

Devon Energy Corporation 20 North Broadway Oklahoma City, Oklahoma 73102-8260 Fax 405-552-8113

July 16, 2002

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

Attention: Michael Stogner

Re: Unorthodox Well Location

Application Reference No. PKRVO-217150424

Winston Federal Gas Com #6

Section 31-T21S-R24E Eddy County, New Mexico DEC #52790-001; C-02-0398



Dear Mr. Stogner:

I am in receipt of your letter dated July 3, 2002 in which you point out certain deficiencies in the referenced unorthodox well location application. In response, I submit to you the following:

- 1. State Form C-102 dedicating the E/2 Section 31 as the spacing unit for the Winston Gas Com #3 as submitted to the NMOCD in May 1998.
- 2. State Form C-102 dedicating the W/2 Section 31 as the spacing unit for the Winston Gas Com #5 as submitted to the NMOCD in July 1998.
- 3. Amended State Form C-102 dated July 15, 2002 changing the previously dedicated spacing unit for the Winston Gas Com #7 from a N/2 spacing unit to an E/2 spacing unit. This amended form was mailed to the Artesia OCD office on July 15, 2002.
- 4. Amended State Form C-102 dated July 15, 2002 changing the previously dedicated spacing unit for the Winston Gas Com #8 from a S/2 spacing unit to an E/2 spacing unit. This amended form was mailed to the Artesia OCD office on July 15, 2002.

As a result of the above filings the Winston Gas Com #3, #7, and #8 will be dedicated to the E/2 spacing unit and the Winston Gas Com #1, #5, and #6 will be dedicated to the W/2 spacing unit. This should paint a much clearer picture with regard to allocation of production to the appropriate spacing unit. I apologize for any inconvenience.

New Mexico Oil Conservation Division July 16, 2002 Page Two

Based on the above, I have taken the liberty of resubmitting the previously denied application for your further review and approval.

Please contact me at 405-552-4633 if any additional information is required.

Yours very truly,

DEVON ENERGY PRODUCTION COMPANY, L.P.

Ken Gray

Senior Land Advisor

KG:da/winston6.ltr

Enclosure

cc: Mr. Tim Gum

New Mexico Oil Conservation Division

1301 West Grand Avenue

Artesia, NM 88210

Mr. James Bruce

P. O. Box 1056

Santa Fe, NM 87504



DISTRICT_I P. O. Box 1980 Hobbs, NM 88241-1980

ZHIBIT# State of New Mexico End _, Minerals, and Natural Resources Department

Form C-102 Revised 02-10-94

instructions on back

Submit to the Appropriate District Office State Lease - 4 copies Fee Lease - 3 copies

DISTRICT II
P. O. Drawer DD Artesia, NM 88211-0719

OIL CONSERVATION DIVISION DISTRICT III 1000 Rio Brazos Rd. P. O. Box 2088 Santa Fe, New Mexico 87504-2088 Aztec, NM 87410

AMENDED REPORT

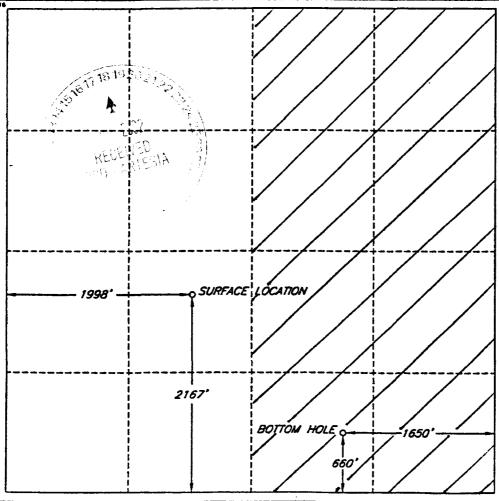
(

DISTRICT IV P. O. Box 2088

Santa Fe, NM 87507-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT

3 Pool Name ² Pool Code 1 API Number INDIAN BASIN (MORROW) • Vell Number * Property Code Property Name WINSTON GAS COM 3 OGRID No. * Operator Name * Elevation 6137 DEVON ENERGY CORPORATION (NEVADA) 3906 *SURFACE LOCATION UL or lot no. Section Township Range Lot Ida | Feet from the North/South line | Feet from the | Bast/West line County 21 SOUTH 24 EAST, N.M.P.M. K 31 2167 SOUTH 1998' WEST EDDY "BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE Lot Ida | Feet from the North/South line | Feet from the | East/West line UL or lot no. Section Township County 21 SOUTH 24 EAST, N.M.P.M. 660' SOUTH 1650' EDDY 31 EAST 12 Dedicated Acres 13 Joint or Infill 14 Consolidation Code 15 Order No. 320

NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



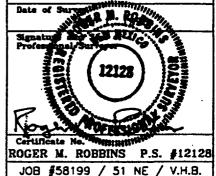
OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Candace R. Graham Printed Name Candace R. Graham Title Engineering Tech. May 11, 1998

SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.



