

DATE IN 11-28-12	SUSPENSE N/A	ENGINEER DK	LOGGED IN 11-28	TYPE NSL	APP NO. PDK31233363989
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ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



Devon
Cotton Draw U #16941

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

6520

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication
☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ BOR ☐ PPR

- [D] Other: Specify _____

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☒ Does Not Apply

- [A] ☐ Working, Royalty or Overriding Royalty Interest Owners
 [B] ☐ Offset Operators, Leaseholders or Surface Owner
 [C] ☐ Application is One Which Requires Published Legal Notice
 [D] ☐ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
 [E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,
 [F] ☐ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Samuel Walker
 Print or Type Name

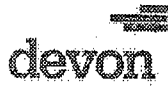
Samuel Walker
 Signature

Landman
 Title

11/27/12
 Date

Samuel.Walker@dmn.com
 e-mail Address

RECEIVED OGD
 2012 NOV 28 A 9:59



devon

Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, Oklahoma 73102-8260
Fax: 405-234-2634

FAX

To: *David Brooks*

From: Samuel Walker
405-228-4342

Fax: *505-476-3462*

Date: *11/28/12*

Phone:

Pages: *11* (including cover page)

Re: *Cotton Draw Unit 159H*

CC:

☐ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

• Comments:



Samuel Walker
Landman

Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, Oklahoma 73102-8280
Office: (405) 228-4342
Fax: (405) 234-2634

November 27, 2012

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505
Attn: David Brooks

Re: Cotton Draw Unit #159H
Section 13-T25S-R31E
Eddy County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. ("Devon"), as Operator, has drilled the referenced horizontal Lower Brushy Canyon Delaware well to a total vertical depth of approximately 8,275' with a total measured depth of approximately 12,765'. As reflected on the attached C-102, the well has been permitted at a surface location of 330' FSL and 660' FWL with a permitted bottom hole location of 200' FWL and 660' FWL of Section 13, Township 25 South, Range 31 East. With the leasehold being the same on the affected leasehold location, it was the intent of Devon to drill the well in such a way as to maximize production in the lateral.

In accordance with Division rules, Devon respectfully requests that the Commission administratively approve this application for an unorthodox location with respect to that portion of the horizontal wellbore as described above in accordance with Division Rule 104(F) (3). This unorthodox location affects the leasehold interest owned by Devon Energy Production Company, L.P. and XTO Energy, Inc. ("XTO"), as partners.

Attached for your review you will find a land plat reflecting Devon and XTO as the affected parties, a structure map on top of the Bone Spring formation, a State of New Mexico form C-102, and an Actual Well Profile Report prepared by Baker Hughes.

Feel free to contact the undersigned at (405) 228-4342 if there are any concerns or questions regarding this application.

