

Devon Energy Production Company, L.P. 405 235 3611 Phone 333 West Sheridan Avenue Oklahoma City, OK 73102

www.devonenergy.com

March 14, 2018

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VIA FED EX OVERNIGHT MAIL

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505 Allison Marks

Re: Helms Oil & Gas, LLC

Application for Authorization to Inject

Case No. 16039

Beckham Ranch 20 SWD Well No. 1

1,980' FNL and 660' FWL, Section 20-T26S-R35E

Lea County, New Mexico

Dear Ms. Marks,

Pursuant to Division Rule 19.15.26.8, please be advised that Devon Energy Production Company, L.P. ("Devon") objects to the referenced application for authorization to inject. Devon filed an entry of appearance dated March 12, 2018.

Thank you for your attention to this matter.

Devon Energy Production Company, L.P.

Millissi Milli

Melissa Miller

Senior Landman

Helms Oil & Gas, LLC cc:

1509 West Wall Street

Suite 201

Midland, TX 79701