DEVOIL ENERGY CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260 Telephone 405/235-3611 FAX 405/552-4550

January 5, 1999

Certified Mail No. Z 068 589 201

STATE OF NEW MEXICO
Energy, Minerals and Natural Resources Dept.
Oil Conservation Division, District II
2040 South Pacheco
Santa Fe, NM 87505

OIL CONSERVATION DIX

313 J. 2062 A W

RE: Authorization to Commingle at Surface the Western Reserves Fed. #2 with the already commingled Devon Federal #3 and Cactus "9B" Federal #2 Section 9-21S-26E Eddy County, NM

Gentlemen:

This is our application for administrative approval to surface commingle gas production from the referenced leases. This production will be commingled at the surface in order to more economically produce and market gas from the wells.

These are federal leases and like application has been made to Bureau of Land Management. A copy of that application is attached. 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 direct inquiries concerning this matter to Wally Frank at (405) 552-4595.

ndace R. Draham (PG 552. 1520

Yours truly,

DEVON ENERGY CORPORATION (NEVADA)

Candace R. Graham Engineering Tech.

/cg

Enclosures

copy: NMOCD in Artesia, DEC Field Office, WF, files

Q:\Prod\Common\Frank\Aweldata\Gasprod\WesternRes#2



January 5, 1999

CERTIFIED MAIL NO. Z 068 589 202

US DEPT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Post Office Box 1778

Carlsbad, New Mexico 88221-1778

RE: Authorization to Commingle at Surface the
Western Reserves Fed. #2
with the already commingled
Devon Federal #3 and Cactus "9B" Federal #2
Section 9-215-26E
Eddy County, New Mexico

Gentlemen:

Concerning the referenced, enclosed please find original and five copies, with attachments, of Form 3160-5 Sundry Notice of Intent for commingling at surface.

Inquiries concerning this matter may be directed to Wally Frank at (405) 235-3611, X4595.

Yours truly,

DEVON ENERGY CORPORATION (NEVADA)

Candace R. Graham

Ms. Candace R. Graham

Engineering Tech.

/cg

Enclosures

copy: NMOCD (Santa Fe & Artesia), WIO's, Engr, Foreman, file

Form 3160-5 (June 1990)

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

FORM APPROVED

Budget Bureau No. 1004-0135 Expires March 31, 1993

	AND REPORTS ON WELLS to deepen or reentry to a different reservoir.	5. Lease Designation and Serial No.
	R PERMIT—" for such proposals	NM0400877 & RNM126 6. If Indian, Allottee or Tribe Name
SUBMIT I	N TRIPLICATE	N/A
1. Type of Well		7. If Unit or CA, Agreement Designation
Oil Gas Other Well		N/A 8. Well Name and No.
2. Name of Operator DEVON ENERGY CORPORATION (NEVAD	A)	(please see below)
3. Address and Telephone No.		9. API Well No.
20 NORTH BROADWAY, SUITE 1500, OKL	AHOMA CITY, OKLAHOMA 73102 (405) 235-3611	(please see below)
4. Location of Well (Footage, Sec., T., R., M., or Survey Des	cription)	10. Field and Pool, or Exploratory Area
Section 9-T21S-R26E (please see below)		(please see below)
		11. County or Parish, State
		Eddy Cnty, NM
CHECK APPROPRIATE BOX(s)	TO INDICATE NATURE OF NOTICE, R	EPORT, OR OTHER DATA
TYPE OF SUBMISSION	TYPE OF ACT	ION
Notice of Intent	Abandonment	Change of Plans
1	Recompletion	New Construction
Subsequent Report	Plugging Back	Non-Routine Fracturing
	Casing Repair	Water Shut-Off
Final Abandonment Notice	Altering Casing Other Commingling at surface	Conversion to Injection Dispose Water
	Other Comminging at surface	(Note: Report results of multiple completion on Well
Describe Proposed or Completed Operations (Clearly state all perting)	inent details, and give pertinent dates, including estimated date of starting	Completion or Recompletion Report and Log form.) any proposed work. If well is directionally drilled, give subsurface
Devon Energy Corporation (Nevada measurement of hydrocarbon produc Devon Federal #3) is requesting approval for surface commetion from the following wells. Cactus "9B" Federal #2	ingling and off-lease storage and Western Reserves Fed. #2
2310' FNL & 2160' FEL	990' FNL & 2310' FEL.	2932' FNL & 1980' FEL
Unit G, Section 9-T21S-R26E	Unit B, Section 9-T21S-R26E	Unit J, Section 4-T21S-R26E
Eddy Cnty, NM	Eddy Cnty, NM	Eddy Cnty, NM
E. Catclaw Draw (Delaware)	E. Catclaw Draw (Delaware)	Avalon (Canyon)
	(10500)	Who who how it
0500	(1000.0.	William of the form
14. I hereby certify that the foregoing is true and correct		
Signed Candace R. Graha	CANDACE R. GRAHAM ENGINEERING TECH.	Date 1/5/99
(This space for Federal or State office use)	A PAGE	
Approved by	Title	Date
Conditions of approval, if any:		

