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**DEVON
ENERGY
CORPORATION**

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November 4, 1997

New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RECEIVED
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CERTIFIED MAIL #: Z447 031 731

Attention: Ben Stone

Dear Mr. Stone:

During the past year the New Mexico OCD has issued several Administrative Orders granting permission to commence injection in numerous wells within Devon Energy's Grayburg Jackson Field specifically in Section 18, 19, 20, 29 and 30-T17S-R31E of Eddy County, New Mexico. Table I list the wells that have been approved for injection in these particular Sections as well the Administrative Order No. and the approved surface injection pressure gradient.

Previously the OCD has established higher surface injection gradients when data was presented demonstrating that injection could be contained within the injection intervals at higher injection pressures. The data formerly presented consisted of frac gradients obtained during recent stimulation treatments at offset wells. As long as the frac gradient and / or wellhead pressure gradient is not exceeded the formation will not be fractured and injection fluids will be contained in the formation. This has been confirmed through temperature and tracer logs at existing injection wells within the field.

Table II presents the average frac gradients and average surface injection gradients for each of the Sections mentioned above. These gradients were obtained during recent stimulation treatments at wells within each Section. Data at the individual wells utilized to obtain these averages has been tabulated in the attached spreadsheets and illustrated on the enclosed plat.

Based on the attached information Devon respectfully request that the wellhead pressure gradients for the wells listed in Table I be increased to the **average** surface injection gradient determined for the particular Section as presented in Table II (for your convenience the requested surface injection gradient is also presented in Table I). By OCD definition the surface injection gradient will be utilized to determine the maximum surface injection pressure by multiplying the appropriate gradient by the depth of the uppermost perforation. When the uppermost perforation is available the requested surface

injection pressure is presented. In instances where supplemental logs are required to determine the final perforated interval only the gradient is presented and the surface injection pressure will be adjusted accordingly if the uppermost perforation changes.

If you require any additional information regarding this matter please feel free to call me at 405-552-4560.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Jackson", with a stylized, cursive script.

Randy Jackson
District Engineer

TABLE I

WELL	SECTION	TOP PERFORATION	OCD ORDER NO.	OCD APPROVED SURFACE INJECTION GRADIENT	CALCULATED ALLOWABLE INJECTION PRESSURE	REQUESTED SURFACE INJECTION GRADIENT	REQUESTED SURFACE INJECTION PRESSURE
		(ft)		(psi/ft)	(psi)	(psi/ft)	(psi)
* C. A. RUSSELL #06	18	2768	WFX-687	0.55	1520	0.60	1661
C. A. RUSSELL #07	18	2779	WFX-687	0.55	1528	0.60	1667
* C. A. RUSSELL #08	18	2738	WFX-687	0.55	1506	0.60	1643
* C. A. RUSSELL #09	18	2740	WFX-687	0.55	1504	0.60	1644
* C. A. RUSSELL #10	18	2752	WFX-687	0.55	1514	0.60	1651
* C. A. RUSSELL #11	18	2783	WFX-687	0.55	1531	0.60	1670
HUDSON FEDERAL #01	18	2768	WFX-687	0.55	1522	0.60	1661
HUDSON FEDERAL #06	18	2782	WFX-687	0.56	1547	0.60	1669
* TURNER "A" 02	18	2760	WFX-697	0.65	1794	0.60	1656
* TURNER "A" 03	18	2754	WFX-687	0.55	1512	0.60	1652
* TURNER "A" 10	18	2719	WFX-687	0.55	1493	0.60	1631
* TURNER "A" 11	18	2717	WFX-687	0.55	1492	0.60	1630
* TURNER "A" 13	18	2713	WFX-687	0.55	1492	0.60	1628
* TURNER "A" 56	18	2755	WFX-687	0.55	1515	0.60	1653
* TURNER "A" 58	18	2725	WFX-687	0.55	1496	0.60	1635
* FREN OIL CO. 07	19	2750	WFX-705	0.35	963	0.63	1733
* FREN OIL CO. 08	19	2750	WFX-705	0.35	963	0.63	1733
* FREN OIL CO. 12	19	2800	WFX-705	0.35	980	0.63	1764
* FREN OIL CO. 13	19	2782	WFX-699	0.50	1391	0.63	1753
* FREN OIL CO. 25	19	2762	WFX-699	0.50	1381	0.63	1740
* FRIESS FEDERAL 05	19	NA	WFX-699	0.50		0.63	
* TURNER "A" 14	19	2700	WFX-717	0.50	1350	0.63	1701
* TURNER "A" 05	19	2732	WFX-697	0.65	1776	0.63	1721
* TURNER "A" 09	19	2700	WFX-687	0.55	1482	0.63	1701
* TURNER "A" 12	19	2672	WFX-687	0.55	1467	0.63	1683
* TURNER "A" 15	19	2732	WFX-687	0.55	1503	0.63	1721
* TURNER "A" 35	19	2679	WFX-687	0.55	1471	0.63	1688
* TURNER "A" 36	19	2713	WFX-687	0.55	1492	0.63	1709
* TURNER "A" 57	19	2711	WFX-687	0.55	1488	0.63	1708
* TURNER "B" 006	20	2732	WFX-699	0.50	1366	0.61	1667
* TURNER "B" 008	20	2753	WFX-699	0.34	944	0.61	1679
* TURNER "B" 009	20	NA	WFX-712	0.50		0.61	
* TURNER "B" 011	20	NA	WFX-712	0.50		0.61	
* TURNER "B" 042	20	2710	WFX-699	0.50	1355	0.61	1653
* TURNER "B" 043	20	2822	WFX-699	0.50	1411	0.61	1721
* TURNER "B" 051	20	2798	WFX-712	0.50	1399	0.61	1707
* TURNER "B" 072	20	2923	WFX-718	0.50	1462	0.61	1783
* TURNER "B" 079	20	2739	WFX-699	0.50	1370	0.61	1671
* TURNER "B" 131	20	2759	WFX-699	0.35	966	0.61	1683
* TURNER "B" 048	29	2962	WFX-699	0.35	1037	0.60	1777
* TURNER "B" 049	29	3081	WFX-699	0.35	1078	0.60	1849
* TURNER "B" 052	29	2998	WFX-699	0.35	1049	0.60	1799
* TURNER "B" 059	29	3080	WFX-712	0.50	1540	0.60	1848
* TURNER "B" 060	29	3167	WFX-699	0.35	1108	0.60	1900
* TURNER "B" 062	29	NA	WFX-712	0.50		0.60	
* TURNER "B" 063	29	NA	WFX-706	0.35		0.60	
* TURNER "B" 071	29	NA	WFX-706	0.35		0.60	
* TURNER "B" 133	29	3209	WFX-706	0.35	1123	0.60	1925
* MAX FRIESS 01	30	2878	WFX-705	0.35	1007	0.56	1612

