

DATE IN 11/05/15	SUSPENSE	ENGINEER L.L.	LOGGED IN 11/05/15	TYPE NSL	APP NO. PLEL1530947347
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ABOVE THIS LINE FOR DIVISION USE ONLY

RECV'D  
11.05.15

NEW MEXICO OIL  
CONSERVATION DIVISION



**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

**Application Acronyms:**

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]  
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]  
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]  
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]  
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]  
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication  
☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement

- ☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

- ☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] Other: Specify \_\_\_\_\_

NSL - 7354  
DEVON 6137  
THISTLE UNIT 94H  
API # 30-025-42679  
TRIPLEX; BONE SPRING  
59900

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☒ Does Not Apply

- [A] ☐ Working, Royalty or Overriding Royalty Interest Owners  
[B] ☐ Offset Operators, Leaseholders or Surface Owner  
[C] ☐ Application is One Which Requires Published Legal Notice  
[D] ☐ Notification and/or Concurrent Approval by BLM or SLO  
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office  
[E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,  
[F] ☐ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **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.

Cari Allen

Print or Type Name- Cari Allen

Cari Allen

Signature

Land Supervisor

Title

11/3/2015

Date

Cari.Allen@dvn.com

E-mail Address

District I  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone: (505) 335-6161 Fax: (505) 393-8750  
 District II  
 811 S. First St., Artesia, NM 88210  
 Phone: (505) 743-1283 Fax: (505) 743-8720  
 District III  
 1003 Rio Brazos Road, Aztec, NM 87410  
 Phone: (505) 534-6128 Fax: (505) 534-6130  
 District IV  
 1220 S. St. Francis Dr., Santa Fe, NM 87505  
 Phone: (505) 476-3461 Fax: (505) 476-3462

State of New Mexico  
 Energy, Minerals & Natural Resources Department  
 OIL CONSERVATION DIVISION  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

Form C-102  
 Revised August 1, 2011  
 Submit one copy to appropriate  
 District Office

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number <b>30-025-42679</b>	<sup>2</sup> Pool Code <b>59900</b>	<sup>3</sup> Pool Name <b>TRIPLE X ; BONE SPRING</b>
<sup>4</sup> Property Code	<sup>5</sup> Property Name <b>THISTLE UNIT</b>	<sup>6</sup> Well Number <b>94H</b>
<sup>7</sup> OGRID No. <b>6137</b>	<sup>8</sup> Operator Name <b>DEVON ENERGY PRODUCTION COMPANY, L.P.</b>	<sup>9</sup> Elevation <b>3713.3</b>

<sup>10</sup> Surface Location

U.L. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
<b>D</b>	<b>22</b>	<b>23 S</b>	<b>33 E</b>		<b>250</b>	<b>NORTH</b>	<b>300</b>	<b>WEST</b>	<b>LEA</b>

<sup>11</sup> Bottom Hole Location If Different From Surface

U.L. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
<b>E</b>	<b>27</b>	<b>23 S</b>	<b>33 E</b>		<b>2590</b>	<b>NORTH</b>	<b>350</b>	<b>WEST</b>	<b>LEA</b>

<sup>12</sup> Dedicated Acres	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
<b>240</b>			

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.

**ST NM V-2818**

**ST NM V-4057**

1320

2640

Project Area

Producing Area

**OPERATOR CERTIFICATION**

I, the undersigned, certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization owns, leases, or has a working interest or undivided 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.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Former Address: \_\_\_\_\_

