

NSL Initial Application

Received: 07/17/20

P.O. No. S7QBP-200717-NSL000

Revised March 23, 2017

RECEIVED: 07/17/20	REVIEWER: LRL	TYPE: NSL	APP NO: pLEL2020232931
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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, L.P. **OGRID Number:** 6137
Well Name: Shetland 2-11 State Fed Com #613H Well **API:** 30-015-47172
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 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	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	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.

Kaitlyn A. Luck

Print or Type Name

Signature

July 17, 2020
Date

505-954-7286
Phone Number

kaluck@hollandhart.com
e-mail Address



Kaitlyn A. Luck
 Phone (505) 954-7286
 KALuck@hollandhart.com

July 17, 2020

VIA ONLINE FILING

Adrienne Sandoval, Director
 Oil Conservation Division
 New Mexico Department of Energy,
 Minerals and Natural Resources
 1220 South Saint Francis Drive
 Santa Fe, New Mexico 87505

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Shetland 2-11 State Fed Com #613H Well in the E/2 of Sections 2 and 11, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

Dear Ms. Sandoval:

Devon Energy Production, LP (“Devon”) (OGRID No. 6137) seeks administrative approval of an unorthodox well location for its **Shetland 2-11 State Fed Com #613H** (API No. 30-015-47172) to be completed within the Purple Sage Wolfcamp Pool (98220) underlying the E/2 of Sections 2 and 11, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

This well will be drilled from a surface location 170 feet from the north line and 1130 feet from the east line (Unit A) of Section 2 to a bottom hole location 20 feet from the south line and 1750 feet from the east line (Unit O) of Section 11. The first take point will be located 100 feet from the north line and 1750 feet from the east line (Unit A) of Section 2, and the last take point will be 100 feet from the south line and 1750 feet from the east line (Unit O) of Section 11.

Pursuant to Division Order R-14262, this acreage is governed by the Special Rules for the Purple Sage-Wolfcamp Gas Pool which provide for wells in the Wolfcamp formation in Eddy County to be located no closer than 330 feet to the outer boundary of the spacing unit. The completed interval for the **Shetland 2-11 State Fed Com #613H** will be unorthodox because it is closer than 330 feet to the northern and southern boundaries of the spacing unit. Approval of the unorthodox completed interval will allow Devon to use its preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

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
 Colorado
 Idaho

Montana
 Nevada
 New Mexico

Utah
 Washington, D.C.
 Wyoming

Exhibit A is a Well Location and Acreage Dedication Plat (Form C-102), which shows that the completed interval of the proposed **Shetland 2-11 State Fed Com #613H** encroaches on the drilling and spacing unit to the north in Section 35, Township 25 South, Range 31 East, and to the south in Section 14, Township 26 South, Range 31 East.

Exhibit B is a land plat for Sections 2 and 11 that shows the proposed **Shetland 2-11 State Fed Com #613H** in relation to the adjoining spacing unit to the north in Section 35 and to the south in Section 14.

Ownership is diverse between the subject spacing unit and the affected spacing units to the north and south. **Exhibit C** reflects that a copy of this application with all attachments has been sent by certified mail to each affected person advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

Exhibit D is a statement from a Devon's petroleum engineer confirming that Devon's requested unorthodox location is necessary to optimize well spacing, thereby preventing waste.

Your attention to this matter is appreciated.

Sincerely,



Kaitlyn A. Luck
**ATTORNEY FOR DEVON ENERGY PRODUCTION
COMPANY, L.P.**

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
District III
1000 Rio Brazos Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 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

¹ API Number		² Pool Code		³ Pool Name	
⁴ Property Code		⁵ Property Name			⁶ Well Number
		SHELTLAND 2-11 STATE FED COM			613H
⁷ OGRID No.		⁸ Operator Name			⁹ Elevation
6137		DEVON ENERGY PRODUCTION COMPANY, L.P.			3292.9

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
A	2	26 S	31 E		170	NORTH	1130	EAST	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
O	11	26 S	31 E		20	SOUTH	1750	EAST	EDDY
¹² Dedicated Acres		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.

17 OPERATOR CERTIFICATION
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.

Signature _____ Date _____

Printed Name _____

E-mail Address _____

18 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.

JULY 6, 2020
Date of Survey

Signature and Seal:
Certificate Number: IMON F. JARAMILA, License No. 12797

EXHIBIT

A

Intent As Drilled

API #		
Operator Name: DEVON ENERGY PRODUCTION CO., L.P.	Property Name: SHETLAND 2-11 STATE FED COM	Well Number 613H

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
Latitude					Longitude			NAD	

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
B	2	26S	31E		100	NORTH	1750	EAST	EDDY
Latitude 32.0792151					Longitude 103.7459017			NAD 83	

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
O	11	26S	31E		100	SOUTH	1750	EAST	EDDY
Latitude 32.0504505					Longitude 103.7459393			NAD 83	

Is this well the defining well for the Horizontal Spacing Unit?

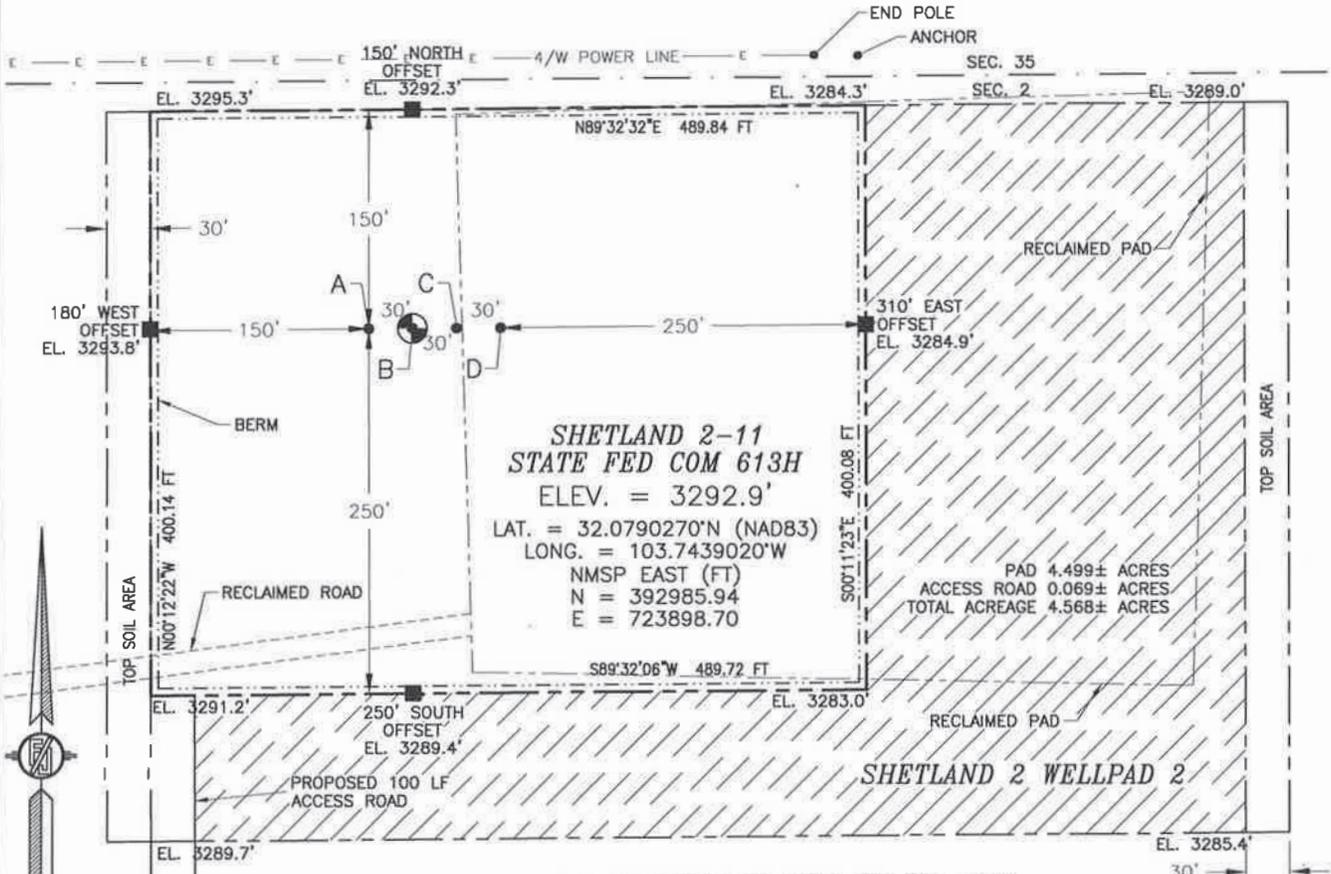
Is this well an infill well?

