

DATE IN 12. Feb. 07	SUSPENSE	ENGINEER O. Brooks	LOGGED IN 14. Feb. 07	TYPE NSL	APP NO. CLP0704534875
---------------------	----------	--------------------	-----------------------	----------	-----------------------

ABOVE THIS LINE FOR DIVISION USE ONLY

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



Devon
 NE Blanches U# 240
 5585

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

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 EOR 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.

Print or Type Name	Signature	Title	Date
e-mail Address			



Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260
Janet Wooldridge, CPL
Senior Landman
405-552-4626
405-552-7843 (Fax)
jan.wooldridge@dvn.com

February 9, 2007

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Attention: Engineering

Re: Request for Administrative Exception to
Unorthodox Location
Northeast Blanco Unit No. 240
Section 18-T31N-R6W
San Juan County, New Mexico

2007 FEB 12 PM 10 03

Gentlemen:

In accordance with my telephone conversation Thursday afternoon, February 8, 2007, with Mr. Charlie Perrin of your Aztec, New Mexico office, I am enclosing for your attention and ruling a Request for Administrative Exception to Unorthodox Location for the Northeast Blanco Unit No. 240.

This request was originally directed to Mr. Perrin in the Aztec office November 28, 2006. Due to a miscommunication, Devon did not also forward this request to the Santa Fe office.

Along with the original request are the certified receipts signifying notice was given to the working interest owners along with an Affidavit stating that two of the working interest owners, BN Non-Coal, LLC and B&N Company were not given notice because Devon Energy Production Company, LP operates on their behalf and manages their interest.

If you have any questions, please contact me at 405-552-4626. Questions regarding operations should be directed to our Senior Operations Engineering Advisor, Mr. Jeff Williford at 405-228-7700. Mr. Williford's E-Mail address is jeff.williford@dvn.com. My E-Mail address is listed above on the letterhead.

Sincerely,

Janet Wooldridge, CPL
Senior Petroleum Landman

cc: Charlie Perrin, NMOCD, Aztec, NM

District I
 PO Box 1980, Hobbs NM 88241-1980
 District II
 PO Drawer KK, Artesia, NM 87211-0719
 District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV
 PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
 Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
 PO Box 2088
 Santa Fe, NM 87504-2088

Form C-102
 Revised February 21, 1994
 Instructions on back
 Submit to Appropriate District Office
 State Lease - 4 Copies
 Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-045-33495		Pool Code 96175	Pool Name Rosa Pictured Cl. Aps	Well Number 96175
Property Code 19641	Property Name NEBU			Well Number # 240
OGRID No. 6137	Operator Name Devon Energy Production Company, L.P.			Elevation 6573

Surface Location

UL or Lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	18	31 N	6 W		1160	NORTH	1315	WEST	SAN JUAN