TABLE I

WELL	SECTION	TOP	OCD	OCD	CALCULATED	REQUESTED	REQUESTED
		PERFORATION	ORDER	APPROVED	ALLOWABLE	SURFACE	SURFACE
			NO.	SURFACE	INJECTION	INJECTION	INJECTION
				INJECTION	PRESSURE	GRADIENT	PRESSURE
				GRADIENT			
		(ft)		(psi/ft)	(psi)	(psi/ft)	(psi)
MAX FRIESS 02	30	2873	WFX-699	0.35	1006	0.56	1609
MAX FRIESS 03	30	NA	WFX-705	0.35		0.56	
MAX FRIESS 04	30	2910	WFX-699	0.35	1019	0.56	1630
TURNER "B" 053	30	3022	WFX-699	0.35	1058	0.56	1692
TURNER "B" 076	30	NA	WFX-706	0.35		0.56	
TURNER "B" 107	30	2951	WFX-706	0.35	1033	0.56	1653
TURNER "B" 108	30	2991	WFX-706	0.35	1047	0.56	1675
TURNER "B" 109	30	3057	WFX-706	0.35	1070	0.56	1712
TURNER "B" 110	30	3124	WFX-706	0.35	1093	0.56	1749
TURNER "B" 111	30	3092	WFX-706	0.35	1082	0.56	1732

Table II

Section	Average Frac Gradient (psi/ft)	Average Surface Injection Gradient (psi/ft)
S/2 Section 18-T17S-R31E	1.05	0.60
S/2 Section 19-T17S-R31E	1.07	0.63
Section 20-T17S-R31E	1.05	0.61
Section 29-T17S-R31E	1.05	0.60
Section 30-T17S-R31E	1.01	0.56

