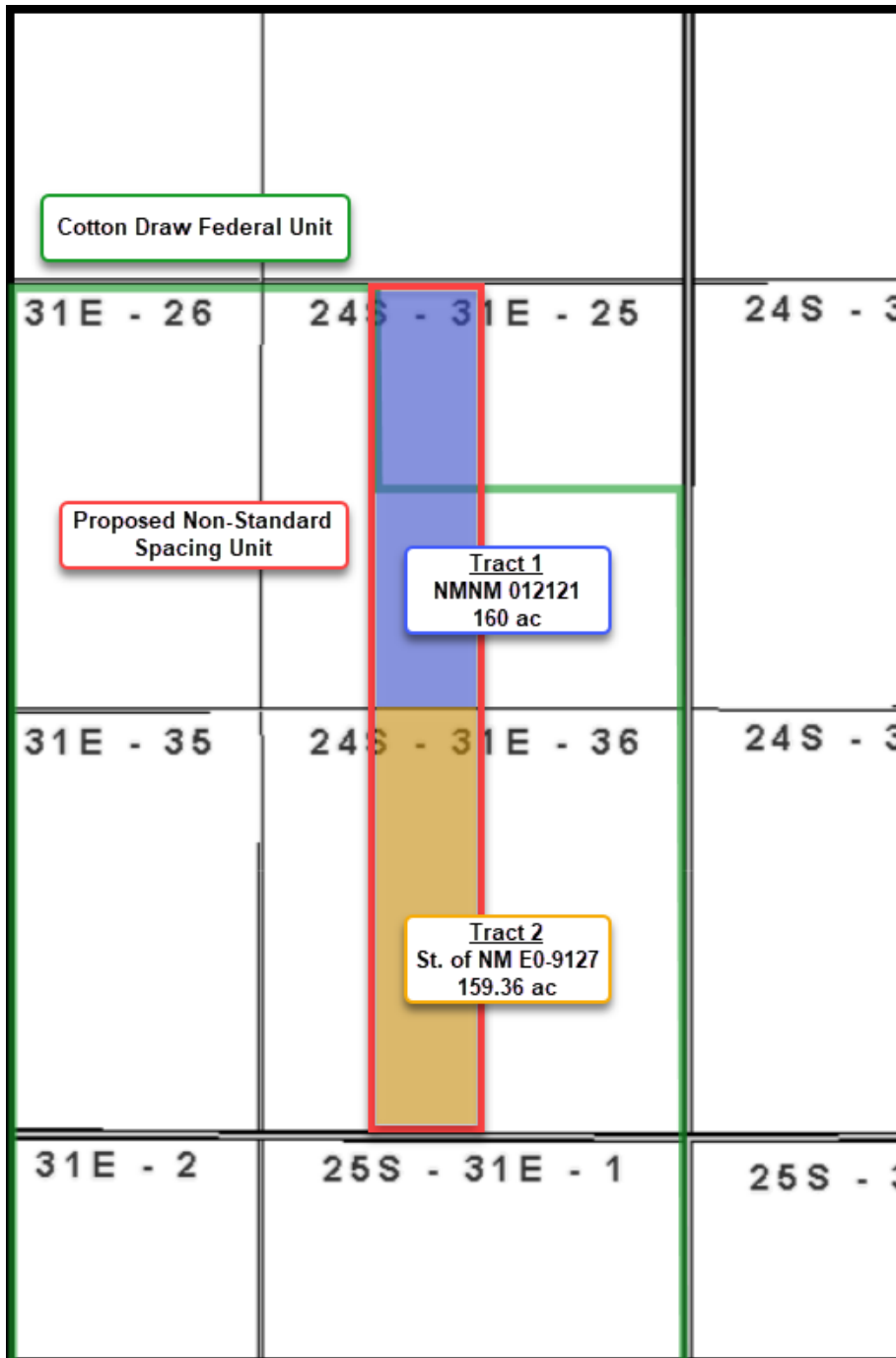
Proposed Non-Standard Horizontal Spacing Unit