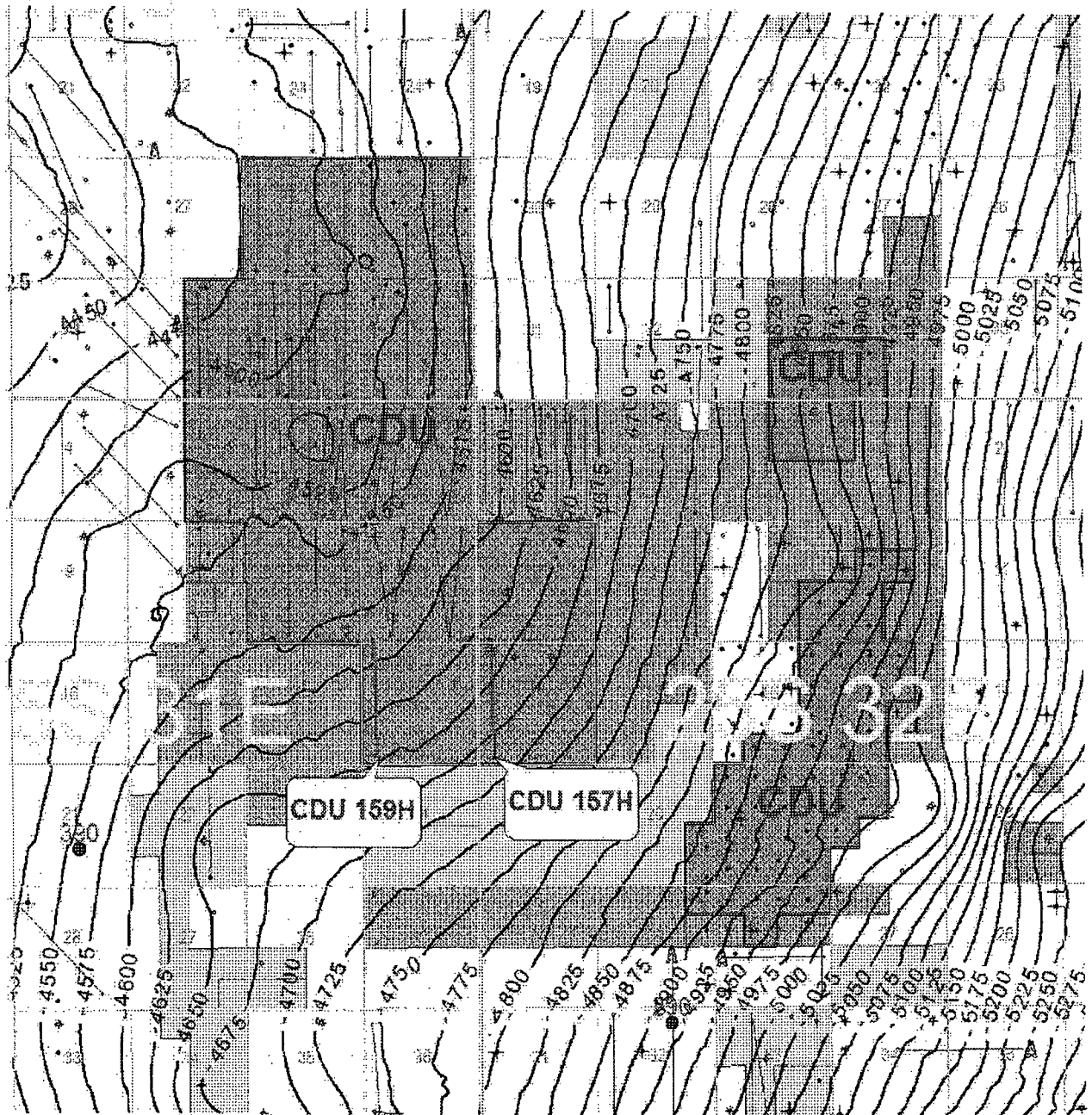
Yours very truly,

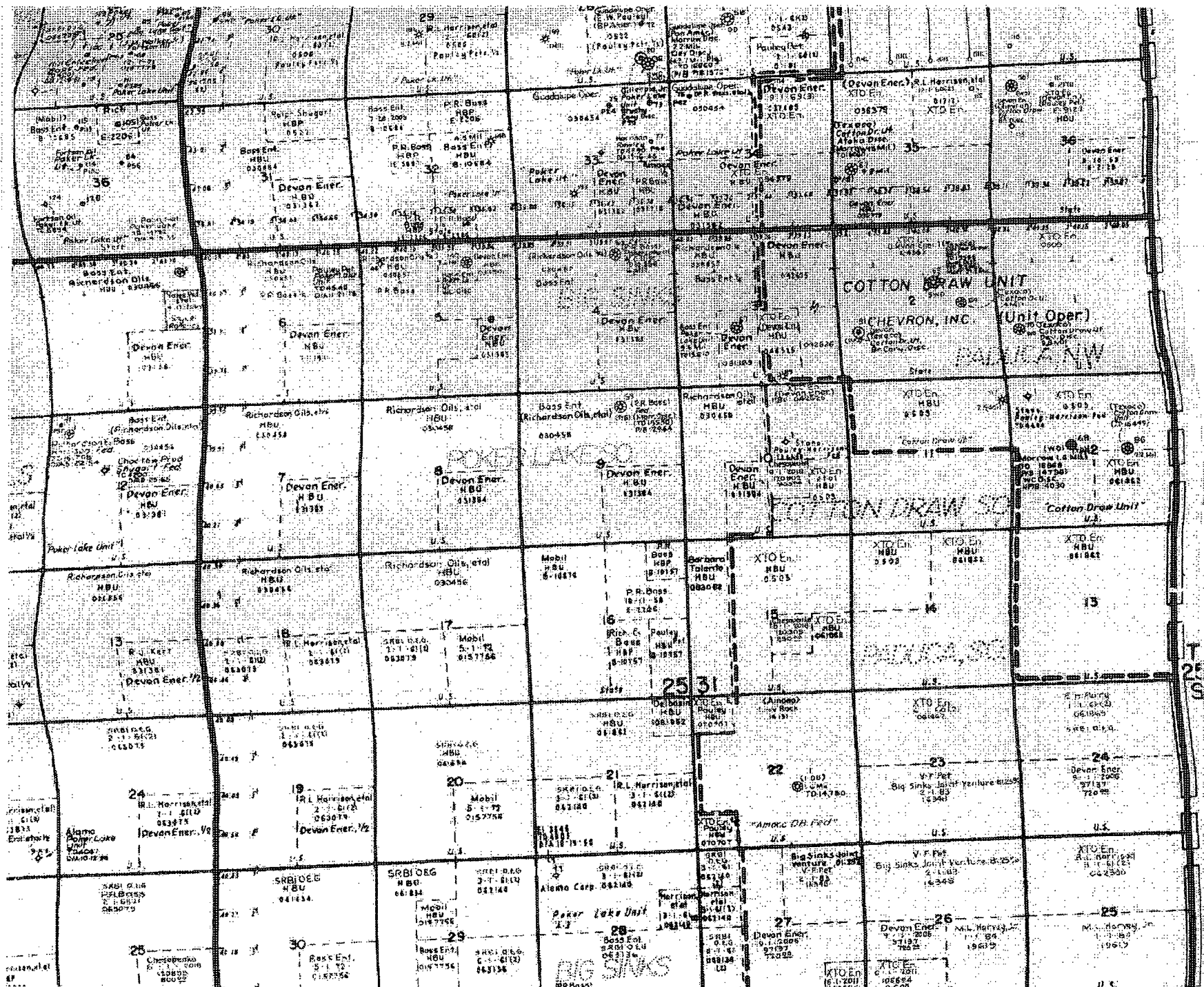
DEVON ENERGY PRODUCTION COMPANY, L.P.