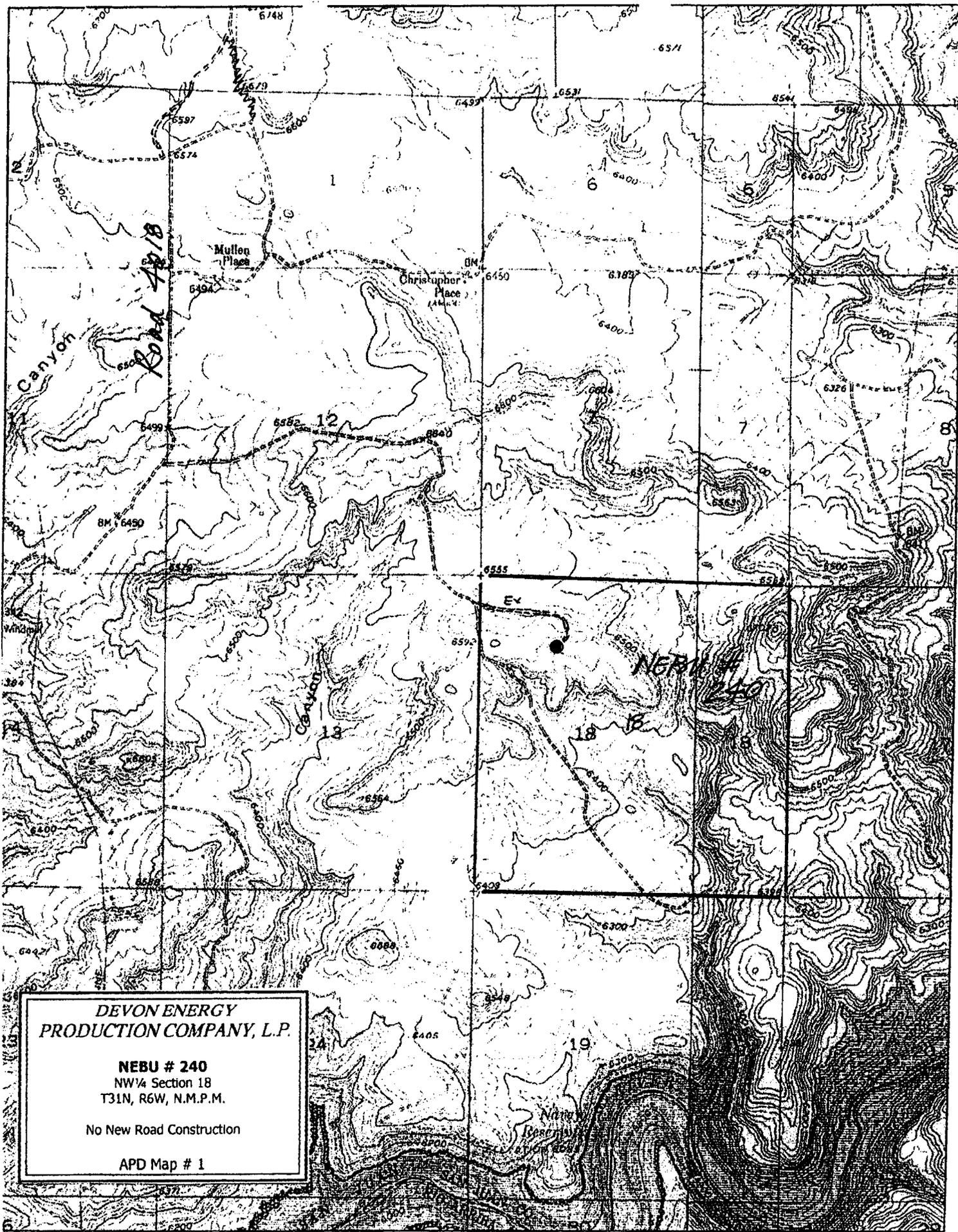
Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

Dedicated Acres 160	Joint or Infill	Consolidation Code	Order No.
-------------------------------	-----------------	--------------------	-----------

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

	<p>17 OPERATOR CERTIFICATION <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</i></p> <p>Signature: <i>M.S. Zimmerman</i> Printed Name: Melisa Zimmerman Title: Sr. Operations Tech Date: December 22, 2005</p>
	<p>18 SURVEYOR CERTIFICATION <i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i></p> <p>Date of Survey: September 26, 2005 Signature and Seal of Professional Surveyor: <i>GARY D. VANN</i></p> <p></p> <p>Certificate Number: 7016</p>



Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Wednesday, February 14, 2007 2:51 PM
To: 'jan.wooldridge@dvn.com'
Subject: Northeast Blanco Unit #240 - NSL Application

Ms. Wooldridge:

I have before me the referenced application.

Please furnish a copy of the location plat (federal equivalent to NMOCD form C-102) depicting the location of this well.

Also, where is the bottom-hole location of this well in the Pictured Cliffs? Will that be same as the surface location? or different?

Thanks

David K. Brooks
Assistant General Counsel
505-476-3450

2/16/2007

Brooks, David K., EMNRD

From: Wooldridge, Jan [Jan.Wooldridge@dvn.com]
Sent: Friday, February 16, 2007 8:02 AM
To: Brooks, David K., EMNRD
Subject: NEBU #240 PC NSL Application

Attachments: Wooldridge, Jan (wooldj) - 02-16-07 - K55Q8VX.pdf



Wooldridge, Jan
(wooldj) - 02-...

Mr. Brooks:

Attached is a copy of the well location and acreage dedication plat used for both the federal and state APD's. My apologies that this was not attached to the original application.

Also, in answer to your E-Mail of Wednesday, the bottom hole location for this well is the same as the surface location. (1160' FNL and 1315' FWL of Section 18-31N-6W, San Juan County).

Please advise if you need additional information.

Thank you,

Janet Wooldridge, CPL
Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102
405-552-4626
Jan.wooldridge@dvn.com

-----Original Message-----

From: Wooldridge, Jan [mailto:Jan.Wooldridge@dvn.com]
Sent: Friday, February 16, 2007 8:52 AM
To: Wooldridge, Jan
Subject: IKON DocSend files for you

This document was generated by IKON DocSend on the device #C00010112.

To learn how a digital workflow can help your business reduce expenses, improve productivity and streamline communications, call 888-ASK IKON or visit www.ikon.com.

Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged.

