<u>ال CONSERvie on Division</u> REUT 405/235-3611 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 731026 Mar 26 Fax 405/552-4552

March 19, 1996

State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

DEVON

ENERGY

OPERATING

CORPORATION

Certified Letter # Z 731 697 770



Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location for the infill producing well located within the Russell-Turner Waterflood Project, at the following location:

WELL

LOCATION

Turner "A" #48

2350' FNL & 1330' FWL, Sec. 19-17S-31E

Attached is a plat of the Russell-Turner Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Russell-Turner Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to lease line. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The well will be drilled at the unorthodox location in order to prevent waste by developing an efficient production and injection pattern within the Russell-Turner Waterflood Project, which was approved under Order R - 3185. When fully developed this well will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

The Turner "A" #49 is offset on four sides of the 40 acre tract by either Avon Energy Corporation or Devon Energy Operating Corporation. Avon Energy Corp. is a closely related company to Devon Energy Operating Corp, and therefore does not require notice. One of the diagonal tracts has wells operated by Mack Energy Corporation. Enclosed is a copy of the letter sent to Mack Energy giving required notice.

Should you require any additional information regarding the unorthodox location, please notify me at 405-552-4527.

Sincerely,

Karen Byers Karen Byers

Engineering Technician

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See Instruction	ns On Reverse	Side

DATE 3-11-94

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tle 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 itements or representations as to any matter within its jurisdiction <u>CT I</u> Box 1980 s, NM 88241-1980 State of New Mexico Energy, Minerals, and Natural Resources Department Form C-102 Revised 02-10-94

Instructions on back

Submit to the Appropriate District Office State Lease — 4 capies Fee Lease — 3 capies

<u>DISTRICT III</u> 1000 Rio Brazos Rd. Aztec, NM 87410

<u>STRICT II</u> O. Drawer DD Artesia, NM 88211-0719

OIL CONSERVATION DIVISION P. 0. Box 2088 Santa Fe, New Mexico 87504-2088

AMENDED REPORT

DISTRICT IV P. O. Box 2088 Santa Fe, NM 87507-2088

7507-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT

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DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 19, 1996

Mack Energy Corporation P. O. Box 400 Duncan, OK 73534

Certified Letter #: Z 731-697 769

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Karen Byers

Karen Byers Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico Bureau of Land Management - Carlsbad, New Mexico

DEVON ENERGY OPERATING CORPORATION

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 RECEVED
 405/235-3611

 20 North Broadway, Suite 1500
 Fax 405/552-4550

 Oklahoma City, Oklahomar 731022
 All 8 Fax 405/552-4552

March 20, 1996

State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 775

Re: Non - Standard Location Approval

Dear Sir:

We recently applied for approval of a Non-standard location on the Turner A #48. The offset operator of this well was Mack Energy. We sent notice to Mack Energy Co. in Duncan, OK. Enclosed is a copy of the certified letter we are sending to Mack Energy Corporation in Artesia, the correct offset operator.

Sincerely,

Karen Dyero

Karen Byers Engineering Technician



20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 20, 1996

Mack Energy Corporation P. O. Box 960 Artesia, New Mexico 88211-0960

Certified Letter #: Z 731-697 774

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

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Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Byers Karin

Karen Byers Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico Bureau of Land Management - Carlsbad, New Mexico Devon Energy Operating Corporation 20 N. Broadway, Suite 1500 Oklahoma City, OK 73112 (405) 552-4527

Fax Cover Sheet

March 28, 1996

Turner "A" Ell No. 48

Mike Stogner State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Fax # (505)827-8177

Number of pages (including cover sheet): 9

From: Karen Byers

Message: This letter was sent to you by certified mail on 3/19/96. As of today, we have yet to receive the card which shows you received it. I am faxing a copy to avoid any further delays.

....

DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 19, 1996

State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 770

Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location for the infill producing well located within the Russell-Turner Waterflood Project, at the following location:

WELL

LOCATION

Turner "A" #48 2350' FNL & 1330' FWL, Sec. 19-17S-31E

Attached is a plat of the Russell-Turner Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Russell-Turner Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to lease line. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The well will be drilled at the unorthodox location in order to prevent waste by developing an efficient production and injection pattern within the Russell-Turner Waterflood Project, which was approved under Order R - 3185. When fully developed this well will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

The Turner "A" #49 is offset on four sides of the 40 acre tract by either Avon Energy Corporation or Devon Energy Operating Corporation. Avon Energy Corp. is a closely related company to Devon Energy Operating Corp, and therefore does not require notice. One of the diagonal tracts has wells operated by Mack Energy Corporation. Enclosed is a copy of the letter sent to Mack Energy giving required notice.

Should you require any additional information regarding the unorthodox location, please notify me at 405-552-4527.

Sincerely,

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Karen ers

Karen Byers Engineering Technician

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DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 19, 1996

Mack Energy Corporation P. O. Box 400 Duncan, OK 73534

Certified Letter #: Z 731-697 769

Dear Sir:

Devon Energy Operating Corp, has applied to the BLM for a permit to duil the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Byers ren

Karen Byers Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico Bureau of Land Management - Carlsbad, New Mexico

DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 20, 1996

State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 775

Re: Non - Standard Location Approval

Dear Sir:

We recently applied for approval of a Non-standard location on the **turner**. The offset operator of this well was Mack Energy. We sent notice to Mack Energy Co. in Duncan, OK. Enclosed is a copy of the certified letter we are sending to Mack Energy Corporation in Artesia, the correct offset operator.

Sincerely. jero

Karen Byers Engineering Technician

DEVON ENERGY OPERATING CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102 405/235-3611 Fax 405/552-4550 Fax 405/552-4552

March 20, 1996

Mack Energy Corporation P. O. Box 960 Artesia, New Mexico 88211-0960

Certified Letter #: Z 731-697 774

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

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Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Karin Byers

Karen Byers **Engineering Technician**

CC:

Oil Conservation Division - Santa Fe, New Mexico Bureau of Land Management - Carlsbad, New Mexico



CMD :	ONGARD					
OG6C101 C101	-APPLICATION FOR PERMIT TO DRILL					
Opr Name, Addr: DEVON E 20 N BR	API Well No: 30 15 28869 APD Status(ENERGY OPERATING CORP Aprvl/Cncl ROADWAY MA CITY,OK 73102					
Prop Idn: 16001 TURNER	A	Well No: 48				
	Township Range Lot Idn North/South					
	17S 31E FTG 2350 F N					
Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): O Cable/Rotary (C/R) : R Lease typ(F/S/P/N/J/U/I): F Ground Level Elevation : 3630						
State Lease No: Multiple Comp (Y/N) : N Prpsd Depth : 4200 Prpsd Frmtn : GRAYBURG-JACKSON						
PF01 HELP PF02	a to modify record PF03 EXIT PF04 GoTo PF05 PF09 PRINT PF10 C102 PF11 HIST					

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API Well No : 30 15 5240 Eff Date : 09-01-1994 WC Status : A Pool Idn : 28509 GRAYBURG JACKSON;7 RVRS-QU-GB-SA OGRID Idn : 136025 DEVON ENERGY OPERATING CORP Prop Idn : 16001 TURNER A Well No : 015

GL Elevation: 3658

U/L Sec Township Range North/South East/West Prop/Act(P/A) B.H. Locn : F 19 17S 31E FTG 1650 F N FTG 1980 F W A Lot Identifier: Dedicated Acre: Lease Type : F Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scrollPF01 HELPPF02PF03 EXITPF04 GoToPF05PF06PF07PF08PF09PF10 NEXT-WCPF11 HISTORYPF12 NXTREC

CMD :

OG6IWCM

API Well No : 30 15 5247 Eff Date : 09-01-1994 WC Status : A Pool Idn : 26790 FREN; SEVEN RIVERS OGRID Idn : 136025 DEVON ENERGY OPERATING CORP Prop Idn : 16001 TURNER A Well No : 022 GL Elevation: 3646 U/L Sec Township Range North/South East/West Prop/Act(P/A) E.H. Locn : F 19 17S 31E FTG 2310 F N FTG 1650 F W A Lot Identifier: Dedicated Acre: 40.00 Lease Type : F Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

	E0044: You	are currently	using this	function		
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PF07	PF08	PF09	PF10	NEXT-WC PF	11 HISTORY	PF12 NXTREC