

ABOVE THIS LINE FOR DIVISION USE ONLY

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



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 _____

APR 26 2002

[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.

James Blount _____ Operations Engineer Advisor 4/24/02
 Print or Type Name Signature Title Date

 e-mail Address

April 24, 2002

Michael E. Stogner
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Mr. Stogner:

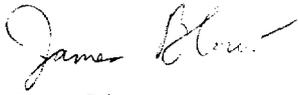
Pursuant to Division Rule 104.F(2), Devon SFS Operating Company applies for administrative approval of an unorthodox oil well location for the following well:

Pure Gold C 17 Federal 15
1220' FSL & 1250' FWL
SW4/ SW4, Section 17-T23S-R31E
Eddy County, New Mexico

Devon is requesting a non-standard location in order to test a 20 acre infill for the Delaware. The S2 of Section 17 is common ownership. The offsetting 40 acre tracts are the same ownership. Should you require any additional information or assistance, please do not hesitate to contact me @405-228-4301.

Please see attached documents.

Respectfully,



James Blount
Operations Engineer Advisor
Devon Energy Production Company, L.P.

JB/kc

Enclosures

C: Bureau of Land Management

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
Budget Bureau No. 1004-0135
Expires March 31, 1993

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.
Use "APPLICATION FOR PERMIT—" for such proposals

SUBMIT IN TRIPLICATE

1. Type of Well
 Oil Well Gas Well Other _____

2. Name of Operator
DEVON ENERGY PRODUCTION COMPANY, LP.

3. Address and Telephone No.
20 NORTH BROADWAY, SUITE 1100, OKLAHOMA CITY, OKLAHOMA 73102 (405) 228-7512

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)
1220' FSL & 1250' FWL, Sec 17-T23S, R31E

5. Lease Designation and Serial No. NM-45235
6. If Indian, Allottee or Tribe Name
7. If Unit or CA, Agreement Designation
8. Well Name and No. Pure Gold C 17 Federal 15
9. API Well No.
10. Field and Pool, or Exploratory Area Los Medonos (Delaware)
11. County or Parish, State Eddy, NM

CHECK APPROPRIATE BOX(S) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Abandonment
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Recompletion
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Plugging Back
	<input type="checkbox"/> Casing Repair
	<input type="checkbox"/> Altering Casing
	<input checked="" type="checkbox"/> Other <u>Non Standard Location</u>
	<input type="checkbox"/> Change of Plans
	<input type="checkbox"/> New Construction
	<input type="checkbox"/> Non-Routine Fracturing
	<input type="checkbox"/> Water Shut-Off
	<input type="checkbox"/> Conversion to Injection
	<input type="checkbox"/> Dispose Water

(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)*

Devon Energy Production Company, LP request approval for a non-standard location in order to test a 20 acre infill for the Delaware. The S2 of section 17 is common ownership.

14. I hereby certify that the foregoing is true and correct

Signed *Karen Cottom* Title Engineering Technician Date April 23, 2002
 (This space for Federal or State office use)

Approved by _____ Title _____ Date _____
 Conditions of approval, if any:

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

***See Instruction on Reverse Side**

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

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

DISTRICT IV
P.O. BOX 2088, SANTA FE, N.M. 87504-2088

State of New Mexico

Energy, Minerals and Natural Resources Department

Form C-102
Revised February 10, 1994
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

API Number	Pool Code 40297	Pool Name Los Medanos; Delaware
Property Code	Property Name PURE GOLD C 17 FEDERAL	Well Number 15
OGRID No. 20305	Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	Elevation 3323'

