

Submit 1 Copy To Appropriate District
Office
District I – (575) 393-6161
1625 N. French Dr., Hobbs, NM 88240
District II – (575) 748-1283
811 S. First St., Artesia, NM 88210
District III – (505) 334-6178
1000 Rio Brazos Rd., Aztec, NM 87410
District IV – (505) 476-3460
1220 S. St. Francis Dr., Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-103
Revised August 1, 2011

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)		WELL API NO. Multiple
1. Type of Well: Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other		5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input type="checkbox"/>
2. Name of Operator Devon Energy Production Company, L.P.		6. State Oil & Gas Lease No.
3. Address of Operator 333 West Sheridan, Oklahoma City, OK 73102		7. Lease Name or Unit Agreement Name Multiple
4. Well Location Unit Letter _____: _____ feet from the _____ line and _____ feet from the _____ line Section _____ Township _____ Range _____ NMPM _____ County _____ LEA _____		8. Well Number
11. Elevation (Show whether DR, RKB, RT, GR, etc.)		9. OGRID Number 6137
10. Pool name or Wildcat See Attached		

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK ☐ PLUG AND ABANDON ☐
 TEMPORARILY ABANDON ☐ CHANGE PLANS ☐
 PULL OR ALTER CASING ☐ MULTIPLE COMPL ☐
 DOWNHOLE COMMINGLE ☐

SUBSEQUENT REPORT OF:

REMEDIAL WORK ☐ ALTERING CASING ☐
 COMMENCE DRILLING OPNS. ☐ P AND A ☐
 CASING/CEMENT JOB ☐

OTHER: Surface Commingle ☐

OTHER: ☐

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

APPLICATION FOR CENTRAL TANK BATTERY\OFF LEASE MEASUREMENT, SALES, & STORAGE

Devon Energy Production Company, L.P. is requesting approval for surface commingle for the subject well. Please see attachments.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Jenny Harms TITLE Regulatory Specialist DATE 9/17/2021

Type or print name Jenny Harms E-mail address: jenny.harms@devn.com PHONE: 405-552-6560

For State Use Only

APPROVED BY: _____ TITLE _____ DATE _____

Conditions of Approval (if any):

Revised March 23, 2017

RECEIVED:	REVIEWER:	TYPE:	APP NO:
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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 Co., L.P. **OGRID Number:** 6137
Well Name: see attachments for multiple wells and API's **API:** _____
Pool: 96641 PADUCA; BONE SPRING (O) **Pool Code:** _____
 98220 PURPLE SAGE; WOLFCAMP (GAS)

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 holders
 B. ☐ Royalty, overriding royalty owners, revenue owners
 C. ☐ Application requires published notice
 D. ☒ Notification and/or concurrent approval by SLO
 E. ☒ Notification and/or concurrent approval by BLM
 F. ☐ Surface owner
 G. ☐ 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.

 Jenny Harms
 Print or Type Name

 Signature

8-29-2022

 Date

405-552-6560

 Phone Number

jenny.harms@dv.com

 e-mail Address

District I
1625 N. French Drive, Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St Francis Dr, Santa Fe, NM
87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107-B
Revised August 1, 2011

OIL CONSERVATION DIVISION

1220 S. St Francis Drive
Santa Fe, New Mexico 87505

Submit the original
application to the Santa Fe
office with one copy to the
appropriate District Office.

APPLICATION FOR SURFACE COMMINGLING (DIVERSE OWNERSHIP)

OPERATOR NAME: Devon Energy Production Co., L.P.
OPERATOR ADDRESS: 333 W Sheridan Avenue, Oklahoma City, OK 73102
APPLICATION TYPE:

☐ Pool Commingling ☐ Lease Commingling ☒ Pool and Lease Commingling ☐ Off-Lease Storage and Measurement (Only if not Surface Commingled)

LEASE TYPE: ☐ Fee ☐ State ☒ Federal

Is this an Amendment to existing Order? ☐ Yes ☒ No If "Yes", please include the appropriate Order No. _____
Have the Bureau of Land Management (BLM) and State Land office (SLO) been notified in writing of the proposed commingling
☒ Yes ☐ No

(A) POOL COMMINGLING

Please attach sheets with the following information

(1) Pool Names and Codes	Gravities / BTU of Non-Commingled Production	Calculated Gravities / BTU of Commingled Production		Calculated Value of Commingled Production	Volumes
See attachments					

- (2) Are any wells producing at top allowables? ☐ Yes ☒ No
(3) Has all interest owners been notified by certified mail of the proposed commingling? ☒ Yes ☐ No.
(4) Measurement type: ☒ Metering ☐ Other (Specify)
(5) Will commingling decrease the value of production? ☐ Yes ☒ No If "yes", describe why commingling should be approved

(B) LEASE COMMINGLING

Please attach sheets with the following information

- (1) Pool Name and Code.
(2) Is all production from same source of supply? ☒ Yes ☐ No
(3) Has all interest owners been notified by certified mail of the proposed commingling? ☒ Yes ☐ No
(4) Measurement type: ☒ Metering ☐ Other (Specify)

(C) POOL and LEASE COMMINGLING

Please attach sheets with the following information

- (1) Complete Sections A and E.