If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.

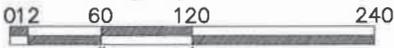
API #		
Operator Name:	Property Name:	Well Number

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO
SITE MAP

NOTE: LATITUDE AND LONGITUDE COORDINATES ARE SHOWN USING THE NORTH AMERICAN DATUM OF 1983 (NAD83) LISTED NEW MEXICO STATE PLANE EAST COORDINATES ARE GRID (NAD83). BASIS OF BEARING AND DISTANCES USED ARE NEW MEXICO STATE PLANE EAST COORDINATES MODIFIED TO THE SURFACE. VERTICAL DATUM NAVD88.



- A - SHETLAND 2-11 STATE FED COM 713H
- B - SHETLAND 2-11 STATE FED COM 613H
- C - SHETLAND 2-11 STATE FED COM 733H
- D - SHETLAND 2-11 STATE FED COM 333H



SCALE 1" = 120'

DIRECTIONS TO LOCATION

FROM STATE HIGHWAY 128 AND CR 1 (ORLA HWY.) GO SOUTH ON CR 1 10.4 MILES, TURN RIGHT ON CALICHE ROAD (ROSS RD.) AND GO WEST 4.9 MILES, TURN RIGHT AND GO NORTH 0.95 MILE, TURN RIGHT AND GO EAST 0.49 MILE, TO ROAD SURVEY AND FOLLOW FLAGS SOUTHEAST 308', THEN EAST 1360' TO A "T" INTERSECTION, THEN NORTH 115' TO THE SOUTHWEST PAD CORNER OF SHETLAND 2 WELLPAD 2, THEN CONTINUE NORTH 100' TO THE SOUTHWEST PAD CORNER FOR THIS LOCATION.

I, FILIMON F. JARAMILLO, A NEW MEXICO REGISTERED PROFESSIONAL SURVEYOR CERTIFY THAT I DIRECTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY WAS CONDUCTED TO THE BEST OF MY KNOWLEDGE AND BELIEF AND THAT IT MEETS THE MINIMUM STANDARDS FOR SURVEYING.



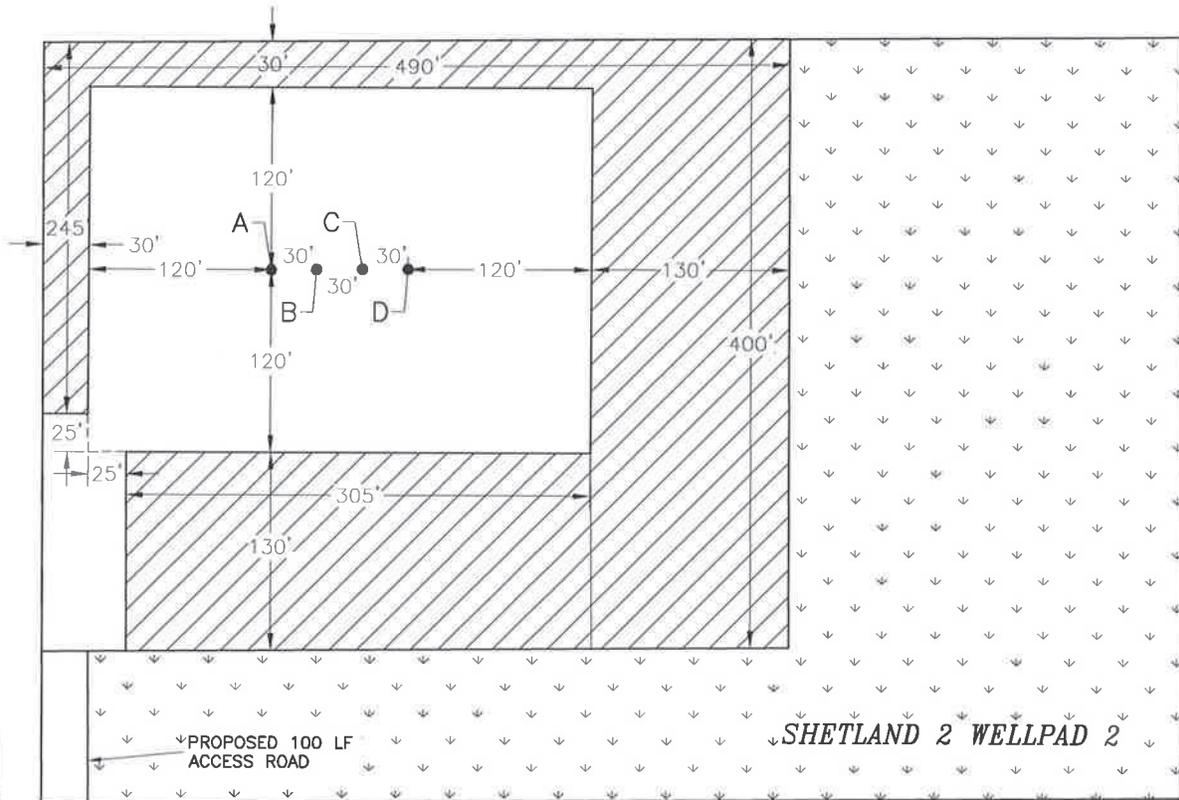
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 2-11 STATE FED COM 613H
 LOCATED 170 FT. FROM THE NORTH LINE
 AND 1130 FT. FROM THE EAST LINE OF
 SECTION 2, TOWNSHIP 26 SOUTH,
 RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO
 LAND STATUS: STATE

JULY 6, 2020

SURVEY NO. 7475A

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
INTERIM SITE BUILD PLAN

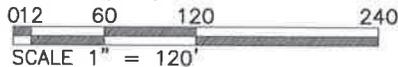
- A - SHETLAND 2-11 STATE FED COM 713H
- B - SHETLAND 2-11 STATE FED COM 613H
- C - SHETLAND 2-11 STATE FED COM 733H
- D - SHETLAND 2-11 STATE FED COM 333H



DENOTES INTERIM PAD RECLAMATION AREA



DENOTES GRADING SITE RECLAMATION AREA



2.500± ACRES INTERIM PAD RECLAMATION AREA
 4.043± ACRES GRADING SITE RECLAMATION AREA
 2.067± ACRES NON-RECLAIMED AREA
 8.610± ACRES SHETLAND 2 WELLPAD 2