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

EXHIBIT

**B**

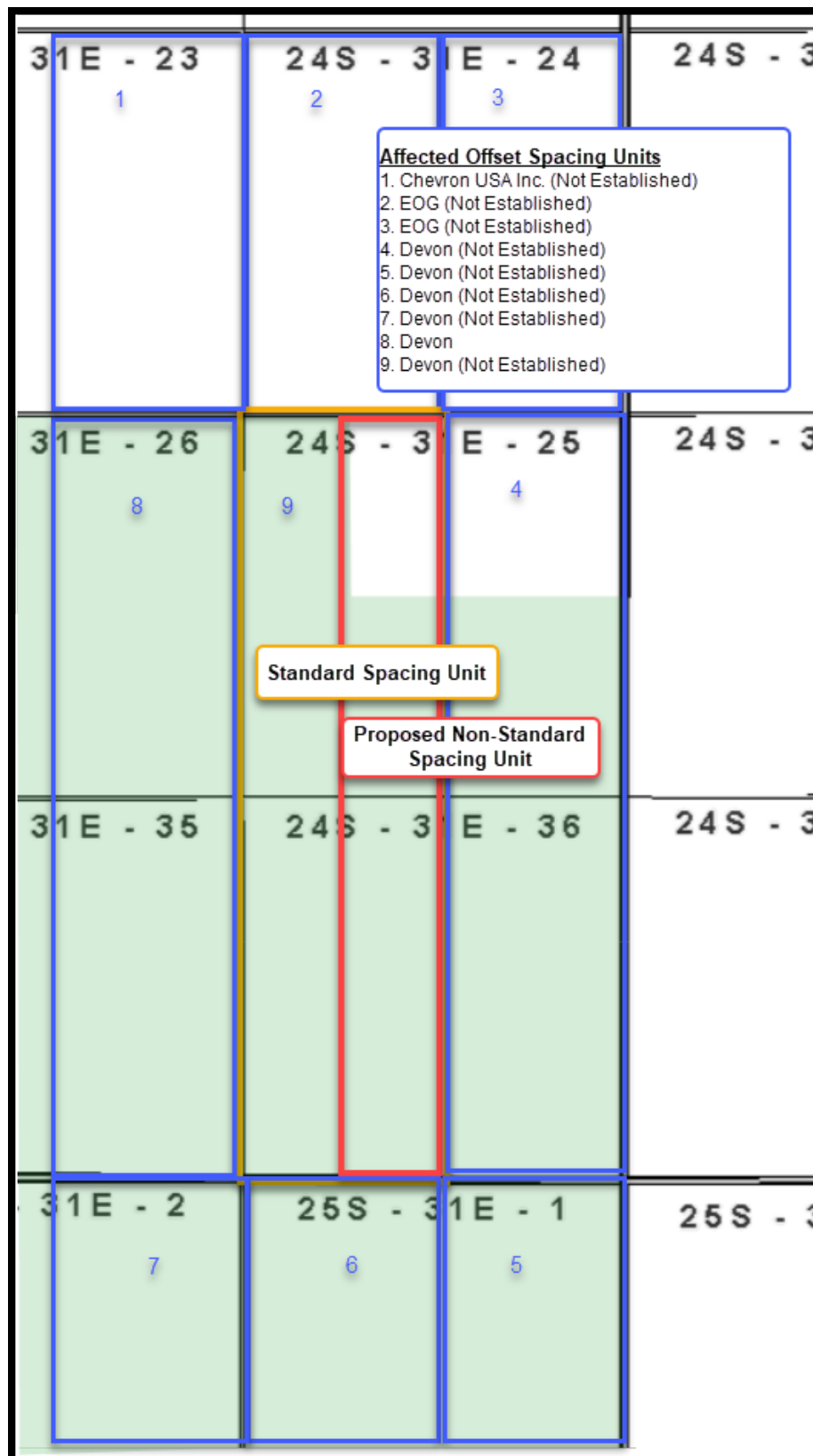
Purple Sage Wolfcamp [98220]