(D) OFF-LEASE STORAGE and MEASUREMENT

Please attached sheets with the following information

- (1) Is all production from same source of supply? ☐ Yes ☒ No
(2) Include proof of notice to all interest owners.

(E) ADDITIONAL INFORMATION (for all application types)

Please attach sheets with the following information

- (1) A schematic diagram of facility, including legal location.
(2) A plat with lease boundaries showing all well and facility locations. Include lease numbers if Federal or State lands are involved.
(3) Lease Names, Lease and Well Numbers, and API Numbers.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE: Jenny Harms

TITLE: Regulatory Specialist

8-29-2022

TYPE OR PRINT NAME Jenny Harms

TELEPHONE NO.: 405-552-6560

E-MAIL ADDRESS: jenny.harms@dmn.com

APPLICATION FOR CENTRAL TANK BATTERY\OFF LEASE MEASUREMENT, SALES, & STORAGE

43 CFR 3173.14 (a)(1)(i-iv)

(iii) Federal unit PA or CA where each unit PA or CA proposed for commingling has the same proportion of Federal interest, and which interest is subject to the same fixed royalty rate and revenue distribution. (For example, the BLM could approve a commingling request under this paragraph where an operator proposes to commingle two Federal CAs of mixed ownership and both CAs are 50 percent Federal/50 percent private, so long as the Federal interests have the same royalty rates and royalty distributions.);

Proposal for **COTTON DRAW UNIT 26 CTB 2 (NEW BATTERY):**

Devon Energy Production Company, LP is requesting approval for a lease/pool Commingle for the following wells:

	API	NMNM0012121-12.5% NMNM105559041	NMNM0036379-12.5% NMNM105416407	STATE			PA INFORMATION
COTTON DRAW UNIT 601H	30-015-47299	31%	35%	34%	FEDERAL: 66% STATE: 34%	BONESPRING	APPROVED PA
COTTON DRAW UNIT 602H	30-015-47300	31%	35%	34%	FEDERAL: 66% STATE: 34%	WOLFCAMP	FUTURE PROPOSED WOLFCAMP PA – NOT ESTABLISHED
COTTON DRAW UNIT 603H	30-015-47301	31%	35%	34%	FEDERAL: 66% STATE: 34%	WOLFCAMP	FUTURE PROPOSED WOLFCAMP PA – NOT ESTABLISHED
COTTON DRAW UNIT 604H	30-015-49302	31%	35%	34%	FEDERAL: 66% STATE: 34%	WOLFCAMP	FUTURE PROPOSED WOLFCAMP PA – NOT ESTABLISHED
COTTON DRAW UNIT 605H	30-015-47297	31%	35%	34%	FEDERAL: 66% STATE: 34%	WOLFCAMP	FUTURE PROPOSED WOLFCAMP PA – NOT ESTABLISHED
COTTON DRAW UNIT 606H	30-015-47296	31%	35%	34%	FEDERAL: 66% STATE: 34%	WOLFCAMP	FUTURE PROPOSED WOLFCAMP PA – NOT ESTABLISHED

Unit/PA: NMNM 070928X (NMNM105415505)

- Cotton Draw Unit 601H is a Bonespring well and will be proposed to the existing Bonespring PA.
- Cotton Draw Unit 602H, 603H, 604H, 605H, 606H are Wolfcamp wells and will be proposed in the future Wolfcamp PA that is not established.

Oil & Gas metering:

The Cotton Draw Unit 26 CTB 2 central tank battery is in SE/4 NE/4 NW/4 & SW/4 NW/4 NE/4, S26, T24S, R31E in Eddy County, New Mexico.

Each well flows to its own 3-Phase Separator where the full well stream is separated into independent gas, oil, and water streams.

3-Phase gas flows through an independent and designated orifice meter for rate allocation. The gas then flows into a manifold where it is combined with gas from other 3-Phases. The combined stream flows into the 2-Phase Separator(s) for further conditioning. The conditioned gas stream flows through an orifice meter(s) for Federal Measurement Point/Sales/Royalty Payment.

3-Phase oil flows through an independent and designated Coriolis meter for rate allocation. The oil then flows into a manifold where it is combined with oil from other 3-Phases. The combined stream flows into the Heater Treater(s) and then ULPS(s) for further conditioning and then into one of the oil tanks for storage. The stored oil is pumped into a LACT unit for Federal Measurement Point/Sales/Royalty Payment.

Flash gas from oil conditioning is recovered using compression (VRU). The recovered gas flows through a designated orifice meter for rate allocation.

3-Phase water flows through an independent and designated magnetic meter for rate allocation. The water then flows into a manifold where it is combined with water from other 3-Phases. The combined stream flows into one of the water tanks for storage.

The central tank battery has three oil tanks and three water tanks that all wells utilize. All wells have one common gas delivery point(s) on location and one common oil delivery point(s) (LACT) on or directly adjacent to location.

