



Susp: 2/25/04

AMESO-405038903

Richard Winchester
Land Advisor

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

Phone: (405) 228-4415
Fax: (405) 552-8113

RECEIVED

February 3, 2004

FEB 05 2004

OIL CONSERVATION
DIVISION

Michael E. Stogner
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

**Re: Application for Approval of Non-Standard Location (Amended)
North Pure Gold "9" Federal #17
1,265' FSL & 35' FWL of Section 9
Township 23 South, Range 31 East
Eddy County, New Mexico**

Mr. Stogner:

By letter dated January 27, 2004, Devon requested administrative approval of a non-standard location for the referenced well, being 1,415' FSL & 85' FWL of Section 9, T23S-R31E. After reviewing this location, the BLM advised Devon to move the location south to a point approximately 1,265' FSL & 35' FWL of Section 9, T23S-R31E. Therefore, Pursuant to Division Rule 104.F(2), Devon Energy Production Company, L.P., hereby applies for administrative approval of the unorthodox well location referenced above. Devon is requesting approval of this non-standard location in order to test a 20-acre infill for the Delaware formation. It is Devon's opinion that this well may capture reserves that are not recoverable from the offsetting wells. Devon is the operator and owns 100% of the working interest in Section 9 and the E/2 of Section 8. Section 9 and the E/2 of Section 8 are covered by lease no. NM NM-77046, issued by the BLM. Yates Petroleum, operator in the NW/4 of Section 16, will be notified of this application by copy of same.

Please call me at (405) 228-4415 should you have any questions or need additional information regarding this application.

Sincerely,

Richard C. Winchester
Land Advisor

Cc: Bureau of Land Management – Roswell
Oil Conservation Division – Artesia
Yates Petroleum Corporation – Artesia (Via Certified Mail)

DISTRICT I
1825 N. French Dr., Hobbs, NM 88240

DISTRICT II
811 South First, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Rd., Artec, NM 87410

DISTRICT IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-102
Revised March 17, 1999

Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION

2040 South Pacheco
Santa Fe, New Mexico 87504-2088

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	Pool Code 40297	Pool Name Los Medanos
Property Code	Property Name NORTH PURE GOLD "9" FEDERAL	Well Number 17
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION COMPANY LP	Elevation 3337'

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	9	23 S	31 E		1265	SOUTH	35	WEST	EDDY