A handwritten signature in black ink, appearing to read "Samuel Walker", written over a horizontal line.

Samuel Walker
Landman

SW Cotton Draw Unit #159H
Enclosure





District I

1625 N. French Dr., Hobbs, NM 88240

District II

1301 W. Grand Avenue, Artesia, NM 88210

District III

1000 Rio Brazos Rd., Aztec, NM 87413

District IV

1230 S. St. Francis Dr., Santa Fe, NM 87505

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 October 15, 2009

Submit one copy to appropriate

District Office

☐ AMENDED REPORT**WELL LOCATION AND ACREAGE DEDICATION PLAT**

API Number 30-029-40385		Pool Code	Pool Name Paduca/Delaware
Property Code	Property Name COTTON DRAW UNIT		Well Number 159 H
DGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.		Elevation 3363.9

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	13	25 S	31 E		330	SOUTH	660	WEST	EDDY

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
D	13	25 S	31 E		200	NORTH	660	WEST	EDDY

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
160			

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.

	BOTTOM OF HOLE LAT. = 32.137033°N (NAD83) LONG. = 103.737951°W NMSP EAST (FT) N = 414255.42 E = 727604.60	NE CORNER SEC. 13 LAT. = 32.137601°N (NAD83) LONG. = 103.723018°W NMSP EAST (FT) N = 414267.37 E = 730257.46	11 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 tract 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 mineral or working interest, or to a subsurface pooling agreement or a compulsory pooling order heretofore agreed by the division. Date: 2/2/12 Signature: _____ Printed Name: Judy A. Barnett, Regulatory Specialist
	SW CORNER SEC. 13 LAT. = 32.123105°N (NAD83) LONG. = 103.740141°W NMSP EAST (FT) N = 408963.40 E = 724955.05	COTTON DRAW UNIT #159 ELEV. = 3363.9 LAT. = 32.124010°N (NAD83) LONG. = 103.738007°W NMSP EAST (FT) N = 408974.77 E = 727624.52	