Secondary recovery will utilize recycled or buyback gas for gas lift. The gas is compressed and flows through an individual orifice meter to each wellhead.

Well Name	Individual Meters		
	Gas Allocation	Oil Allocation	Water Allocation
Cotton Draw Unit 601H	DVN / *	DVN / *	DVN / *
Cotton Draw Unit 602H	DVN / *	DVN / *	DVN / *
Cotton Draw Unit 603H	DVN / *	DVN / *	DVN / *
Cotton Draw Unit 604H	DVN / *	DVN / *	DVN / *
Cotton Draw Unit 605H	DVN / *	DVN / *	DVN / *
Cotton Draw Unit 606H	DVN / *	DVN / *	DVN / *
Common Meters			
VRU Allocation	DVN / *		
Gas FMP	COTTON DRAW MIDSTREAM / *		
Oil FMP	PLAINS / *		

Meter Owner / Serial Number:

* Meter serial numbers to be provided after construction of facility.

Process and Flow Descriptions:

The flow of produced fluids is described above and shown in detail on the enclosed facility diagram, along with a description of each vessel and map which shows the lease boundaries, location of wells, facility, and gas sales meter.

The proposed commingling will maximize the ultimate recovery of oil and/or gas from the federal leases and will reduce environmental impacts by minimizing surface disturbance and emissions. The proposed commingling will reduce operating expenses, as well as, not adversely affect federal royalty income, production accountability, or the distribution of royalty.

Devon Energy Production Company, LP understands the requested approval will not constitute the granting of any right-of-way or construction rights not granted by the lease instrument.

Working, royalty, and overriding interest owners have been notified of this proposal via certified mail (see attached). NMOCD Notice Variance Requested: Devon Energy Production Company, LP request approval to add new leases and pools and/or new wells producing from the authorized leases and pools. Devon Energy Production Company, LP request approval to only notice the interest owners of new leases and pools to be added via amendment (reference rule 19.15.12.10(C)(4)(g) NMAC)

Allocation Methodology

PRORATED ALLOCATION

GAS ALLOCATION

Each well has a Wellhead Allocation (WH ALLOC) meter and a Gas Lift Injection (GL INJ) meter. The CTB has a commingled gas Meter (BATT ALLOC or 3rd Party Sales) that measures the volume of gas that leaves the CTB, this meter would be considered the FMP. Any Buy Back meter that measures off-lease gas coming on lease used for gas lift injection from the gathering line would be considered an FMP.

1. Buyback is the volume of off-lease gas used for gas lift, compression fuel, and well injection.
2. Net Well Production is base amount of production not used for gas lift and is calculated by subtracting gas lift injection (GL INJ) volume from the wellhead allocation (WH ALLOC) meter reading.
3. Lease use gas is allocated by theoretical % for each well * total amount of lease use volume.
4. Theoretical % used for the allocation of production/sales is calculated by dividing the Net Well Production volume for each well into the sum of the Net Well Production.
5. Net CTB Gas is Battery Allocation (BATT ALLOC) or 3rd Party Sales meter measuring commingled CTB gas less any Buy Back. All off lease Buy Back will be metered as an FMP and netted out of the BATT ALLOC FMP metered volume to derive both the Total Net FMP and total Net CTB production.
6. Theoretical % for each well is multiplied by the Net CTB Gas.
7. HP Flare is volume of gas flared from the CTB, allocated to wells by Theoretical % for each well * HP FL volume.
8. VRU measures the gas that flashes from the ultra-low-pressure separator (ULPS) and is piped in upstream of the commingled CTB BATT ALLOC meter. The VRU volume will be allocated based on the same allocation methodology applied for WH ALLOC allocated gas.
9. Allocated Production is all gas produced by CTB and is calculated by adding Total Net FMP Volumes+ HP Flare + Lease Use.

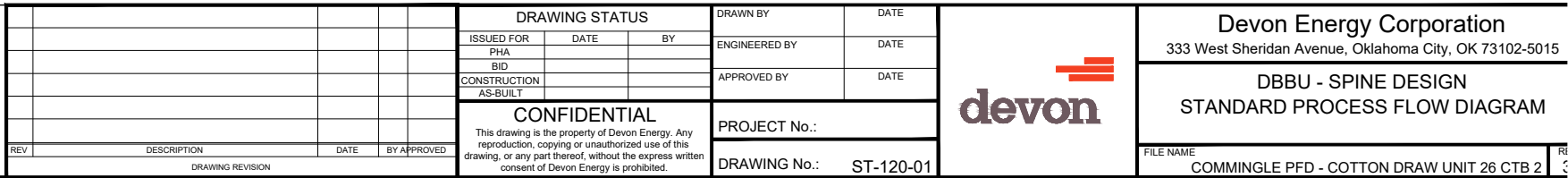
Each well has an oil meter measuring the volume of oil produced by the well. This volume is used as the allocation point to prorate Allocated Production and Total Sales Volume (FMP) back to each well.