Surface Location

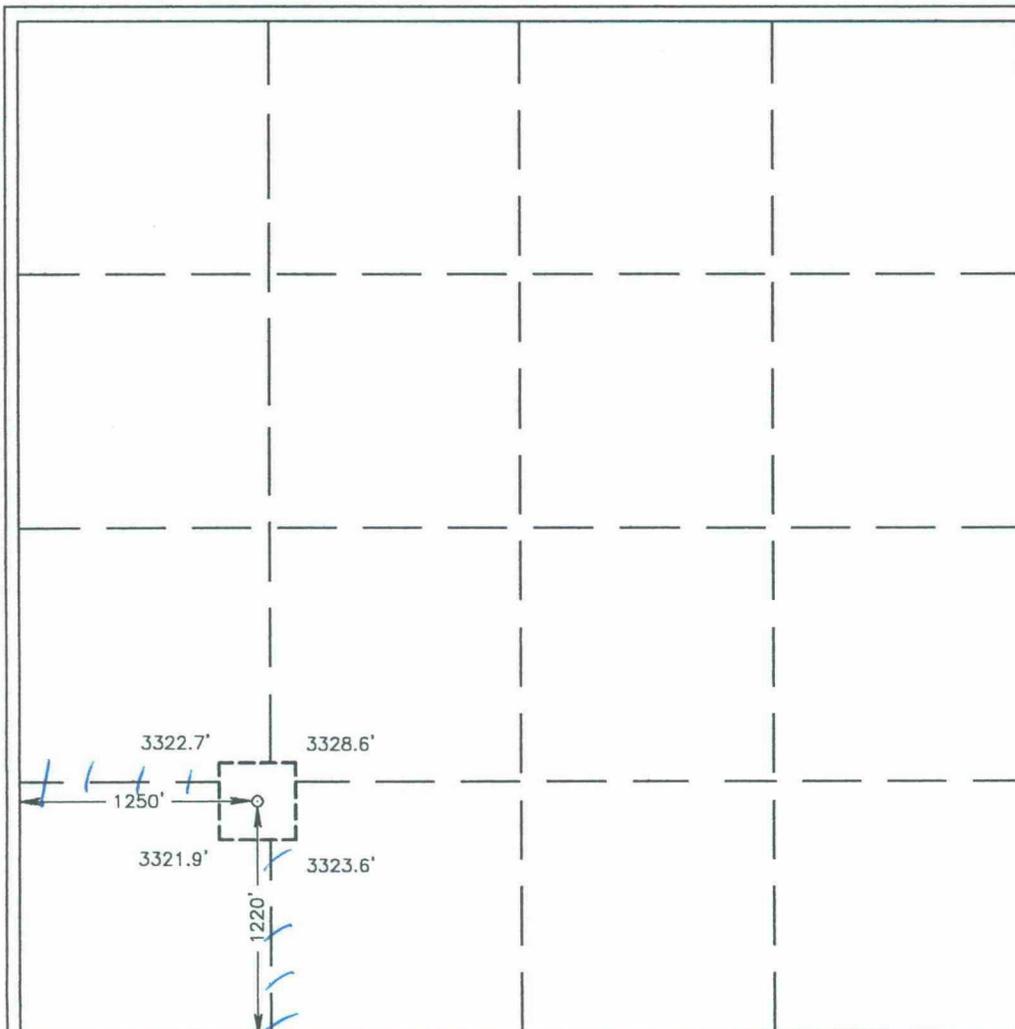
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	17	23-S	31-E		1220	SOUTH	1250	WEST	EDDY