PP: 330 FSL & 660 FWL



Weatherford

Devon Energy
CDU #159H
Eddy County, New Mexico

Section 1

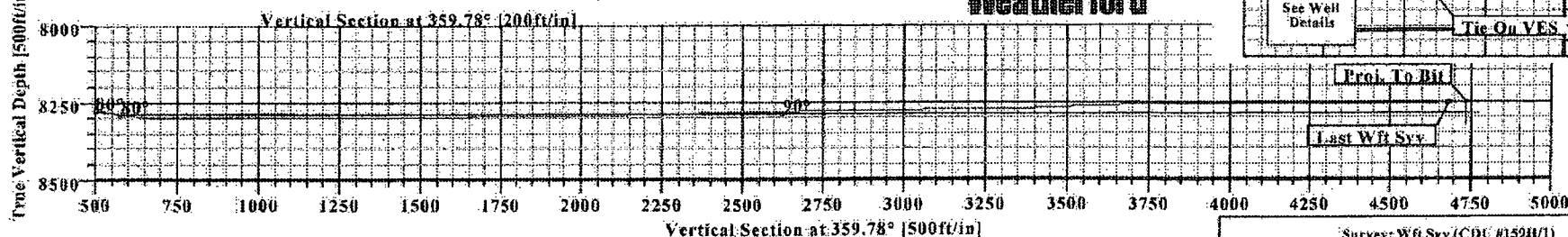
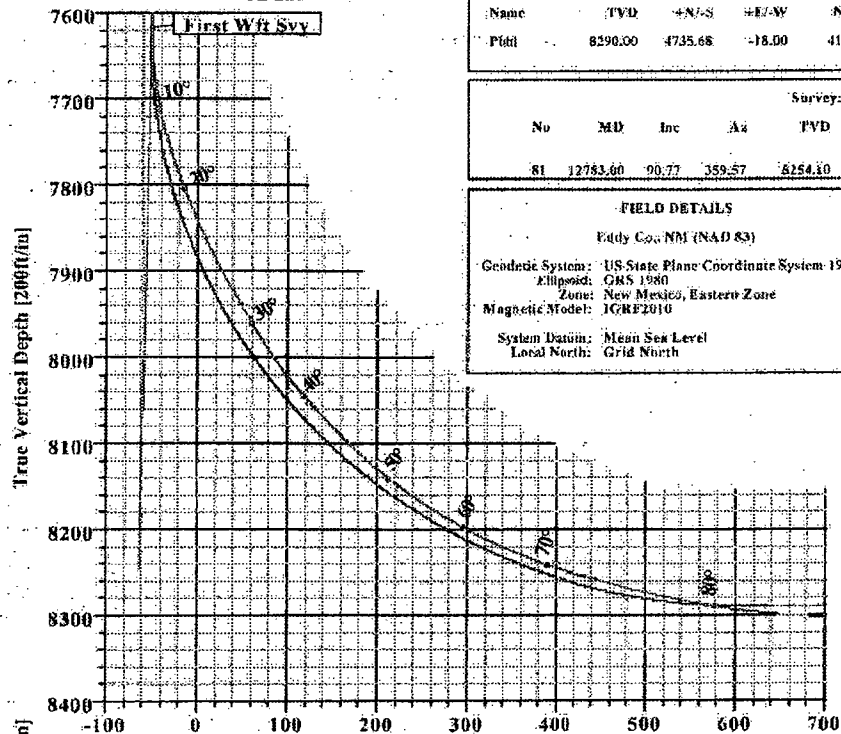
Weatherford (Wft) Final Definitive

Plot & Survey

devon

Cotton Draw Unit #159H
Eddy Co., New Mexico

KB ELEV: 3390
GL ELEV: 3364



SECTION DETAILS

Sec	MD	Inc	Azi	TVD	+N/-S	+E/-W	DLeg	TFace	VSec	Target
1	7600.00	0.99	178.02	7596.05	-50.28	155.51	0.00	0.00	-50.68	
2	7639.00	1.00	174.19	7635.05	-50.96	153.56	-0.17	278.46	-51.55	
3	7650.00	2.00	157.92	7646.05	-50.86	155.56	27.27	-177.51	-51.46	
4	7655.00	2.00	157.92	7651.04	-50.69	155.55	0.00	0.00	-51.28	
5	8671.85	90.00	157.92	8290.00	610.53	131.58	8.65	0.00	610.02	
6	12799.71	90.00	157.92	8290.00	4735.68	-18.00	0.00	0.00	4735.71	Ptbl

WELL DETAILS

Name	+N/-S	+E/-W	Northing	Easting	Latitude	Longitude	Slot
CDU #159H	0.00	0.00	499360.00	725634.11	32°07'26.428N	103°44'16.843W	N/A

TARGET DETAILS

Name	TVD	+N/-S	+E/-W	Northing	Easting	Latitude	Longitude	Shape
Ptbl	8290.00	4735.68	-18.00	414095.68	725616.11	32°08'13.292N	103°44'16.748W	Point

Survey: Wft Svy (CDU #159H/1)

No	MD	Inc	Azi	TVD	+N/-S	+E/-W	DLeg	TFace	VSec
81	12783.60	90.77	159.57	8254.10	4734.74	20.76	0.00	180.00	4734.63

FIELD DETAILS

Eddy Co. NM (NAD 83)