If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

devon

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260
Janet Wooldridge, CPL
Senior Landman
405-552-4626
405-552-7843 (Fax)
jan.wooldridge@dvn.com

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

January 4, 2007

State of New Mexico
Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410
Attention: Mr. Charlie Perrin

Re: Request for Administrative Exception to
Unorthodox Location
Northeast Blanco Unit No. 240
Section 18-T31N-R6W
San Juan County, New Mexico

Gentlemen:

On November 28, 2007 I transmitted to you a request for administrative exception for the NEBU Well No. 240 non-standard spacing. Attached are the required certified receipts from the working interest owners along with an Affidavit stating that two of the working interest owners, BN Non-Coal, LLC and B&N Company were not given notice because Devon Energy Production Company, LP operates on their behalf and manages their interest.

Your consideration in this review is certainly appreciated.

Sincerely,

Janet Wooldridge
Janet Wooldridge, CPL

enc.

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none">Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.Print your name and address on the reverse so that we can return the card to you.Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature <i>x Shelle B Bernally</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to: <i>St. of New Mexico Oil Conservation Division 1000 Rio Brazos Road Aztec, New Mexico 87410 Attn: Charlie Perrin</i>		B. Received by (Printed Name) <i>Shelle B Bernally</i> C. Date of Delivery <i>1.8.2007</i>	
2. Article Number (Transfer from se. <i>7003 0680 0002 1818 0245</i>)		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
		4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

Unorthodox Well Surface Location

B & N Co., L.P.
c/o Devon Energy Production Company
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

BN Non-Coal LLC
c/o Devon Energy Production Company
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

BP America Production Company
Attn: Michael Beirne
501 Westlake Park Blvd.
Houston, Texas 77079

ConocoPhillips Company
Burlington Resources Oil & Gas Co.
Attn: Linda Dean
3401 E. 30th Street
Farmington, New Mexico 87402

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ConocoPhillips Company
 Burlington Resources Oil & Gas Co.
 Attn: Linda Dean
 3401 E. 30th Street
 Farmington, New Mexico 87402

2. Article Number

(Transfer from service label)

7005 1160 0005 1809 5378

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-154

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
Lori Davis

B. Received by (Printed Name) Agent
LORI DAVIS Addressee

C. Date of Delivery
12-4-06

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

State of New Mexico
 Oil Conversation Division
 1000 Rio Brazos Road
 Aztec, New Mexico 87410
 Attn: Charlie Perrin

2. Article Number

(Transfer from service label)

7003 1680 0002 1818 0269

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-154

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee
Shelbe Bernal

B. Received by (Printed Name) Agent
Shelbe Bernal Addressee

C. Date of Delivery
12-4-2006

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

devon

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

BP America Production Company
Attn: Michael Beirne
501 Westlake Park Blvd.
Houston, Texas 77079

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

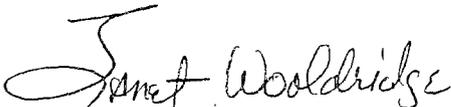
Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.

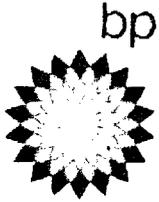

Janet Wooldridge
Senior Division Landman

Enclosures

BP America Production Company has no objection to this administrative application for unorthodox surface location.

By: 
Title: Land Negotiator

Date: 12/11/06



BP America Production Company

Onshore US, North America Gas SPU
501 Westlake Park Boulevard
Houston, Texas 77079

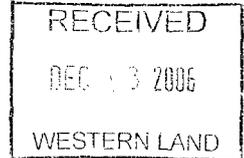
Michael J. Beirne

Land Negotiator

Phone: 281.366.1634

Fax: 281.366.0700

Email: michael.beirne@bp.com



December 12, 2006

Devon Energy Production Company, L.P.
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, OK 73102

Re: Unorthodox Surface Location
NEBU Well No. 240
Township 31 North, Range 6 West, N.M.P.M.
Section 18: NW/4

Dear Jan,

Enclosed is one (1) original copy of BP America Production Company's approval of an unorthodox location for the referenced well. Please call with any questions or concerns.

Best regards,

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

Michael J. Beirne

Enclosure

devon

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

BP America Production Company
Attn: Michael Beirne
501 Westlake Park Blvd.
Houston, Texas 77079

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

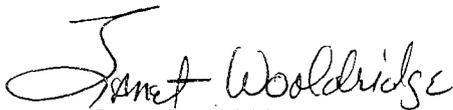
Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.


Janet Wooldridge
Senior Division Landman

Enclosures

BP America Production Company has no objection to this administrative application for unorthodox surface location.