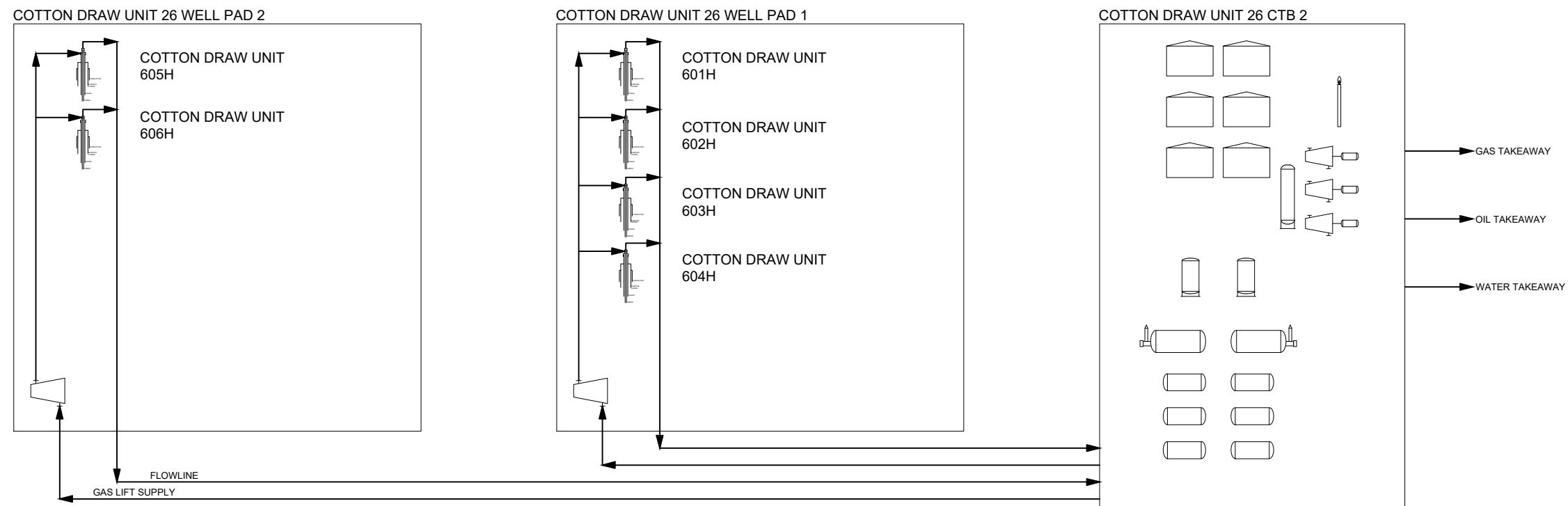
1. Allocated production is volume of oil produced by the CTB and is calculated by Ending Tank Inventory + Pipeline LACT (FMP) – Beginning Tank Inventory.
2. Available oil for sale is calculated by Pipeline LACT (FMP) + Beginning Tank Inventory.
3. Theoretical % is calculated by dividing each oil meter volume into the sum of oil meters.
4. The Theoretical % available for sale is the well sales available divided by the total available sales.
5. Total Sales Volume is the volume of oil sold through the FMP meter
6. Beginning Inventory comes from previous accounting period's Ending Inventory for each well.
7. Ending Inventory for each well is calculated by multiplying the theoretical production % by total ending inventory.

WATER ALLOCATION

Each well has a water meter measuring the volume of water produced by the well. This volume is used as the allocation point to prorate Allocated Production and Total Transferred Volume back to each well.

1. CTB Allocated production is volume of water produced by the CTB and is calculated by Ending Tank Inventory + Water Transfer – Beginning Tank Inventory.
2. CTB Available Water to Transfer is calculated by Water Transfer + Tank Inventory.
3. Theoretical % is calculated by dividing each water meter volume into the sum of the water meters.
4. The Theoretical % available for transfer for each well is the well production available divided the total Available water.
5. Total Transfer Volume is the volume of water metered by the water transfer meter.
6. Beginning Inventory comes from previous accounting period's allocated Ending Inventory for each well.
7. Ending Inventory for each well is calculated by multiplying the theoretical production % by total ending inventory.





NOTES:

1. EQUIPMENT AND LAYOUT CONFIGURATIONS ARE ONLY REPRESENTATIVE
2. MEASUREMENT POINTS SHOWN IN PROCESS FLOW DIAGRAM

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Devon Energy
333 West Sheridan Avenue
Oklahoma City, OK 73102-5015

405 228 3044 Phone
www.devonenergy.com

August 31, 2022

New Mexico Oil Conversation Division
1120 South Saint Francis Drive
Santa Fe, NM 87504

RE: Cotton Draw 26 CTB 2
Section 2 & 36-23S-31E Eddy
County, New Mexico

Mr. McClure:

Devon Energy Production Company, L.P. ("Devon") desires to Commingle with the leases and pools on the wells listed below. Upon review of the title information and Devon's records, please be advised that ownership in each well is identical.

