

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Melanie Kenderdine**  
Cabinet Secretary - Designate

**Ben Shelton**  
Deputy Secretary (Acting)

**Gerasimos "Gerry" Razatos**  
Division Director (Acting)  
Oil Conservation Division



Darin Savage  
[darin@abidieschill.com](mailto:darin@abidieschill.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL – 8901**

**Devon Energy Production Company, L.P. [OGRID 6137]**  
**Boa State Com Well No. 705H**  
**API No. 30-025-51524**

Reference is made to your application received on March 5<sup>th</sup>, 2025.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	445 FNL & 1778 FEL	B	34	22S	33E	Lea
First Take Point	382 FNL & 2406 FEL	B	34	22S	33E	Lea
Last Take Point	121 FSL & 2334 FEL	O	03	23S	33E	Lea
Terminus	42 FSL & 2335 FEL	O	03	23S	33E	Lea

**Proposed Horizontal Units**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
E/2 Section 34, T22S, R33E	639.19	Bell Lake; Wolfcamp, North	5170
E/2 Section 03, T23S, R33E			

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 shall dedicate to each horizontal **oil** well 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 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

Administrative Order NSL – 8901  
Devon Energy Production Company, L.P.  
Page 2 of 2

well shall be no closer than 100 feet in 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 232 feet to the western edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 34, encroachment to the NE/4 NW/4

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. It is understood that the affected tracts are a 100% W.I. to the applicant of this application, therefore the notice period does not apply.

The Division understands you are seeking this unorthodox location due to deviating the well at the heel of the well bore. This is in order to avoid collision with existing wells and future well bores in the spacing unit, all while preventing waste, and protecting the correlative rights within the Wolfcamp formation underlying the E/2 of Section 34, T22S, R33E and the E/2 of Section 03, T23S, R33E.

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.



**GERASIMOS RAZATOS**  
**DIRECTOR (ACTING)**  
GR/lrl

**Date:** 3/12/2025

ID NO. 439408

NSL - 8901

Revised March 23, 2017

RECEIVED: <b>03/05/25</b>	REVIEWER:	TYPE:	APP NO: <b>pLEL2506532401</b>
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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: **Boa State Com 705H Well**API: **30-025-51524**Pool: **Bell Lake; Wolfcamp, North**Pool Code: **5170**

**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☐ PPR2) **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.**

March 5, 2025

Darin Savage

Date

Print or Type Name

970-385-4401

/s/ Darin Savage

Phone Number

darin@abadieschill.com

Signature

e-mail Address

**SUBMITTED TO THE OIL CONSERVATION DIVISION:**

Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its **Boa State Com 705H Well** located in the E/2 of Section 34, Township 22 South, Range 33 East, and Lots 1 & 2, the S/2 NE/4, and the SE/4 (the equivalent of the E/2) of Section 3, Township 23 South, Range 33 East, NMPM, Lea County, New Mexico.

**TABLE OF CONTENTS**

Administrative Checklist for NSL

- Exhibit A: C-102 Form, specifically identifying the NSL (19.15.15.13C)
- Exhibit B: A statement discussing the reasons for the unorthodox location (19.15.15.13C)
- Exhibit C: Tract map outlining the unit location of the unorthodox well with affected area tracts identified (19.15.15.13C)
- Exhibit D: The New Mexico State Land Office, with address, listed as an affected party with a copy of the notice letter.

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



For the Pursuit of Energy

ABADIE | SCHILL PC

Colorado	New Mexico
Louisiana	Texas
Nebraska	Kansas
Montana	Wyoming
Oklahoma	California
	North Dakota

March 5, 2025

Gerasimos Razatos, Director (Acting)  
Oil Conservation Division  
New Mexico Department of Energy  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Copy to: Leonard Lowe, Division Technical Examiner

**Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Boa State Com 705H Well located in the E/2 of Section 34, Township 22 South, Range 33 East and Lots 1 & 2, the S/2 NE/4, and the SE/4 (the equivalent of the E/2) of Section 3, Township 23 South, Range 33 East, NMPM, Lea County, New Mexico.**

Dear Acting Director Razatos:

Devon Energy Production Company, L.P., (“Devon”), OGRID No. 6137, is seeking administrative approval of an unorthodox well location (“NSL”) for the Boa State Com 705H Well (the “705H Well”) (API No. 30-025-51524) located in the Bell Lake; Wolfcamp, North (Oil) Pool (Pool Code 5170) underlying the E/2 of Section 34, Township 22 South, Range 33 East, and Lots 1 & 2, the S/2 NE/4, and the SE/4 (the equivalent of the E/2) of Section 3, Township 23 South, Range 33 East, NMPM, Lea County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that has been drilled as follows:

- Surface Location (SL): 445’ from the North line and 1778’ from the East line (Unit B) of Section 34, Township 22 South, Range 33 East;
- Bottom Hole Location (BHL): 42’ from the South line and 2335’ from the East line (Unit O) of Section 3, Township 23 South, Range 33 East;
- First Take Point (FTP): 382’ from the North line and 2406’ from the East line (Unit B) of Section 34, Township 22 South, Range 33 East;
- Last Take Point (LTP): 121’ from the South line and 2334’ from the East line (Unit O) of Section 3, Township 23 South, Range 33 East.

abadieschill.com

214 McKenzie Street, Santa Fe, New Mexico, 87501

O : 970.385.4401 • F : 970.385.4901

Devon has included as Exhibit B, a letter explaining why this application is needed. This well will produce from the Bell Lake Wolfcamp, North Pool (Pool Code 5170). The statewide rules establish 330' foot setback requirements. A portion of the beginning of the well's interval deviated within 330' of the western boundary of the spacing unit

The unorthodox location will encroach towards the NE/4 NW/4 of Section 34, Township 22 South, Range 33 East, Lea County, New Mexico.

Devon attests that the State owns 100% of the minerals, and Devon owns 100% of the working interest in the E/2 and W/2 of both Section 34, Township 22 South, Range 33 East and Section 3, Township 23 South, Range 33 East. Because the area is uniform in ownership, no notice is required for this application pursuant to 19.15.16.15.C(7) NMAC. However, Devon further attests that it has sent notice to the New Mexico State Land Office because the State owns the minerals in the adjoining spacing unit toward which the well encroaches pursuant to 19.15.2.7A(8)(d) NMAC; said notice as described satisfies all provisions of 19.15.4.12A(2) NMAC; copies of the application and required plat maps were furnished. Devon provides herein a sectional map of this area, attached as Exhibit C. There is no pooling case associated with this application because the State owns 100% of the mineral interest, and Devon owns 100% of the working interest in both Section 34, Township 22 South, Range 33 East and Section 3, Township 23 South, Range 33 East.

Your consideration in this matter is appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Darin C. Savage', written over a horizontal line.

Darin C. Savage  
Attorney for Applicant

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 type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input checked="" type="checkbox"/> As Drilled	

## WELL LOCATION INFORMATION

API Number 30-025-51524	Pool Code 5170	Pool Name BELL LAKE;WOLFCAMP, NORTH
Property Code 334068	Property Name BOA STATE COM	Well Number 705H
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Ground Level Elevation 3548.6'
Surface Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input checked="" 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
B	34	22-S	33-E		445' N	1778' E	32.354270	103.557494	LEA

## Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
O	3	23-S	33-E		42' S	2335' E	32.326608	103.559244	LEA

Dedicated Acres 639.19	Infill or Defining Well INFILL	Defining Well API 30-025-51526	Overlapping Spacing Unit (Y/N) N	Consolidation Code C
Order Numbers 2287815      NSL in process			Well setbacks are under Common Ownership: <input checked="" 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
B	34	22-S	33-E		49' N	2441' E	32.355362	103.559643	LEA

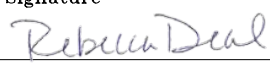
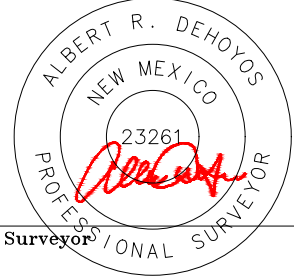
## First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
B	34	22-S	33-E		382' N	2406' E	32.354447	103.559529	LEA

## Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
O	3	23-S	33-E		121' S	2334' E	32.326825	103.559241	LEA