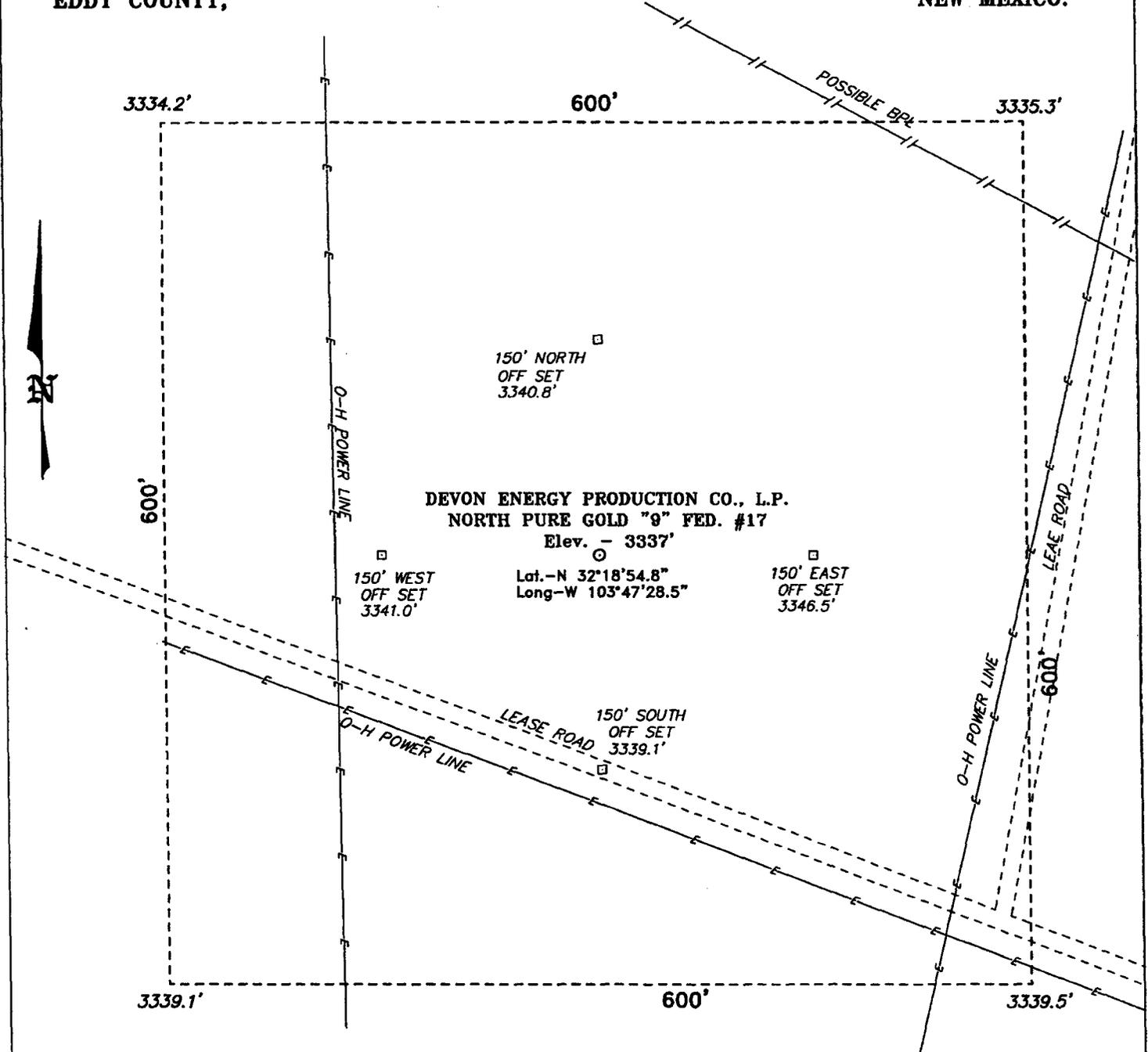
Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres 40		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>OPERATOR CERTIFICATION</p> <p>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Linda B Guthrie</i> Signature</p> <p>Linda B Guthrie Printed Name</p> <p>Operations Associate Title</p> <p>02/02/04 Date</p>
	<p>SURVEYOR CERTIFICATION</p> <p>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.</p> <p>JANUARY 28 2004</p> <p>Date Surveyed</p> <p>GARY L. JONES Signature & Seal of Professional Surveyor</p> <p>9777 No. 3956</p> <p>Certificate No. 9777</p> <p>GARY L. JONES PROFESSIONAL SURVEYOR</p> <p>BASIN SURVEYS</p>

SECTION 9, TOWNSHIP 23 SOUTH, RANGE 31 EAST, N.M.P.M.,
 EDDY COUNTY, NEW MEXICO.



DEVON ENERGY PRODUCTION CO., L.P.
 NORTH PURE GOLD "9" FED. #17
 Elev. - 3337'

Lat.-N 32°18'54.8"
 Long-W 103°47'28.5"

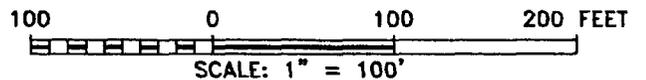
150' WEST
 OFF SET
 3341.0'

150' EAST
 OFF SET
 3346.5'

150' SOUTH
 OFF SET
 3339.1'

Directions to Location:

ON STATE HWY 128 GO 0.3 MILE PAST MM13 TO
 LEASE ROAD; THENCE NORTH ON LEASE ROAD FOR
 1.4 MILE; THENCE EAST FOR 0.2 MILE TO LOCATION.



DEVON ENERGY PROD. CO., L.P.