Well Name	API Number	Pool	Spacing	Leases
COTTON DRAW UNIT #601H	30-015-47299	PADUCA; BONE SPRING (96641)	W/2W/2 of Section 2-25S-31E, and W/2W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624
COTTON DRAW UNIT #602H	30-015-47300	PURPLE SAGE; WOLFCAMP (98220)	W/2 of Section 2-25S-31E, and W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624
COTTON DRAW UNIT #603H	30-015-47301	PURPLE SAGE; WOLFCAMP (98220)	W/2 of Section 2-25S-31E, and W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624
COTTON DRAW UNIT #604H	30-015-49302	PURPLE SAGE; WOLFCAMP (98220)	W/2 of Section 2-25S-31E, and W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624
COTTON DRAW UNIT #605H	30-015-47297	PURPLE SAGE; WOLFCAMP (98220)	W/2 of Section 2-25S-31E, and W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624
COTTON DRAW UNIT #606H	30-015-47296	PURPLE SAGE; WOLFCAMP (98220)	W/2 of Section 2-25S-31E, and W/2 of Sections 26 & 35-24S-31E	NMNM 0012121, NMNM 0036379, & K045624

If you have any questions, please feel free to contact me directly.

Sincerely,

Verl Brown

Verl Brown, JD, CPL

Senior Staff Landman

405 228 8804 Direct

verl.brown@dvn.com

Devon Energy Production Company, L.P.

333 W. Sheridan Avenue

Oklahoma City, OK 73102-5015

Well Name	Well Number	US Well Number	Lease Number	Case Number	Operator
COTTON DRAW	601H	3001547299	NMNM012121	NMNM70928X	DEVON
COTTON DRAW	605H	3001547297	NMNM012121	NMNM70928X	DEVON
COTTON DRAW	606H	3001547296	NMNM012121	NMNM70928X	DEVON
COTTON DRAW	604H	3001549302	NMNM012121	NMNM70928X	DEVON
COTTON DRAW	603H	3001547301	NMNM012121	NMNM70928X	DEVON
COTTON DRAW	602H	3001547300	NMNM012121	NMNM70928X	DEVON

Notice of Intent

Sundry ID: 2676528

Type of Submission: Notice of Intent

Date Sundry Submitted: 06/14/2022

Date proposed operation will begin: 06/14/2022

Type of Action: Commingling (Surface)

Time Sundry Submitted: 06:16

Procedure Description: APPLICATION FOR CENTRAL TANK BATTERY\OFF LEASE MEASUREMENT, SALES, & STORAGE 43 CFR 3173.14 (a)(1)(i-iv) (iii) Federal unit PA or CA where each unit PA or CA proposed for commingling has the same proportion of Federal interest, and which interest is subject to the same fixed royalty rate and revenue distribution. (For example, the BLM could approve a commingling request under this paragraph where an operator proposes to commingle two Federal CAs of mixed ownership and both CAs are 50 percent Federal/50 percent private, so long as the Federal interests have the same royalty rates and royalty distributions.); Proposal for COTTON DRAW UNIT 26 CTB 2 (NEW BATTERY): Devon Energy Production Company, LP is requesting approval for a lease/pool Commingle. Please see attachments.

Surface Disturbance

Is any additional surface disturbance proposed?: No

NOI Attachments

Procedure Description

DBBU_Commingling_Narative_attachments_6_13_22_20220729092658.pdf

Conditions of Approval

Specialist Review

Surface_Commingling_COA_20220811210741.pdf

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: JENNY HARMS

Signed on: JUL 29, 2022 09:25 AM

Name: DEVON ENERGY PRODUCTION COMPANY LP

Title: Regulatory Compliance Professional

Street Address: 333 West Sheridan Avenue

City: Oklahoma CityState: OK

Phone: (405) 552-6560

Email address: jennifer.harms@dvn.com

Field

Representative Name:

Street Address:

City:State:Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Name: Jonathon W Shepard

BLM POC Title: Petroleum Engineer

BLM POC Phone: 5752345972

BLM POC Email Address: jshepard@blm.gov

Disposition: Approved

Disposition Date: 08/11/2022

Signature: Jonathon Shepard

ORIGIN ID: OKCA (405) 819-6057		SHIP DATE: 08SEP22
JENNY HARRIS		ACTWGT: 1.00 LB
DEVON ENERGY		CAD: 103493122INET4530
333 W. SHERIDAN AVE.		
OKLAHOMA CITY, OK 73102		BILL SENDER
UNITED STATES US		
TO COMMISSIONER OF PUBLIC LANDS		
ATTN: COMMINGLING MANAGER		
PO BOX 1148		
SANTA FE NM 87504		
(405) 552-6560	REF: 9001002213	
INV.	DEPT.	
581J1/EC8C/FE2D		
		
		
J223822081281ue		
TRK# 7778 8460 2817	FRI - 09 SEP 10:30A	
0201	PRIORITY OVERNIGHT	
XX SAFA		87504
NM-US		ABQ
		

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Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, OK 73102-5010

September 8, 2022

Commissioner of Public Lands
Attn: Commingle Manager
PO Box 1148
Santa Fe, NM 87504-1148

Re: Central Tank Battery COTTON DRAW 26 CTB 2
Sec., T, R: SE/4 NE/4 NW/4 & SW/4 NW/4 NE/4, S26, T24S, R31E
Eddy County, New Mexico.
Lease: NMNM12121 & NMNM036379
Pool: 96641 PADUCA; BONE SPRING (O)
98220 PURPLE SAGE; WOLFCAMP (GAS)

To Whom It May Concern:

Please find enclosed the SLO Commingle Application, application fee check of \$150.00.