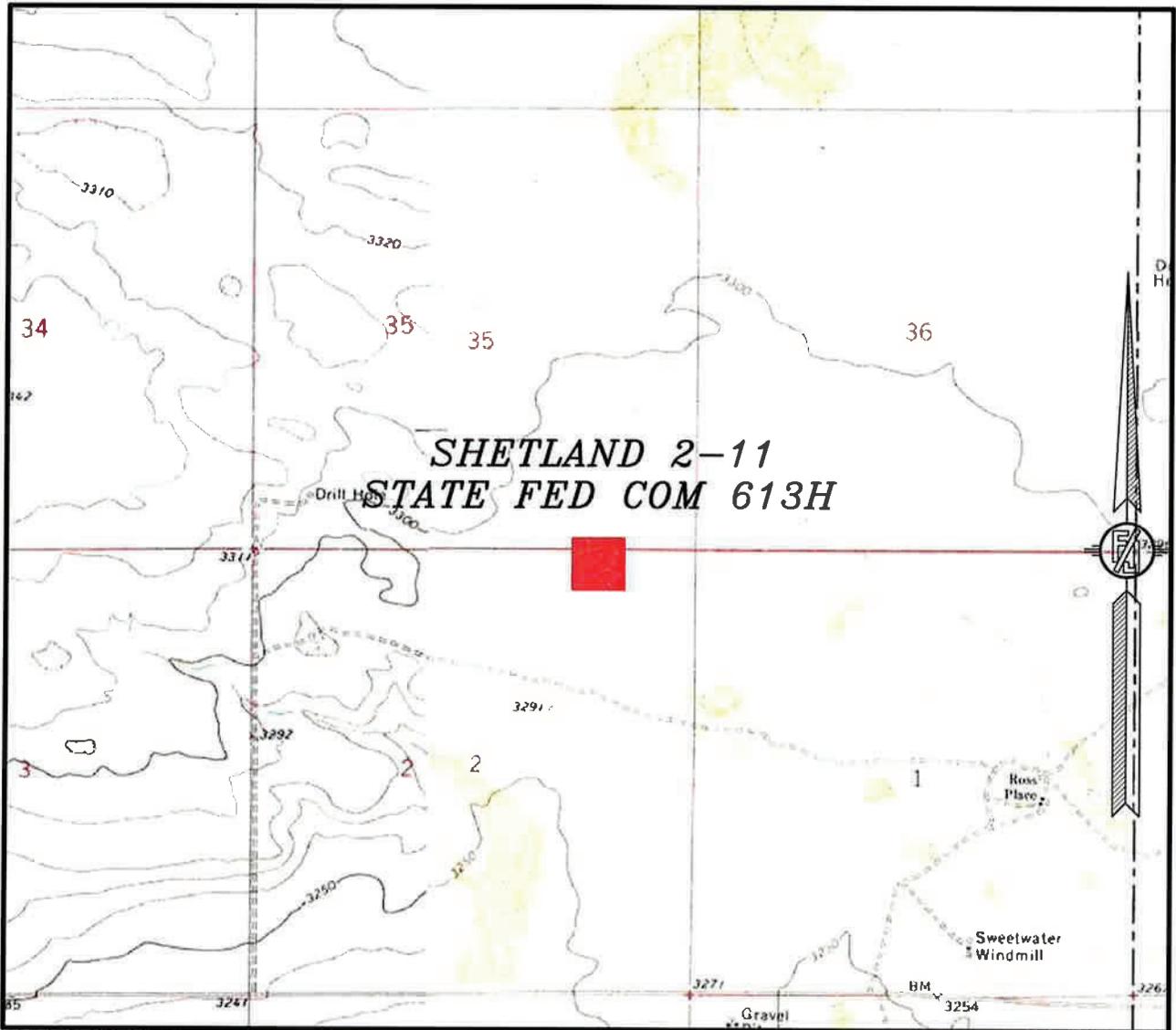
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 2-11 STATE FED COM 613H
 LOCATED 170 FT. FROM THE NORTH LINE
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 SECTION 2, TOWNSHIP 26 SOUTH,
 RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO
 LAND STATUS: STATE

JULY 6, 2020

SURVEY NO. 7475A

MADRON SURVEYING, INC. 301 SOUTH CANAL (575) 234-3341 CARLSBAD, NEW MEXICO

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
LOCATION VERIFICATION MAP



USGS QUAD MAP:
PADUCA BREAKS WEST

NOT TO SCALE

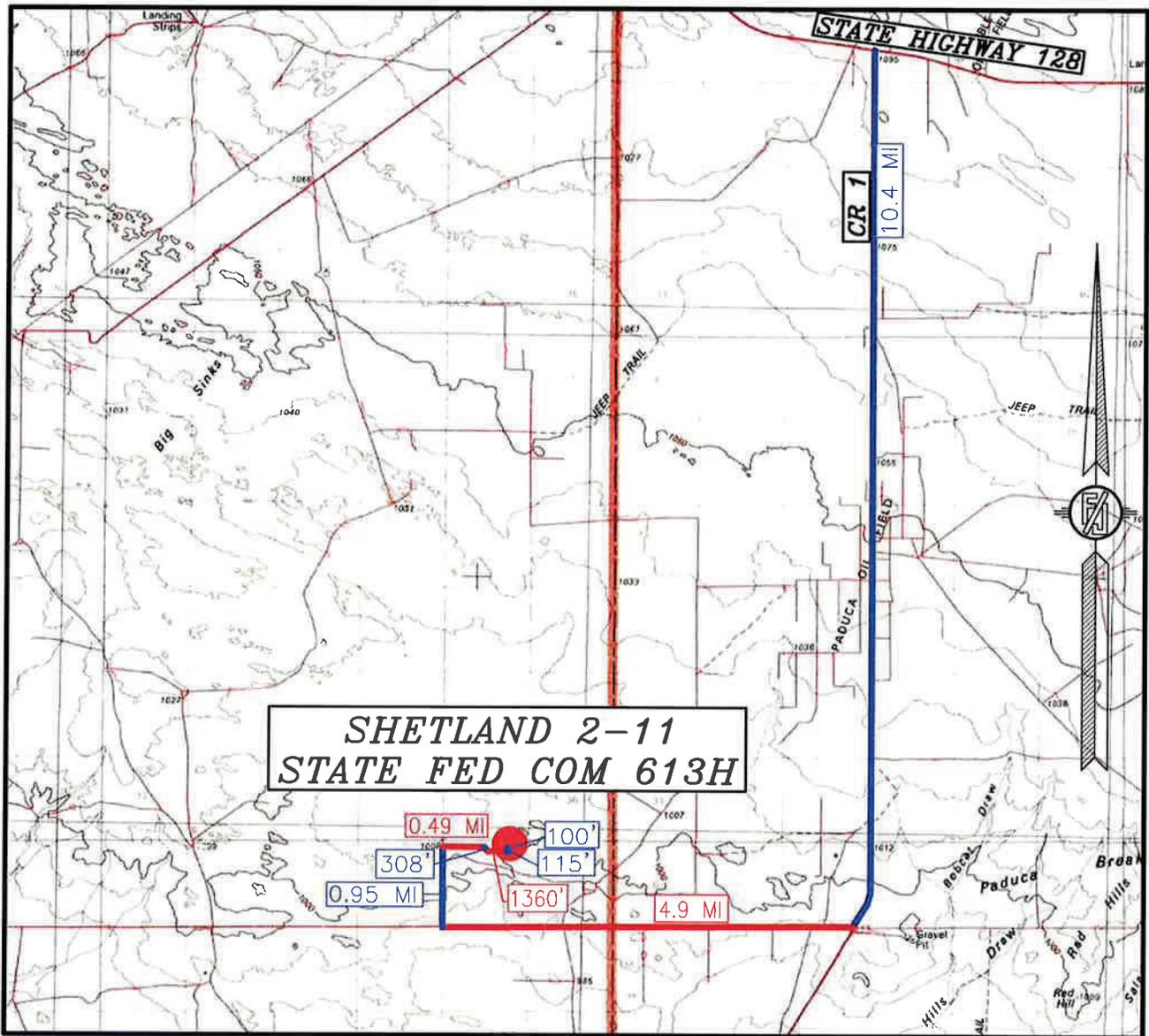
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RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
LAND STATUS: STATE

JULY 6, 2020

SURVEY NO. 7475A

MADRON SURVEYING, INC. 301 SOUTH CANAL (575) 234-3341 CARLSBAD, NEW MEXICO

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
VICINITY MAP



**SHETLAND 2-11
STATE FED COM 613H**

DISTANCES IN MILES

NOT TO SCALE

DEVON ENERGY PRODUCTION COMPANY, L.P.