By: 
Title: Land Negotiator

Date: 12/11/06



Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260
Janet Wooldridge, CPL
Senior Landman
405-552-4626
405-552-7843 (Fax)
ian.wooldridge@dvn.com

November 28, 2006

State of New Mexico
Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87410
Attention: Mr. Charlie Perrin

Re: Request for Administrative Exception to
Unorthodox Location
Northeast Blanco Unit No. 240
Section 18-T31N-R6W
San Juan County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. ("Devon"), as Operator, drilled the referenced Pictured Cliffs well to a total depth of 3,781' and dedicated the Southwest Quarter (SW/4) of Section 18-31N-6W as the spacing unit. Devon attempted to place this well at a legal surface location that would prevent waste by incorporating the wellpad for this well with the existing wellpad for the NEBU 322M and NEBU 496A wells. This consolidated wellpad was quite large before the addition of the NEBU 240 due to topographical issues. The wellpad sits on top of a knob in a hill that is solid rock. Devon had to flatten the knob out to prepare for the well locations and had to blast pits on all three wells.

In order to keep the wellsite for the NEBU 240 on the existing wellpad it placed the surface location 1160' from the north line and 1315' from the west line of Section 18-T31N-R6W which is 5' closer than rules permit. Devon respectfully requests that the Commission administratively approve this application for an unorthodox surface location in accordance with Division Rule 104(F)(3).

Leasehold for the entire North half of Section 18-31N-6W is Federal lease SF-078970 (NEBU Unit Tract No. 4). Leasehold for the South half of Section 18-31N-6W is Federal Lease No. 078988 (NEBU Unit Tract No. 5). Ownership in Tracts 4 and 5 is identical. There are no Pictured Cliff wells to the east of the NEBU 240 (NE/4 Sec.18) and thus no leasehold owner in Section 18 is affected by this unorthodox location. Devon's records reflect that BP America, ConocoPhillips/Burlington Oil and Gas; BN Non-Coal, LLC and B&N Co., L.P. own interests in

Request for Administrative Exception to
Unorthodox Location
Northeast Blanco Unit No. 240
Section 18-31N-6W
San Juan County, New Mexico
November 28, 2006

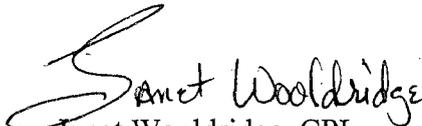
the five spacing units to the north (NEBU 239 - SW/4 Sec.7-31N-6W); northwest (NEBU 229J – SE/4 Sec. 12-31N-7W); west (NEBU 230 – NE/4 Sec. 13-31N-7W); southwest (NEBU 230J – SE/4 Sec. 13-31N-7W) and south (NEBU 223 – SW/4 Sec. 18-31N-6W) all in San Juan County, New Mexico. As identified on the well plat, each of the wells listed above has received a Paying Well Determination and currently awaits approval for inclusion in the Pictured Cliffs Participating Area.

Attached for your review you will find (a) a land plat showing the spacing unit, the proposed unorthodox well location and the adjoining spacing units and wells; (b) a list of affected persons as defined in Rule 1207.A(2) and (c) State of New Mexico form C-102; and (c) copies of notice letters to affected persons.

If you have any questions or concerns regarding this application, please contact me at 405-552-4626 or jan.wooldridge@dvn.com.

Sincerely,

DEVON ENERGY PRODUCTION COMPANY, L.P.


Janet Wooldridge, CPL
Senior Division Landman

Enc.

NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

Unorthodox Well Surface Location

B & N Co., L.P.
c/o Devon Energy Production Company
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