REF: NORTH PURE GOLD "9" FED. No. 17 / Well Pad Topo

THE NORTH PURE GOLD "9" FED. No. 17 LOCATED 1265' FROM
 THE SOUTH LINE AND 35' FROM THE WEST LINE OF
 SECTION 9, TOWNSHIP 23 SOUTH, RANGE 31 EAST,
 N.M.P.M., EDDY COUNTY, NEW MEXICO.

BASIN SURVEYS P.O. BOX 1786 - HOBBS, NEW MEXICO

W.O. Number: 3958

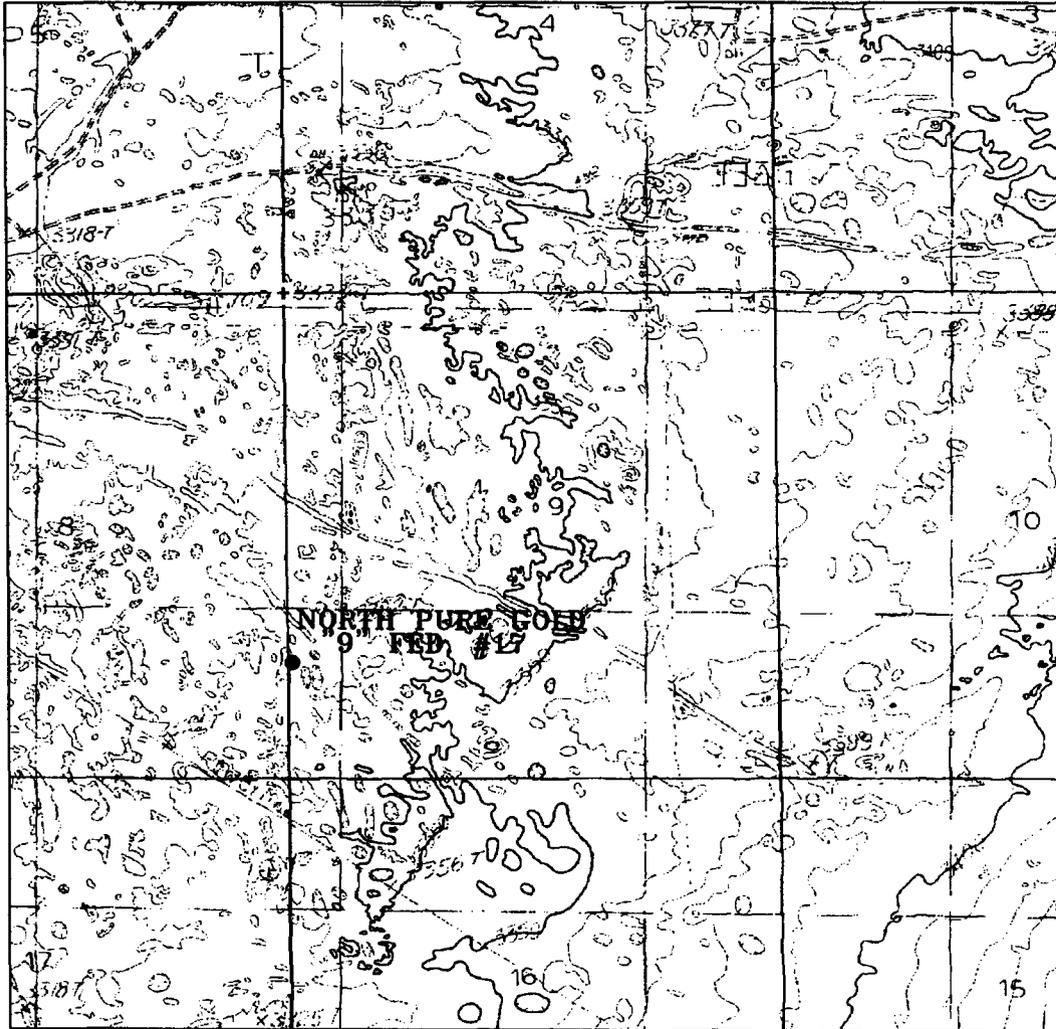
Drawn By: K. GOAD

Date: 01-29-2004

Disk: KJG CD#4 - 3958A.DWG

Survey Date: 01-28-2004

Sheet 1 of 1 Sheets



NORTH PURE GOLD "9" FEDERAL #17
 Located at 1265' FSL and 35' FWL
 Section 9, Township 23 South, Range 31 East,
 N.M.P.M., Eddy County, New Mexico.