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

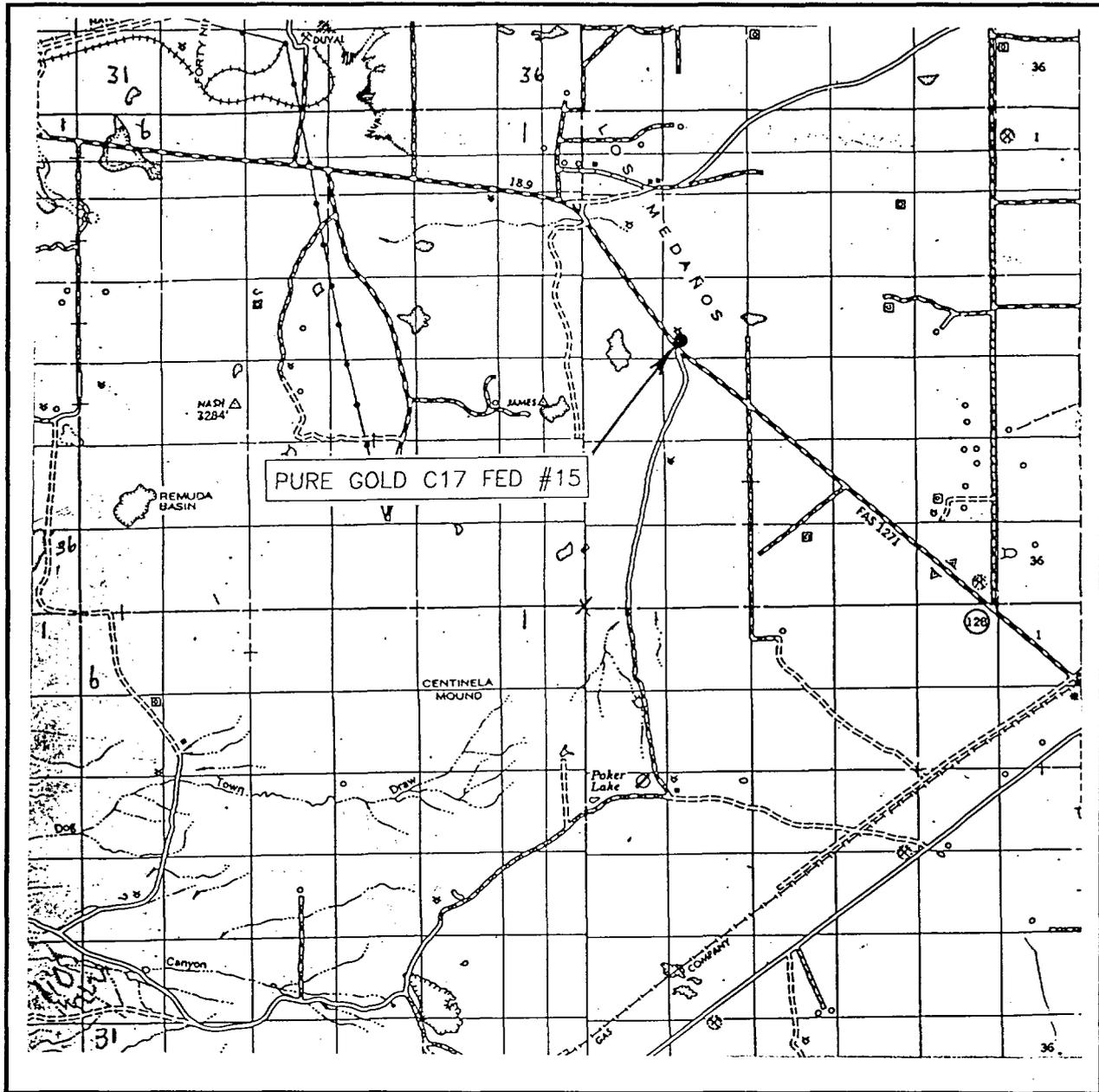
Dedicated Acres 40	Joint or Infill Y	Consolidation Code	Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



OPERATOR CERTIFICATION	
<i>I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.</i>	
Signature	
James Blount	
Printed Name	
Operations Engineer Advisor	
Title	
April 23, 2002	
Date	
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>	
APRIL 11, 2002	
Date Surveyed	AWB
Signature & Seal of Professional Surveyor	
02.11.0251	
Certificate No. RONALD J. ELBSON	3239
GARY ELBSON	12841

VICINITY MAP



SCALE: 1" = 2 MILES

SEC. 17 TWP. 23-S RGE. 31-E

SURVEY N.M.P.M.