Spacing Unit Type		Horizontal	Vertical	Ground Floor Elevation:
		HZ		

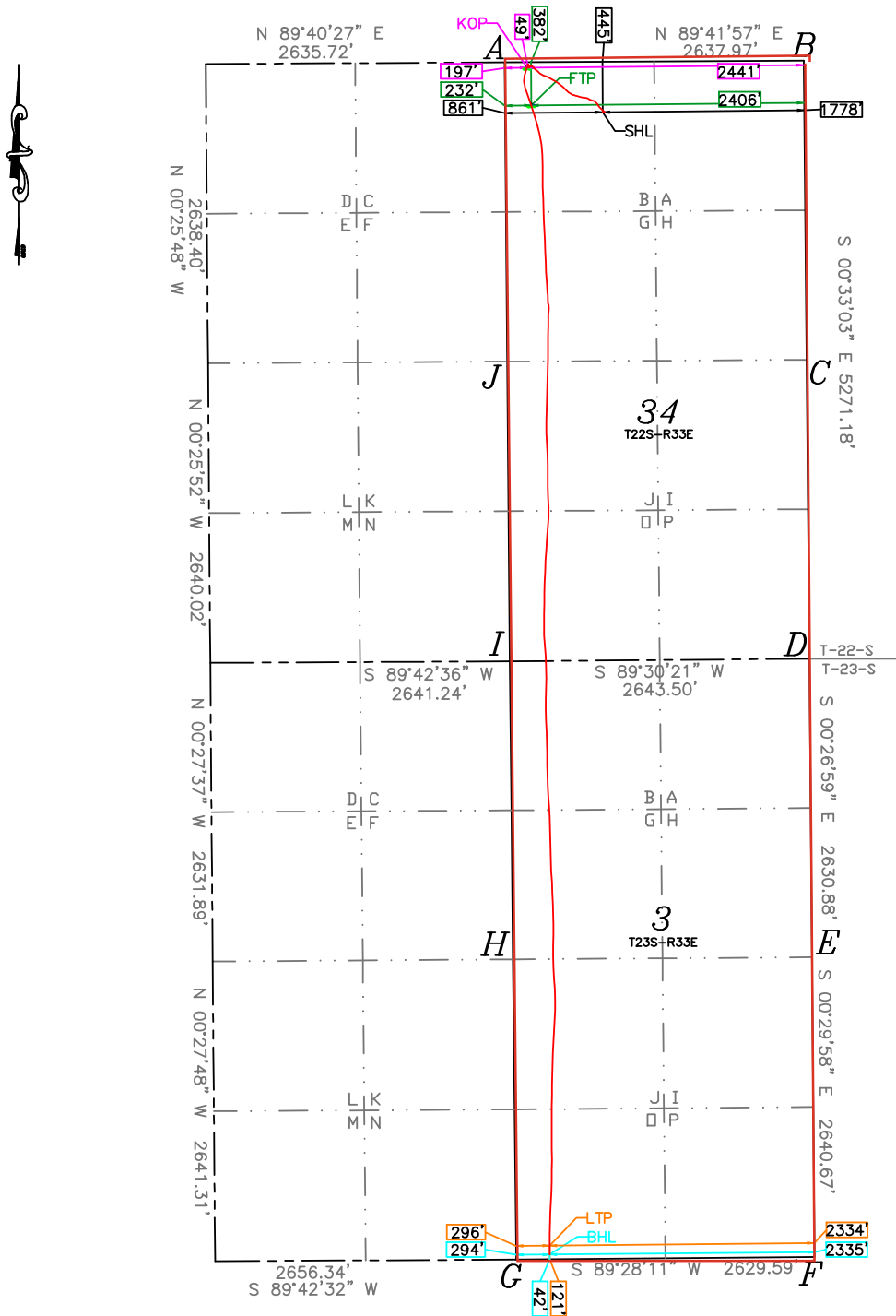
<b>OPERATOR CERTIFICATIONS</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including 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 1/20/2025		Signature and Seal of Professional Surveyor 	
Printed Name Rebecca Deal, Regulatory Analyst Email Address rebecca.deal@dvnm.com		Certificate Number 23261	Date of Survey 06/2024

**EXHIBIT**  
**A**

## 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.



**SURFACE HOLE LOCATION**  
 GEODETIC COORDINATES NAD 83  
 NMSP EAST SURFACE LOCATION  
 445' FNL 1778' FEL SECTION 34  
 0' MEASURED DEPTH IN FEET  
 NAD 83, SPCS NM EAST  
 N:493483.49/E:780912.29  
 LAT:32.354270/LDN:103.557494

**KICK OFF POINT**  
 49' FNL 2441' FEL SECTION 34  
 11,747' MEASURED DEPTH IN FEET  
 NAD 83, SPCS NM EAST  
 N:493875.70/E:780245.73  
 LAT:32.355362/LDN:103.559643

**FIRST TAKE POINT**  
 382' FNL 2406' FEL SECTION 34  
 12,432' MEASURED DEPTH IN FEET  
 NAD 83, SPCS NM EAST  
 N:493543.27/E:780283.29  
 LAT:32.354447/LDN:103.559529

