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July 29, 2003

RECEIVED

JUL 29 2003

Oil Conservation Division

Case 13133

Hand Delivered

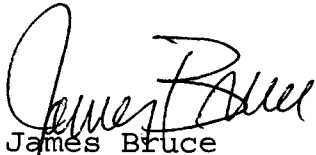
Florene Davidson
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Dear Florene:

Enclosed are an original and one copy of an application for compulsory pooling, together with a proposed advertisement, filed on behalf of Devon Energy Production Company, L.P. Please set this matter for the August 21, 2003 Examiner hearing. Thank you.

The proposed advertisement is also on the enclosed disk.

Very truly yours,


James Bruce

Attorney for Devon Energy Production Company, L.P.

PARTIES BEING POOLED

Occidental Permian Limited Partnership
P.O. Box 50250
Midland, Texas 79710

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BEFORE THE NEW MEXICO OIL CONSERVATION DIVISION

JUL 29 2003

Oil Conservation Division

APPLICATION OF DEVON ENERGY PRODUCTION
COMPANY, L.P. FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO.

Case No. 13133

APPLICATION

Devon Energy Production Company, L.P. applies for an order pooling all mineral interests from the surface to the base of the Morrow formation underlying the E½ of Section 28, Township 18 South, Range 24 East, N.M.P.M., Eddy County, New Mexico, and in support thereof, states:

1. Applicant is a working interest owner in the E½ of Section 28, and has the right to drill a well thereon.

2. Applicant proposes to drill its Southern Cross "28" State Com. Well No. 1, at an orthodox location in the SE¼SE¼ of Section 28, and seeks to dedicate the following acreage to the well:

- (a) The SE¼ of Section 28 for all pools or formations developed on 160 acre spacing within that vertical extent; and
- (b) The E½ of Section 28 for all pools or formations developed on 320 spacing within that vertical extent, including the Undesignated Penasco Draw-Permo Penn Gas Pool, Undesignated Antelope Sink-Strawn Gas Pool, Undesignated Antelope Sink-Atoka Gas Pool, and Undesignated North Antelope Sink-Morrow Gas Pool.

3. Applicant has in good faith sought to obtain the voluntary joinder of all other mineral interest owners in the E½ of Section 28 for the purposes set forth herein.

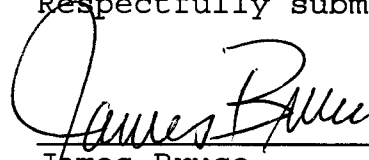
4. Although applicant attempted to obtain voluntary agreements from all mineral interest owners to participate in the drilling of the well or to otherwise commit their interests to the well, certain interest owners have failed or refused to join in dedicating their interests. Therefore, applicant seeks an order pooling all mineral interest owners in the E½ of Section 28, pursuant to NMSA 1978 §70-2-17.

5. The pooling of all mineral interests underlying the E½ of Section 28, as set forth above, will prevent the drilling of unnecessary wells, prevent waste, and protect correlative rights.

WHEREFORE, Applicant requests that, after notice and hearing, the Division enter its order:

- A. Pooling all mineral interests in the E½ of Section 28, from the surface to the base of the Morrow formation;
- B. Designating applicant as operator of the well;
- C. Considering the cost of drilling and completing the well, and allocating the cost thereof among the well's working interest owners;
- D. Approving actual operating charges and supervision costs, together with a provision adjusting the rates as provided in the COPAS accounting procedure; and
- E. Setting a penalty for the risk involved in drilling and completing the well in the event a working interest owner elects not to participate in the well.

Respectfully submitted,

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

James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Devon Energy Production
Company, L.P.