

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson
Governor

Joanna Prukop
Cabinet Secretary

Mark Fesmire
Division Director
Oil Conservation Division



July 17, 2009

Devon Energy Production Company, L.P.
Attn: Mr. Brett Hudson
20 North Broadway
Oklahoma City, OK 73102-8260

Administrative Order NSL-6061

**Re: Bell Lake Unit Well No. 21
API No. 30-025-35118
1340 feet FSL and 660 feet FWL
Unit L, Section 32-22S-34E
Lea County, New Mexico**

Dear Mr. Hudson:

Reference is made to the following:

(a) your application (**administrative application reference No. pTGW09-17335466**) submitted to the New Mexico Oil Conservation Division (the Division) in Santa Fe, New Mexico on June 19, 2009, and

(b) the Division's records pertinent to this request.

Devon Energy Production Company, L.P. [OGRID 20305] (Devon) has requested to re-complete the above-referenced well at an unorthodox oil well location, described above in the caption of this letter. The NW/4 SW/4/ of Section 32 will be dedicated to this well in order to form a standard 40-acre spacing unit in the undesignated Northeast Bell Lake-Delaware Pool (97630) and the undesignated Rock Lake-Bone Spring Pool (52766). These pools are governed by statewide Rule 15.9.A, which provides for 40-acre units, with wells located at least 330 feet from a unit outer boundary. This location is less than 330 feet from the southern unit boundary.

Your application has been duly filed under the provisions of Division Rules 15.13 and 4.12.A(2).

It is our understanding that you are seeking this location in order to utilize an existing wellbore that was drilled to a different formation.



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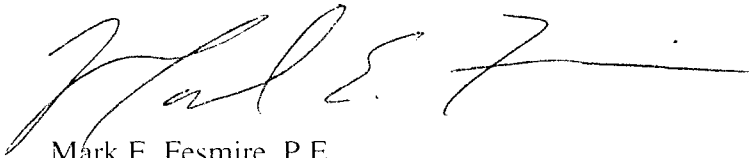
It is also understood that you have given due notice of this application to all operators or owners who are "affected persons," as defined in Rule 4.12.A(2), in all adjoining units towards which the proposed location encroaches.

Pursuant to the authority conferred by Division Rule 15.13.B, the above-described unorthodox location is hereby approved.

This approval is subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 5.9.

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark E. Fesmire', followed by a long horizontal flourish.

Mark E. Fesmire, P.E.
Director

MEF/db

cc: New Mexico Oil Conservation Division - Hobbs
New Mexico State Land Office - Santa Fe