COUNTY EDDY

DESCRIPTION 1220' FSL & 1250' FWL

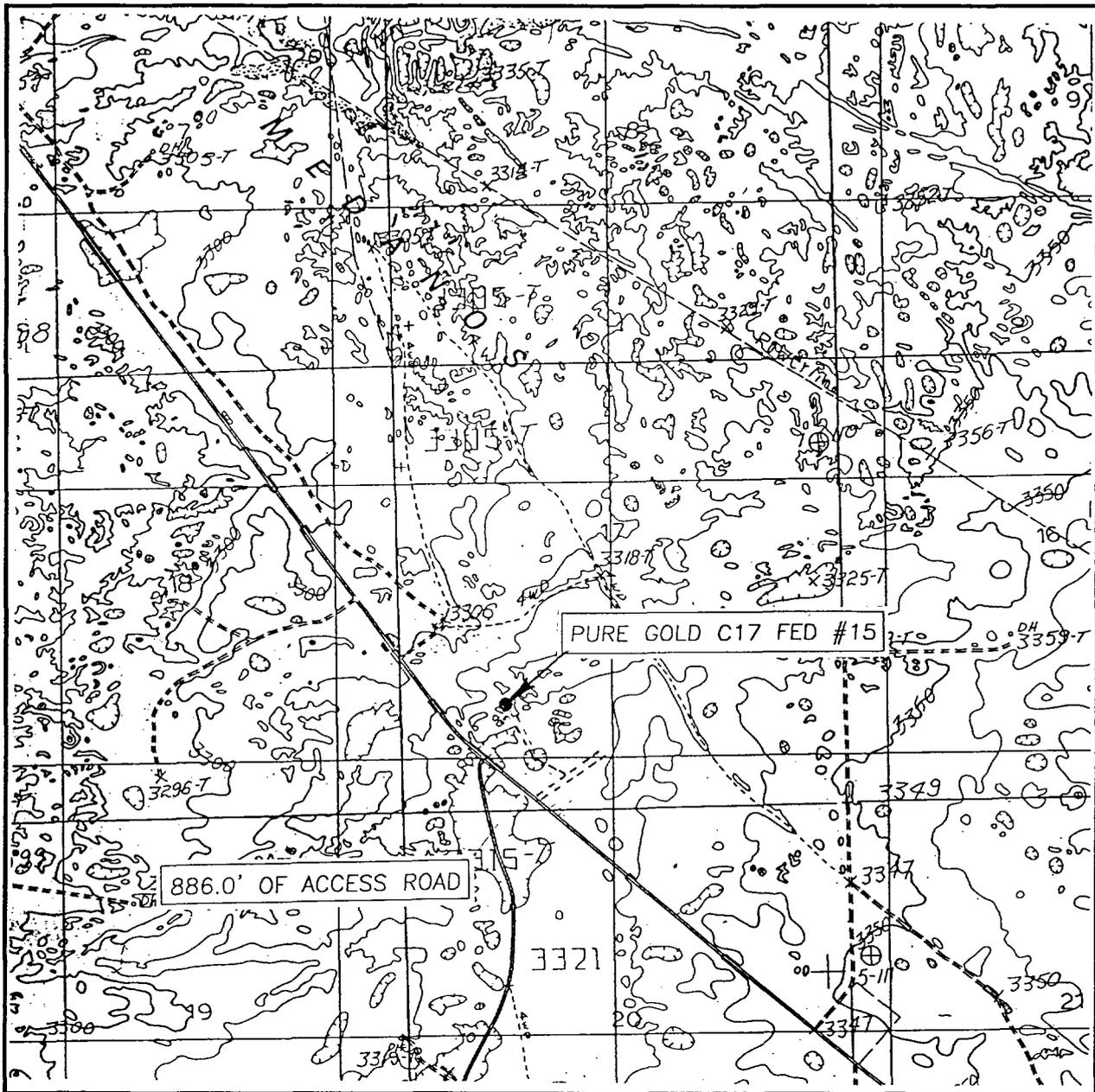
ELEVATION 3323'

OPERATOR DEVON ENERGY PROD. CO.

LEASE PURE GOLD C17 FEDERAL

JOHN WEST SURVEYING
 HOBBS, NEW MEXICO
 (505) 393-3117

LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

CONTOUR INTERVAL: 10
LOS MEDANOS, N.M.