SHETLAND 2-11 STATE FED COM 613H

LOCATED 170 FT. FROM THE NORTH LINE

AND 1130 FT. FROM THE EAST LINE OF

SECTION 2, TOWNSHIP 26 SOUTH,

RANGE 31 EAST, N.M.P.M.

EDDY COUNTY, STATE OF NEW MEXICO

LAND STATUS: STATE

DIRECTIONS TO LOCATION

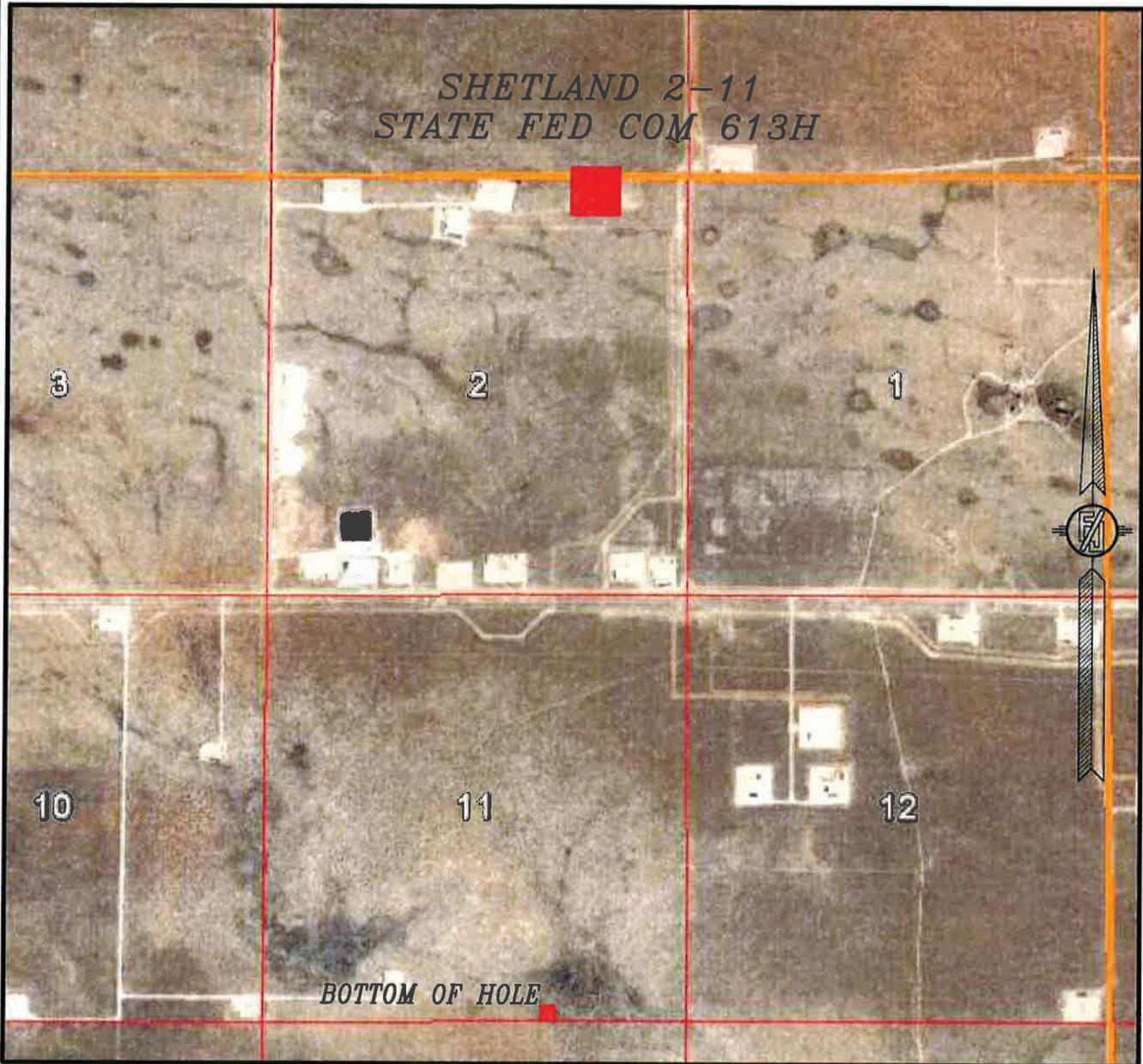
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JULY 6, 2020

