

ABOVE THIS LINE FOR DIVISION USE ONLY

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



Devon
Keller 4 st #1

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 _____

- [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 Bruce
 P.O. Box 1056
 Santa Fe, New Mexico 87504

James Bruce
 Signature

Attorney for Applicant
 Title
 Date
 jamesbruc@aol.com
 e-mail Address

8/1/07

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 RECEIVED

JAMES BRUCE
ATTORNEY AT LAW

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jamesbruc@aol.com

August 1, 2007

Hand delivered

Mark E. Fesmire, P.E.
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Mr. Fesmire:

Pursuant to Division Rule 104.F(2), Devon Energy Production Company, L.P. applies for approval of an unorthodox oil well location for the following well:

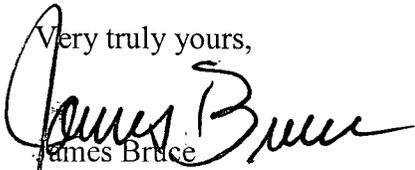
<u>Well:</u>	Keller 4 State Well No. 1
<u>Location:</u>	1980 feet FSL & 1475 feet FWL
<u>Well unit:</u>	NE $\frac{1}{4}$ SW $\frac{1}{4}$ of Section 4, Township 23 South, Range 35 East, N.M.P.M., Lea County, New Mexico

The well was drilled to a depth sufficient to test the Morrow formation, and was completed in and produced from the Atoka formation. Applicant intends to re-complete the well uphole, and requests unorthodox location approval in the Delaware and Bone Spring formations. Both pools are spaced on 40 acres, with wells to be located no closer than 330 feet to a quarter-quarter section line. A Form C-102 is attached as Exhibit A.

The SW $\frac{1}{4}$ of Section 4 is covered by State Lease V-6366. See Exhibit B. Interest ownership is common in the SW $\frac{1}{4}$, so no offset interest owners have been notified of this application.

Please contact me if you need any further information on this application.

Very truly yours,


James Bruce

Attorney for Devon Energy Production Company, L.P.

DISTRICT I
1626 N. French Dr., Hobbs, NM 88240

DISTRICT II
811 South First, Artesia, NM 88210

DISTRICT III
1000 Rio Brazos Ed., Artesia, 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 30-025-36643	Pool Code 52769	Pool Name <i>under S Rock Lake Bore Spring</i>
Property Code	Property Name KELLER "4" STATE	Well Number 1
OGRID No.	Operator Name DEVON ENERGY PRODUCTION CO., L.P.	Elevation 3541'

Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
K	4	23 S	35 E		1980	SOUTH	1475	WEST	LEA

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	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

OPERATOR CERTIFICATION

I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief.

Signature _____

Printed Name _____

Title _____

Date _____

SURVEYOR CERTIFICATION

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.

FEBRUARY 3, 2005

Signature & Seal of Professional Surveyor
[Signature]

WFO. No. 6073

Certificate No. 7977 L. Jones 7977

PROFESSIONAL SURVEYOR

EXHIBIT A

13 Records found.

Lease Number:

V0-6366-0000

Company name: DEVON ENERGY PRODUCTION COMPANY, LP
 Company ID: 6137
 Assigned from: N/A
 Total acres: 520.32
 Prod stat: N/A

Lease term:

Lease term: FIVE(5) YEAR TERM, 1/6th ROYALTY
 Issue date: 9/1/2001
 Termination date: Active
 Termination reason: N/A
 Current term: Primary Term

Billing information:

Bill to: DEVON ENERGY PRODUCTION COMPANY, LP
 Rent per acre: 1.00
 Billing frequency: Annual
 Minimum annual rent: 520.32
 Last bill date: 8/3/2006
 Next bill date: 9/1/2007
 Escalation: 0

Land information:

Section	Township	Range	Unit Letter	Lot	Tract	Acreage
4	23S	35E	A	1		40.32
			E			40.00
			F			40.00
			G			40.00
			H			40.00
			I			40.00
			J			40.00
			K			40.00
			L			40.00
			M			40.00
			N			40.00
			O			40.00
			P			40.00

EXHIBIT B