SEC. 17 TWP. 23-S RGE. 31-E

SURVEY _____ N.M.P.M. _____

COUNTY _____ EDDY _____

DESCRIPTION 1220' FSL & 1250' FWL

ELEVATION 3323'

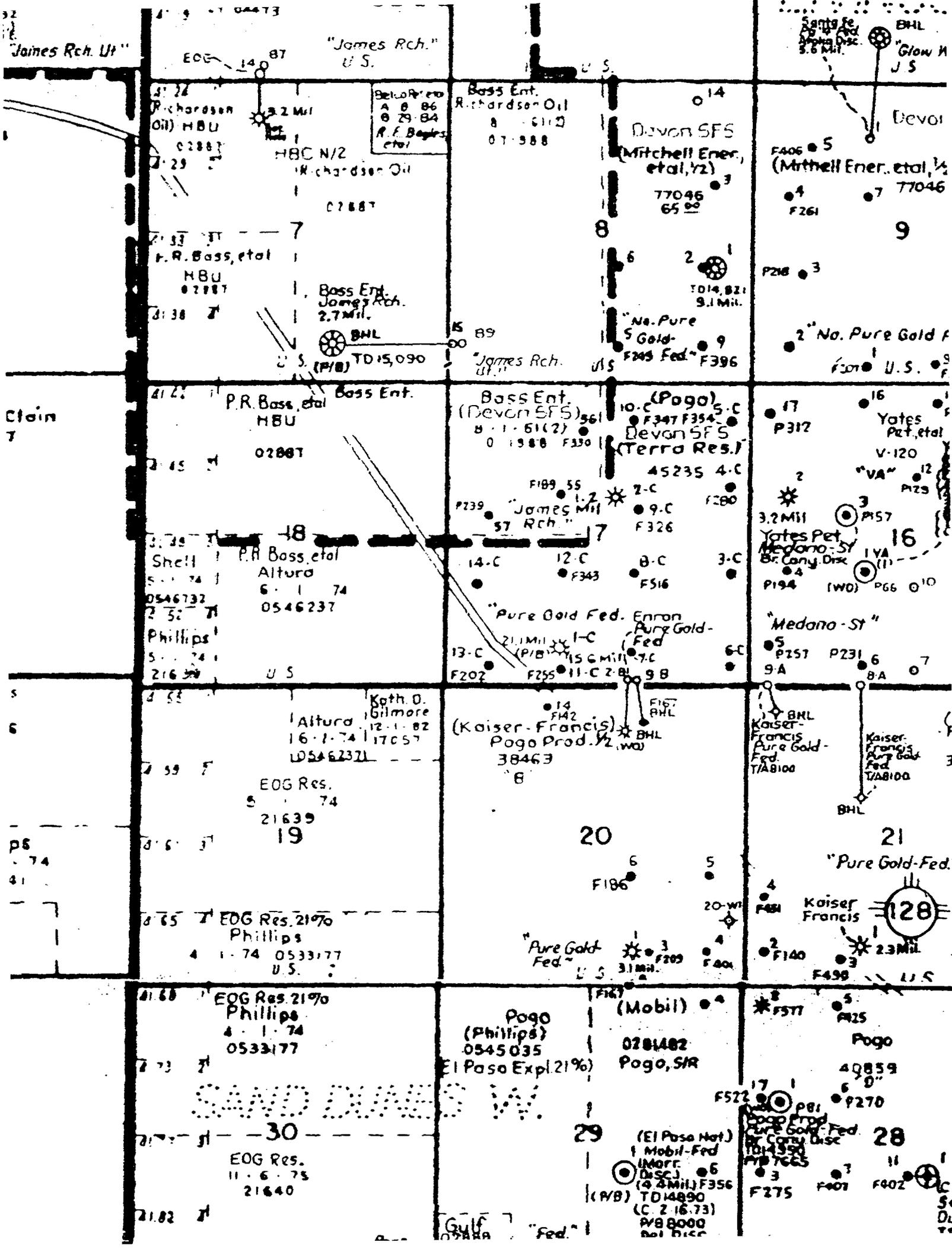
OPERATOR DEVON ENERGY PROD. CO.

LEASE PURE GOLD C17 FEDERAL

U.S.G.S. TOPOGRAPHIC MAP

LOS MEDANOS, N.M.

