

**JAMES BRUCE**  
ATTORNEY AT LAW

POST OFFICE BOX 1056  
SANTA FE, NEW MEXICO 87504

369 MONTEZUMA, NO. 213  
SANTA FE, NEW MEXICO 87501

(505) 982-2043 (Phone)  
(505) 660-6612 (Cell)  
(505) 982-2151 (Fax)

[jamesbruc@aol.com](mailto:jamesbruc@aol.com)

January 23, 2009

Via fax

Richard Ezeanyim  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Re: Case No. 14268/Devon Energy Production Company, L.P.  
E½ §15-19S-31E, Eddy County, New Mexico

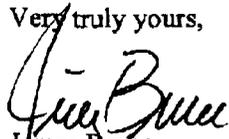
Dear Richard:

I would like to clarify the matters discussed at the hearing yesterday:

1. In Case No. 14244 (Order No. R-13059), Devon pooled ConocoPhillips Company into the E½ §15 for all depths from the surface to the base of the Morrow formation, including the Strawn formation. (There were a number of other interest owners, from the surface to the base of the Morrow formation, who voluntarily joined in the well.)
2. There were several working interest owners in the Strawn formation only in the NE¼SE¼ §15 who were not pooled in Case No. 14244. The reason was that Devon had to move forward with pooling the E½ §15 as to the Morrow formation because of an expiring lease, and title information on the NE¼SE¼ §15 was not complete when Case No. 14244 was filed.
3. As the witness testified at hearing, title information on the Strawn formation in the NE¼SE¼ §15 is complex, resulting in about 30% of the title being unclear.

As a result, in Case No. 14268 Devon seeks the pooling of the interest owners highlighted on Exhibit 2 in the event that the well is completed in the Strawn formation after the Morrow formation is tested. The order in this case need only pool the Strawn formation in the SE¼ §15 (it is spaced on 160 acres).

Very truly yours,



James Bruce

Attorney for Devon Energy Production Company, L.P.