SURVEY NO. 7475A

MADRON SURVEYING, INC. 301 SOUTH CANAL (575) 234-3341 CARLSBAD, NEW MEXICO

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
AERIAL PHOTO



NOT TO SCALE
AERIAL PHOTO:
GOOGLE EARTH
FEBRUARY 2019

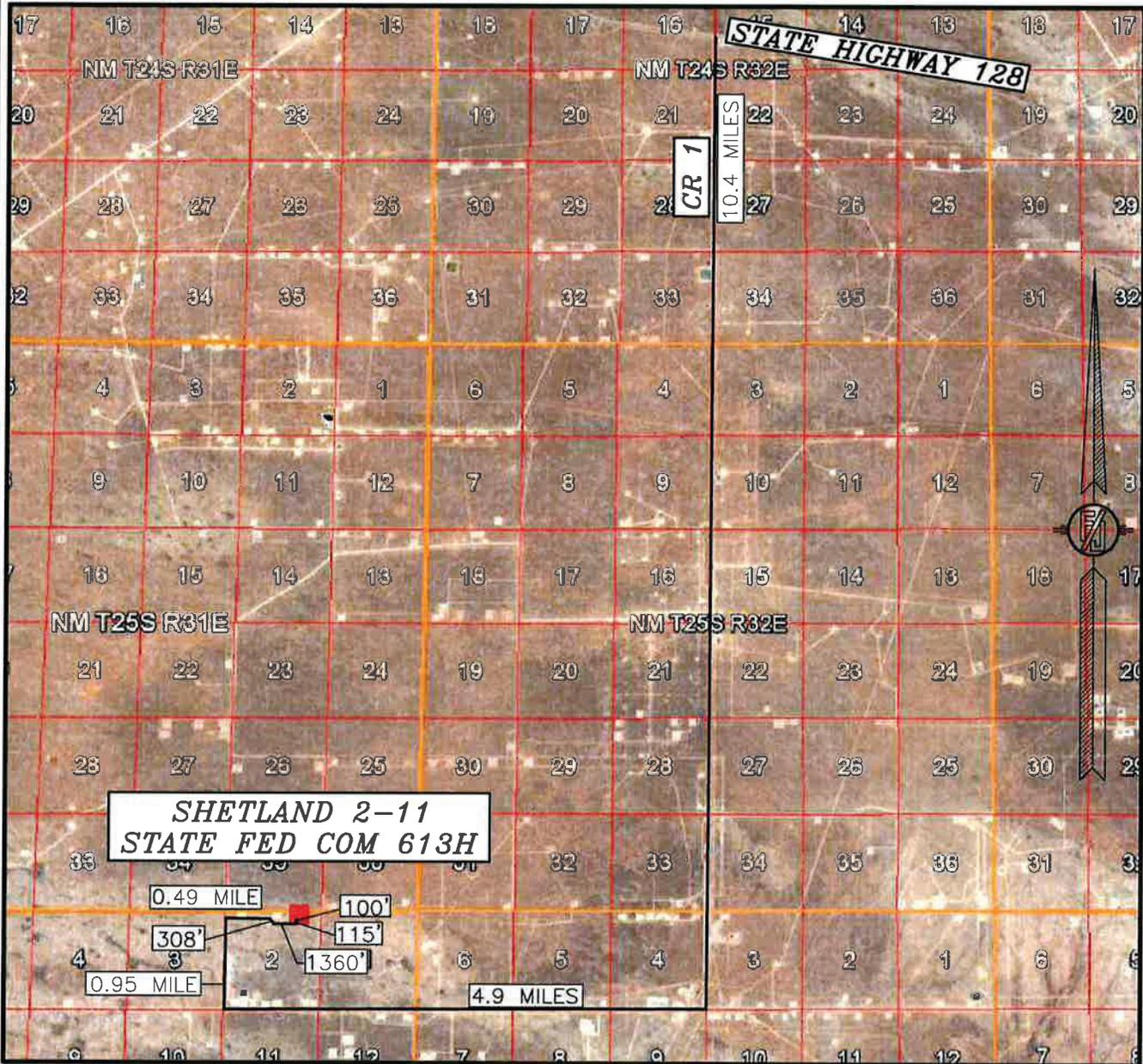
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 2-11 STATE FED COM 613H
LOCATED 170 FT. FROM THE NORTH LINE
AND 1130 FT. FROM THE EAST LINE OF
SECTION 2, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
LAND STATUS: STATE

JULY 6, 2020

SURVEY NO. 7475A

MADRON SURVEYING, INC. 301 SOUTH CANAL (575) 234-3341 CARLSBAD, NEW MEXICO

SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
ACCESS AERIAL ROUTE MAP



NOT TO SCALE
AERIAL PHOTO:
GOOGLE EARTH
FEBRUARY 2019

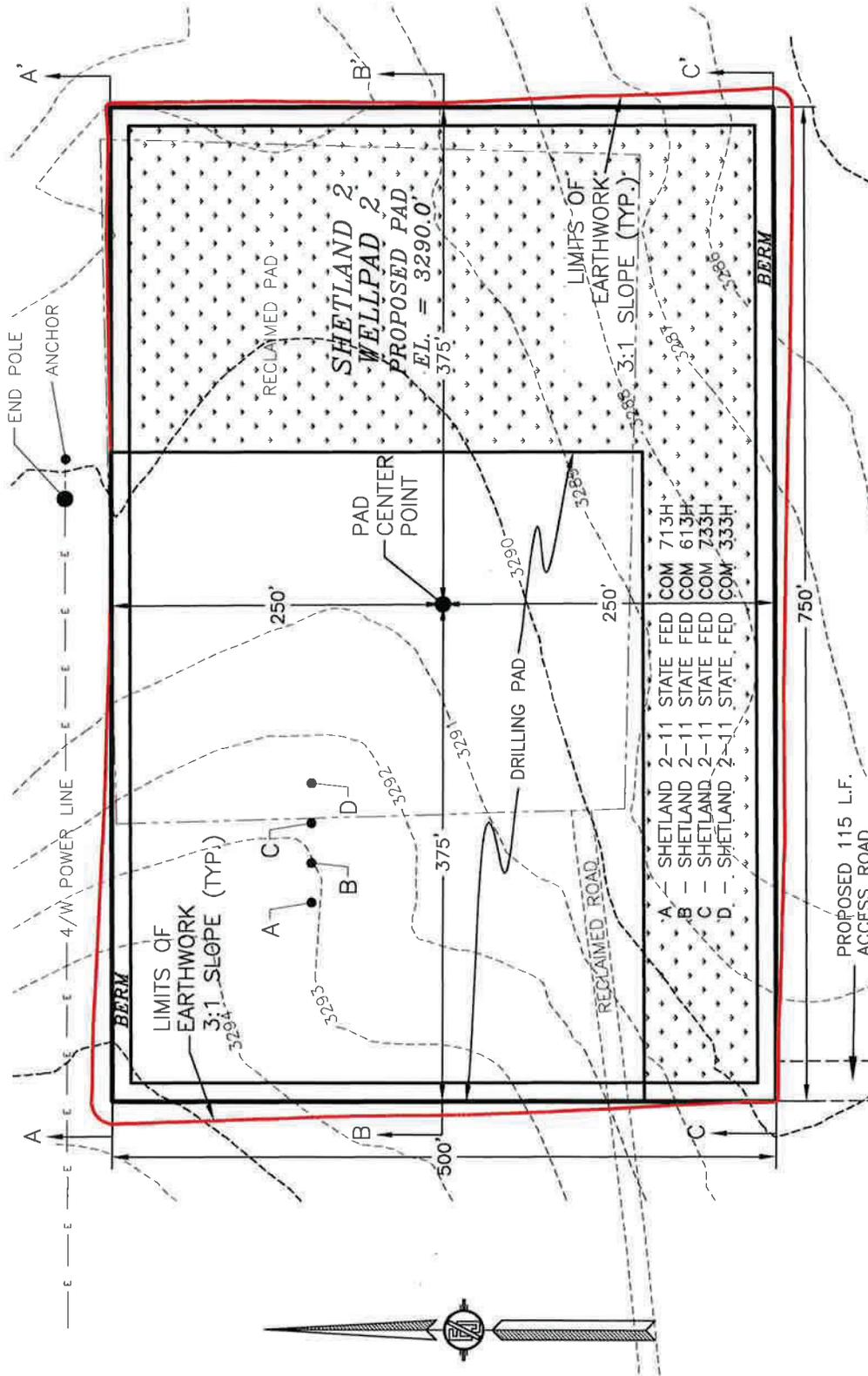
DEVON ENERGY PRODUCTION COMPANY, L.P.
SHETLAND 2-11 STATE FED COM 613H
LOCATED 170 FT. FROM THE NORTH LINE
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SECTION 2, TOWNSHIP 26 SOUTH,
RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
LAND STATUS: STATE

JULY 6, 2020

SURVEY NO. 7475A

MADRON SURVEYING, INC. 301 SOUTH CANAL (575) 234-3341 CARLSBAD, NEW MEXICO

PLAN VIEW



I, FILMON F. JARAMILLO, A NEW MEXICO REGISTERED PROFESSIONAL SURVEYOR CERTIFY THAT I DIRECTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR SURVEYS IN NEW MEXICO.