JOHN WEST SURVEYING
HOBBS, NEW MEXICO
(505) 393-3117



"James Rch. Ut"

"James Rch." U.S.

Santa Fe
8.6 Mil.
BHL
"Glow M"
J.S.

Richardson Oil HBU
02887
HBC N/2
Richardson Oil
02887
R.R. Bass, et al
HBU
02887
Bass Ent.
Joang's Rch.
2.7 Mil.
BHL
TD15,090
(P/B)

Bass Ent.
Richardson Oil
8-0112
07-988
Belco Petro
A 8-86
B 29-84
R.E. Bayless
et al

Devon SFS
(Mitchell Ener. et al, 1/2)
77046
65 00
TD14,821
9.1 Mil.
"No. Pure
Gold-
Fed." F396

Devon
F406 5
(Mitchell Ener. et al, 1/2)
77046
F261
F218 3
2 "No. Pure Gold F
U.S.

P.R. Bass, et al
HBU
02887
Shell
Altura
6-1-74
0546237
Phillips
U.S.
21639
19

Bass Ent.
(Devon SFS)
0-1-51(2)
0-1988 F330
"James Rch."
F326
"Pure Gold Fed. Enron
Pure Gold-
Fed."
F207 F255
11-C 2-B
9 B

(Pogo) 5-C
F347 F354
Devon SFS
(Terra Res.)
45235 4-C
Yates Pet. et al
"VA"
Yates Pet.
Medano-St
Br. Cany. Disc
P194 (W/O) P66 010
"Medano-St"
P157 P231 6 7
9-A 8-A 0

Kath. O.
Gilmore
Altura
12-1-82
17057
W546237
EOG Res.
5-1-74
21639
19
EOG Res. 21%
Phillips
4-1-74 0533177
U.S.

(Kaiser-Francis)
Pogo Prod. 1/2
38463
"B"
"Pure Gold-
Fed."
3.1 Mil.

BHL
Kaiser-
Francis
Pure Gold-
Fed.
T/A8100
Kaiser-
Francis
Pure Gold-
Fed.
T/A8100
BHL
"Pure Gold-Fed."
Kaiser Francis
128
F140
F499 U.S.

EOG Res. 21%
Phillips
4-1-74
0533177
EOG Res.
11-6-75
21640

Pogo
(Phillips)
0545035
El Paso Exp. (21%)
(Mobil)
0281482
Pogo, S/R
(El Paso Nat.)
Mobil-Fed
IMOR
Disc.
(4.4 Mil.) F356
TD14890
(C. 2.16.73)
P/B 8000
Not Disc.

F577 F425
Pogo
49859
F270
F572 P81
Pogo Prod.
Pure Gold- Fed.
Br. Cany. Disc
TD14350
P/B 7665
F275 F407 F402
C1
50
70

April 24, 2002

Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Re: Unorthodox Location
Pure Gold C-17 Federal #15
Sec. 17-T23S-R31E
Eddy County, New Mexico

02 APR 26 PM 2:28
OIL CONSERVATION DIV.

Gentlemen:

Devon SFS Operating, Inc. ("Devon") hereby submits for administrative approval the following unorthodox location to be drilled in the Los Medanos (Delaware) field to a depth of approximately 8,500'.

Pure Gold C-17 Federal #15 1220' FSL & 1250' FWL Section 17-T23S-R31E

The proposed location is unorthodox because it is less than the required 330' from the quarter-quarter boundaries as required by Section 104(B)(1) of the Oil Conservation Division ("OCD") Rules and Regulations. The well unit is to be dedicated to the proposed well and the existing Pure Gold C-17 Federal #13.

Production in this field is largely from the Brushy Canyon "B" and "D" zones (see attached Net Sandstone maps), which have a primary recovery of approximately 10% of original oil in place due to their low permeability. In order to improve recovery, infill drilling is recommended to contact additional mobile oil. Devon believes drilling the referenced well at said location is necessary to obtain the most efficient production from the field and to prevent waste as required by 501(A) of the OCD Rules and Regulations. Accordingly, the referenced non-standard location will maximize the distance between existing production and give the proposed well the greatest chance of contacting economic quantities of mobile oil.