Should you require any additional information or assistance, please do not hesitate to contact me my email or phone.

Sincerely,

A handwritten signature in blue ink that reads "Jenny Harms". The signature is fluid and cursive, with the first name "Jenny" and last name "Harms" clearly distinguishable.

Jenny Harms
Regulatory Compliance Professional
Work Phone: (405)552-6560
Jennifer.harms@devon.com
Devon Energy Center-Tower
333 West Sheridan Avenue Oklahoma City OK 73102-5015

Enclosures

Economic Justification Report

Well Name & Number	Type	Fed Lease 1	Royalty Rate	Fed Lease 2 (if applicable)	Royalty Rate	Fed Lease 3 (if applicable)	Royalty Rate	BOPD	Oil Gravity @ 60°	MCFPD	Dry BTU
Cotton Draw Unit 601H	Sweet	See Attachments				-		1,130	42.6	2,100	1,325
Cotton Draw Unit 602H	Sweet					-		2,005	47	6,600	1,471
Cotton Draw Unit 603H	Sweet					-		2,561	46	7,700	1,471
Cotton Draw Unit 604H	Sweet					-		2,668	50	20,700	1,285
Cotton Draw Unit 605H	Sweet					-		2,089	48	6,030	1,471
Cotton Draw Unit 606H	Sweet					-		2,900	48	7,750	1,471
These calculations are based off of offset well production and are only a proposal											

Signed:



Date: 9/17/2022

Printed Name: Jenny Harms

Title: Regulatory Compliance Specialist

Economic Combined Production

BOPD	Oil Gravity @ 60°	MCFPD	Dry BTU
13353.0	47.4	50880.0	1389.3

The combining of production between the wells above will not have any valuation impact due to any quality differences in the oil quality between the Bonespring and Wolfcamp formations.

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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-47299	² Pool Code 96641	³ Pool Name PADUCA; BONE SPRING
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 601H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3536.1

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	26	24 S	31 E		385	NORTH	1135	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	2	25 S	31 E		12	SOUTH	456	WEST	EDDY
¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ 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.

	<p>¹⁷ OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p><i>Shayda Omoumi</i> 7/26/2022 Signature Date</p> <p>Shayda Omoumi Printed Name</p> <p>shayda.omoumi@devn.com E-mail Address</p> <p>¹⁸ SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>JULY 21, 2022 Date of Survey</p> <p><i>[Signature]</i> Signature and Seal of Professional Surveyor: 12797</p> <p>Certificate Number: 12797 Survey No. 7990C</p>
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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-47300	² Pool Code 98220	³ Pool Name PURPLE SAGE; WOLFCAMP (GAS)
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 602H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3536.2

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	26	24 S	31 E		385	NORTH	1165	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	2	25 S	31 E		100	SOUTH	436	WEST	EDDY

¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-47301	² Pool Code 98220	³ Pool Name PURPLE SAGE; WOLFCAMP (GAS)
⁴ Property Code 300365	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 603H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3535.8

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	26	24 S	31 E		385	NORTH	1195	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	2	25 S	31 E		94	SOUTH	1068	WEST	EDDY

¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-49302	² Pool Code 98220	³ Pool Name PURPLE SAGE; WOLFCAMP (GAS)
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 604H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3535.6

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	26	24 S	31 E		385	NORTH	1255	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	2	25 S	31 E		152	SOUTH	1297	WEST	EDDY

¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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	<p>17 OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>Signature: <i>Shayda Omoumi</i> Date: 7/27/2022</p> <p>Printed Name: Shayda Omoumi</p> <p>E-mail Address: shayda.omoumi@dvn.com</p> <p>18 SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>JULY 21, 2022</p> <p>Date of Survey</p> <p>Signature and Seal of Professional Surveyor: <i>[Signature]</i></p> <p>Certificate Number: 12797</p> <p>Survey No. 7993E</p>
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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-47297	² Pool Code 98220	³ Pool Name PURPLE SAGE; WOLFCAMP (GAS)
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 605H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3539.7

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	26	24 S	31 E		385	NORTH	2530	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	2	25 S	31 E		36	SOUTH	1698	WEST	EDDY

¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-47296	² Pool Code 98220	³ Pool Name PURPLE SAGE; WOLFCAMP (GAS)
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 606H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3539.9

¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	26	24 S	31 E		385	NORTH	2560	WEST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	2	25 S	31 E		51	SOUTH	2341	WEST	EDDY

¹² Dedicated Acres 960	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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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.