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 (Nevada) is requesting approval for surface commingling and off-lease measurement of Natural Gas hydrocarbon production only from the following formation and well of Federal lease No. RNM126; Lease Name: Western Reserves Federal #2

Well No.	Loc.	Sec.	Twp.	Rng.	Formation
2	SW/NE	4	21S	26E	Canyon

with Natural Gas hydrocarbon production only from the following formation and wells already approved for surface commingling and off-lease measurement on Federal lease No. NM0400877 Lease Name; Cactus "9B" Federal #2 & Devon Federal #3.

Well No.	Loc.	Sec.	Twp.	Rng.	Formation
2	NW/NE	9	21S	26E	Delaware
3	SW/NE	9	21S	26E	Delaware

Production from the wells involved is as follows:

Well Name and No.	BOPD	Oil Gravity	MCFPD
Devon Federal #3	36	41.5° @ 68°F	169
Cactus "9B" Federal #2	4	40.5° @ 60°F	53
Western Reserves Fed. #2	0.5	52.0° @ 68°F	125

The proposed operation is described in detail on the attached diagrams.

A map is enclosed (Attachment A) showing the lease numbers and locations of all leases within the affected area. The Federal leases cover Section #4 & #9 where the wells are located. The off lease measurement site is located NE/NW of Section 16, T21S, R26E on State lease No. L-6705 (Attachment B). Neither the Delaware nor Canyon producing zone is unitized or communitized.

A schematic diagram (Attachment C) is also attached which clearly identifies all equipment that is being utilized.

The off lease measuring facility is located in the NE/NW of Section 16, T21S, R26E on State lease No. L-6705, Eddy County, New Mexico. The BLM will be notified if there is any future change in the facility location.

Details of the method for allocating production to contributing sources are as follows:

Application for Surface Commingling, Off Lease Measurement Approval Lease No. NM0400877 & RNM126 - Devon Fed. 3/Cactus "9B" Fed. 2 & Western Res. Fed. 2) Sections 4&9-21S-26E, Eddy County, New Mexico January 5, 1999 Page Two

The natural gas from the Western Reserves Federal #2, Devon Federal #3 and the Cactus "9B" Federal #2 is the only hydrocarbon being commingled, measured, and sold off-lease. Each of the wells has it's own orifice check meter. These check meters will be used to allocate production back to each well from the common, off-lease, sales point.

The working interest owners have been notified of this proposal.

The commingling of production is in the interest of conservation and waste and will result in the most effective, economic means of producing the reserves in place from the Western Reserves Federal #2 and will not result in reduced royalty or improper measurement of production from the Cactus "9B" Federal #2 or the Devon Federal #3.

The proposed commingling will result in increased production from the marginally economic Western Reserves Fed. #2 and is necessary for the reserves development and continued operation of the above referenced Federal lease.

Devon Energy Corporation (Nevada) understands that the requested approval will not constitute the granting of any right-of-way or construction rights not granted by the lease instrument. And, Devon Energy Corporation (Nevada) will submit within 30 days an application for right-of-way approval to the BLM's realty section in your office if we have not already done so.

Additional wells require additional commingling approvals.