Geodetic System: US State Plane Coordinate System 1983

Ellipsoid: GRS 1980

Zone: New Mexico, Eastern Zone

Magnetic Model: IGRF2010

System Datum: Mean Sea Level

Local North: Grid North

SITE DETAILS

Cotton Draw Unit #159H

Site Centre Northing: 499360.00

Easting: 725634.11

Ground Level: 3364.00

Positional Uncertainty: 0.00

Convergence: 0.32



Azimuths to Grid North

True North: -0.32°

Magnetic North: 7.18°

Magnetic Field

Strength: 48434e1

Dip Angle: 60.03°

Model: IGRF2010

Total Correction to Grid North: 7.50°

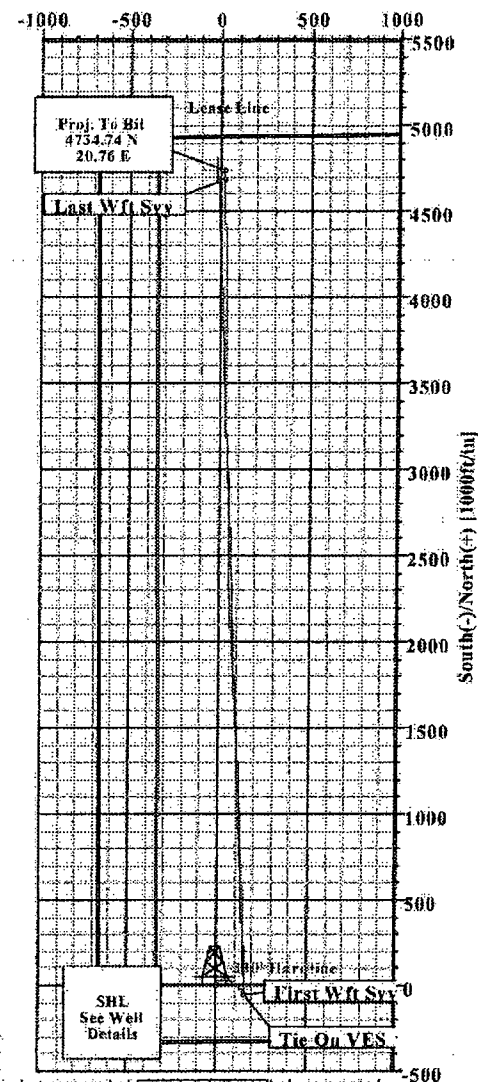
Model: IGRF2010

LEGEND

- CDU #159H, 1, Gyro
- CDU #159H, 1, Plan #3
- Wft Svy

Weatherford

West(-)/East(+) [1000ft/in]



Survey: Wft Svy (CDU #159H/1)

Created By: Russell W. Joyner

Date: 10/11/2012

devon

Weatherford

WFT Survey Report X & Y's



Weatherford

Company: Devon Energy	Date: 10/11/2012	Time: 09:21:34	Page: 1
Field: Eddy Co., NM (NAD-83)	Co-ordinate(N/E) Reference:	Well: CDU #159H, Gnd North	
Site: Cotton Draw Unit #159H	Vertical (TVD) Reference:	SITE 3390.0	
Well: CDU #159H	Section (VS) Reference:	Well (0.00N,0.00E,359.78Azi)	
Wellpath: 1	Survey Calculation Method:	Minimum Curvature	Db: Sybase

Survey: Wft Svy	Start Date: 10/5/2012
Company: Weatherford	Engineer: Russell W. Joyner
Tool: MWD/MWD - Standard	Tied-to: User Defined

Field: Eddy Co., NM (NAD-83)

Map System: US State Plane Coordinate System 1983
 Geo Datum: GRS 1980
 Sys Datum: Mean Sea Level

Map Zone: New Mexico, Eastern Zone
 Coordinate System: Well Centre
 Geomagnetic Model: IGRF2010

Site: Cotton Draw Unit #159H

Site Position:	Northings:	409360.00 ft	Latitude:	32 7 26.428 N
From: Map	Easting:	725634.11 ft	Longitude:	103 44 16.843 W
Position Uncertainty:	0.00 ft		North Reference:	Grid
Ground Level:	3364.00 ft		Grid Convergence:	0.32 deg

Well: CDU #159H

Slot Name:

Well Position:	+N/-S	0.00 ft	Northings:	409360.00 ft	Latitude:	32 7 26.428 N
	+E/-W	0.00 ft	Easting:	725634.11 ft	Longitude:	103 44 16.843 W
Position Uncertainty:	0.00 ft					