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

## Cotton Draw 25-36 Fed State Com Area

Proposed Non-Standard Horizontal Spacing Unit



C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>		Revised July, 2024	
			Submittal Type:	<input checked="" type="checkbox"/> Initial Submittal
				<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled		

## WELL LOCATION INFORMATION

API Number	Pool Code 98220	Pool Name Purple Sage; Wolfcamp (Gas)
Property Code	Property Name COTTON DRAW 25-36 FED STATE COM	Well Number 627H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3544.4'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

## Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2535' W	32.195054	103.731851	EDDY

## Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	2310' W	32.166680	103.732620	EDDY

Dedicated Acres 319.36	Infill or Defining Well Infill	Defining Well API	Overlapping Spacing Unit (Y/N) No	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

## Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

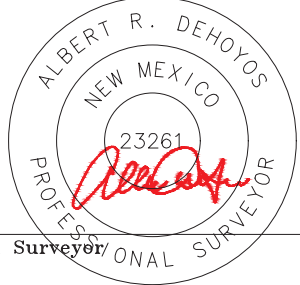
## First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		100' N	2310' W	32.195328	103.732578	EDDY

## Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	2310' W	32.166900	103.732619	EDDY

Spacing Unit Type		Horizontal	Vertical	Ground Floor Elevation:
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<b>OPERATOR CERTIFICATIONS</b> 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.		<b>SURVEYOR CERTIFICATIONS</b> I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.	
Signature	Date		
Signature and Seal of Professional Surveyor			
Printed Name			
Email Address		Certificate Number 23261	Date of Survey 07/2024

