

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF DEVON ENERGY CORPORATION
(NEVADA) FOR SIMULTANEOUS DEDICATION,
EDDY COUNTY, NEW MEXICO.

No. 11905

APPLICATION

Devon Energy Corporation (Nevada) hereby applies for an exception to Division Rule 104.D.(3) to permit simultaneous dedication of three Morrow wells in Section 11, Township 21 South, Range 25 East, and in support thereof, states:

1. Applicant is the operator of Section 11, which is within the Catclaw Draw-Morrow Gas Pool ("the Pool"). Special Rules and Regulations for the Pool require 640 acre spacing and proration units, with wells to be no closer than 1650 feet to the outer boundary of the section nor closer than 330 feet to a quarter-quarter section line.

2. Section 11 is dedicated to the Pure Fed. Well No. 1, located 2078 feet from the south line and 1892 feet from the west line, and the Pure Fed. Well No. 2, located 1270 feet from the South line and 810 feet from the east line. Both wells are completed in and producing from the Pool.

3. Applicant desires to drill its Pure Fed. Well No. 3 at an orthodox gas well location 1650 feet from the north and east lines of Section 11, to test the Pool, and seeks to simultaneously dedicate Section 11 to the Pure Fed. Well Nos. 1, 2, and 3. Applicant also seeks Division authorization to produce all three wells continuously and concurrently.

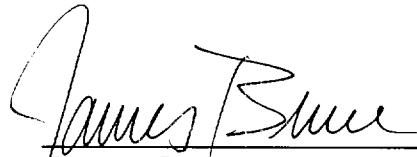
4. Notice of this application has been given to all offset

operators or lessees, by certified mail.

5. The granting of this application is in the interests of conservation, the prevention of waste, and the protection of correlative rights.

WHEREFORE, applicant requests that, after hearing, the Division grant applicant authority to drill its Pure Fed. Well No. 3, simultaneously dedicate Section 11 to its Pure Fed. Well Nos. 1, 2, and 3, and to produce said wells continuously and concurrently.

Respectfully submitted,

A handwritten signature in cursive script, reading "James Bruce", written over a horizontal line.

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Devon Energy Corporation
(Nevada)

PROPOSED ADVERTISEMENT

CASE 11905: Application of Devon Energy Corporation (Nevada) for simultaneous dedication, Eddy County, New Mexico. Applicant seeks an exception to Division Rule 104.D.(3) to permit it to drill its Pure Fed. Well No. 3 at a location 1650 feet from the north and east lines of Section 11, Township 21 South, Range 25 East, NMPM, to test the Catclaw Draw-Morrow Gas Pool, and to simultaneously dedicate Section 11, in the Morrow formation, to the Pure Fed. Well No. 3 and its existing Pure Fed. Well Nos. 1 and 2. Said well unit is located approximately 9.5 miles northwest of Carlsbad, New Mexico.

JAMES BRUCE

ATTORNEY AT LAW

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612 OLD SANTA FE TRAIL
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December 16, 1997

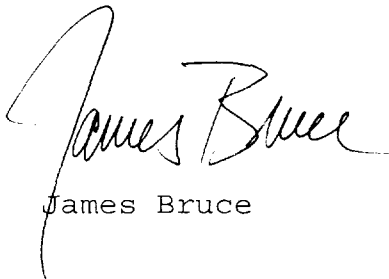
Hand Delivered

Florene Davidson
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed are an original and two copies of an application for simultaneous dedication, together with a proposed advertisement, filed on behalf of Devon Energy Corporation (Nevada). Please set this matter for the January 8, 1998 hearing.

Very truly yours,



James Bruce

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