Wellpath: 1

Current Datum:	SITE	Height	3390.00 ft	Drilled From:	Surface
Magnetic Data:	9/29/2012			Tie-on Depth:	0.00 ft
Field Strength:	48434 uT			Above System Datum:	Mean Sea Level
Vertical Section:	Depth From (TVD)	+N/-S		Declination:	7.50 deg
	ft	ft		Mag Dip Angle:	60.03 deg
	0.00	0.00		+E/-W	Direction
				ft	deg
				0.00	359.78

Survey

MD ft	Incl deg	Azim deg	TVD ft	N/S ft	E/W ft	DLS deg/100ft	VS ft	MapN ft	MapE ft	Comment
7800.00	0.99	178.02	7596.05	-50.28	155.51	0.00	-50.88	409309.72	725789.62	Tie On VES
7620.00	0.81	5.69	7616.05	-50.31	155.53	8.97	-50.91	409309.69	725788.64	First Wft Svy
7670.00	5.29	2.11	7665.97	-47.66	155.65	8.97	-48.25	409312.34	725789.76	
7702.00	9.58	0.97	7697.69	-43.52	155.75	13.41	-44.12	409316.48	725789.88	
7733.00	13.50	359.93	7728.06	-37.32	155.79	12.66	-37.92	409322.68	725789.90	
7764.00	16.61	358.53	7757.99	-29.27	155.67	10.10	-29.87	409330.73	725789.78	
7796.00	18.71	356.94	7788.48	-19.57	155.28	6.73	-20.17	409340.43	725789.39	
7827.00	21.24	357.14	7817.62	-9.00	154.73	8.16	-9.59	409351.00	725788.84	
7858.00	23.52	0.04	7846.28	2.80	154.46	8.17	2.21	409362.80	725788.57	
7890.00	25.11	1.07	7875.44	15.97	154.59	5.14	15.38	409375.97	725788.70	
7921.00	27.33	1.36	7903.25	29.67	154.88	7.17	29.07	409389.67	725788.99	
7952.00	28.81	1.98	7930.60	44.25	155.31	4.87	43.65	409404.25	725789.42	
7983.00	29.85	2.05	7957.63	59.42	155.84	3.36	58.82	409419.42	725789.95	
8015.00	32.04	1.64	7985.07	75.87	156.37	6.88	75.27	409435.87	725790.48	
8046.00	34.96	0.74	8010.92	92.97	156.72	9.55	92.37	409452.97	725790.83	
8077.00	39.08	0.11	8035.67	111.63	156.86	13.35	111.03	409471.63	725790.96	
8108.00	41.36	359.11	8059.33	131.65	156.71	7.64	131.05	409491.65	725790.82	
8140.00	42.95	358.59	8083.06	153.12	156.28	5.09	162.52	409513.12	725790.39	
8171.00	45.80	357.55	8105.21	174.78	155.55	9.49	174.19	409534.78	725789.66	
8202.00	47.70	356.14	8126.45	197.33	154.30	6.97	196.73	409557.33	725788.41	
8233.00	50.96	354.45	8146.65	220.75	152.36	11.30	220.17	409580.75	725786.47	
8265.00	54.96	354.95	8165.93	246.18	150.01	12.56	245.81	409606.18	725784.12	
8296.00	57.66	356.07	8183.12	271.89	147.99	9.21	271.32	409631.89	725782.10	
8327.00	60.11	358.68	8199.14	298.40	146.78	10.70	297.84	409658.40	725780.89	



Weatherford

WFT Survey Report X & Y's



Weatherford

Company: Devon Energy Field: Eddy Co., NM (NAD 83) Site: Cotton Draw Unit #159H Well: CDU #159H Wellpath: 1	Date: 10/11/2012 Co-ordinate(NE) Reference: Vertical (TVD) Reference: Section (VS) Reference: Survey Calculation Method:	Time: 09:21:34 Well: CDU #159H, Grid North SITE: 3390.0 Well: (0.00N,0.00E 359.78Azi) Minimum Curvature	Page: 2 Db: Sybase
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Survey