DEVON ENERGY CORPORATION
FRAC GRADIENTS / SURFACE GRADIENT
S/2 OF SECTION 18-T17S-R31E

WELL	GRAYBURG	GRAYBURG	SAN ANDRES	SAN ANDRES	REMARKS		
	FRAC	CALCULATED	FRAC	CALCULATED			
	GRADIENT	SURFACE	GRADIENT	SURFACE			
		INJECTION		INJECTION			
		GRADIENT		GRADIENT			
	psi/ft	psi/ft	psi/ft	psi/ft			
RUSSELL 016	1.01	0.56	1.02	0.58			
RUSSELL 020	1.06	0.61			NO SAN ANDRES DATA AVAILABLE		
RUSSELL 021	1.05	0.61	0.99	0.55			
TURNER "A" 002	1.15	0.71	1.05	0.60			
TURNER "A" 003	1.07	0.62	1.11	0.66			
TURNER "A" 010	1.03	0.59	0.94	0.50			
TURNER "A" 011	1.14	0.69			NO SAN ANDRES DATA AVAILABLE		
TURNER "A" 013	0.97	0.53	1.02	0.57			
TURNER "A" 038	0.92	0.48	0.87	0.42			
TURNER "A" 039	1.03	0.58	0.87	0.43			
TURNER "A" 040	1.06	0.61	1.12	0.68			
TURNER "A" 041	0.99	0.55	0.99	0.55			
TURNER "A" 042	1.05	0.61	1.12	0.67			
TURNER "A" 043	1.05	0.60	1.15	0.70			
TURNER "A" 044	1.09	0.64	1.04	0.60			
TURNER "A" 052	1.05	0.61	1.11	0.67			
TURNER "A" 053	1.02	0.58	1.06	0.61			
TURNER "A" 055	1.02	0.58	1.18	0.74			
TURNER "A" 056	1.05	0.60	1.17	0.73			
TURNER "A" 058	1.12	0.68	1.18	0.73			
AVERAGE	1.05	0.60	1.06	0.61			

DEVON ENERGY CORPORATION
FRAC GRADIENTS / SURFACE GRADIENTS
S/2 SECTION 19-T17S-R31E

WELL	GRAYBURG FRAC GRADIENT	GRAYBURG CALCULATED SURFACE INJECTION GRADIENT	SAN ANDRES FRAC GRADIENT	SAN ANDRES CALCULATED SURFACE INJECTION GRADIENT	REMARKS
	psi/ft	psi/ft	psi/ft	psi/ft	
FREN OIL CO. 03					NO PRESSURE DATA AVAILABLE
FREN OIL CO. 07	1.07	0.63	1.14	0.70	
FREN OIL CO. 08	1.06	0.61	1.27	0.83	
FREN OIL CO. 10	1.07	0.63			NO SAN ANDRES DATA AVAILABLE
FREN OIL CO. 12					NO PRESSURE DATA AVAILABLE
FREN OIL CO. 13	1.16	0.72	0.97	0.52	
FREN OIL CO. 18	0.99	0.55			NO SAN ANDRES DATA AVAILABLE
FREN OIL CO. 19	1.08	0.63	1.12	0.68	
FREN OIL CO. 23	1.07	0.62			NO SAN ANDRES DATA AVAILABLE
FREN OIL CO. 24	1.08	0.63	1.12	0.68	
FREN OIL CO. 25	1.09	0.64	1.06	0.62	
FRIESS FEDERAL 01					NO PRESSURE DATA AVAILABLE
FRIESS FEDERAL 04	1.15	0.70	1.14	0.70	
TURNER "A" 48	1.00	0.56	1.07	0.63	
TURNER "A" 49	1.07	0.62	1.40	0.96	
TURNER "A" 50	1.14	0.70	1.13	0.69	
TURNER "A" 51	1.02	0.58	1.23	0.79	
TURNER "B" 100	1.06	0.61	1.14	0.70	
AVERAGE	1.07	0.63	1.15	0.71	

