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## DEVON ENERGY CORPORATION October 10, 1995

20 North Broadway, Suite 1500 Telephone:405/235-3611 Oklahoma City, Oklahoma 73102-8260 FAX 405/552-4550 Certified Mail No. Z 731 697 582

New Mexico Oil Conservation Division P. O. Box 2088 Santa Fe, New Mexico 87504-2088

Re: Authorization to Commingle at Surface Todd 23 Sand Dunes (Cherry Canyon) Todd 26 Sand Dunes (Cherry Canyon) Todd 26 Ingle Wells (Delaware) Sections 23 and 26, T23S-R31E Eddy County, New Mexico

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Dear Sir:

This is our application for administrative approval to commingle gas production from the referenced leases. This production will be commingled at the surface only in order to more economically market gas from the wells. Gas from two of these leases must currently be vented due to lack of marketable quantities. The combined production will justify installation of a sales line.

These are federal leases, and like application has been made to Bureau of Land Management. A wealth of detail is included in our application to the BLM and a copy of that application is attached to assist you in your evaluation.

No information as to produced liquids is included as no liquids will be commingled. A schematic of the proposed operation, a plat showing all wells to be commingled, and the pool from which each well produces are all included in the BLM filing. Please advise if you need further information.

Sincerely, Devon Energy Corporation

Gerald T. (Tom) Pepper

Gerald T. (Tom) Pepp District Engineer

## APPLICATION FOR SURFACE COMMINGLING, OFF LEASE STORAGE AND MEASUREMENT APPROVAL

To: Bureau of Land Management P. O. Box 1778 Carlsbad, New Mexico 88221-1778

Devon Energy Corporation is requesting approval for surface commingling and off-lease storage and measurement of hydrocarbon production (gas production only) from the following formations and wells on Federal Lease No. NM0405444, Lease name: Todd 23 Federal. Production from these wells is currently collected at a facility we will refer to in the remainder of this application as the Todd 23 CC battery, more specifically described below:

Well	Loc.	Sec.	Twp.	Rng.	Formation
No.					
23O #1	SE/4	23	T23S	R31E	Sand Dunes (Cherry Canyon)
23J #2	SE/4	23	T23S	R31E	Sand Dunes (Cherry Canyon)

with hydrocarbon production (gas only) from the following formation and wells on Federal lease No. NM0405444-A; Lease Name:Todd 26 Federal. Production from these wells is currently collected at a facility we will refer to in the remainder of this application as the Todd 26 CC battery, more specifically described below:

Well	Loc.	Sec.	Twp.	Rng.	Formation
No.			_	-	
26B #4	NE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)
26J #5	SE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)
26A #6	NE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)
26O #7	SE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)

and to commingle this combined production stream with hydrocarbon production (gas only) from the following formation and wells on Federal Lease No. NM0405444-A; Lease Name: Todd 26 Federal. This battery serves the same Federal lease number as the battery referred to just above. However, this battery is for production from the Ingle Wells (Delaware) field only. This facility will be referred to in the remainder of this application as the Todd 26 BC battery, more specifically described below:

Well	Loc.	Sec.	Twp.	Rng.	Formation
No.			_	_	
26G #8	NE/4	26	T23S	R31E	Ingle Wells (Delaware)
26M #9	SW/4	26	T23S	R31E	Ingle Wells (Delaware)
26K #10	SW/4	26	T23S	R31E	Ingle Wells (Delaware)

26A #11	NE/4	26	T23S	R31E	Ingle Wells (Delaware)
26N #14	SW/4	26	T23S	R31E	Ingle Wells (Delaware)
26O #15	SE/4	26	T23S	R31E	Ingle Wells (Delaware)
26P #16	SE/4	26	T23S	R31E	Ingle Wells (Delaware)
26H #19	NE/4	26	T23S	R31E	Ingle Wells (Delaware)
26I #20	SE/4	26	T23S	R31E	Ingle Wells (Delaware)
26J #21	SE/4	26	T23S	R31E	Ingle Wells (Delaware)
26B #22	NE/4	26	T23S	R31E	Ingle Wells (Delaware)

Gas production from the wells is currently vented, and no recent tests are available for either the section 23 or section 26 Sand Dunes (Cherry Canyon) wells. Gas production from the section 26 Ingle Wells (Delaware) producers is itemized below:

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A map is enclosed showing the lease numbers and location of all leases and wells that will contribute production to the proposed commingling facility. All unitized/communitized areas, producing zones/pools are also clearly illustrated.

A schematic diagram (Exhibit 1) is also attached which clearly identifies all equipment that will be utilized.