MD ft	Incl deg	Azim deg	TVD ft	N/S ft	E/W ft	DLS deg/100ft	VS ft	MapN ft	MapE ft	Comment
8358.00	63.99	0.63	8213.67	325.78	146.83	13.69	325.21	409685.78	725780.74	
8389.00	66.69	0.39	8226.60	353.95	146.88	8.74	353.38	409713.95	725780.99	
8421.00	69.33	359.27	8238.58	383.62	146.79	8.87	383.05	409743.62	725780.90	
8443.00	71.35	358.31	8245.98	404.33	146.35	10.06	403.76	409764.33	725780.46	
8475.00	74.07	358.31	8255.49	434.87	145.45	8.50	434.30	409794.87	725779.56	
8506.00	74.44	358.51	8263.91	464.69	144.62	1.35	464.13	409824.69	725778.73	
8537.00	75.88	358.44	8271.85	494.65	143.82	4.65	494.09	409854.65	725777.93	
8569.00	77.53	358.01	8279.20	525.77	142.86	5.32	525.22	409885.77	725776.97	
8600.00	78.66	357.89	8285.60	556.08	141.77	3.66	555.54	409916.08	725775.88	
8631.00	80.59	357.15	8291.18	586.55	140.45	6.65	586.00	409946.55	725774.56	
8662.00	82.64	357.07	8295.70	617.18	138.90	6.62	616.64	409977.18	725773.01	
8693.00	85.24	357.36	8298.97	647.96	137.41	8.44	647.43	410007.96	725771.52	
8724.00	87.62	357.61	8300.90	678.87	136.05	7.72	678.34	410038.87	725770.16	
8756.00	89.79	356.97	8301.83	710.83	134.54	7.07	710.30	410070.83	725768.85	
8849.00	90.07	356.34	8301.74	803.67	129.11	0.74	803.16	410163.67	725763.22	
8943.00	90.00	357.54	8301.68	897.53	124.09	1.28	897.05	410257.53	725758.20	
9036.00	91.33	357.90	8300.60	990.45	120.39	1.48	989.98	410350.45	725754.50	
9130.00	90.70	357.92	8298.94	1084.37	116.97	0.67	1083.91	410444.37	725751.08	
9224.00	89.93	358.32	8298.42	1178.32	113.88	0.92	1177.87	410538.32	725747.99	
9318.00	90.63	357.63	8297.96	1272.26	110.56	1.05	1271.82	410632.28	725744.67	
9412.00	89.58	357.52	8297.79	1366.17	106.58	1.12	1365.75	410726.17	725740.69	
9505.00	90.07	356.74	8298.08	1459.05	101.93	0.99	1458.65	410819.05	725736.04	
9600.00	89.51	356.57	8298.42	1553.89	96.38	0.62	1553.51	410913.89	725730.49	
9693.00	91.96	356.96	8297.23	1646.73	91.14	2.67	1646.36	411006.73	725725.25	
9787.00	91.40	357.10	8294.47	1740.56	86.27	0.61	1740.22	411100.56	725720.38	
9881.00	90.91	356.99	8292.58	1834.42	81.42	0.53	1834.09	411194.42	725715.53	
9975.00	89.72	357.10	8292.06	1928.29	76.58	1.27	1927.98	411288.29	725710.69	
10069.00	90.00	356.28	8292.29	2022.13	71.15	0.92	2021.84	411382.13	725705.26	
10162.00	90.42	356.89	8291.95	2114.96	65.61	0.80	2114.70	411474.96	725699.72	
10256.00	91.47	357.32	8290.40	2208.83	60.86	1.21	2208.58	411568.83	725694.97	
10350.00	91.75	357.92	8287.76	2302.71	56.96	0.70	2302.47	411662.71	725691.07	
10443.00	90.00	358.61	8286.34	2395.65	54.15	2.02	2395.43	411755.65	725688.26	
10537.00	90.00	359.75	8286.34	2489.64	52.80	1.21	2489.42	411849.64	725686.91	
10631.00	92.31	359.54	8284.45	2583.61	52.22	2.47	2583.39	411943.61	725686.33	
10725.00	91.54	359.28	8281.29	2677.56	51.25	0.86	2677.34	412037.56	725685.36	
10818.00	89.18	358.57	8280.72	2770.53	49.51	2.67	2770.32	412130.53	725683.62	
10912.00	90.28	358.36	8281.18	2864.49	46.99	1.21	2864.29	412224.49	725681.10	
11006.00	92.38	358.43	8279.00	2958.43	44.36	2.24	2958.23	412318.43	725678.47	
11099.00	91.05	358.21	8276.21	3051.34	41.63	1.45	3051.16	412411.34	725675.74	
11193.00	91.47	358.37	8274.15	3145.28	38.83	0.48	3145.10	412505.28	725672.94	
11287.00	90.63	358.09	8272.43	3239.22	35.92	0.94	3239.05	412599.22	725670.03	
11381.00	89.86	357.84	8272.02	3333.15	32.59	0.86	3333.01	412693.15	725666.70	
11475.00	92.87	359.49	8269.78	3427.09	30.40	3.65	3426.95	412787.09	725664.51	
11570.00	92.31	359.76	8265.49	3521.99	29.78	0.65	3521.85	412881.99	725663.89	
11664.00	91.96	0.12	8261.99	3615.92	29.68	0.53	3615.78	412975.92	725663.79	
11759.00	91.40	359.85	8259.20	3710.88	29.65	0.65	3710.74	413070.88	725663.76	
11853.00	89.86	359.69	8258.17	3804.87	29.28	1.65	3804.73	413164.87	725663.39	
11948.00	90.07	0.13	8258.23	3899.87	29.13	0.51	3899.73	413259.87	725663.24	
12043.00	89.65	0.44	8258.46	3994.87	29.60	0.55	3994.73	413354.87	725663.71	
12138.00	89.58	359.87	8259.10	4089.87	29.86	0.60	4089.72	413449.87	725663.97	
12233.00	89.65	359.99	8259.74	4184.87	29.74	0.15	4184.72	413544.87	725663.85	
12327.00	90.63	359.23	8259.51	4278.86	29.10	1.32	4278.72	413638.86	725663.21	