DEVON ENERGY CORPORATION
FRAC GRADIENTS / SURFACE GRADIENTS
SECTION 20-T17S-R31E

WELL	GRAYBURG	GRAYBURG	SAN ANDRES	SAN ANDRES	REMARKS			
	FRAC	CALCULATED	FRAC	CALCULATED				
	GRADIENT	SURFACE	GRADIENT	SURFACE				
		INJECTION		INJECTION				
		GRADIENT		GRADIENT				
	psi/ft	psi/ft	psi/ft	psi/ft				
TURNER "B" 003	1.04	0.59	1.02	0.57				
TURNER "B" 006	0.95	0.51	1.01	0.57				
TURNER "B" 008	1.10	0.65			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 042				0.67	NO GRAYBURG DATA AVAILABLE.			
TURNER "B" 043	0.96	0.52			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 044	0.93	0.48			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 067	0.92	0.48	1.04	0.60				
TURNER "B" 072	0.91	0.46	1.14	0.69				
TURNER "B" 079	1.09	0.65	1.14	0.70				
TURNER "B" 092	1.07	0.63	1.12	0.67				
TURNER "B" 093	1.06	0.61	1.02	0.57				
TURNER "B" 094	1.04	0.59	1.06	0.62				
TURNER "B" 095	1.10	0.65	1.10	0.65				
TURNER "B" 096	1.20	0.76	1.18	0.73				
TURNER "B" 097	1.08	0.64	1.02	0.57				
TURNER "B" 101	1.09	0.64			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 102	1.10	0.66	1.10	0.66				
TURNER "B" 103	1.14	0.69			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 104	1.18	0.73			NO SAN ANDRES DATA AVAILABLE.			
TURNER "B" 106	1.12	0.68	1.05	0.61				
TURNER "B" 118	1.00	0.55	0.94	0.50				
TURNER "B" 131	1.06	0.61	1.18	0.74				
TURNER "B" 132	1.06	0.61	1.14	0.69				
TURNER "B" 134	1.04	0.59	1.06	0.61				
AVERAGE	1.05	0.61	1.08	0.63				

DEVON ENERGY CORPORATION
FRAC GRADIENTS / SURFACE GRADIENTS
SECTION 29-T17S-R31E

WELL	GRAYBURG FRAC GRADIENT	GRAYBURG CALCULATED SURFACE INJECTION GRADIENT	SAN ANDRES FRAC GRADIENT	SAN ANDRES CALCULATED SURFACE INJECTION GRADIENT	REMARKS			
	psi/ft	psi/ft	psi/ft	psi/ft				
TURNER "B" 080	1.10	0.66			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 081	1.06	0.61			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 082	1.09	0.65			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 083	1.13	0.68			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 084	1.08	0.64			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 085	1.04	0.59			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 086	1.02	0.57			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 087	0.94	0.50			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 088	1.00	0.55			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 089	1.05	0.60			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 090	1.17	0.72			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 091	1.05	0.61			NO SAN ANDRES DATA AVAILABLE			
TURNER "B" 098	1.01	0.56	1.06	0.61				
TURNER "B" 099	1.05	0.61	1.09	0.65				
TURNER "B" 100	1.06	0.61	1.14	0.70				
TURNER "B" 133	0.91	0.46			NO SAN ANDRES DATA AVAILABLE			
AVERAGE	1.05	0.60	1.10	0.65				

DEVON ENERGY CORPORATION
FRAC GRADIENTS / SURFACE GRADIENTS
SECTION 30-T17S-R31E

WELL	GRAYBURG FRAC GRADIENT	GRAYBURG CALCULATED SURFACE INJECTION GRADIENT	SAN ANDRES FRAC GRADIENT	SAN ANDRES CALCULATED SURFACE INJECTION GRADIENT	REMARKS
	psi/ft	psi/ft	psi/ft	psi/ft	
FREN OIL CO. 23	1.07	0.62			NO SAN ANDRES DATA AVAILABLE
MAX FRIESS 01	0.86	0.42			NO SAN ANDRES DATA AVAILABLE
MAX FRIESS 02	1.13	0.68			NO SAN ANDRES DATA AVAILABLE
MAX FRIESS 03					NO PRESSURE DATA AVAILABLE
MAX FRIESS 04	0.93	0.49	1.13	0.69	
MAX FRIESS 05	1.12	0.67	1.06	0.62	
MAX FRIESS 06	1.02	0.58	0.93	0.48	
MAX FRIESS 07	1.12	0.68			NO SAN ANDRES DATA AVAILABLE
TURNER "B" 100	1.06	0.61	1.14	0.70	
TURNER "B" 107	1.00	0.56	1.03	0.59	
TURNER "B" 108	0.92	0.47	0.91	0.47	
TURNER "B" 109	0.91	0.47			NO SAN ANDRES DATA AVAILABLE
TURNER "B" 110	0.94	0.50			NO SAN ANDRES DATA AVAILABLE
TURNER "B" 111	0.95	0.50			NO SAN ANDRES DATA AVAILABLE
TURNER "B" 113	1.03	0.58			NO SAN ANDRES DATA AVAILABLE
TURNER "B" 114	1.05	0.60	1.18	0.73	
TURNER "B" 53	0.99	0.55	0.93	0.48	
TURNER "B" 56					NO PRESSURE DATA AVAILABLE
TURNER "B" 98	1.01	0.56	1.06	0.61	
TURNER "B" 99	1.05	0.61	1.09	0.65	
AVERAGE	1.01	0.56	1.05	0.60	