EXHIBIT

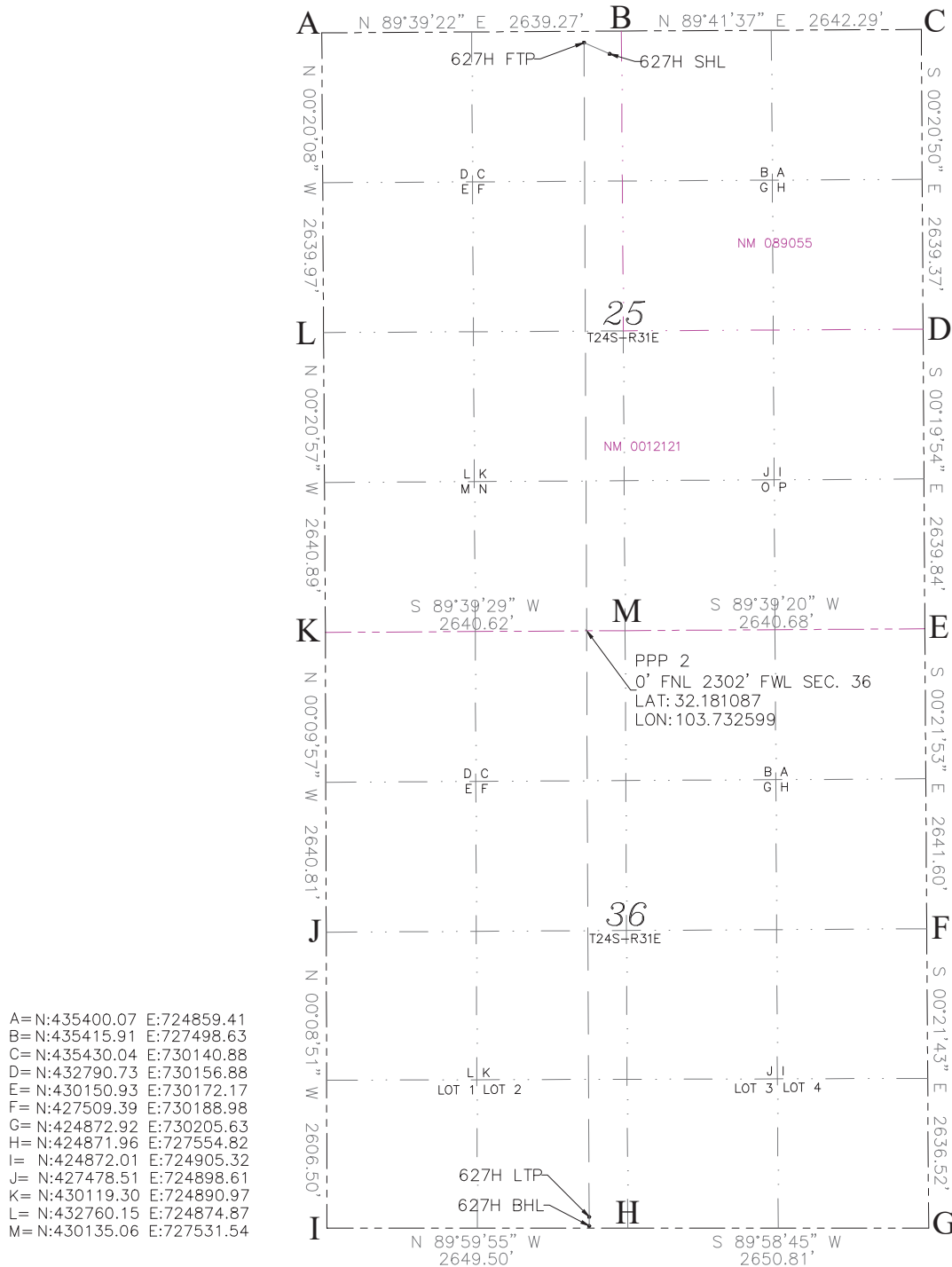
C



## 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.



C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July, 2024	
		Submittal Type:	<input checked="" type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

WELL LOCATION INFORMATION

API Number	Pool Code 98220	Pool Name Purple Sage; Wolfcamp (Gas)
Property Code	Property Name COTTON DRAW 25-36 FED STATE COM	Well Number 712H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3544.8'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2475' W	32.195054	103.732045	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	1650' W	32.166690	103.734753	EDDY

Dedicated Acres 319.36	Infill or Defining Well Infill	Defining Well API	Overlapping Spacing Unit (Y/N) No	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

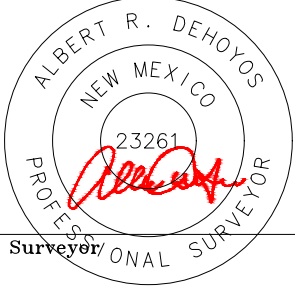
First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		100' N	1650' W	32.195328	103.734712	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	1650' W	32.166910	103.734752	EDDY

Spacing Unit Type					Horizontal	Vertical	Ground Floor Elevation:
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<b>OPERATOR CERTIFICATIONS</b> 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.		<b>SURVEYOR CERTIFICATIONS</b> I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.	
Signature	Date		
Printed Name			
Email Address		Certificate Number 23261	Date of Survey 07/2024



C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July, 2024	
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			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

WELL LOCATION INFORMATION

API Number	Pool Code 98220	Pool Name Purple Sage; Wolfcamp (Gas)
Property Code	Property Name COTTON DRAW 25-36 FED STATE COM	Well Number 732H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3544.6'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2565' W	32.195054	103.731754	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	2000' W	32.166685	103.733622	EDDY

Dedicated Acres 319.36	Infill or Defining Well Defining	Defining Well API	Overlapping Spacing Unit (Y/N) No	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

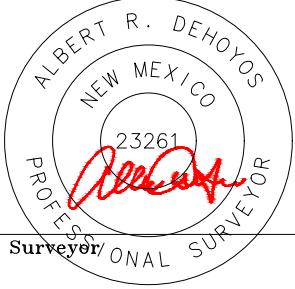
First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		100' N	2000' W	32.195328	103.733581	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	2000' W	32.166905	103.733621	EDDY