	<p>¹⁷ OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>Signature: <i>Shayda Omoumi</i> Date: 7/27/2022</p> <p>Printed Name: Shayda Omoumi</p> <p>E-mail Address: shayda.omoumi@dvn.com</p> <p>¹⁸ SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</p> <p>JULY 21, 2022</p> <p>Date of Survey</p> <p>Signature and Seal of Professional Surveyor: <i>[Signature]</i></p> <p>Certificate Number: 12797</p> <p>Survey No. 8007B</p>
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**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATION FOR SURFACE COMMINGLING
SUBMITTED BY DEVON ENERGY PRODUCTION
COMPANY, LP**

ORDER NO. PLC-1020

ORDER

The Director of the New Mexico Oil Conservation Division (“OCD”), having considered the application and the recommendation of the OCD Engineering Bureau, issues the following Order.

FINDINGS OF FACT

1. Devon Energy Production Company, LP (“Applicant”) submitted a complete application to surface commingle the oil and gas production from the pools, leases, and wells as described in Exhibit A (“Application”).
2. Applicant proposed a method to allocate the oil and gas production to the pools, leases, and wells to be commingled.
3. Applicant submitted a certification by a licensed attorney or qualified petroleum landman that the ownership in the pools, leases, and wells to be commingled is identical as defined in 19.15.12.7 B. NMAC.
4. Applicant provided notice of the Application to the Bureau of Land Management (“BLM”) or New Mexico State Land Office (“NMSLO”), as applicable.
5. Applicant certified the commingling of oil and gas production from the pools, leases, and wells will not in reasonable probability reduce the value of the oil and gas production to less than if it had remained segregated.
6. Applicant in the notice for the Application stated that it sought authorization to prospectively include additional pools, leases, and wells in accordance with 19.15.12.10 C.(4)(g) NMAC.
7. Applicant stated that it sought authorization to surface commingle and off-lease measure, as applicable, oil and gas production from wells which have not yet been approved to be drilled, but will produce from a pool and lease as described in Exhibit A.

CONCLUSIONS OF LAW

8. OCD has jurisdiction to issue this Order pursuant to the Oil and Gas Act, NMSA 1978, §§ 70-2-6, 70-2-11, 70-2-12, 70-2-16, and 70-2-17, 19.15.12. NMAC, and 19.15.23. NMAC.
9. Applicant satisfied the notice requirements for the Application in accordance with 19.15.12.10 A.(2) NMAC, 19.15.12.10 C.(4)(c) NMAC, and 19.15.12.10 C.(4)(e) NMAC, as applicable.

10. Applicant satisfied the notice requirements for the Application in accordance with 19.15.23.9 A.(5) NMAC and 19.15.23.9 A.(6) NMAC, as applicable.
11. Applicant's proposed method of allocation, as modified herein, complies with 19.15.12.10 B.(1) NMAC or 19.15.12.10 C.(1) NMAC, as applicable.
12. Commingling of oil and gas production from state, federal, or tribal leases shall not commence until approved by the BLM or NMSLO, as applicable, in accordance with 19.15.12.10 B.(3) NMAC and 19.15.12.10 C.(4)(h) NMAC.
13. Applicant did not give adequate notice that it sought authorization to prospectively include additional pools, leases, or wells as required by 19.15.12.10 C.(4)(g) NMAC.
14. By granting the Application with the conditions specified below, this Order prevents waste and protects correlative rights, public health, and the environment.

ORDER

1. Applicant is authorized to surface commingle oil and gas production from the pools, leases, and wells as described in Exhibit A.

Applicant is authorized to store and measure oil and gas production off-lease from the pools, leases, and wells as described in Exhibit A at a central tank battery or gas title transfer meter described in Exhibit A.

Applicant is authorized to surface commingle oil and gas production from wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A.

Applicant is authorized to store and measure oil and gas production off-lease from wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A at a central tank battery or gas title transfer meter described in Exhibit A.

2. The allocation of oil and gas production to wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A shall be determined in the same manner as to wells identified in Exhibit A that produce from that pool and lease, provided that if more than one allocation method is being used or if there are no wells identified in Exhibit A that produce from the pool and lease, then allocation of oil and gas production to each well not included in Exhibit A shall be determined by OCD prior to commingling production from it with the production from another well.
3. The oil and gas production for each well identified in Exhibit A shall be separated and metered prior to commingling it with production from another well.
4. Applicant shall measure and market the commingled oil at a central tank battery described in Exhibit A in accordance with this Order and 19.15.18.15. NMAC or 19.15.23.8. NMAC.
5. Applicant shall measure and market the commingled gas at a well pad, central delivery point, central tank battery, or gas title transfer meter described in Exhibit A in accordance with this Order and 19.15.19.9. NMAC, provided however that if the gas is vented or flared, and

regardless of the reason or authorization pursuant to 19.15.28.8 B. NMAC for such venting or flaring, Applicant shall measure or estimate the gas in accordance with 19.15.28.8 E. NMAC.

