



**MONTGOMERY
& ANDREWS**
LAW FIRM

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2013 AUG 15 P 2:43

August 15, 2013

Ms. Jami Bailey, Director
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Hand-Delivered

Case 15047

Re: Devon Energy Production Company Bell Lake "24" Fed Well No. 1-H
API No. 30-025-41182
Sections 24 and 13, T-24-S, R-32-E NMPM
Lea County, New Mexico

Dear Ms. Bailey:

As the offsetting operator and working interest owner in Section 13, T-24-S R-32-E, Cimarex Energy Co. objects to the proposed configuration of the non-standard spacing unit and project area for the above-referenced horizontal well. The extension of the 200 acre unit into the SW/4 SW/4 of Section 13 disrupts the logical development pattern for the area, will impair Cimarex's correlative rights and may cause waste. A copy of the C-102 for the proposed well is enclosed. This matter should be set for hearing before one of the Division's Examiners and Devon should show cause why its APD should not be rescinded.

Very truly yours,

Montgomery & Andrews, P.A.

J. Scott Hall
Attorneys for Cimarex Energy Co.

JSH:kw
Enclosure

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307
Santa Fe, New Mexico 87504-2307

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Ms. Jami Bailey, Director
August 15, 2013
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cc: Samuel Walker
Devon Energy Production Company
333 W. Sheridan Avenue
Oklahoma City, OK 73102-5010

Matt Hood
Cimarex Energy Co.
600 N. Marienfeld, Suite 600
Midland, TX 79701

493954

District I
1623 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) 334-6179
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87503
Phone: (505) 476-3460 Fax: (505) 476-3462

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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 30025-41182	² Pool Code 97964	³ Pool Name WC-025 E-07 5243225 E. LOWER B S
⁴ Property Code 39911	⁵ Property Name BELL LAKE "24" FED	⁶ Well Number 1H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3578.9

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
M	24	24 S	32 E		200	SOUTH	660	WEST	LEA

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	13	24 S	32 E		990	SOUTH	660	WEST	LEA

¹² Dedicated Acres	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
200			

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.

W.O. CORNER SEC. 13 LAT. = 32.2176700°N LONG. = 103.6368339°W NMSP EAST (FT) N = 443620.31 E = 756734.70 BOTTOM OF HOLE LAT. = 32.2131452°N LONG. = 103.6347047°W NMSP EAST (FT) N = 441978.50 E = 757403.85 SW CORNER SEC. 13 COMPUTED LAT. = 32.2104230°N LONG. = 103.6368415°W NMSP EAST (FT) N = 440983.28 E = 756749.44 SE CORNER SEC. 13 COMPUTED LAT. = 32.2104297°N LONG. = 103.6198101°W NMSP EAST (FT) N = 441020.87 E = 762017.02 PP: 223 FSL; 660 FWL BELL LAKE "24" FED #1H ELEV. = 3578.9' LAT. = 32.1984419°N (HADB3) LONG. = 103.6347401°W NMSP EAST (FT) N = 435901.91 E = 757432.42 SURFACE LOCATION SW CORNER SEC. 24 LAT. = 32.1958887°N LONG. = 103.6368744°W NMSP EAST (FT) N = 435696.35 E = 756773.51 SE CORNER SEC. 24 LAT. = 32.1959025°N LONG. = 103.6283518°W NMSP EAST (FT) N = 435718.54 E = 759409.83 SE CORNER SEC. 24 COMPUTED LAT. = 32.1959128°N LONG. = 103.6198272°W NMSP EAST (FT) N = 435739.89 E = 762046.77	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 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: <i>D. A.</i> Date: 1/9/2013 David Cook, Regulatory Specialist Printed Name David.Cook@dmn.com 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. NOVEMBER 30, 2012 Date of Survey Signature and Seal of Professional Surveyor: FILIACION F. JARAMILLO, PLS 12797 Certificate Number: SURVEY NO. 1383
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MAY 20 2013