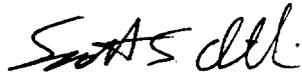
Rule 1207(A)(2)(b) of the OCD Rules and Regulations states that "notice shall be given to the affected persons in the adjoining spacing units towards which the unorthodox location encroaches." As shown by the enclosed plat, the proposed location does not encroach upon the interest of any offset operators, but only encroaches toward spacing units operated by Devon within the same federal lease (NM-45235), each spacing unit having common ownership.

Pure Gold C-17 Federal #15
April 24, 2002
Page -2-

Devon plans to begin drilling this well as part of its current and continuing drilling program, so your prompt administrative approval of the referenced unorthodox location will be greatly appreciated.

If there are any questions or concerns, please contact the undersigned or Dave Rittersbacher at (405) 235-3611.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott S. Quillin". The signature is written in a cursive style with some loops and flourishes.

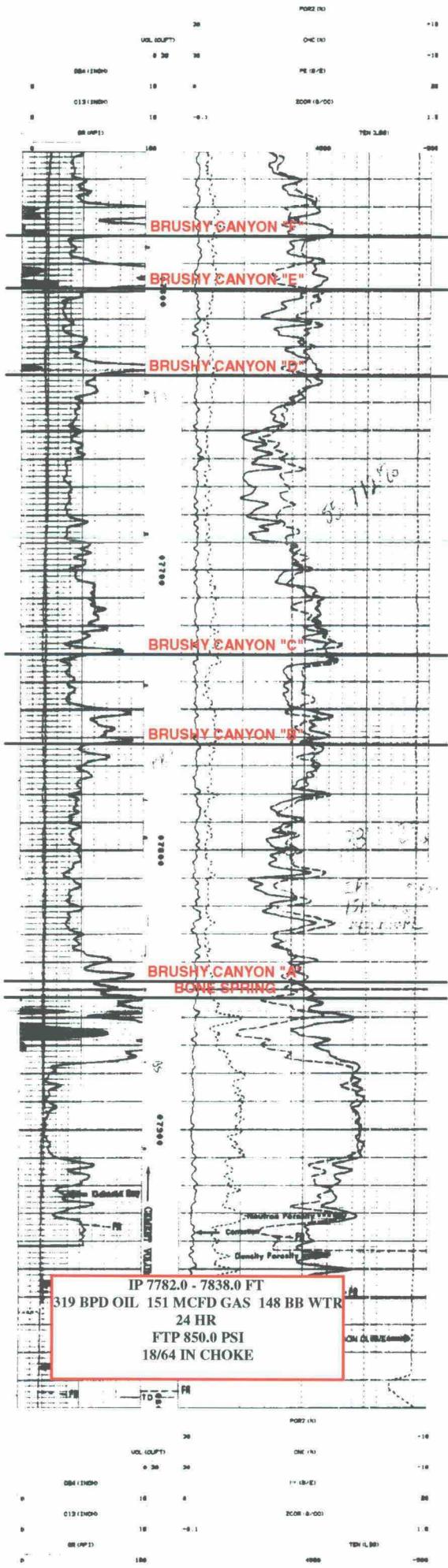
Scott S. Quillin
Landman

ssq:\mkb\pure gold c-17 fed 15

enc.

TYPE LOG - LOS MEDANOS (DELAWARE) FIELD

1
 SANTA FE ENERGY
 PURE GOLD 'C-17' FEDERAL #14
 NW SW
 023.0S 031.0E 017
 06-17-1993
 3330.0 ft KB
 TD 8000.0 ft
 30015274220000



ILLEGIBLE

LARGE FORMAT
EXHIBIT HAS
BEEN REMOVED
AND IS LOCATED
IN THE NEXT FILE

LARGE FORMAT
EXHIBIT HAS
BEEN REMOVED
AND IS LOCATED
IN THE NEXT FILE

**LARGE FORMAT
EXHIBIT HAS
BEEN REMOVED
AND IS LOCATED
IN THE NEXT FILE**