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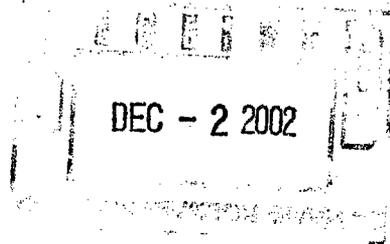
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devon

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260
Fax 405-552-8113

November 22, 2002

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



Re: Winston Federal Gas Com #9
Section 31-T21S-R24E
Eddy County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. (Devon) as Operator, intends to drill the referenced Cisco Canyon well to a depth of approximately 8,600'. Devon initially staked and attempted to permit this well at a location of 660' FNL & 1980' FWL. Due to the presence of an existing pipeline and electrical lines, Devon will be required to move the location to the North and East to a location 480' FNL & 2260' FWL which is an unorthodox location pursuant to the Indian Basin Upper Penn Associated Pool Rules.

Inasmuch as this well will be producing from an unorthodox location from that permitted by the Indian Basin Upper Penn Associated Pool Rules, Devon respectfully requests that the Commission administratively approve this application for an unorthodox location in accordance with Division Rule 104(F)(3). This well will be the fourth and final well drilled in the designated spacing unit as the Winston #1, #5 and #6 have been previously drilled on the remaining 80 acre locations. Our records reflect that Devon is the only party affected by this application; therefore, no other notice is required.

Attached you will find a land plat reflecting Devon as the only affected party, a net Cisco Canyon Isopach map, and State of New Mexico form C-102. You will note that the well is being permitted as a deviated well with an orthodox bottom hole location of 660' FNL & 1980' FWL. However, given the fact that Devon is the only affected party, Devon would prefer to drill this well vertically and avoid the unnecessary expense of drilling a deviated well.

Feel free to call me at (405) 552-4633 if there are any questions or concerns regarding this application.

Yours very truly,
DEVON ENERGY PRODUCTION COMPANY, L.P.


Ken Gray
Senior Land Advisor
Kg/WGC 9 UL