Weatherford

WFT Survey Report X & Y's


Weatherford

Company: Devon Energy	Date: 10/11/2012	Time: 09:21:34	Page: 3
Field: Eddy Co. NM (NAD 83)	Co-ordinate(NF) Reference: Well: CDU #159H, Grid North		
Site: Cotton Draw Unit #159H	Vertical (TVD) Reference: SITE 3390.0		
Well: CDU #159H	Section (VS) Reference: Well (0.00N,0.00E,359.78Azi)		
Wellpath: 1	Survey Calculation Method: Minimum Curvature	Db: Sybase	

Survey

MD ft	Incl deg	Azmi deg	TVD ft	N/S ft	E/W ft	DLS deg/100ft	VS ft	MapN ft	MapE ft	Comment
12421.00	90.84	358.73	8258.30	4372.84	27.43	0.58	4372.70	413732.84	725661.54	
12516.00	90.77	358.60	8258.97	4467.80	25.21	0.16	4467.67	413827.80	725659.32	
12610.00	90.42	358.77	8255.99	4561.77	23.06	0.41	4561.65	413921.77	725657.17	
12704.00	90.63	359.25	8255.13	4655.75	21.43	0.56	4655.64	414015.75	725655.54	
12731.00	90.77	359.57	8254.80	4682.75	21.15	1.29	4682.64	414042.75	725655.26	Last Wft Svy
12783.00	90.77	359.57	8254.10	4734.74	20.76	0.00	4734.63	414094.74	725654.87	Proj. To Bit

Annotation

MD ft	TVD ft	
7600.00	7596.05	Tie On VES
7620.00	7618.05	First Wft Svy
12731.00	8254.80	Last Wft Svy
12783.00	8254.10	Proj. To Bit

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Thursday, November 29, 2012 5:14 PM
To: 'samuel.walker@devon.com'
Subject: Cotton Draw Unit ## 157H and 159H

Dear Mr. Walker

On each of these applications you state that the spacing unit toward which the unorthodox portion of the proposed wellbore will encroach is owned by Devon and XTO as partners. No certificate of notice to XTO is provided.

Is XTO also an owner of the proposed wells, and, if so, is their percentage in the proposed wells the same as in the units encroached upon? If the answer to both those questions is "yes," then notice is not necessary. Otherwise, it is.

Please advise.

Sincerely

David K. Brooks

Brooks, David K., EMNRD

From: Walker, Samuel <Samuel.Walker@devon.com>
Sent: Monday, December 03, 2012 8:57 AM
To: Brooks, David K., EMNRD
Subject: RE: Cotton Draw Unit ## 157H and 159H

Mr. Brooks,

I am sorry about the confusion. The answer to both of those questions is yes. Thank you for your help. If you need anything else from me, please do not hesitate to ask.

Regards,

Samuel Walker
Landman - Midcontinent

Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, OK 73102-5010
405 228 4342 Office
405 234 2634 Fax

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Monday, December 03, 2012 9:43 AM
To: Walker, Samuel
Subject: FW: Cotton Draw Unit ## 157H and 159H

From: Brooks, David K., EMNRD
Sent: Thursday, November 29, 2012 5:14 PM
To: 'samuel.walker@devon.com'
Subject: Cotton Draw Unit ## 157H and 159H

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Please advise.

Sincerely

David K. Brooks
