

RUFUS WALLINGFORD

757 N. Eldridge at Memorial Drive
Houston, Texas 77079
(281) 870-7670

April 28, 1998

Ms. Karen Byers
Engineering Technician
Devon Energy Corporation
20 North Broadway, Suite 1500
Oklahoma City, OK 73102-8260

Dear Ms. Myers:

On behalf of myself and as Trustee of the J. K. Wallingford Trust, this letter will notify you of my objection to the drilling of the Turner B #115. It is obvious that this well will drain from the Turner A lease and adversely affect my overriding royalty interest.

By copy of this letter I am notifying the State of New Mexico and the Bureau of Land Management of my objection.

Sincerely yours,


Rufus Wallingford

RW:clr

copy: Ernie Botters
District Engineer
Devon Energy Corporation
20 North Broadway, #1500
Oklahoma City, OK 73102-8260

Gary Kump
Geologist
Devon Energy Corporation
20 North Broadway, #1500
Oklahoma City, OK 73102-8260

James Bruce, Attorney
P. O. Box 1056
Santa Fe, NM 87504

Governor Gary E. Johnson
Office of the Governor
State Capitol Building
Santa Fe, NM 87503

Bureau of Land Management
P. O. Box 1778
Carlsbad, NM 88221-1778

NEW MEXICO
OIL CONSERVATION DIVISION

Devon EXHIBIT 2
CASE NO. 12036

Martha W. West
39 Elkins Lake
Huntsville, TX 77340

Devon Energy Corporation Owner #39280

May 2, 1998

Oil Conservation Division
State of New Mexico
2040 South Pacheco Street
Santa Fe, NM 87505

Attention: Mike Stogner

Dear Mr. Stogner:

This letter is official notice to you of my objection to the location of the proposed well Turner B #115, with the proposed location of 1050' FNL and 25' FWL, Section 20, Township 17S, Range 31E, for which there is reportedly a permit issued by the BLM to Devon Energy Corporation, Oklahoma City, Oklahoma, operator.

It is my understanding from a certified letter (# Z-100-656-184) that I received from Devon Energy Corporation, dated April 22, 1998 (attached), that this is a non-standard location and approval is required for the drilling of this well from your agency before an allowable will be issued. The Devon Energy Corporation's letter was to serve the required notice to me, as one of the interest owners in the Turner A lease.

After several telephone calls to Devon Energy Corporation and the BLM, I determined it was necessary to register my objection to the location with the Oil Conservation Division of the State of New Mexico. My husband, E. O. West, Jr., is a retired Division Landman from The Superior Oil Company. He and our attorney advise me on these matters.

The reason for my objection is as follows.

The Devon Energy representatives we talked to, Ms. Karen Byers and Mr. Ken Gray, said that the location was chosen to "even things out" among all owners, as they had drilled several "A" wells near the "B" lease line. We believe it would drain the "A" lease under which I own an overriding royalty interest. Devon Energy apparently believes that since the BLM owns all royalty interests under both leases that the rights of the overriding royalty interest owners can be ignored in this operation. When we suggested that a unit be formed around the well so that all owners could participate, the idea was rejected by the Devon Energy representatives over the phone. We would not object if the well was moved 25' on the "A" Lease.

Again, I wish to go on record as expressing my non-approval of this location. Please advise me of the decision that is made regarding this location.

Sincerely Yours,

MARTHA W. WEST

Martha W. West

Attachments - Letter from Devon Energy Corporation and Attached Plat of Proposed Location

Cc: Devon Energy Corporation: (1) Karen Byers, Engineering Technician, (2) Ernie Bottross, District Engineer, (3) Gary Kump, Geologist, - 20 North Broadway, Suite 1500, Oklahoma City, OK 73102-8260

Attorney for Devon Energy Corporation: James Bruce, POB 1056, Santa Fe, NM 87504