**SURVEYOR CERTIFICATION**

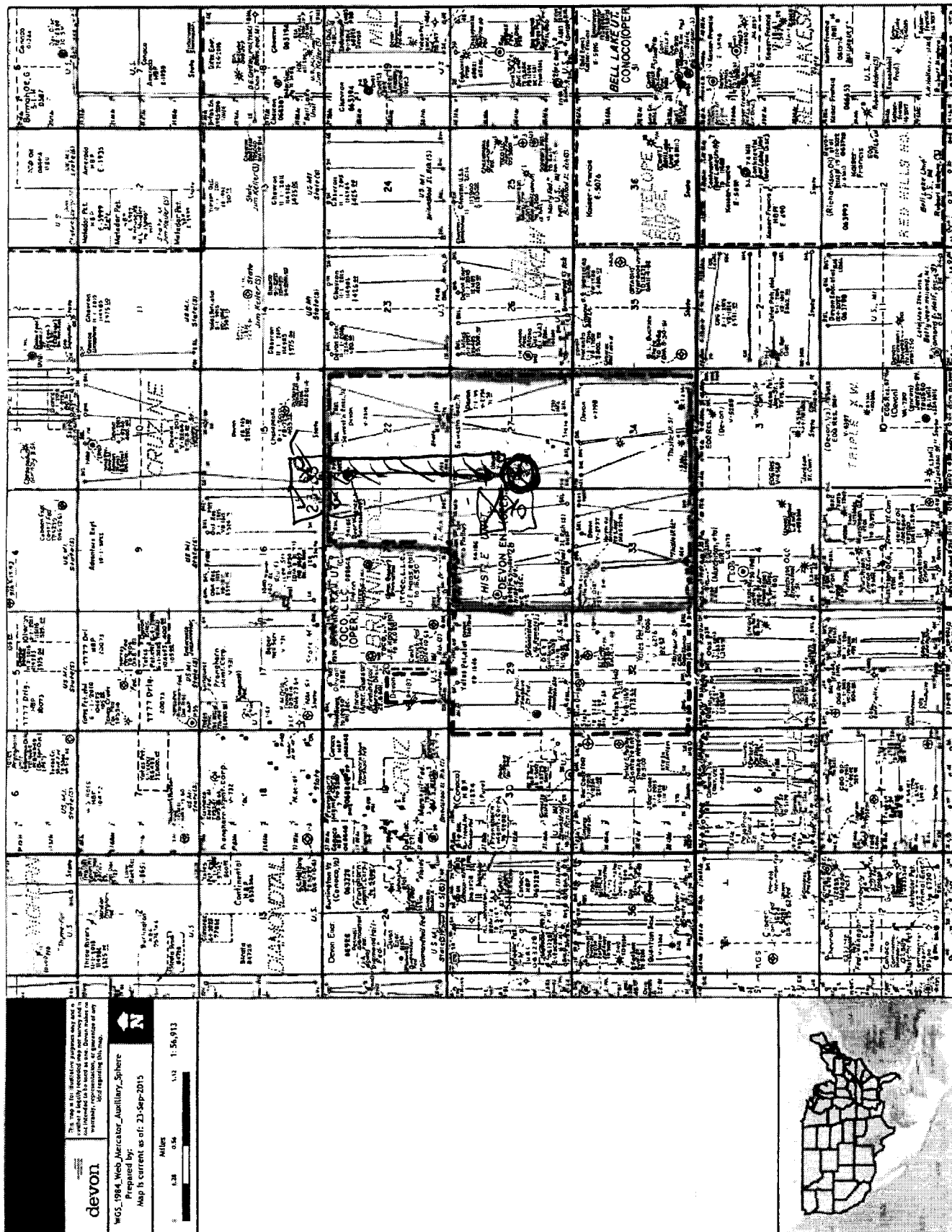
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

MAY 17 2011

Date of Survey: \_\_\_\_\_

Signature: \_\_\_\_\_

Contract No. \_\_\_\_\_ SURVEY NO. 3804N



**McMillan, Michael, EMNRD**

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**From:** Glass, Carol <Carol.Glass@dvn.com>  
**Sent:** Thursday, November 05, 2015 5:52 AM  
**To:** McMillan, Michael, EMNRD  
**Subject:** Application for Non-Standard Location Thistle Unit 94H  
**Attachments:** THISTLE UNIT 94H.PDF

Mr. McMillan,

Good morning. I had first communicated with you in September regarding the captioned well. The well has now been drilled and it appears that the first perf (at the toe of the lateral) will be at a non-standard location affecting only the S/2 Section 27-T23S-R33E. Since the well is inside the unit boundary (please refer to plat showing the outline of the Thistle Unit which is operated by Devon Energy), it is my understanding that no notification to any other party is required.

Would you please kindly review the attached and let me know should you need additional information regarding this application and request?

The hard copies of this application will be sent to you via Fed-Ex.

Thank you for your time and consideration to this matter.

