

Telephone 405/235-3611 FAX 405/552-4550

April 22, 1998

New Mexico Energy, Mineral & Natural Resourses Dept. Oil Conservation Division Attention: Mike Stogner 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

CERTIFIED MAIL: Z 076 700 859

Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location at the following location:

WELL

LOCATION

Turner B #115

1050' FNL & 25' FWL, Sec. 20-17S-31E

Forms 3160 - 3 and C - 102 are attached for the well listed above.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to the governmental quarter - quarter section boundary. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The well will be drilled at the unorthodox location in order to prevent waste by developing an efficient production injection pattern within the Russell - Turner Waterflood Project, which was approved under Order R-3185 and to avoid an archaeological site. When fully developed this well will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

Since we are the operator of the offseting 40 acre tracts, no notice is necessary. Interest owners that have production in offsetting 40 acre tracts were notified by certified mail. Copies of this notification to each interest owner along with the certified mail number is attached. Copies of the return receipts will be forwarded to you when they are received.

Should you require any additional information regarding this unorthodox location, please notify me at 405-552-4527.

Sincerely,

Karen Byers

Engineering Technician

Enclosures

Form 3160-3 (December 1990)	UNITED DEPARTMENT C BUREAU OF LAI	STATES	NTERIO	SUBMIT II	Instructions on {	311 S.	1s Farm approve	ed. :	
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b. TYPE OF WELL:	GAS Other		Mars	MULTIPLE 158	1 JUL -9	AL O	A THE SAME		
2 NAME OF OPERA	TOR			1			OR LEASE MANE, W		
	DEVON ENERGY CORPO	RATION (Nev	rada)	BURT	- Att CF L	* t include	"B"#115	20057	
3. ADDRESS AND T	ELEPHONE NO. 20 N. BROADWAY, SUITI	E 1500, OKC, C)K 73102 (40	5) 552-4560 i	OSYIELL	OFFIC	30-01	5-302	
	LL (Report location clearly and in a	ccordance with a	ny State requiren	ients)*	10		BURG-JACKSO		
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	AND DIRECTION FROM MEASURET TOWN OF	POST OFFICE.	37 STA	TE.			WIT OR PARISE	13. STATE	
5 miles east & 1 mile	e north of Loco Hills, N.M.				7	EDDY		390	
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PROPERTY OR LEASE !		407.43			RECEIVED	1.6	40		
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17 1/2"	13 3/8" H-40	48.0#		40'			Commented to surf		
12 1/4"	8 5/8" J-55	24.0#		40017351	TNS	<u> </u>	125 sk P&L C + 2	00 sk Class 'C'	
7 7/8**	5 1/2" J-55	15.5#	•	4200'			550 sk PSL C + 4	25 ab Cl 8 w/10% 03	
the Grayburg-Ja wellbore will be p outlined in the fo Drilling Program Exhibits #1/1-A Exhibit #2 Exhibit #3/3-A Exhibit #4 Exhibit #5 Exhibit #6	= Blowout Prevention Equip = Location and Elevation Pla = Road Map and Topo Map = Wells Within 1 Mile Radiu = Production Facilities Plat = Rotary Rig Layout = Casing Design	cial quantitie Federal Regul Inents. Ment at	The undersiterms, conducted or thereof, as d Lease No. Legal Descriptions of the conducted or the conducted	gree Grayburgerams to adherent stitus, stipular concerning of the leased lescribed below C029395-A leption: Section sections	-Jackson is ere to onshor all applica- tions and perations land or por- ow: on 20-T17N- wide	deemed ore oil a ble APPR GENE SPEC	non-commerciand gas regula OVAL SUBJ RAL REQUI	cial, the tions are ECT TO REMENTS Ai ATIONS	
proposal is to drill or d any.	SCRIBE PROPOSED PROGRAM eepen directionally, give pertinent	iata on subsurfa	ce locations and	measured and	true vertical d	epths. G	pposed new produ	enter program, if	
(This space for Fede	ral or State office use)								
PERMIT MO				APPROVA	L DATE				
Application approval door	not warrant or certify that the applicant					uld entitle	the applicant to con	duct operations thereo	
CONDITIONS OF APP (OR)(APPROVED BY	G. SGD.) ARMANDO A. LOPEZ		Acrus	adm wik	IERALS	DA′	re <u>4-</u>	7-98	

