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2005 SEP 27 PM 12 38

Case 13580

September 26, 2005

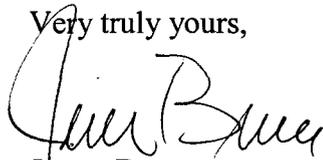
Hand Delivered

Florene Davidson  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed for filing, on behalf of Devon Energy Production Company, L.P., are an original and one copy of an application for an exception to Division Rule No. R-111-P, together with a proposed advertisement. The advertisement has also been e-mailed to the Division. Please set this matter for the October 20, 2005 Examiner hearing. Thank you.

Very truly yours,



James Bruce

Attorney for Devon Energy Production Company, L.P.

BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

APPLICATION OF DEVON ENERGY PRODUCTION COMPANY, L.P. FOR AN EXCEPTION TO DIVISION ORDER NO. R-111-P, EDDY COUNTY, NEW MEXICO.

Case No. 13580

APPLICATION

Devon Energy Production Company, L.P. applies for an order excepting acreage from certain requirements of Division Order No. R-111, as amended. In support thereof, applicant states:

1. Applicant is the operator of United States Oil and Gas Lease NM 041882-A, which covers the N $\frac{1}{2}$ NW $\frac{1}{4}$  of Section 26 and all of Section 27, Township 23 South, Range 31 East, N.M.P.M.

2. Sections 26 and 27 are within the boundaries of the oil-potash area of Southeast New Mexico, as defined in Division Order No. R-111, as amended.

3. Ordering paragraph D of Order No. R-111-P contains certain casing and cementing requirements for wells drilled in the oil-potash area.

4. Applicant desires to drill wells in the N $\frac{1}{2}$ NW $\frac{1}{4}$  of Section 26 and all of Section 27 to a depth sufficient to test the Delaware and Bone Spring formations.

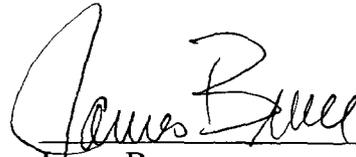
5. Applicant requests that, for Delaware/Bone Spring wells drilled in the N $\frac{1}{2}$ NW $\frac{1}{4}$  of Section 26 and all of Section 27, it not be required to cement the production strings to the surface.

6. Granting this application will prevent waste and protect correlative rights.

**WHEREFORE**, applicant requests that, after notice and hearing, the Division enter its order granting the relief requested above.

2005 SEP 27 8:11 38

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "James Bruce", written over a horizontal line.

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
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Attorney for Devon Energy Production  
Company, L.P.

Proposed Advertisement

**Case No. 13580: Application of Devon Energy Production Company, L.P. for an exception to Division Order No. R-111-P, Eddy County, New Mexico.** Applicant seeks an order granting an exception to Division Order No. R-111-P so that it is not required to cement production strings to the surface on wells drilled to the Delaware and Bone Spring formations on a federal oil and gas lease covering the N½NW¼ of Section 26 and all of Section 27, Township 23 South, Range 31 East, NMPM. The affected area is located approximately 15 miles east-northeast of Harroun, New Mexico.

2005 SEP 27 PM 12 38