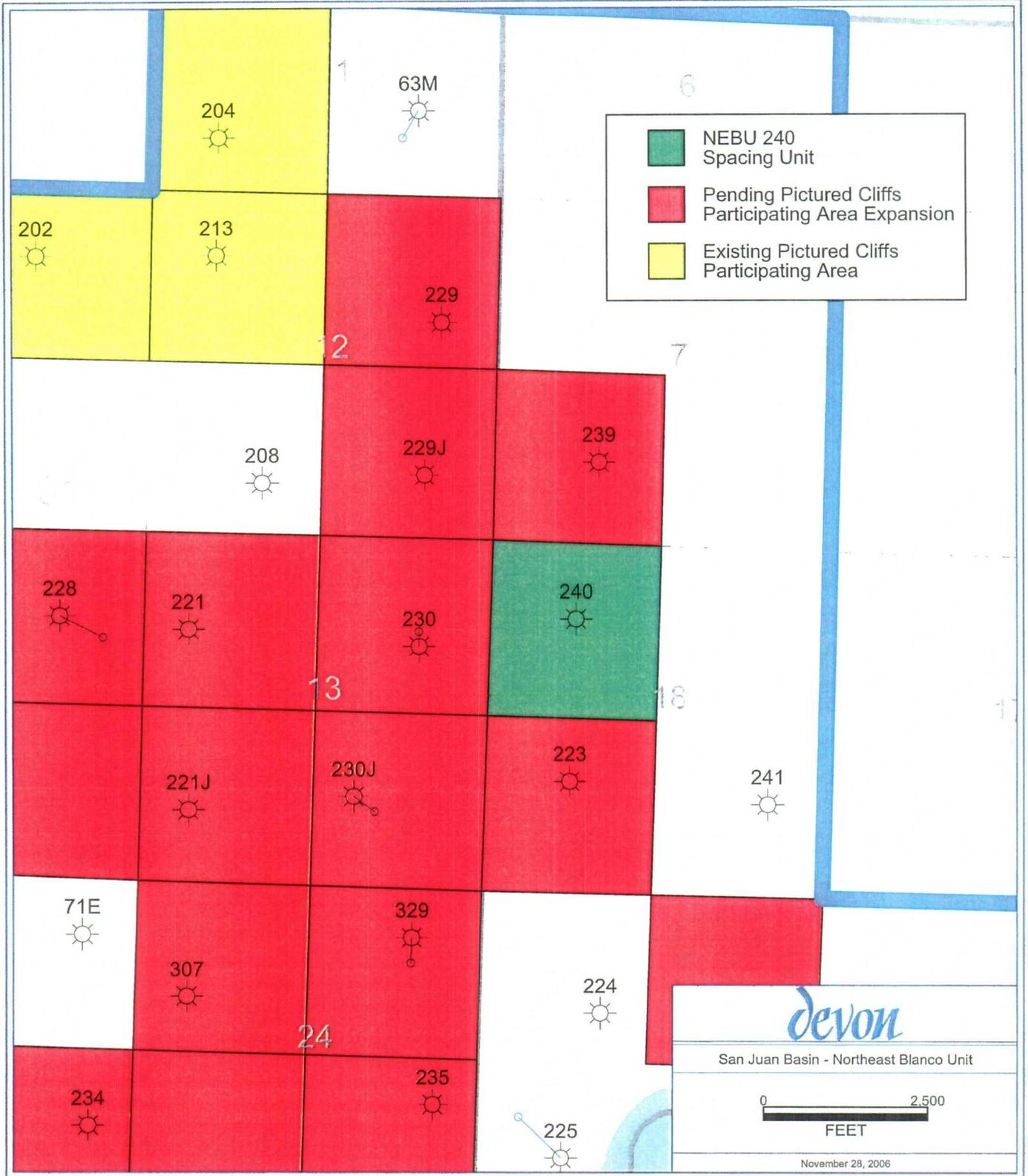
BN Non-Coal LLC
c/o Devon Energy Production Company
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

BP America Production Company
Attn: Michael Beirne
501 Westlake Park Blvd.
Houston, Texas 77079

ConocoPhillips Company
Burlington Resources Oil & Gas Co.
Attn: Linda Dean
3401 E. 30th Street
Farmington, New Mexico 87402

NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



devon

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

ConocoPhillips Company
Burlington Resources Oil & Gas Co.
Attn: Linda Dean
3401 E. 30th Street
Farmington, New Mexico 87402

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

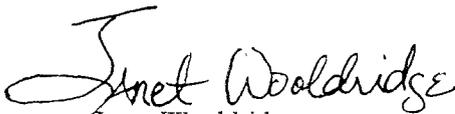
Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.



Janet Wooldridge
Senior Division Landman

Enclosures

ConocoPhillips Company/Burlington Resources Oil & Gas Company has no objection to this administrative application for unorthodox surface location.

By: _____
Title: _____

Date: _____



Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

B & N Co., L.P.
c/o Devon Energy Production Company
Attn: Jan Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.


Janet Wooldridge
Senior Division Landman

Enclosures

B & N Co., L.P. has no objection to this administrative application for unorthodox surface location.

By: _____ Date: _____
Title: _____



Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

BN Non-Coal LLC
c/o Devon Energy Production Company
Attn: Janet Wooldridge
20 N. Broadway
Oklahoma City, Oklahoma 73102

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.

Janet Wooldridge
Senior Division Landman

Enclosures

BN Non-Coal LLC has no objection to this administrative application for unorthodox surface location.

By: _____ Date: _____
Title: _____



Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

(Certified Mail – Return Receipt Requested)

November 28, 2006

BP America Production Company
Attn: Michael Beirne
501 Westlake Park Blvd.
Houston, Texas 77079

Re: NEBU Well No. 240
Section 18-31N-6W
San Juan County, New Mexico

Ladies and Gentleman:

Attached you will find Devon Energy Production Company L.P.'s ("Devon") administrative application for approval of an unorthodox well surface location covering the referenced Pictured Cliffs well. Devon's records indicate that your company may be the owner of operating rights in an offset spacing unit and are entitled to notice of this application in accordance with Division Rule 104 (f). Obligations to this application should be submitted to the NMOCD. If you have no objection to this application, please so indicate by signing and returning one copy of this letter to me at the address shown above.

