

NEW: EXICO ENERGY, M. JERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 5, 2001

Devon SFS Operating, Inc. c/o James Bruce P. O. Box 1056 Santa Fe, New Mexico 87504



Telefax No. (505) 982-2151

Administrative Order NSL-4660

Dear Mr. Bruce:

Reference is made to the following: (i) your letters of application dated October 13, 19, and 29, 2001 (application reference No. pKRV0-129039620); (ii) a letter dated October 22, 2001 from Mr. Michael E. Stogner, Engineer with the New Mexico Oil Conservation Division ("Division") in Santa Fe; and (iii) the Division's records in Santa Fe; all concerning Devon SFS Operating, Inc.'s request for an off-pattern non-standard Morrow gas well location for its proposed Stock Tank "15" Federal Well No. 1 (API No. 30-005-63371), to be drilled 1980 feet from the South line and 990 feet from the West line (Unit L) of Section 15, Township 15 South, Range 28 East, NMPM, Undesignated Buffalo Valley-Pennsylvanian Gas Pool (73080), Chaves County, New Mexico.

The W/2 of Section 15 is to be dedicated to this well in order to form a standard 320-acre stand-up gas spacing and proration unit for the Buffalo Valley-Pennsylvanian (Prorated) Gas Pool.

This application has been duly filed under the provisions of: (i) Division Rule 104.F, revised by Division Order No. R-11231, issued by the New Mexico Oil Conservation Commission in Case No. 12119 on August 12, 1999; (ii) Division Rule 605; and (iii) the "Special Rules and Regulations for the Buffalo Valley-Pennsylvanian Gas Pool", as promulgated by Division Order No. R-8170, as amended.

The geologic interpretation submitted with this application indicates that a well drilled off-pattern in the SW/4 of Section 15 will be at a more favorable geologic position within the Morrow sand than a well drilled at a location considered to be on-pattern/standard within the W/2 of Section 15.

By authority granted me under the provisions of Division Rules 605.B (2) (b) and 104.F (2) and the applicable provisions of the special pool rules governing the Buffalo Valley-Pennsylvanian Gas Pool, the above-described unorthodox gas well location is hereby approved.

Sincerely,

Lori Wrotenbery Director

LW/MES/kv

cc: New Mexico Oil Conservation Division - Artesia

U. S. Bureau of Land Management - Roswell