Carol Glass  
Landman  
Devon Energy Corporation  
333 W. Sheridan Avenue  
Oklahoma City, OK 73102  
Direct Line: 405.552.6160  
Carol.Glass@dvn.com

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Devon Energy Production Company, L.P.  
333 West Sheridan Avenue  
Oklahoma City, OK 73102

405 235 3611 Phone  
[www.devonenergy.com](http://www.devonenergy.com)

November 3, 2015

VIA FED EX OVERNIGHT MAIL

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

Re: Application for a Non-Standard Location  
Thistle Unit 94H  
W/2 W/2 of Section 22 and W/2 NW/4 of Section 27-23S-33E  
Lea County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. ("Devon") has drilled the referenced horizontal well to an approximate total vertical depth of 10,480' and an approximate total measured depth of 18,300' in order to test the First Bone Spring Sandstone formation. As reflected on the attached C-102, the well has been permitted at a surface location of 250' FNL & 300' FWL Sec. 22-23S-33E with a permitted bottom hole location of 2,590' FNL & 350' FWL of Section 27-23S-33E. The projected first perforation is expected to be approximately 2,390' FNL and 472' FWL of Section 27-23S-33E. The projected last perforation is expected to be approximately 578' FNL and 379' FWL Section 27-23S-33E. The project area for this well is the W/2 W/2 of Section 22 and W/2 NW/4 of Section 27-23S-33E and consists of 240 acres.

In accordance with Rule 19.15.15.13 NMAC of the New Mexico Oil Conservation Division, Devon respectfully requests that the New Mexico Oil Conservation Division administratively approve this application for an unorthodox location with respect to that portion of the horizontal wellbore as described in the above paragraph. Devon is seeking the unorthodox location approval in order is to maximize recovery of reserves. The New Mexico Oil Conservation Division's approval of the unorthodox location for the Thistle Unit 94H will serve the interests of preventing waste and improving well performance.

Please be advised that this well is within the boundary of the Thistle Unit in which Devon is the operator.

Enclosed are the following documents:

1. Form C-102
2. Land Plat
3. Administrative Application Checklist

If you have any questions concerning this application, please contact the undersigned at 405.552.6160.

Sincerely,

DEVON ENERGY PRODUCTION COMPANY, L.P.

A handwritten signature in cursive script that reads "Carol Glass".

Carol Glass  
Landman

Senator Shendo,

We are grateful for this opportunity to answer your questions.

The New Mexico Energy, Minerals and Natural Resources Department (EMNRD) is currently leading a "Policy Initiative Work Group" designed to address the issue of venting and flaring in oil and natural gas operations in New Mexico. Membership in this group includes operators and other agencies who are leading the effort in finding solutions in every area of our state. Our goal is to develop a rule which will address this issue with common sense solutions.

Additionally, EMNRD has also begun requiring operators to calculate and disclose venting and flaring measures as part of their production reports. We believe this is a crucial first step to understand not only the extent of venting and flaring, but to also help establish a baseline for which to measure the issue in the future.

Again, we are grateful for this opportunity and welcome the chance to speak with you in the future.

## Catanach, David, EMNRD

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**From:** Dawson, Scott, EMNRD  
**Sent:** Monday, November 09, 2015 8:29 AM  
**To:** Catanach, David, EMNRD  
**Subject:** FW: Shendo LetterSD10 22 2015.docx

David,

FYI

SD

**From:** Shendo, Benny [mailto:Benny.Shendo@nmlegis.gov]  
**Sent:** Monday, November 09, 2015 8:20 AM  
**To:** Dawson, Scott, EMNRD  
**Subject:** RE: Shendo LetterSD10 22 2015.docx

Dear Mr. Dawson,

Thank you for the brief update, I would like to know who is a member of the "Policy Initiative Work Group" that is addressing the issue of venting and flaring. I had specifically made mention of the certain agency to be part of the work group in my Senate Memorial.

Since the interim committee work is winding down, I would most likely ask that you present your work and update to the Senate Conservation committee. As Vice-Chair, I will be talking to Chairman Wirth about putting your group on the agenda for an update.

Thank you again and have a wonderful week.

Benny

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**From:** Dawson, Scott, EMNRD [Scott.Dawson@state.nm.us]  
**Sent:** Friday, November 06, 2015 10:11 AM  
**To:** Shendo, Benny  
**Subject:** FW: Shendo LetterSD10 22 2015.docx

Hello Senator Shendo,

The New Mexico Energy, Minerals and Natural Resources Department (EMNRD) is currently leading a "Policy Initiative Work Group" designed to address the issue of venting and flaring in oil and natural gas operations in New Mexico.

Here is an update. We will keep you informed of our progress.

Thanks Senator Shendo and Have a Great Day!

*Scott Dawson - CPG*

Deputy Division Director – New Mexico Oil Conservation Division  
Energy, Minerals and Natural Resources Department

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