focused on excellence
in the oilfield

P.O. Box 1786
 1120 N. West County Rd.
 Hobbs, New Mexico 88241
 (505) 393-7316 - Office
 (505) 392-3074 - Fax
 basinsurveys.com

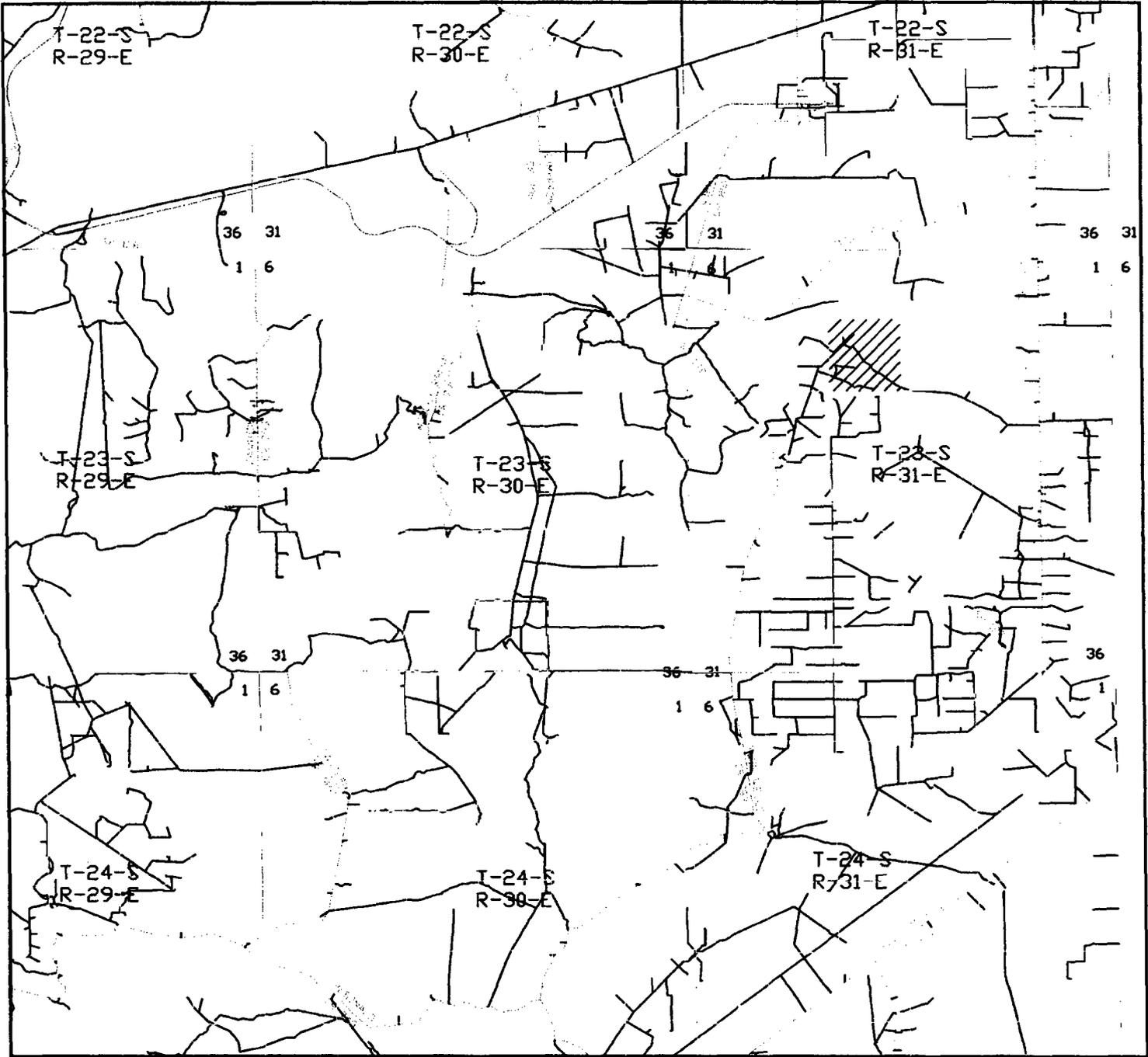
W.O. Number: 3958AA - KJG #1

Survey Date: 01-28-2004

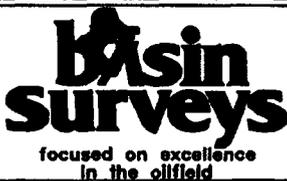
Scale: 1" = 2000'

Date: 01-29-2004

**DEVON ENERGY
 PRODUCTION
 COMPANY LP.**



NORTH PURE GOLD "9" FEDERAL #17
 Located at 1265' FSL and 35' FWL
 Section 9, Township 23 South, Range 31 East,
 N.M.P.M., Eddy County, New Mexico.



P.O. Box 1786
 1120 N. West County Rd.
 Hobbs, New Mexico 88241
 (505) 393-7316 - Office
 (505) 392-3074 - Fax
 basinsurveys.com

W.O. Number: 3958AA - KJG #1

Survey Date: 01-28-2004

Scale: 1" = 2 miles

Date: 01-29-2004

**DEVON ENERGY
 PRODUCTION
 COMPANY LP.**

Stogner, Michael

From: Stogner, Michael
Sent: Thursday, March 04, 2004 6:24 PM
To: Richard C. Winchester (E-mail)
Cc: Jim Bruce (E-mail); Arrant, Bryan
Subject: Request to Amend NSL-4995 (SD)

I have reviewed your request of February 5, 2004 (pMES0-405038903) to move the location of Devon's proposed North Pure Gold "9" Federal Well No. 17, approved by Division Administrative Order NSL-4995 (SD) to be drilled at an unorthodox infill oil well location 1415' FSL & 85' FWL (Unit L) of Sec. 9-T23S-R31E, NMPM, Los Medanos-Delaware Pool, to the southwest 158 feet. Why is the US-BLM requiring Devon to move this location, what was wrong with the original staked location? Submit any written documentation from the BLM, if available, and/or plats depicting such topographic concerns or problems.