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction

O. Box 1980 Hobbs, NM 88241-1980

Energy, Amerals, and Natural Resources Department

Revised 02-10-94

Submit to the Appropriate District Office State Lease - 4 copies Fee Lease - 3 copies

P. O. Drawer DD Artesia, NM 88211-0719 OIL CONSERVATION DIVISION P. O. Box 2088 DISTRICT III 1000 Rio Brazos Rd. Santa Fe, New Mexico 87504-2088 Aztec, NM 87410

AMENDED REPORT

TURNER B 1.15 OCRESS No. 1 Operator Name 6137 Devon Energy Corporation (Nevada) "SURFACE LOCATION Response to the part of	DISTRICT IV P. O. Box 2088 Santa Fe, NM 87507-2088 WEIL LOCATION AND ACREAGE DEDICATION PLAT												
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Telephone 405/235-3611

April 22, 1998

J. K. Wallingford Trust Rufus Wallingford & Martha West, Co-Trustees 757 N. Eldridge Houston, TX 77079

Certified Letter #: Z 100 656 181

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at (405) 552 - 4527.

Sincerely,

Karen Byers Karen Byers

Engineering Technician

enclosure



Telephone 405/235-3611

April 22, 1998

Rufus Wallingford Browning Ferris Industries, Inc. 757 N. Eldridge at Memorial Dr. Houston, TX 77079

Certified Letter #: Z 100 656 182

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers

Engineering Technician

Karen Byers

enclosure

CC



Telephone 405/235-3611

April 22, 1998

Sabine Royalty Trust NationsBank of Texas, N.A., Escrow Agent P. O. Box 840738 Dallas, TX 75284-0738

Certified Letter #: Z 100 656 183

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers Karen Byers

Engineering Technician

enclosure

CC



Telephone 405/235-3611 FAX 405/552-4550

April 22, 1998

Martha A.West 39 Elkins Lake Huntsville, TX 77340

Certified Letter #: Z 100 656 184

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers

Karen Byers

Engineering Technician

enclosure

cc



Telephone 405/235-3611

April 22, 1998

Marshall & Winston, Inc. P. O. Box 50880 Midland, TX 79710-0880

Certified Letter #: Z 100 656 185

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers

Engineering Technician

enclosure

CC



Telephone 405/235-3611

April 22, 1998

Braille Institute of America Inc., Acct 63100 C/O Trust Oil & Gas NationsBank of Texas, N. A. P. O. Box 840738 Dallas, TX 75284-0738

Certified Letter #: Z 100 656 186

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers

Engineering Technician

enclosure

CC-



Telephone 405/235-3611 FAX 405/552-4550

April 22, 1998

Ward Investments, Ltd. Co. 101 South Fourth Street Artesia, NM 88210

Certified Letter #: Z 100 656 187

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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Sincerely,

Karen Byers

Engineering Technician

enclosure

CC



Telephone 405/235-3611

April 22, 1998

Selma Andrews Perpetual Charitable Trust #5188-02 C/O NationsBank of Texas, NA, TTEE P. O. Box 840738 Dallas, TX 75284-0738

Certified Letter #: Z 100 656 188

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at (405) 552 - 4527.

Sincerely,

Karen Byers

Engineering Technician

Karen Byers

enclosure



Telephone 405/235-3611 FAX 405/552-4550

April 22, 1998

Selma Andrews Trust #5188-01 F/B/O Peggy Barrett C/O NationsBank of TX, NA, TTEE P. O. Box 840738 Dallas, TX 75284-0738

Certified Letter #: Z 100 656 189

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at (405) 552 - 4527.

Sincerely,

Karen Byers

Engineering Technician

enclosure

cc



Telephone 405/235-3611

April 22, 1998

Mesa Oil Company 5205 N. O'Connor Blvd., Suite 1400 Irving, TX 75039

Certified Letter #: Z 100 656 190

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at (405) 552 - 4527.

Sincerely,

Karen Byers

Engineering Technician

enclosure

CC