



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

November 2, 2004

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

Devon Energy Production Company, L. P.
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

RECEIVED

NOV 08 2004

OOB-ARTESIA

Attention: Linda Guthrie
Linda.Guthrie@devn.com

Re: *Devon Energy Production Company, L. P.'s Kurtland "6" Federal Well No. 2 (API No. 30-015-33238), located on the surface 3000 feet from the North line and 610 feet from the West line (Lot 12/Unit L) of Irregular Section 6, Township 21 South, range 27 East, NMPM, Eddy County, New Mexico.*

Dear Ms. Guthrie:

I received your letter dated September 9, 2004, and have subsequently reviewed the Division's well file on the Kurtland "6" Federal Well No. 2 and Division Administrative Orders NSL-4974 and DHC-3323. Please refer to Division Administrative Order NSL-4974, which was issued for the Burton Flat-Morrow Gas Pool (73280) only. Since the subject well is dually completed in the Morrow interval and the Undesignated Alacran Hills-Atoka Gas Pool (70060) under the authorization of Division Administrative Order DHC-3323, dated August 6, 2004, the NSL order will need to be amended to include the Atoka interval.

In lieu of running a directional survey on this wellbore, the Division will accept a "worst case scenario" non-standard location request for both the Atoka and Morrow intervals in this matter. Please file your application to amend Division Administrative Order NSL-4974 in accordance with Division Rules 104.F and 1207.A (2).

Should you have any questions or comments concerning this matter, please contact your legal counsel, Mr. James Bruce in Santa Fe at (505) 982-2043. Thank you.

Sincerely,

Michael E. Stogner
Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division - Artesia
James Bruce, Legal Counsel for Devon Energy Production Company, L. P. - Santa Fe