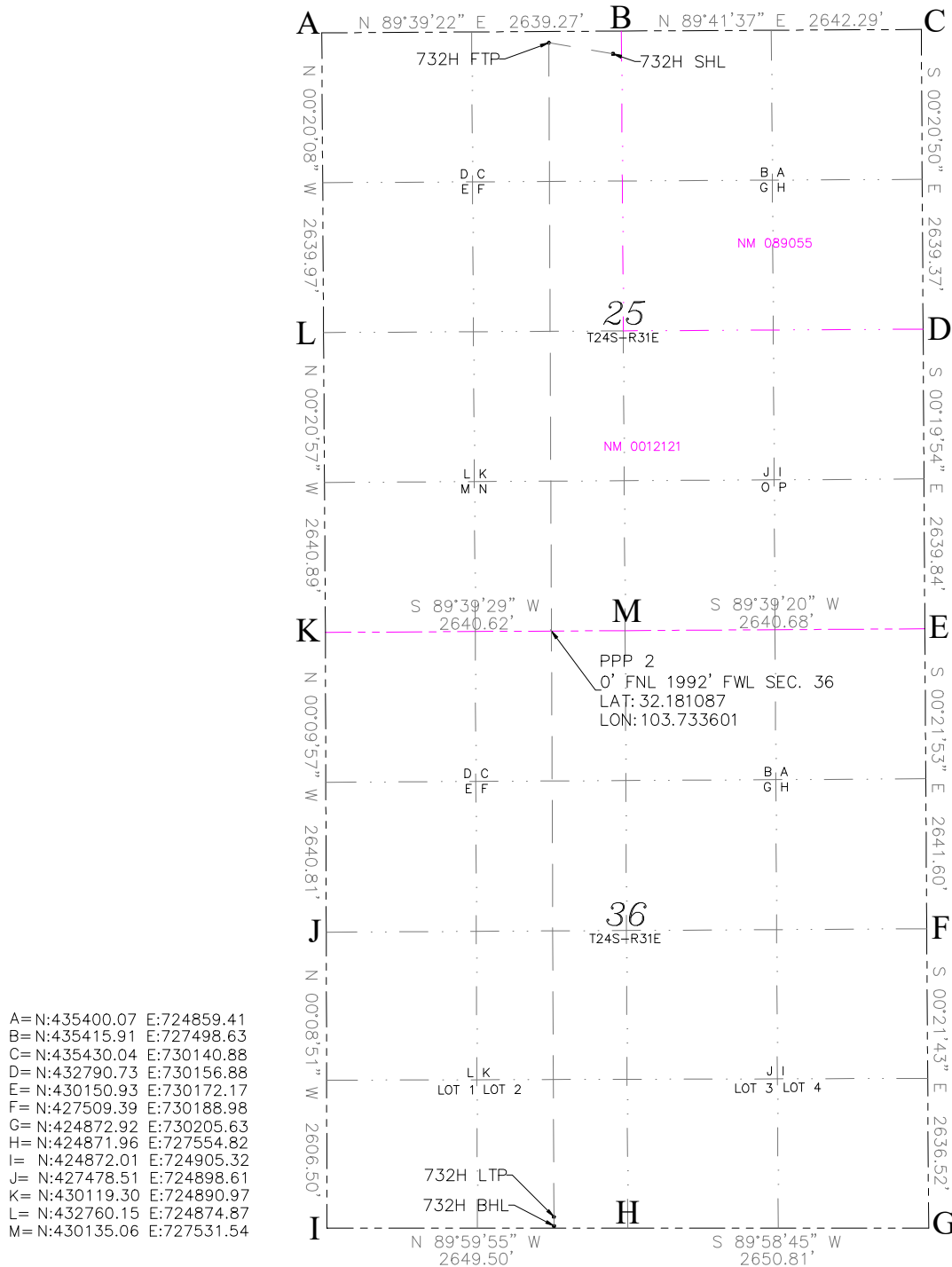
Spacing Unit Type					Horizontal	Vertical	Ground Floor Elevation:
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Signature	Date		
Printed Name			
Email Address		Certificate Number 23261	Date of Survey 07/2024

## ACREAGE DEDICATION PLATS

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			<input type="checkbox"/> Amended Report
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## WELL LOCATION INFORMATION