Thank you.

Stogner, Michael

From: Winchester, Richard [Richard.Winchester@dvn.com]
Sent: Tuesday, March 09, 2004 8:35 AM
To: Stogner, Michael
Cc: Jim Bruce (E-mail); Arrant, Bryan
Subject: RE: Request to Amend NSL-4995 (SD)

Mr. Stogner:

Devon was advised by BLM field inspector Barry Hunt that the original location would have to be moved due to its proximity to sand dunes. Mr. Hunt advised a Devon operations employee of the required location move during an inspection of the original location. No written notification was issued by the BLM.

Please call me at (405) 228-4415 should you have any questions or need additional information.

Richard Winchester
Land Advisor

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

From: Stogner, Michael [mailto:MSTOGNER@state.nm.us]
Sent: Thursday, March 04, 2004 7:24 PM
To: Winchester, Richard
Cc: Jim Bruce (E-mail); Arrant, Bryan
Subject: Request to Amend NSL-4995 (SD)

I have reviewed your request of February 5, 2004 (pMES0-405038903) to move the location of Devon's proposed North Pure Gold "9" Federal Well No. 17, approved by Division Administrative Order NSL-4995 (SD) to be drilled at an unorthodox infill oil well location 1415' FSL & 85' FWL (Unit L) of Sec. 9-T23S-R31E, NMPM, Los Medanos-Delaware Pool, to the southwest 158 feet. Why is the US-BLM requiring Devon to move this location, what was wrong with the original staked location? Submit any written documentation from the BLM, if available, and/or plats depicting such topographic concerns or problems.

Thank you.

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