**Process and Flow Description**: Gas from the Cherry Canyon producers in section 23 is initially collected at the Todd 23 CC battery, located at the pad site of the Todd "23O" Federal #1 well in the SE/4, Sec. 23, T23S, R31E, on lease no. NM0405444, Eddy county, New Mexico. The storage and measuring facility where commingling of production from the 23 CC battery and 26 CC battery will take place is located on the pad site of the Todd "26B" Federal #4 well in the NE/4, Sec. 26, T23S, R31E, on lease no. NM0405444-A, Eddy county, New Mexico. BLM will be notified if there is any future change in the location of this facility. The facility where the combined production from

Todd 26 CC battery will be commingled with production from the Todd 26 BC battery is located on the pad of the Todd "26G" Federal #2, also in the NE/4, Sec. 26, T23S, R31E, on lease no. NM0405444-A, Eddy county, New Mexico. BLM will be notified if there is any future change in this facility's location also.

**Production Allocation**: Details of the proposed method for allocating production to contributing sources is as follows:

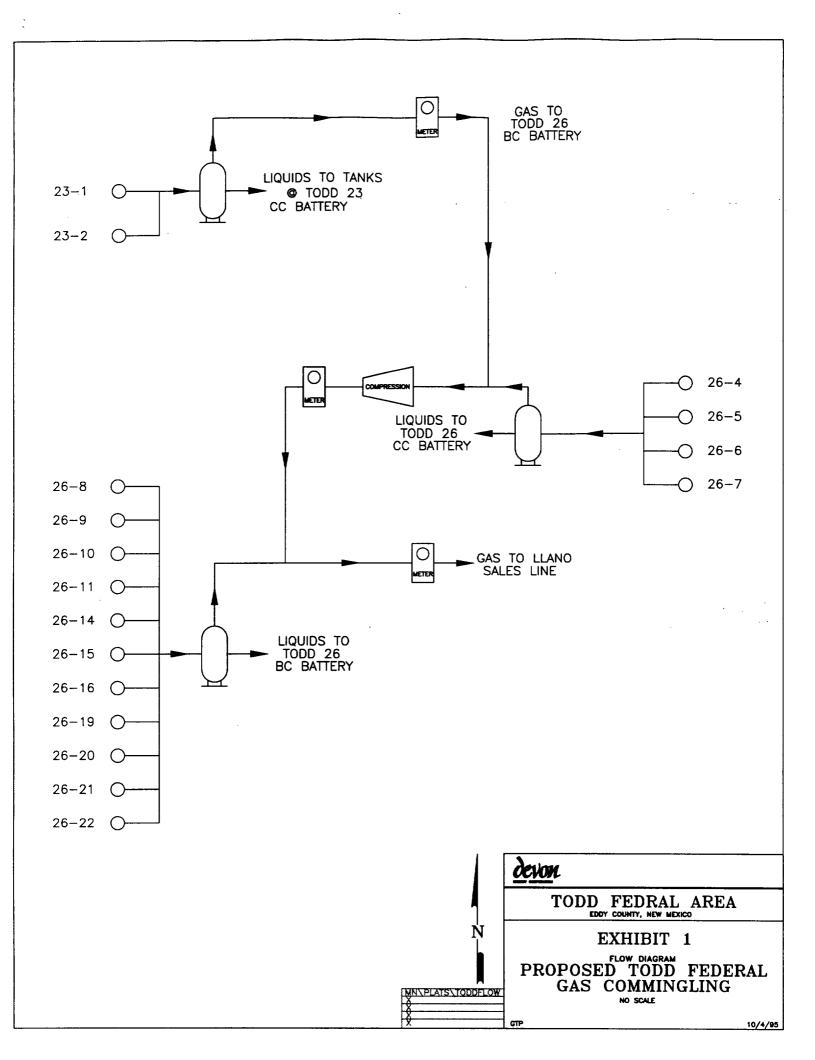
A total flow meter will be set at the Todd 23 CC battery. A meter will also be set at the Todd 26 CC battery. A meter is already in place at the Todd 26 BC battery. The combined production from the Sand Dunes (Cherry Canyon) producers in section 23 will be read as a single volume from the total flow meter at the Todd 23 CC battery, and then allocated to individual wells based on well test data. This total will be subtracted from the gas volume shown at the meter on the Todd 26 CC battery, with the difference representing production from the section 26 Sand Dunes (Cherry Canyon) producers. This difference will then be allocated to individual Sand Dunes (Cherry Canyon) producers in section 26 based on well tests. Finally, the total gas production as recorded at the Todd 26 CC battery will be subtracted from the gas volume measured at the Todd 26 BC battery, with the difference representing gas production from the Todd 26 Ingle Wells (Delaware) producers. This volume will then be allocated to the individual Ingle Wells (Delaware) producers in section 26 based on their respective well tests. The working interest owners have been notified of the proposal, and have either agreed to this allocation or capitulated rather than attempt to decipher this paragraph.