API Number	Pool Code 98220	Pool Name Purple Sage; Wolfcamp (Gas)
Property Code	Property Name COTTON DRAW 25-36 FED STATE COM	Well Number 822H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3544.4'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

## Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2505' W	32.195054	103.731948	EDDY

## Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	2310' W	32.166680	103.732620	EDDY

Dedicated Acres 319.36	Infill or Defining Well Infill	Defining Well API	Overlapping Spacing Unit (Y/N) No	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

## Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

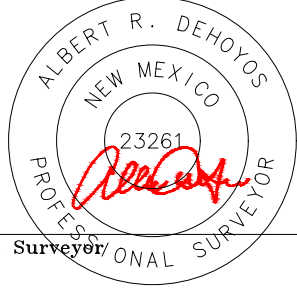
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## Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	2310' W	32.166900	103.732619	EDDY

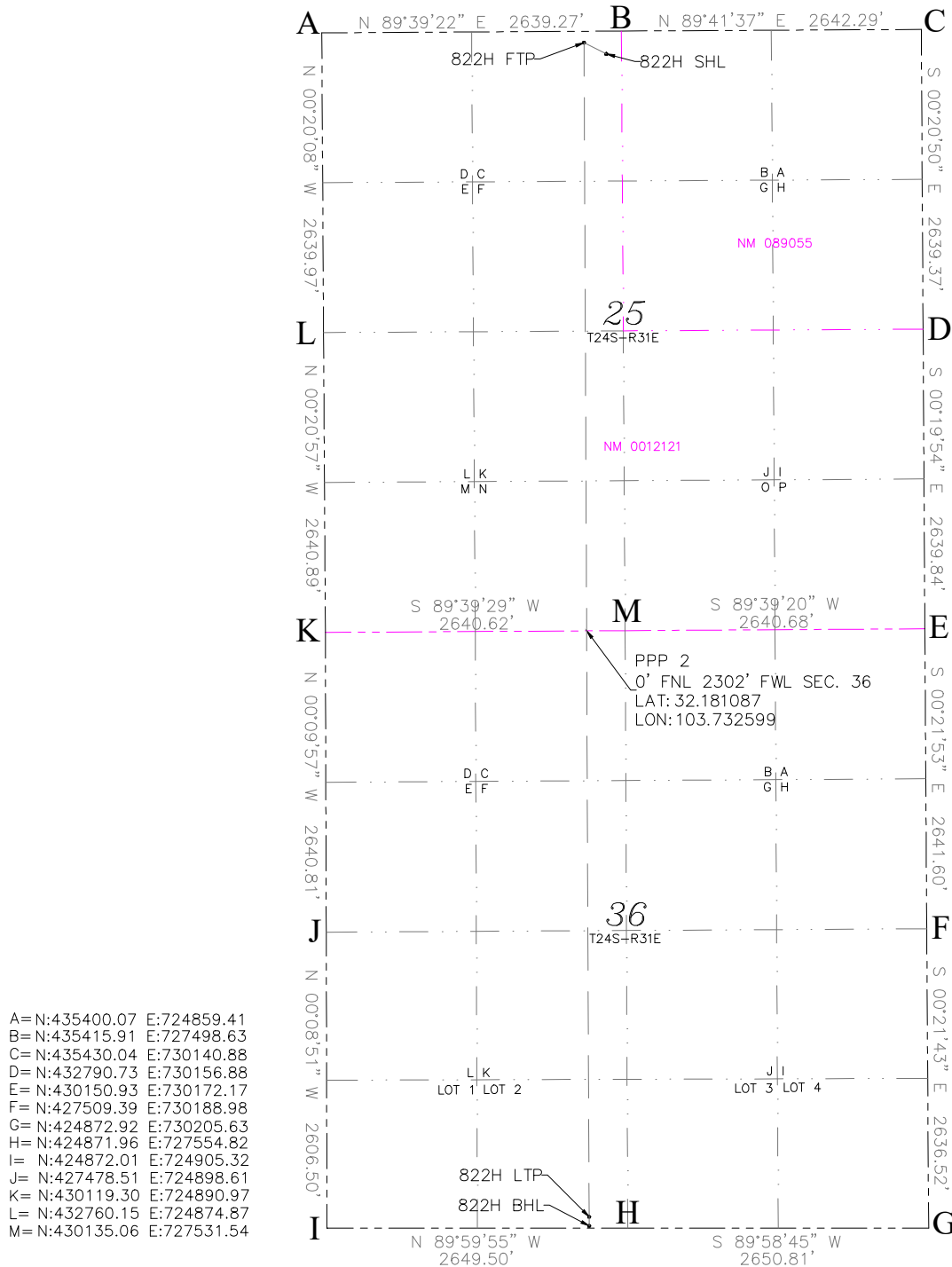
Spacing Unit Type		Horizontal	Vertical	Ground Floor Elevation:
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Signature	Date		
Printed Name			
Email Address		Certificate Number 23261	Date of Survey 07/2024