DEVON ENERGY PRODUCTION COMPANY, L.P.
 PAD ELEVATIONS AND CROSS SECTIONS
FOR SHELTLAND 2-11 STATE FED COM 613H
 SECTION 2, TOWNSHIP 26 SOUTH,
 RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO

SCALE 1" = 120'

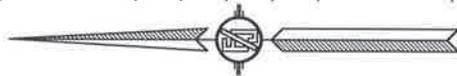
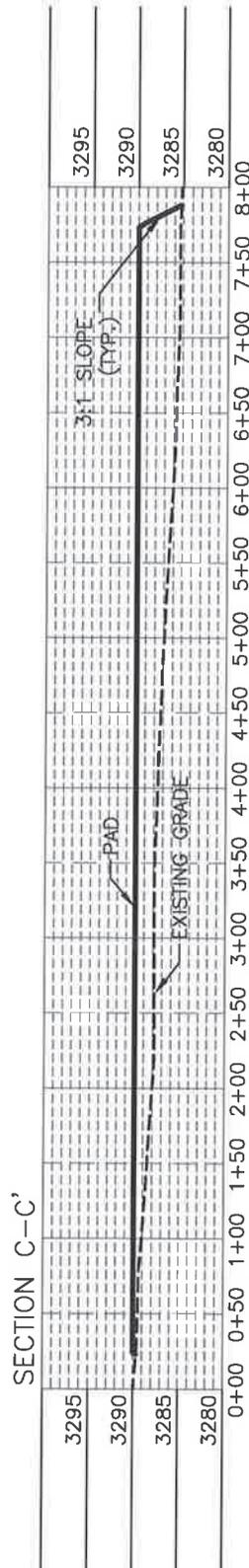
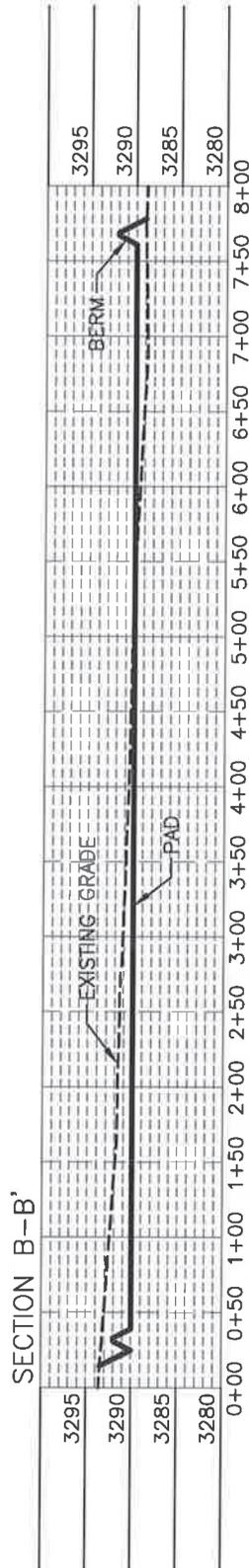
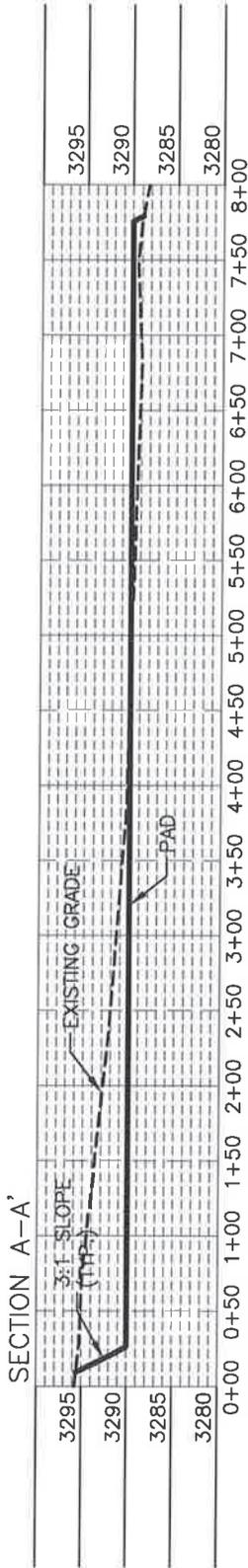
CUT	FILL	NET
11553 CU. YD	11331 CU. YD	222 CU. YD (CUT)

EARTHWORK QUANTITIES ARE ESTIMATED

JULY 6, 2020
 301 SOUTH CANAL
 (375) 234-5341

MADISON SURVEYING, INC. CARLSBAD, NEW MEXICO
 SURVEY NO. 7475A SHEET 1-2

CROSS-SECTIONS



L. FILMON F. JARAMILLO, A NEW MEXICO REGISTERED PROFESSIONAL SURVEYOR CERTIFY THAT I DIRECTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO.



DEVON ENERGY PRODUCTION COMPANY, L.P.
PAD ELEVATIONS AND CROSS SECTIONS
FOR SHETLAND 2-11 STATE FED COM 613H
 SECTION 2, TOWNSHIP 26 SOUTH,
 RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO

JULY 6, 2020

301 SOUTH CANAL
 (575) 234-3341

MADRON SURVEYING, INC. CARLSBAD, NEW MEXICO

SHEET 2-2
 SURVEY NO. 7475A

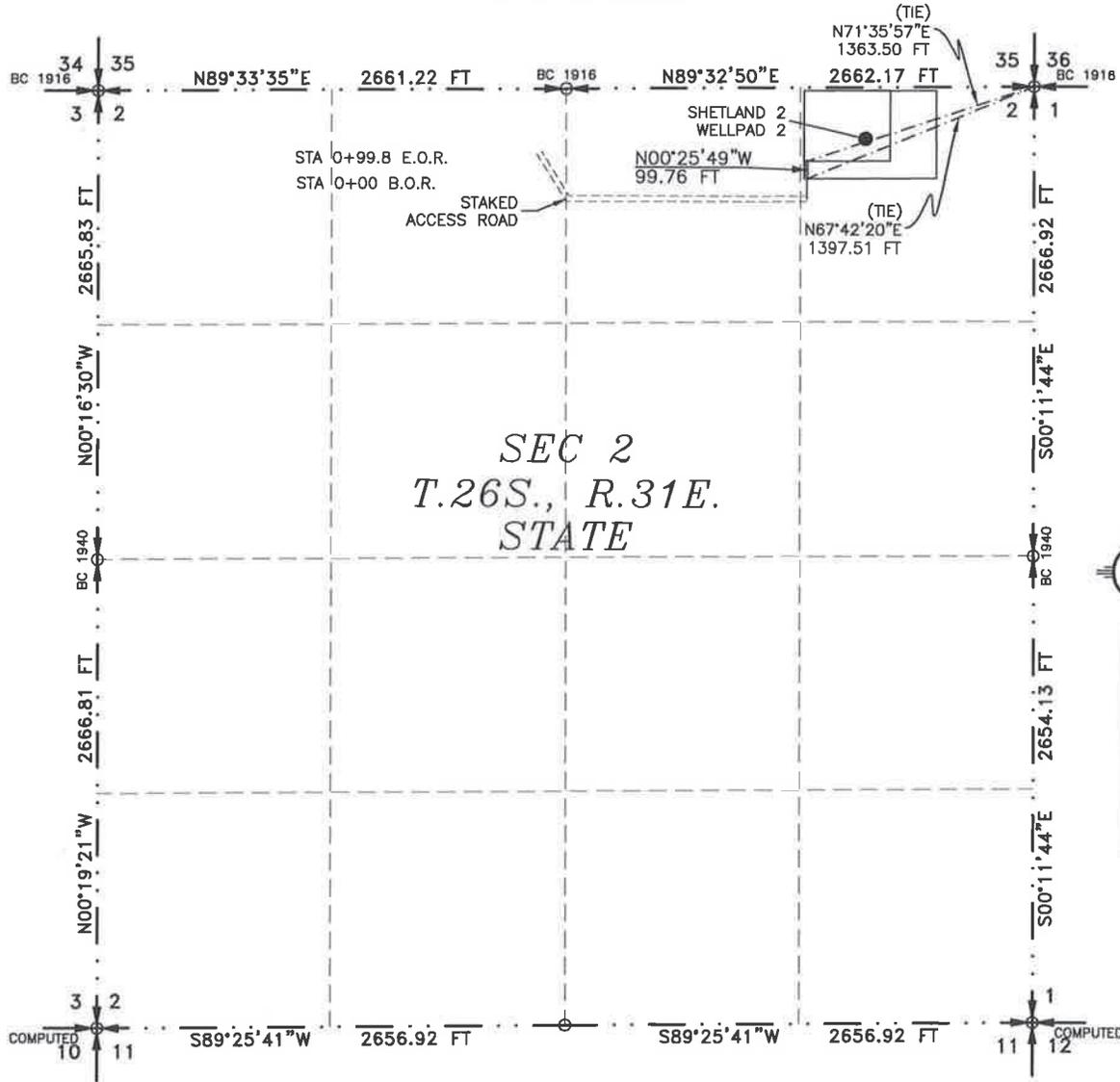


CUT	FILL	NET
11553 CU. YD	11331 CU. YD	222 CU. YD (CUT)

EARTHWORK QUANTITIES ARE ESTIMATED

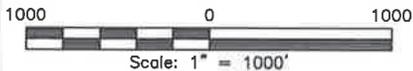
ACCESS ROAD PLAT (7600264R)
 ACCESS ROAD TO THE SHETLAND 2 WELLPAD 2
 (SHETLAND 2-11 STATE FED COM 713H, 613H, 7333H, 333H)

DEVON ENERGY PRODUCTION COMPANY, L.P.
 CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING
 SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
 EDDY COUNTY, STATE OF NEW MEXICO
 JULY 6, 2020



SEC 2
 T.26S., R.31E.
 STATE

SEE NEXT SHEET (2-2) FOR DESCRIPTION



GENERAL NOTES

- 1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.
- 2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SURVEYOR CERTIFICATE

I, FILIMON F. JARAMILLO, A NEW MEXICO PROFESSIONAL SURVEYOR NO. 12797, HEREBY CERTIFY THAT I HAVE CONDUCTED AND AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT THIS SURVEY AND PLAT MEET THE MINIMUM STANDARDS FOR LAND SURVEYING IN THE STATE OF NEW MEXICO.

IN WITNESS WHEREOF, THIS CERTIFICATE IS EXECUTED AT CARLSBAD, NEW MEXICO, THIS 6th DAY OF JULY 2020.

FILIMON F. JARAMILLO
 FILIMON F. JARAMILLO PLS. 12797
 CARLSBAD, NEW MEXICO

MADRON SURVEYING, INC.
 301 SOUTH CANAL
 CARLSBAD, NEW MEXICO 88220
 Phone (575) 234-3341

SURVEY NO. 7475A
 CARLSBAD, NEW MEXICO

SHEET: 1-2

MADRON SURVEYING, INC.

301 SOUTH CANAL
 (575) 234-3341

ACCESS ROAD PLAT (7600264R)
ACCESS ROAD TO THE SHETLAND 2 WELLPAD 2
(SHETLAND 2-11 STATE FED COM 713H, 613H, 7333H, 333H)

DEVON ENERGY PRODUCTION COMPANY, L.P.
CENTERLINE SURVEY OF AN ACCESS ROAD CROSSING
SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M.
EDDY COUNTY, STATE OF NEW MEXICO
JULY 6, 2020

DESCRIPTION

A STRIP OF LAND 30 FEET WIDE CROSSING STATE OF NEW MEXICO LAND IN SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., EDDY COUNTY, STATE OF NEW MEXICO AND BEING 15 FEET EACH SIDE OF THE FOLLOWING DESCRIBED CENTERLINE SURVEY:

BEGINNING AT A POINT WITHIN THE NE/4 NE/4 OF SAID SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M., WHENCE THE NORTHEAST CORNER OF SAID SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS N67°42'20"E, A DISTANCE OF 1397.51 FEET;
THENCE N00°25'49"W A DISTANCE OF 99.76 FEET THE TERMINUS OF THIS CENTERLINE SURVEY, WHENCE THE NORTHEAST CORNER OF SAID SECTION 2, TOWNSHIP 26 SOUTH, RANGE 31 EAST, N.M.P.M. BEARS N71°35'57"E, A DISTANCE OF 1363.50 FEET;

SAID STRIP OF LAND BEING 99.76 FEET OR 6.05 RODS IN LENGTH, CONTAINING 0.069 ACRES MORE OR LESS AND BEING ALLOCATED BY FORTIES AS FOLLOWS:

NE/4 NE/4 99.76 L.F. 6.05 RODS 0.069 ACRES

GENERAL NOTES

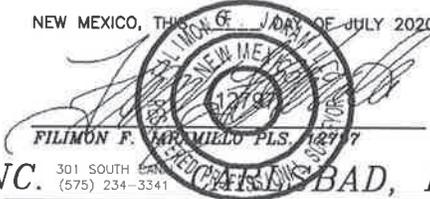
1.) THE INTENT OF THIS ROUTE SURVEY IS TO ACQUIRE AN EASEMENT.

2.) BASIS OF BEARING AND DISTANCE IS NMSP EAST (NAD83) MODIFIED TO SURFACE COORDINATES. NAD 83 (FEET) AND NAVD 88 (FEET) COORDINATE SYSTEMS USED IN THE SURVEY.

SURVEYOR CERTIFICATE

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IN WITNESS WHEREOF, THIS CERTIFICATE IS EXECUTED AT CARLSBAD, NEW MEXICO, THIS 6TH DAY OF JULY 2020