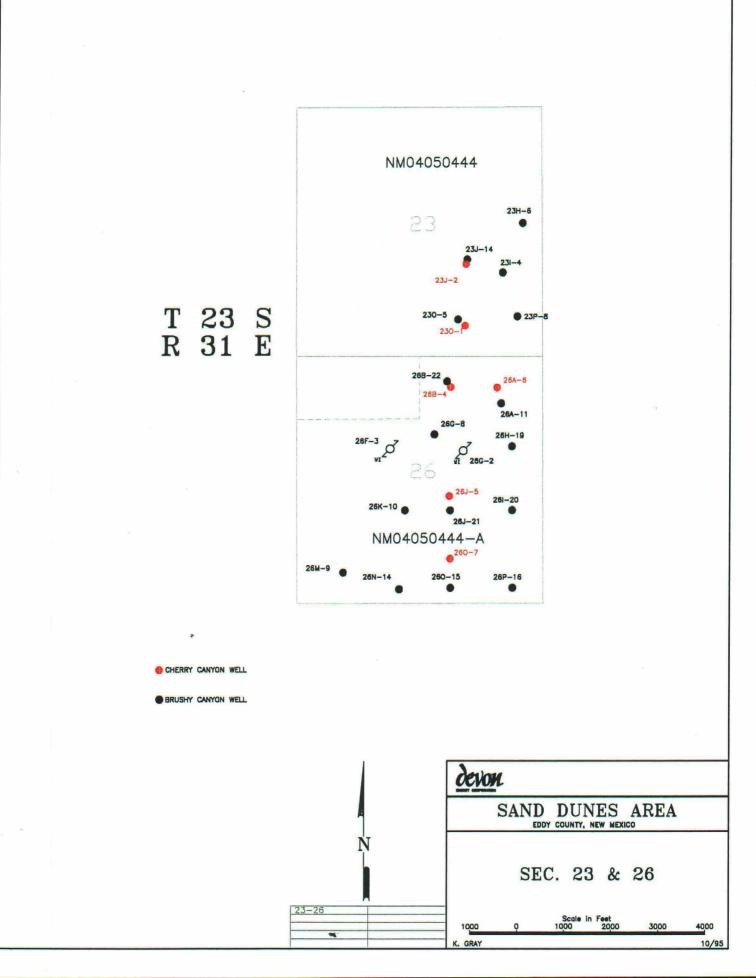
The proposed commingling of production is in the interest of conservation and will not result in reduced royalty or improper measurement of production. Furthermore, this action is an effort to respond to BLM issued Notice of Non-Compliance #NM-067-95-DW-1174.

We understand that the requested approval will not constitute the granting of any right-of-way or construction rights not granted by the lease instrument. Further, we do not anticipate that any such rights will be needed beyond those already existing. We will submit within 30 days any applications for right-of-way approval to the BLM's Realty Section in your office if we determine that any are required.

Signed: Name: Title: District Engineer Date: Certified Mail No. Z 731 697 583

DEVON ENERGY CORPORATION 20 N. Broadway, Suite 1500 OKC, OK 73102-8260





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	3. Address and Telephone No.		
	20 NORTH BROADWAY, SUITE 150	30, OKLAHOMA CITY, OKLAHOMA 73102 (405) 235-36	
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Eddy Crity, NM  CHECK APPROPRIATE BOX(s) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA  TYPE OF SUBMISSION  Notice of Intent Notice of Intent Description Understand Description Descriptio	T23S-R31E (please see attached for	or details by well)	
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RECEIVED Feb 15 10 50 MM 196 AREA

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26A #6	NE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)
260 #7	SE/4	26	T23S	R31E	Sand Dunes (Cherry Canyon)

Gas production from the wells in section 23 is currently vented, and gas from the wells in section 26 is sold through a meter at that location. No recent tests are available for either the section 23 or section 26 Sand Dunes (Cherry Canyon) wells. A map is enclosed showing the lease numbers and location of all leases and wells that will contribute production to the proposed commingling facility. All unitized/communitized areas, producing zones/pools are also clearly illustrated.

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Surface Commingling Application February 13, 1996 Page 2

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The proposed commingling of production is in the interest of conservation and will not result in reduced royalty or improper measurement of production. Furthermore, this action is an effort to respond to BLM issued Notice of Non-Compliance #NM-067-95-DW-1174. As noted above, the gas from the wells in section 26 is no longer vented in any case.

We understand that the requested approval will not constitute the granting of any rightof-way or construction rights not granted by the lease instrument. Further, we do not anticipate that any such rights will be needed beyond those already existing. We will submit within 30 days any applications for right-of-way approval to the BLM's Realty Section in your office if we determine that any are required.

Signed: Name: Title: Date: Gerald T. Pepper District Engineer

February 13, 1996

Devon Energy Corporation (Nevada) 20 N. Broadway, Suite 1500 Oklahoma City, OK 73102-8260 Certified Mail No. Z 731 696 310