If there are any questions or if additional information is required, feel free to call me at (405) 552-4626.

Cordially,

DEVON ENERGY PRODUCTION COMPANY, L.P.

Janet Wooldridge
Senior Division Landman

Enclosures

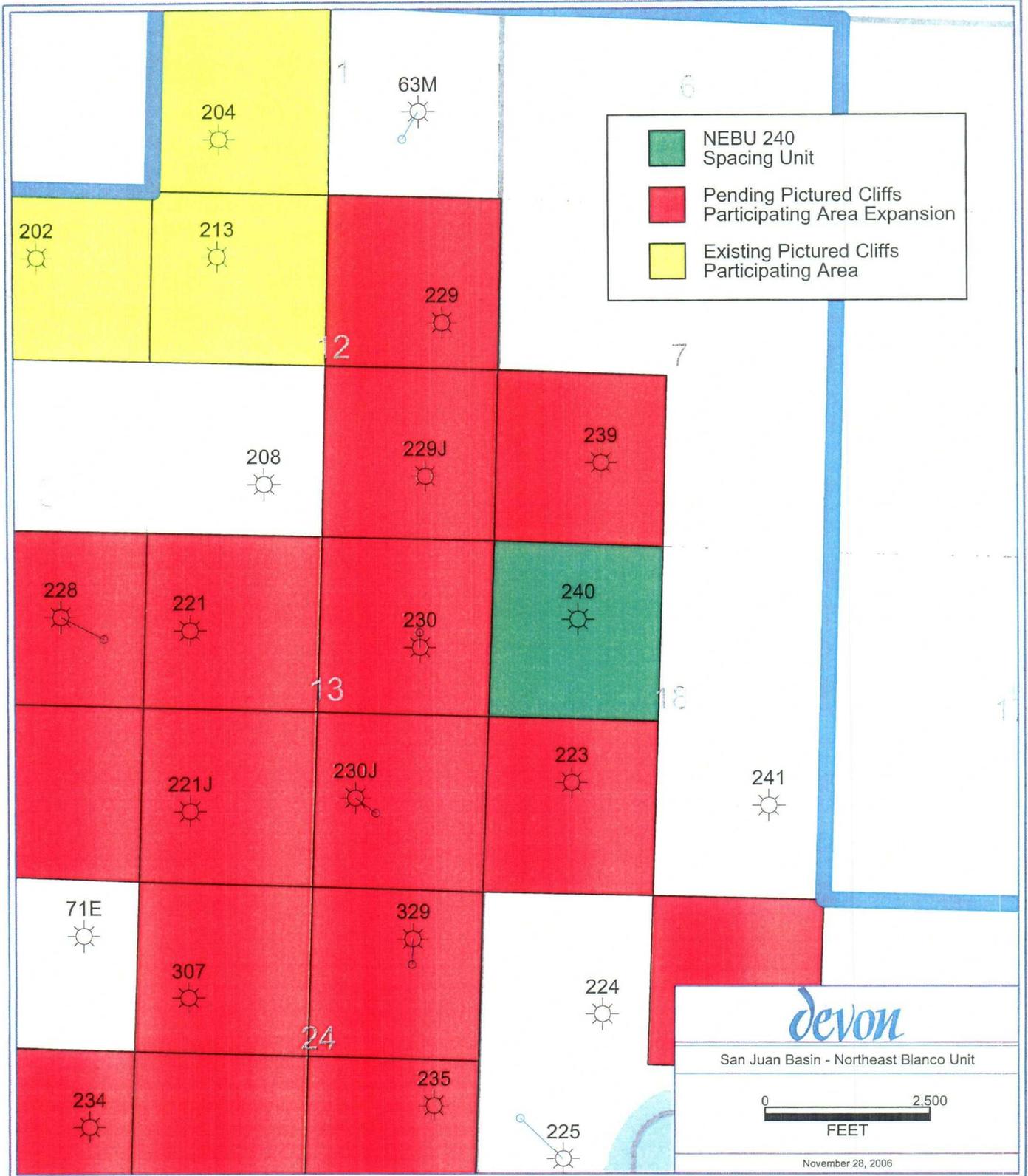
BP America Production Company has no objection to this administrative application for unorthodox surface location.