MADRON SURVEYING, INC.
301 SOUTH CANAL
CARLSBAD, NEW MEXICO 88220
Phone (575) 234-3341

SURVEY NO. 7475A

SHEET: 2-2

MADRON SURVEYING, INC. 301 SOUTH CANAL CARLSBAD, NEW MEXICO (575) 234-3341

Affected Tracts Shetland 2-11 State Fed Com 613H

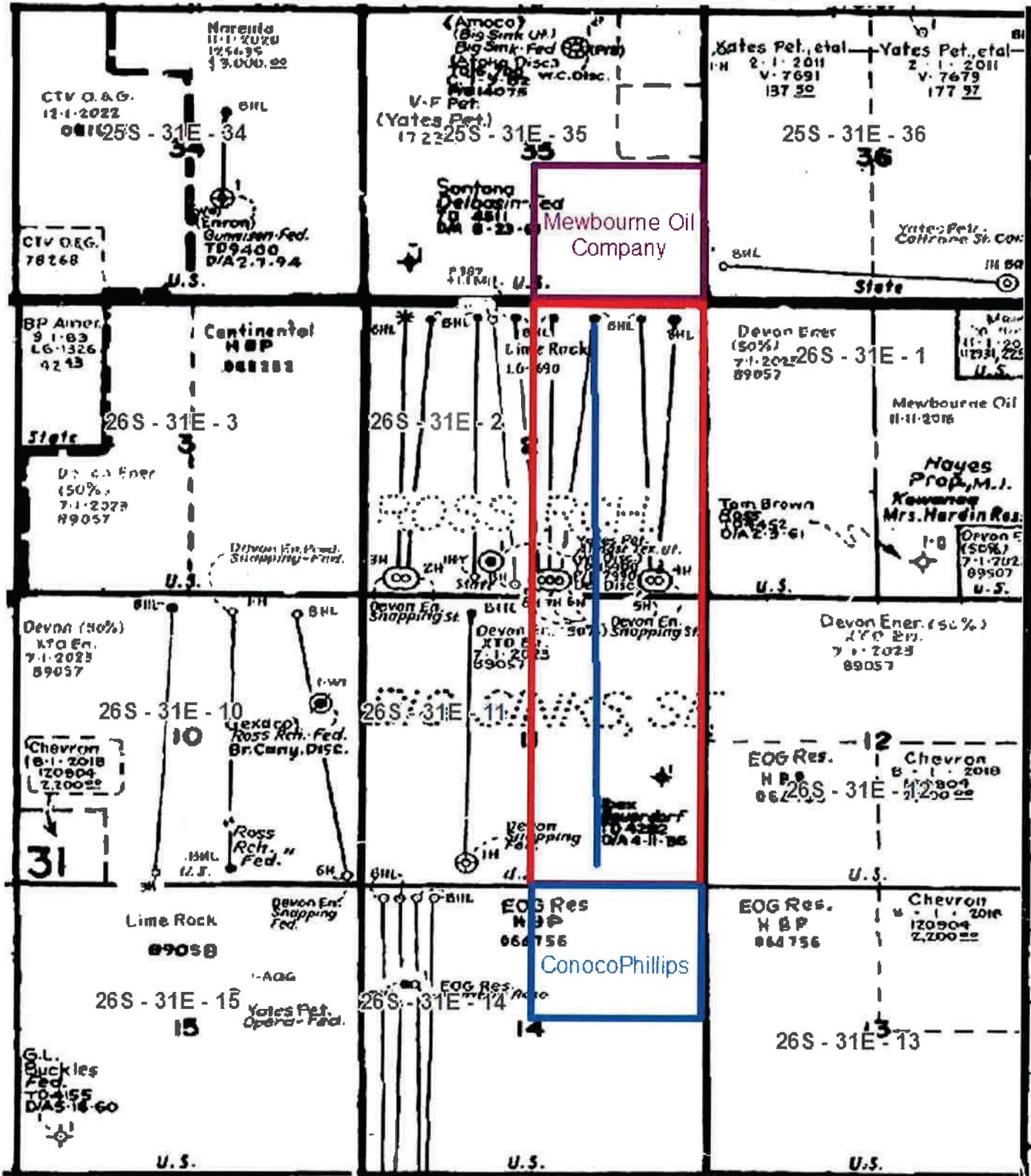


EXHIBIT
B



Kaitlyn A. Luck
Phone (505) 954-7286
KALuck@hollandhart.com

July 17, 2020

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES:

Re: Application of Devon Energy Production, LP, for administrative approval of an unorthodox well location for its Shetland 2-11 State Fed Com #613H in the E/2 of Sections 2 and 11, Township 26 South, Range 31 East, N.M.P.M., Eddy County, New Mexico.

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 this date with the applicant and 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.

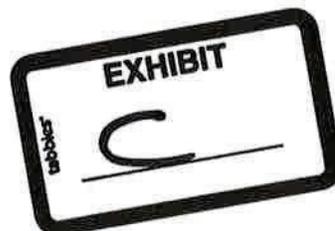
If you have any questions about this application, please contact the following:

Tim Prout
Devon Energy
(405) 552-6113
Tim.Prout@dvn.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Kaitlyn Luck", written over a horizontal line.

Kaitlyn A. Luck
ATTORNEY FOR DEVON ENERGY PRODUCTION
COMPANY, L.P.





Shipment Confirmation Acceptance Notice

A. Mailer Action

Note to Mailer: The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

Shipment Date: 07/17/2020

Shipped From:

Name: HOLLAND & HART LLP (1)

Address: 110 N GUADALUPE ST # 1

City: SANTA FE

State: NM ZIP+4® 87501

**Devon - Shetland 611H, 613H, 711H, 712H, 732H NSL
CM# 41132.0002**

Type of Mail	Volume
Priority Mail Express®*	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	4
Total	4

*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

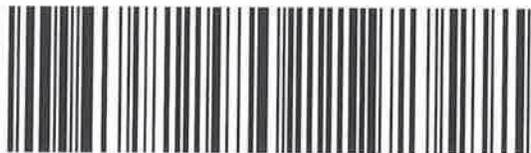
B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.
Leave form with customer or in customer's mail receptacle.

USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0023 0575 16



Firm Mailing Book For Accountable Mail

Name and Address of Sender
 Holland & Hart LLP (1)
 110 N Guadalupe St # 1
 Santa Fe NM 87501

Check type of mail or service
 Adult Signature Required
 Adult Signature Restricted Delivery
 Certified Mail
 Certified Mail Restricted Delivery
 Collect on Delivery (COD)
 Insured Mail
 Priority Mail

Priority Mail Express
 Registered Mail
 Return Receipt for Merchandise
 Signature Confirmation
 Signature Confirmation Restricted Delivery

Postage 1.90

Actual Value if Registered

Handling Charge

Extra Service Fee 3.55

Due Sender if COD

Insured Value

ASRD Fee

ASR Fee

RD Fee

RR Fee 1.70

SC Fee

SCRD Fee

SH Fee

Affix Stamp Here
 (if issued as an international certificate of mailing or for additional copies of this receipt).
Postmark with Date of Receipt.

USPS Tracking/Article Number	Addressee (Name, Street, City, State, & ZIP Code™)	Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee
1. 9214 8901 9403 8316 8330 11	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	1.90	3.55								1.70			
2. 9214 8901 9403 8316 8330 28	State Land Office 310 Old Santa Fe Trail Santa Fe NM 87501	1.90	3.55								1.70			
3. 9214 8901 9403 8316 8330 35	ConocoPhillips Company 600 N Dairy Ashford Houston TX 77079	1.90	3.55								1.70			
4. 9214 8901 9403 8316 8330 42	Mexbourne Oil Company 500 West Texas Suite 1020 Midland TX 79701	1.90	3.55								1.70			
				Handling Charge - If Registered and over \$50,000 in value				Adult Signature Required	Adult Signature Restricted Delivery	Restricted Delivery	Return Receipt	Signature Confirmation	Signature Confirmation Restricted Delivery	Special Handling

Total Number of Pieces Listed by Sender 4

Total Number of Pieces Received at Post Office

Postmaster, Per (Name of receiving employee)

PS Form 3877, April 2015 (Page 1 of 1) Complete in Ink

PSN 7530-02-000-9098

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

July 15, 2020

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

RE: Application for Nonstandard Locations
Engineering Statement
Devon Energy Production Company, L.P.
Shetland 11-2 Fed State Com 611H, 711H, 712H, 732H
Shetland 2-11 State Fed Com 613H
Sections 10 & 3-26S-31E
Eddy County, New Mexico

Dear Mr. Lowe:

Devon Energy Production Company, L.P. respectfully requests administrative approval of a non-standard location for each of the Shetland wells referenced above by decreasing the first and last take point(s) from 330 feet to 100 feet from the horizontal plane outer boundary. The wells are located in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Devon's responsibility as a prudent operator to maximize lateral length and to minimize reserves left in the ground. Decreasing the last take point will increase the wells effective lateral length by 460 feet thereby increasing ultimate recovery of reserves and preventing waste of natural resources.

Sincerely,

A handwritten signature in cursive script that reads "Paige Bowes".

Paige Bowes
Reservoir Engineer