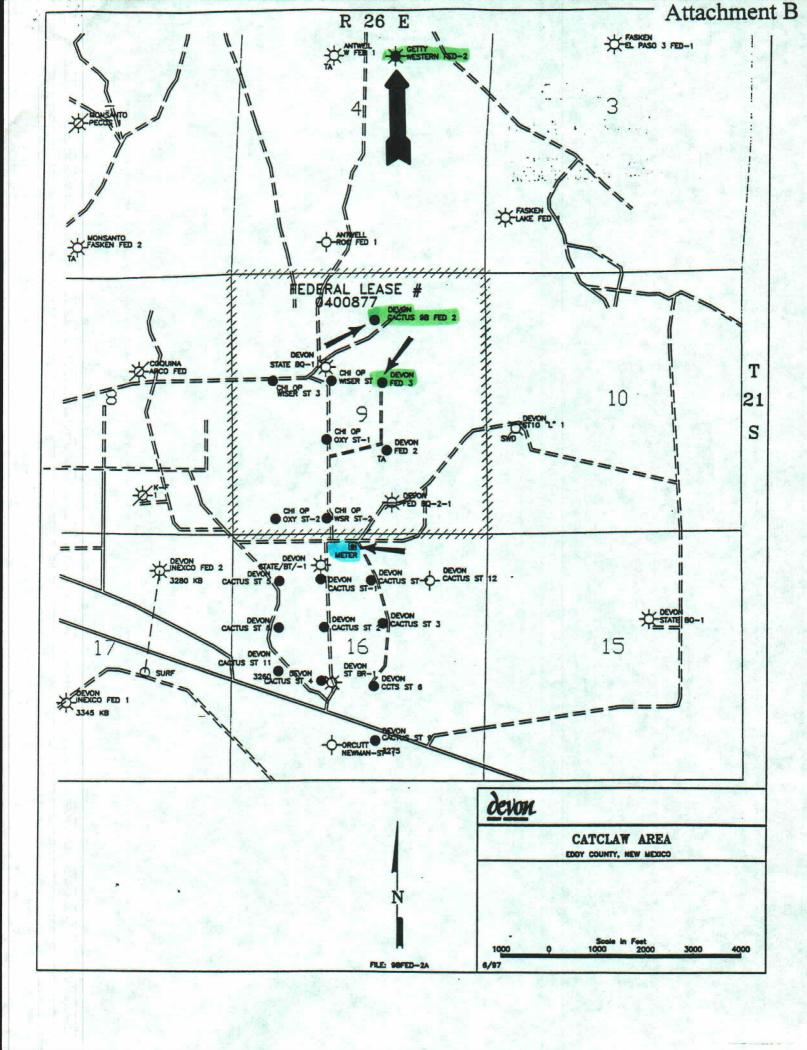
Devon Energy Corporation (Nevada) 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260 (405) 235-3611 X4595 Signature:

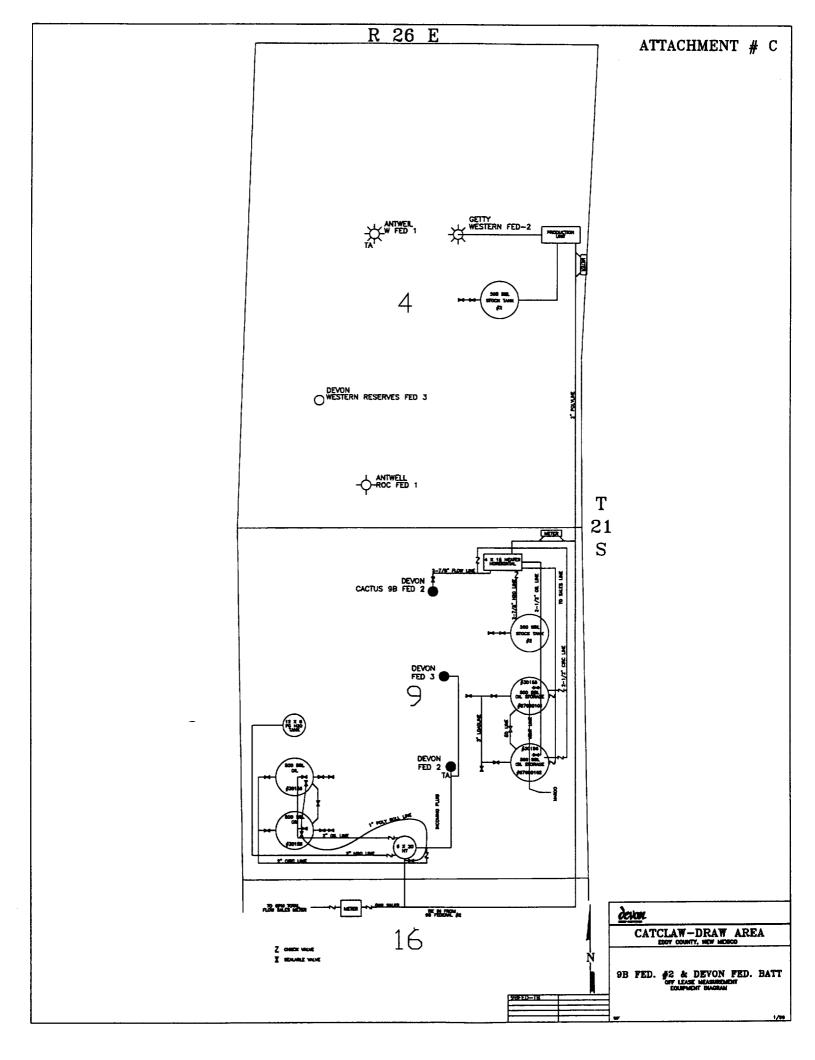
Title:

Name: Walter M. Frank

District Engineer

Date: January 5, 1999





January 5, 1999

Working Interest Owners

Re: Intent to Commingle Gas Production
Avalon (Canyon)
Western Reserves Fed. #2
With the already commingled
Delaware Pool
Devon Federal #3 and
Cactus "9B" Federal #2
Sec. 9-T21S-R26E
Eddy County, New Mexico

Gentlemen:

This is to inform you, per BLM regulations, of our intention to surface commingle gas production from the referenced pool. We have attached a copy of our application to the BLM and wish to call your attention to a few items. First, please note that the legal locations of all wells included in this commingling are itemized. Second, please note the planned method of allocating gas production from each of the wells. We have also notified the NMOCD of our intentions in this matter.

We anticipate commingled gas sales of about 340 MCFD. If you need additional information, please advise.

Sincerely,

DEVON ENERGY CORPORATION

Walter M. Frank District Engineer Intent to Commingle Gas Production Delaware Pool wells Sec. 9-T21S-R26E Eddy County, New Mexico January 5, 1999 Page 2

WIO Address List

BONNEVILLE FUELS CORP (PARTICIPATE) ATTN DAVE SPELMAN 1550 LINCOLN SUITE 1800 DENVER CO 80264	Certified Mail No. Z 068 589 203
OXY USA INC ATTN ERMA GALINDO PO BOX 50250 MIDLAND TX 79710	Z 068 589 204
DAVID FARMER PO BOX 1173 MIDLAND TX 79702	Z 068 589 205
TOM E JOHNSON PO BOX 1707 MIDLAND TX 79702	Z 068 589 206
RIVERHILL ENERGY CORP C/O COASTAL MANAGEMENT PO BOX 970412 DALLAS TX 75397-0412	Z 068 589 207
ST MARY LAND & EXPL CO 1776 LINCOLN STREET SUITE 1100 DANVER CO 80203	Z 068 589 208
SANTA FE ENERGY OPERATING PARTNERS 550 WEST TEXAS SUITE 1330 MIDLAND TX 79701	Z 068 589 209

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PS Form 3811, December 1994

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PS Form 3811 , December 1994	102595-97-B-0179	Domestic Return Receipt

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

ADMINISTRATIVE ORDER OLS-181

Devon Energy Corporation 20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260

Attention: Ms. Candace Graham

The above named company is hereby authorized to commingle East Catclaw Draw Delaware (10500) Pool production from the following wells:

Lease:

Devon Federal Well No.3 (Federal Lease No.NM-0400877)

Description:

SW/4 NE/4, and.

Lease:

Cactus '9B' Federal Well No.2 (Federal Lease No.NM-0400877)

Description:

NW/4 NE/4,

both located in Section 9, Township 21 South, Range 26 East, NMPM, Eddy County, New Mexico.

The aforementioned production is to be transported prior to measurement at the gas sales meter facility located in Unit Letter 'C' of Section 16, Township 21 South, Range 26 East, NMPM, Eddy County, New Mexico. Such gas production shall be allocated to the above described lease by separate orifice meter measurement at each well. Liquid production will not be commingled.

NOTE: This installation shall be installed and operated in accordance with the applicable provisions of Rule 303 of the Division Rules and Regulations and there shall be no intercommunication of the handling, separating, treating or storage facilities designated to the above lease with any other lease prior to a central sales meter.

FURTHER: The operator shall notify the Artesia district office of the Division prior to implementation of the commingling process.

DONE at Santa Fe, New Mexico, on this 29th day of September, 1997.

TCLIAM J. LEMAY,

Division Director

WJL/BES

cc:

Oil Conservation Division - Artesia State Land Office - Oil & Gas Division Bureau of Land Management - Carlsbad RECEIVED

OCT 20 1997

PRODUCTION DEPT.