By: _____
Title: _____

Date: _____

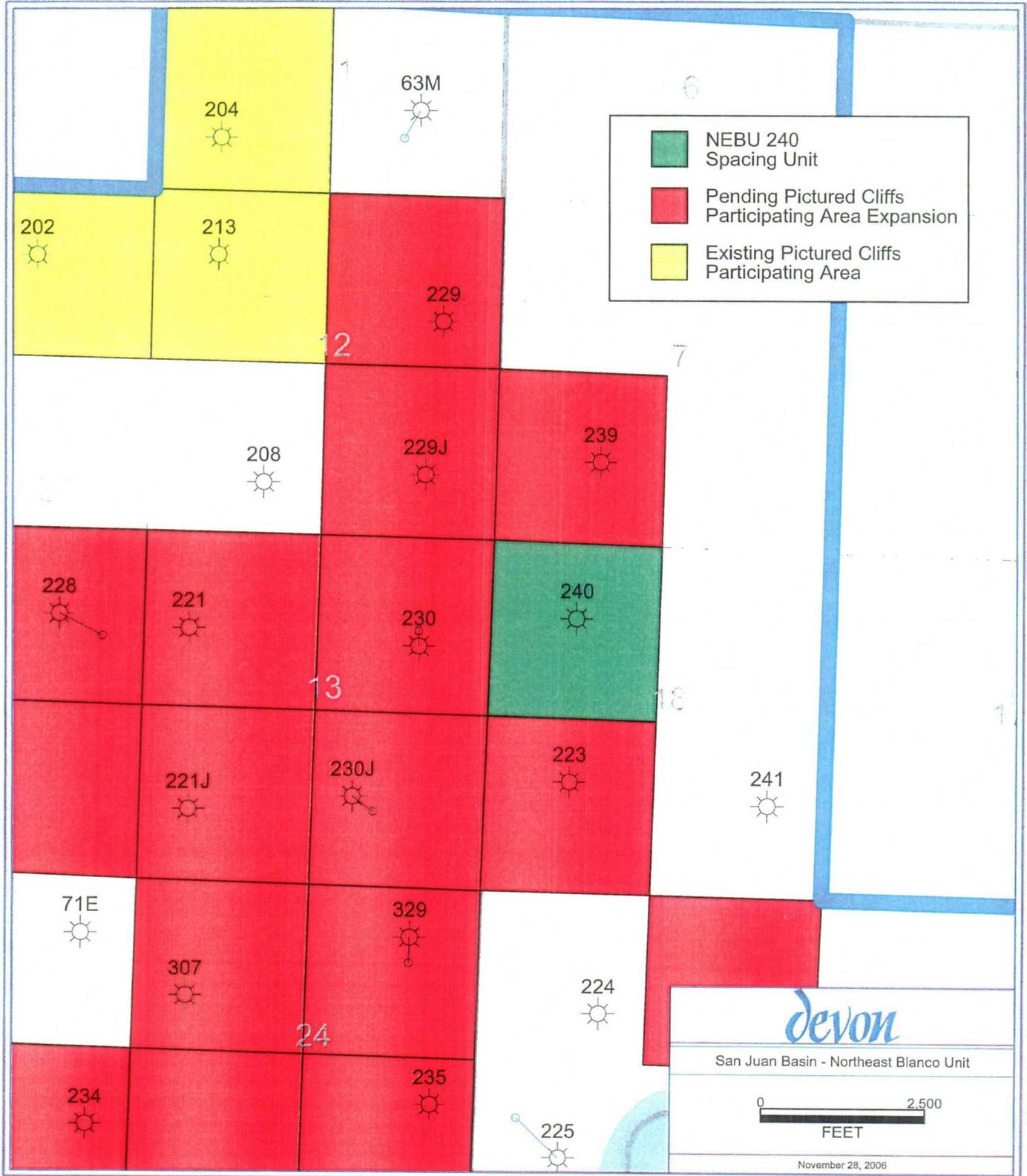
NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