6. Applicant shall calibrate the meters used to measure or allocate oil and gas production in accordance with 19.15.12.10 C.(2) NMAC.
7. If the commingling of oil and gas production from any pool, lease, or well reduces the value of the commingled oil and gas production to less than if it had remained segregated, no later than sixty (60) days after the decrease in value has occurred Applicant shall submit a new surface commingling application to OCD to amend this Order to remove the pool, lease, or well whose oil and gas production caused the decrease in value. If Applicant fails to submit a new application, this Order shall terminate on the following day, and if OCD denies the application, this Order shall terminate on the date of such action.
8. Applicant's request for authorization to add pools, leases, and wells prospectively pursuant to 19.15.12.10 C.(4)(g) NMAC is denied.
9. If a well is not included in Exhibit A but produces from a pool and lease as described in Exhibit A, then Applicant shall submit Forms C-102 and C-103 to the OCD Engineering Bureau after the well has been approved to be drilled and prior to off-lease measuring or commingling oil or gas production from it with the production from another well. The Form C-103 shall reference this Order and identify the well, proposed method to determine the allocation of oil and gas production to it, and the location(s) that commingling of its production will occur.
10. Applicant shall not commence commingling oil or gas production from state, federal, or tribal leases until approved by the BLM or NMSLO, as applicable.
11. If OCD determines that Applicant has failed to comply with any provision of this Order, OCD may take any action authorized by the Oil and Gas Act or the New Mexico Administrative Code (NMAC).
12. OCD retains jurisdiction of this matter and reserves the right to modify or revoke this Order as it deems necessary.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**



**ALBERT CHANG
DIRECTOR**

DATE: 9/2/2025

State of New Mexico
Energy, Minerals and Natural Resources Department

Exhibit A

Order: **PLC-1020**

Operator: **Devon Energy Production Company, LP (6137)**

Central Tank Battery: **Cotton Draw Unit 26 Central Tank Battery 2**

Central Tank Battery Location: **UL B, C, Section 26, Township 24 South, Range 31 East**

Gas Title Transfer Meter Location: **UL B, C, Section 26, Township 24 South, Range 31 East**

Pools

Pool Name	Pool Code
PADUCA;BONE SPRING	96641
PURPLE SAGE;WOLFCAMP (GAS)	98220

Leases as defined in 19.15.12.7(C) NMAC

Lease	UL or Q/Q	S-T-R
PA Bone Spring NMNM 105670366 (070928I)	W2NW, SW	25-24S-31E
	ALL	26-24S-31E
	E2	34-24S-31E
	ALL	35-24S-31E
	W2	36-24S-31E
	ALL	01-25S-31E
	ALL	02-25S-31E
	E2	03-25S-31E
	ALL	11-25S-31E
	ALL	12-25S-31E
	ALL	13-25S-31E
	ALL	07-25S-32E
	ALL	18-25S-32E
PA Wolfcamp NMNM 105557435 (070928E)	W2	26-24S-31E
	W2	35-24S-31E
	ALL	02-25S-31E
	ALL	11-25S-31E
Cotton Draw Unit SLO 300107	W2NW, S2	25-24S-31E
	ALL	26-24S-31E
	E2	34-24S-31E
	All	35-24S-31E
	All	36-24S-31E
	ALL	01-25S-31E
	ALL	02-25S-31E
	E2	03-25S-31E
	ALL	11-25S-31E
	ALL	12-25S-31E
	ALL	13-25S-31E

SE4	33-24S-32E
N2SW	34-24S-32E
ALL	07-25S-32E
E2E2, SWSE, SESW	16-25S-32E
ALL	18-25S-32E
E2SE	20-25S-32E
ALL	21-25S-32E
NW4, NWSW	22-25S-32E
N2N2, SENW	28-25S-32E
NENE	29-25S-32E

Wells				
Well API	Well Name	UL or Q/Q	S-T-R	Pool
30-015-47299	COTTON DRAW UNIT #601H	W2	02-25S-31E	96641
		W2	26-24S-31E	
		W2	35-24S-31E	
30-015-47300	COTTON DRAW UNIT #602H	W2	02-25S-31E	98220
		W2	26-24S-31E	
		W2	35-24S-31E	
30-015-47301	COTTON DRAW UNIT #603H	W2	02-25S-31E	98220
		W2	26-24S-31E	
		W2	35-24S-31E	
30-015-49302	COTTON DRAW UNIT #604H	W2	02-25S-31E	98220
		W2	26-24S-31E	
		W2	35-24S-31E	
30-015-47297	COTTON DRAW UNIT #605H	W2	02-25S-31E	98220
		W2	26-24S-31E	
		W2	35-24S-31E	
30-015-47296	COTTON DRAW UNIT #606H	W2	02-25S-31E	98220
		W2	26-24S-31E	
		W2	35-24S-31E	

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 144265

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 144265
	Action Type: [C-107] Surface Commingle or Off-Lease (C-107B)

CONDITIONS

Created By	Condition	Condition Date
sarah.clelland	Please review the content of the order to ensure you are familiar with the authorities granted and any conditions of approval. If you have any questions regarding this matter, please email us at OCD.Engineer@emnrd.nm.gov .	9/5/2025