**LAST TAKE POINT**  
 121' FSL 2334' FEL SECTION 3  
 22,511' MEASURED DEPTH IN FEET  
 NAD 83, SPCS NM EAST  
 N:483494.84/E:780444.94  
 LAT:32.326825/LDN:103.559241

**BOTTOM HOLE LOCATION**  
 42' FSL 2335' FEL SECTION 3  
 22,590' MEASURED DEPTH IN FEET  
 NAD 83, SPCS NM EAST  
 N:483416.09/E:780444.57  
 LAT:32.326608/LDN:103.559244

**CORNER COORDINATES**  
 NAD 83, SPCS NM EAST  
 A=N:493923.95/E:780047.82  
 B=N:493937.81/E:782685.76  
 C=N:491302.34/E:782711.09  
 D=N:488666.87/E:782736.43  
 E=N:486036.07/E:782757.07  
 F=N:483395.50/E:782780.10  
 G=N:483371.16/E:780150.62  
 H=N:486017.52/E:780121.71  
 I=N:488644.07/E:780093.02  
 J=N:491286.48/E:780070.40





Devon Energy Production Company LP  
333 West Sheridan Avenue  
Oklahoma City, OK 73102

405 228 8788 Phone  
www.devonenergy.com

February 17, 2025

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

RE: Application for Non-Standard Location  
Engineering Statement  
Boa State Com 705H  
E/2 of Sections 34 of 22S-33E and 3 of 23S-33E  
Lea County, New Mexico

Dear Mr. Lowe,

Devon Energy Production Company, L.P. ("Devon") respectfully requests approval of a non-standard location for the Boa State Com 705H (API #30-025-51524) (the "Well") referenced above by allowing a portion of the perforated lateral to be located 232' from the western boundary of the spacing unit. The Well is in the Bell Lake North Wolfcamp (Pool Code 5170).

It is Devon's responsibility as a prudent operator to locate the lateral for maximum production and to minimize reserves left in the ground. While drilling the Well, the heel of the Well deviated slightly to the west to ensure collision with other existing and future wellbores in the spacing unit does not occur. In doing so, the Well was landed outside of the standard setbacks, but quickly deviated eastward inside the setbacks for most of the lateral. Perforating the lateral as close to the heel as possible ensures maximum reserves recovery and prevents waste.

The working interest and mineral ownership in the W/2 spacing unit of Sections 3 & 34 is identical to the ownership in the E/2 spacing unit, which is the offset spacing unit where the well encroaches, and therefore, Devon is in a position to locate the lateral in a manner to increase ultimate recovery of reserves and thereby prevent waste of natural resources, without negatively impacting any of the offset owners, including the State of New Mexico, which owns 100% of mineral interests in both spacing units.

