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DATE: 9/20/95

TO: Mike Stogner

COMPANY: New Mexico OCD - Santa Fe

FAX PHONE: (505) 827-8177

OFFICE PHONE: _____

Thanks for your help.

FROM: Karen Byers
DEVON ENERGY CORPORATION

NUMBER OF PAGES FOLLOWING: 2

TRANSMISSION COMPLETED: _____

DEVON
ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500
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September 7, 1995

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogdon

Re: Non Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location for the infill producing well located within the Keel West Waterflood Project, at the following location:

WELL	LOCATION
J. L. Keel A #19Y	1368' FSL & 1367' FEL, Sec. 7-17S-31E

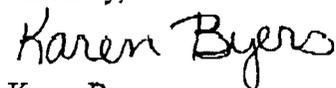
Attached is a plat of the Keel - West Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Keel - West Waterflood project is located on federal property and the proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to the governmental quarter - quarter section boundaries. 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 and injection pattern within the Keel - West Waterflood Project, which was approved under Order R - 2268. 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.

There are no operators that have production in offsetting 40 acre tracts. The well listed is offset by wells that are already operated by Devon Energy Operating Corporation; therefore, no notification is necessary.

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

Sincerely,



Karen Byers
Engineering Technician

API Well No : 30 15 28040 Eff Date : 09-01-1994 WC Status : A
Pool Idn : 28509 GRAYBURG JACKSON;7 RVRB-QU-GB-SA
OGRID Idn : 136025 DEVON ENERGY OPERATING CORP
Prop Idn : 15967 J L KEEL A

Well No : 019
GL Elevation: 3698

	U/L	Sec	Township	Range	North/South	East/West	Prop/Act (P/A)
B.H. Locn	J	7	17S	31E	FTG 1350 F S	FTG 1320 F E	P

Lot Identifier:
Dedicated Acre: 40.00

Lease Type : F
Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

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