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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.



C-102  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>	Revised July, 2024	
		Submittal Type:	<input checked="" type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

## WELL LOCATION INFORMATION

API Number	Pool Code <b>98220</b>	Pool Name <b>Purple Sage; Wolfcamp (Gas)</b>
Property Code	Property Name <b>COTTON DRAW 25-36 FED STATE COM</b>	Well Number <b>832H</b>
OGRID No. <b>6137</b>	Operator Name <b>DEVON ENERGY PRODUCTION COMPANY, L.P.</b>	Ground Level Elevation <b>3544.7'</b>
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

## Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		200' N	2445' W	32.195054	103.732142	EDDY

## Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	20' S	1650' W	32.166690	103.734753	EDDY

Dedicated Acres <b>319.36</b>	Infill or Defining Well <b>Infill</b>	Defining Well API	Overlapping Spacing Unit (Y/N) <b>No</b>	Consolidation Code
Order Numbers			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

## Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

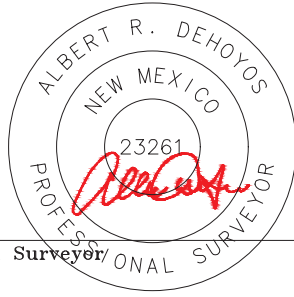
## First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
C	25	24-S	31-E		100' N	1650' W	32.195328	103.734712	EDDY

## Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
	36	24-S	31-E	2	100' S	1650' W	32.166910	103.734752	EDDY