**EXHIBIT  
B**

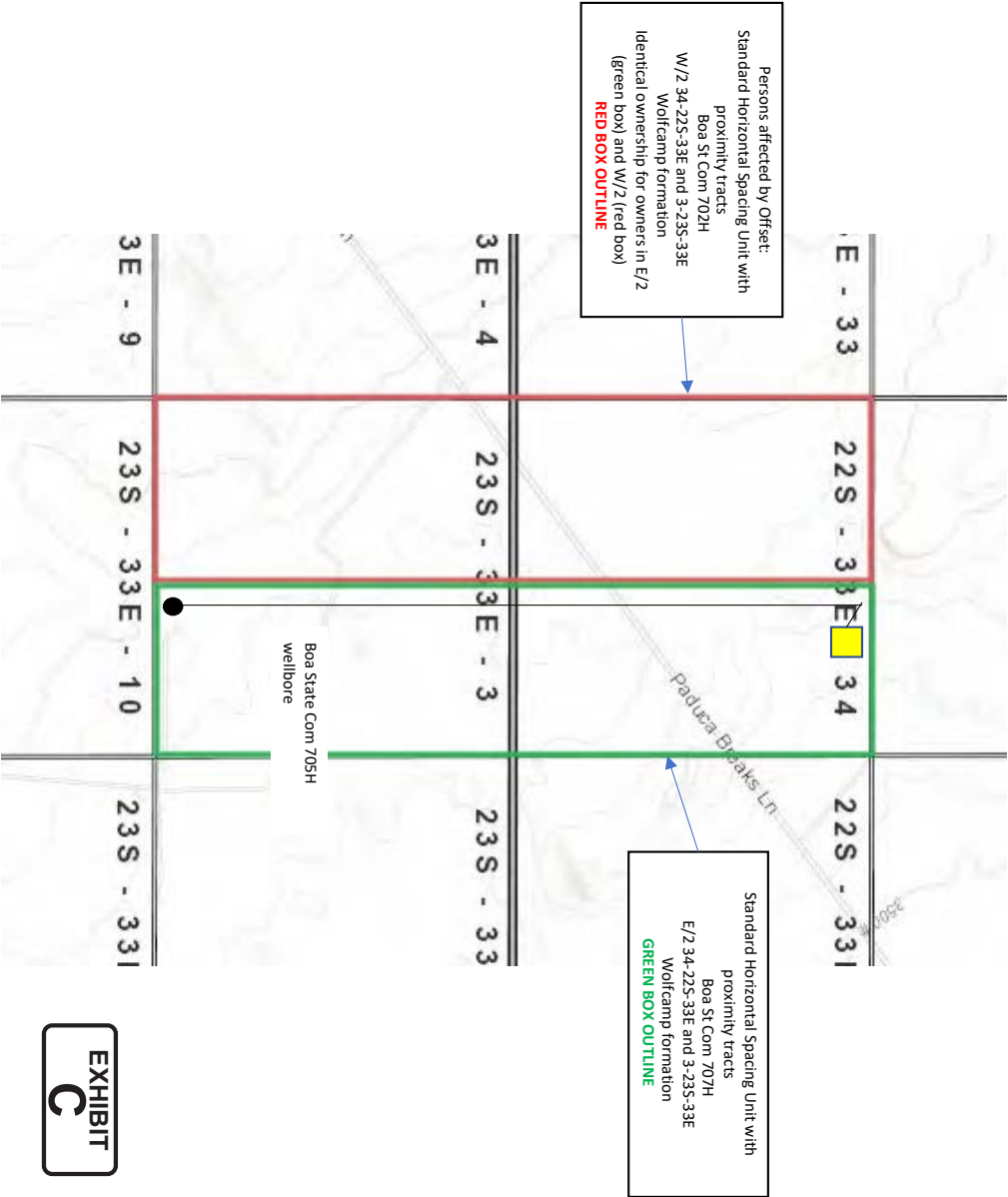
February 17, 2025  
Page 2

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Curt Johnston", written in a cursive style.

Curtis Johnston  
Reservoir Engineer



Transaction Report Details - CertifiedPro.net						
Date Mailed - 03/05/2025						
USPS Article Number	Date Mailed	Reference Number	Name 1	Address1	City	Mailing Status
931486904300132309303	3/5/25	NSL Box State Com	New Mexico State Land Office	310 Old Santa Fe Trail	Santa Fe	Mailed
					NM	87501

EXHIBIT

D



For the Pursuit of Energy

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Colorado	New Mexico
Louisiana	Texas
Nebraska	Kansas
Montana	Wyoming
Oklahoma	California
	North Dakota

March 5, 2025

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**NOTICE TO AFFECTED PERSONS/PARTIES  
RE: APPLICATION FOR ADMINISTRATIVE  
APPROVAL OF UNORTHODOX WELL LOCATION**

**Re: Application of Devon Energy Production Company, L.P., for administrative approval of unorthodox well location for its Boa State Com 705H Well located in the E/2 of Section 34, Township 22 South, Range 33 East and Lots 1 & 2, the S/2 NE/4, and the SE/4 (the equivalent of the E/2) of Section 3, Township 23 South, Range 33 East, NMPM, Lea County, New Mexico.**

To the New Mexico State Land Office ("NMSLO"):

Enclosed in this notice are copies of the above referenced application filed with the New Mexico Conservation Division on the date referenced above.

Because state leases are involved and the NMSLO has a royalty interest in the subject lands, the NMSLO is being notified of this NSL application. Any objections that you have to one or more of these applications should be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division receives the applications filed for administrative approval by the Division. Email correspondence for this matter can be sent to the Division at [OCD.Engineer@emnrd.nm.gov](mailto:OCD.Engineer@emnrd.nm.gov).

If you have any questions concerning this application, please contact:

David Broussard  
Landman – Delaware Basin  
Devon Energy Production Company, L.P.  
(405) 228-8788  
[David.Broussard@dvn.com](mailto:David.Broussard@dvn.com)

Your consideration is much appreciated.

[abadieschill.com](http://abadieschill.com)

214 McKenzie Street, Santa Fe, New Mexico, 87501

O : 970.385.4401 • F : 970.385.4901

Sincerely,

A handwritten signature in black ink, appearing to be 'Darin C. Savage', written over a horizontal line.

Darin C. Savage

Attorney for Devon Energy  
Production Company, L.P.

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 439408

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 439408
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	3/6/2025