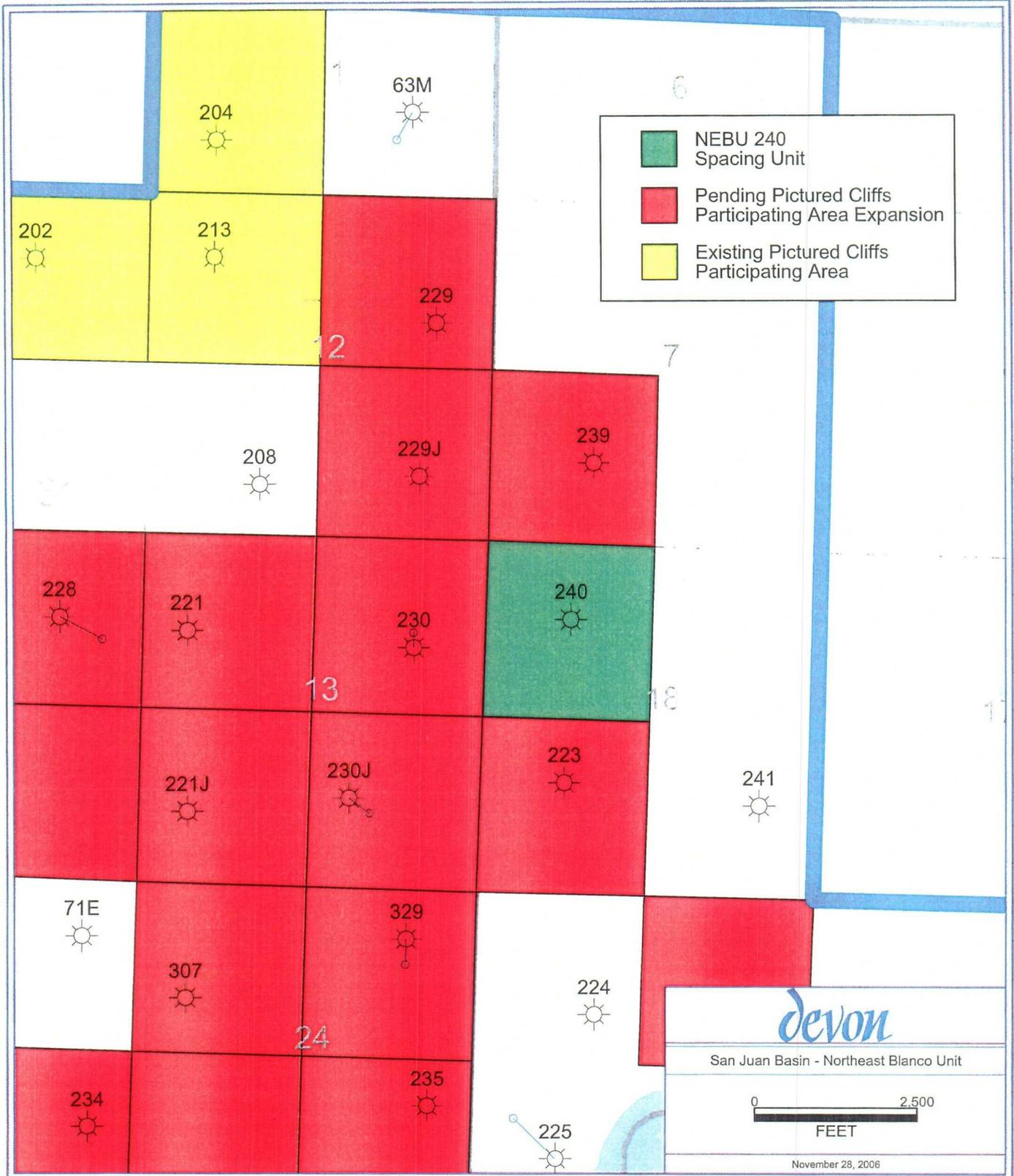
NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



NEBU 240 Application for Unorthodox Location

1160' FNL & 1315' FWL
Sec. 18 - 31N - 6W
San Juan County, NM



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

State of New Mexico
Oil Conversation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410
Attn: Charlie Perrin

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
X Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
if YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7003 1680 0002 1818 0269

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BN Non-Coal LLC
 c/o Devon Energy Production Company
 Attn: Jan Wooldridge
 20 N. Broadway
 Oklahoma City, Oklahoma 73102

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Not Mailed Hand Delivered SW 11/28/06

2. Article Number
(Transfer from service label)

7005 1160 0005 1809 5392

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Michael Beirne
 BP America Production Company
 501 Westlake Park Blvd.
 Houston, TX 77079

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7005 1160 0005 1809 5385

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
 Print your name and address on the reverse so that we can return the card to you.
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

B & N Co., L.P.
 c/o Devon Energy Production Company
 Attn: Jan Wooldridge
 20 N. Broadway
 Oklahoma City, Oklahoma 73102

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

HAND Delivered 11/28/06 SW

2. Article Number
(Transfer from service label)

7005 1160 0005 1809 5408

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee X	
1. Article Addressed to: <p style="text-align: center;">ConocoPhillips Company Burlington Resources Oil & Gas Co. Attn: Linda Dean 3401 E. 30th Street Farmington, New Mexico 87402</p>	B. Received by (<i>Printed Name</i>)	C. Date of Delivery
	D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
	3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
2. Article Number (<i>Transfer from service label</i>)	4. Restricted Delivery? (<i>Extra Fee</i>) <input type="checkbox"/> Yes 7005 1160 0005 1809 5378	