Spacing Unit Type					Horizontal	Vertical	Ground Floor Elevation:
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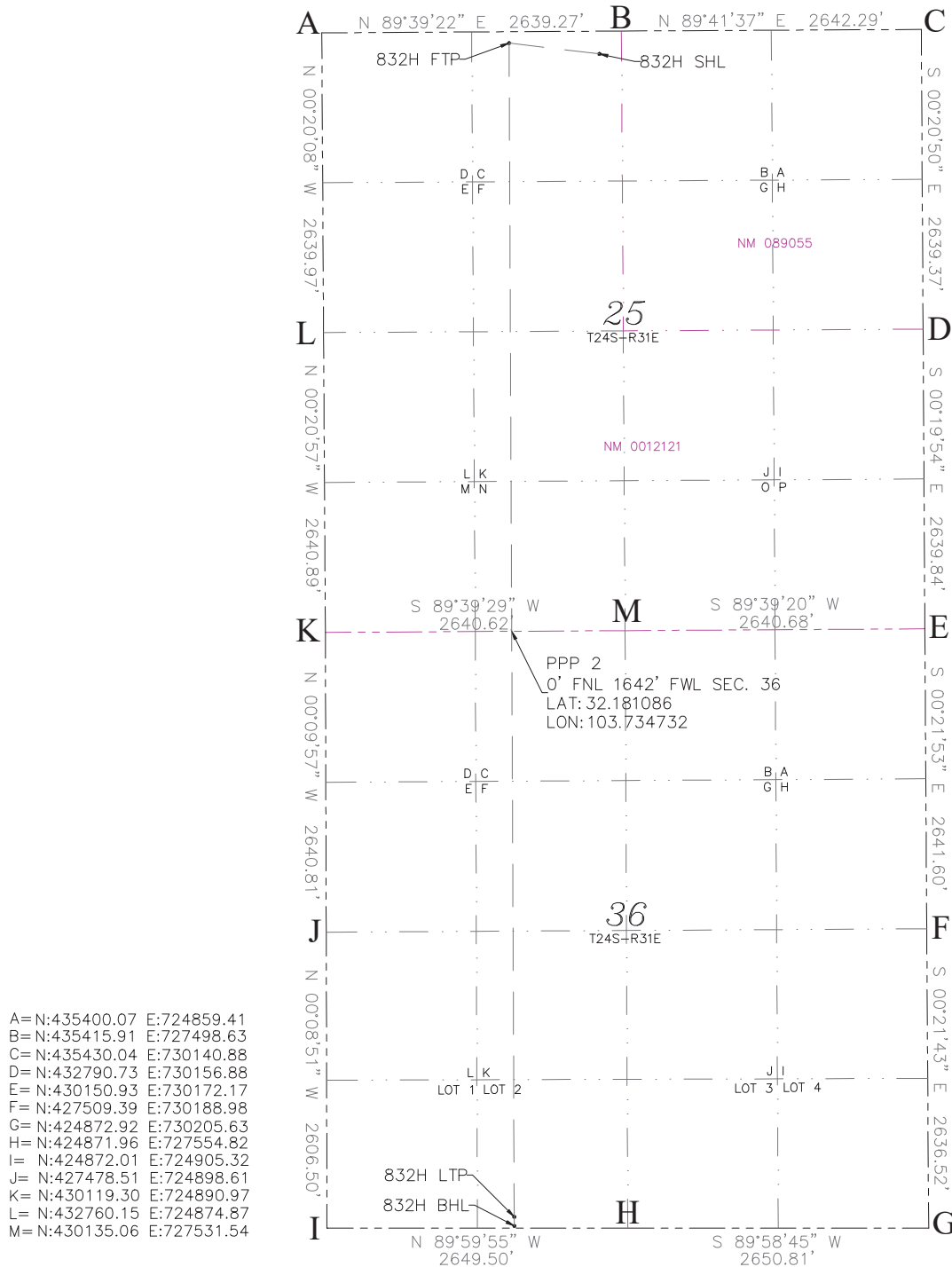
<b>OPERATOR CERTIFICATIONS</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including 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.		<b>SURVEYOR CERTIFICATIONS</b> I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under supervision, and that the same is true and correct to the best of my belief.  	
Signature	Date	Signature and Seal of Professional Surveyor	
Printed Name		Certificate Number	Date of Survey
Email Address		23261	07/2024



## ACREAGE DEDICATION PLATS

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Chevron U.S.A. Inc.  
EOG Resources, Inc.  
XTO Energy, Inc.  
Bureau of Land Management  
State of New Mexico Commissioner of Public Lands Land  
Office  
New Mexico Oil Conservation Division

1400 Smith Street  
Attn: Chloe Sawtelle, 5509 Champions Drive  
Attn: Matthew Fletcher, 22777 Springwoods Village Pkwy  
301 Dinosaur Trail  
  
310 Old Santa Fe Trail  
1220 South St. Francis Dr.

Houston	TX	77000
Midland	TX	79706
Spring	TX	77389
Santa Fe	NM	87508
Santa Fe	NM	87504
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](mailto:Ryan.Cloer@dvn.com)

Sincerely,

A handwritten signature in blue ink that reads "Paula M. Vance".

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.
9414811898765484284568	EOG Resources, Inc.	5509 Champions Dr Attn Chloe Sawtelle	Midland	TX	79706-2843	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.
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.
9414811898765484284599	Bureau of Land Management	301 Dinosaur Trl	Santa Fe	NM	87508-1560	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.
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/oed/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: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 383885
	Action Type: [UF-NSP] Non-Standard Proration (NSP)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	9/16/2024