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Aubrey Dunn
COMMISSIONER

State of New Mexico
Commissioner of Public Lands

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COMMISSIONER'S OFFICE

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January 7, 2015

Devon Energy Corporation
333 West Sheridan Ave
Oklahoma City, Oklahoma 73102-8260

Attention: Mr. Samuel Walker

Re: Cotton Draw Unit
Commercial Well Determinations
Cotton Draw Unit Well Nos. 117H, 219H and 220H
Sec. 36-24S-31E
Bone Spring Formation
Eddy and Lea Counties, New Mexico

Dear Mr. Walker:

This office is in receipt of your letter of May 14, 2014, together with the data that supports your commercial determination regarding the Cotton Draw Unit Well Nos. 117H, 219H and 220H.

The Bureau of Land Management, by their letter of August 13, 2014, has advised this office that they have concurred with your determination that the Cotton Draw Unit Well Nos. 117H, 219H and 220H are capable of producing unitized substances in paying quantities from the Bone Spring formation.

Please be advised that the Commissioner of Public Lands concurs with Devon and the Bureau of Land Management's determinations that the above captioned Cotton Draw Unit Wells are commercial wells in the Bone Spring formation and are entitled to participate in the Bone Spring participating area. Please submit a copy of the proposed Bone Spring participating area to this office for our approval.

If you have any questions or if we may be of further help, please contact Pete Martinez at (505) 827-5791.

Very truly yours,

AUBREY DUNN
COMMISSIONER OF PUBLIC LANDS

BY:


Terry Warnell
Oil, Gas and Minerals Division
(505) 827-5744
AD/TW/pm

cc: Reader File,
NMOCD Attention: Mr. Daniel Sanchez
TRD-Attention: Ms. Joan Ishimoto
RMD-Attn: Mr. Kurt McFall
BLM Carlsbad - Attn: Mr. Ed Fernandez