DISTRICT I P.O. Box 1980, Hobbs, NM 86240

State of New Mexico Energy, Minerale and Notural Resources Departm

Form C-102 d February 10, 1994 Instruction on back Submit to Appropriate District Office

State Lease - 4 Copies For Lease - 3 Copies

DISTRICT III

DISTRICT II P.O. Drawer DD, Artesia, NM 88210

1000 Rie Brance Rd., Astec, NM 87410

OIL CONSERVATION DIVISION P.O. Box 2088

Santa Fe, New Mexico 87504-2088

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

| API Number | Pool Code | Pool Code Pool Name | | | | |
|---------------|--------------------|------------------------|-------|--|--|--|
| } | INDIAN BASIN (MORR | | | | | |
| Property Code | ty Name | Vell Number | | | | |
| | Winston | 5 | | | | |
| OGRED No. | Operat | Operator Name | | | | |
| 6137 | Devon Energ | y Corporation (Nevada) | 3928' | | | |

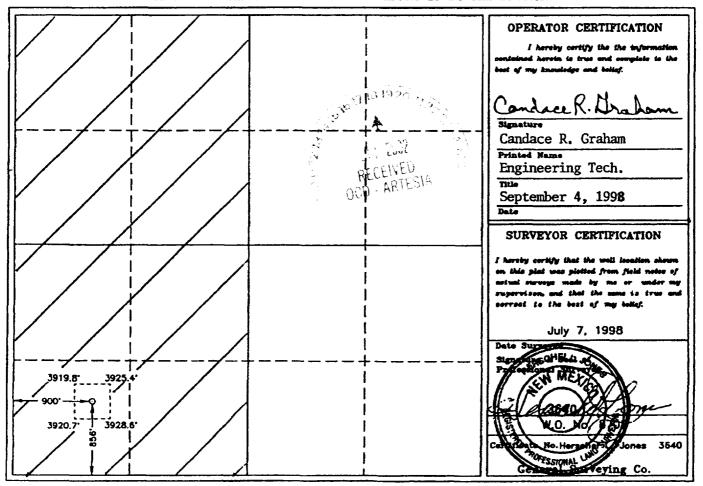
Surface Location

| 1 | UL or lot No. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County | l |
|---|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|---|
| 1 | М | 31 | 21 S | 24 E | | 856 | South | 900 | West | Eddy | |

Bottom Hole Location If Different From Surface

| | UL or le | ot No. | Section | Townsh | tp R | nge | Lot Id | Pe | et from | the | North/South line | Feet from the | East/West line | County |
|---|----------|---------|-----------|--------|---------|-----------|--------|-------|---------|-----|------------------|---------------|----------------|----------|
| + | Dedicate | ed Acre | s Joint o | e prum | Consoli | iation Co | ode | Order | No. | | <u> </u> | | | <u> </u> |
| | 317 | .18 | | | | | | | | | | | | |

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



DISTRICT I P. O. Box 1980 Hobbs, NM 88241-1980

State of New Mexico Energy, Minerals, and Natural Resources Department

Form C-102 Revised 02-10-94 Instructions on back

Submit to the Appropriate District Office State Lease - 4 copies
Fee Lease - 3 copies

DISTRICT II P. O. Drawer DO Artesia, NM 88211-0719

1000 Rio Brazos Rd. Aztec, NM 87410

OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088

X AMENDED REPORT

*changed unit

BEZNER

51 NE

JOB #64995

P.S. #7920

DISTRICT IV P. O. Box 2088 configuration Sonto Fe. NM 87507-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT API Number ² Pool Code 3 Pool Name 33685 Indian Basin (Upper Penn) Assoc. 30-015-30872 Property Code Property Name Vell Number WINSTON GAS COM 20201 OGRED No. PRODUCTION COMPANY, L.P. Operator Name * Elevation DEVON ENERGY CORPORATION (NEVADA) -6137 3811' "SURFACE LOCATION UL or let no. Section Lot Ida Feet from the North/South line Feet from the Township Range East/West line County 21 SOUTH 24 BAST, N.M.P.M 497 31 NORTH 1863 EAST EDDY "BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE UL er lot no. Township Lot Ide Feet from the North/South line Feet from the East/West line County 1656'-A # 21 SOUTH 24 EAST, N.M.P.M. NORTH EAST EDDY 2 Dedicated Acres 13 Joint or Infill " Consolidation Code 16 Order No. 320 NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION OPERATOR CERTIFICATION 497 I hereby certify that the information contained herein is true and complete 1863 SURFACE to the best of my knowledge and belief. LOCATION 012 Steneture Candace 793 Candace R. Graham BHL Tille Engineering Tech. *July 15, 2002 SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. Date of Survey SEPTEMBER 8, 1999 Signature and Seel of

DISTRICT I P. O. Box 1980 Hobbs, NM 88241-1980

State of New Mexico Energy, Minerals, and Natural Resources Department Form C-102 d 02-10-94

instructions on back

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P. O. Drawer DD Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

DISTRICT IV

P. O. Box 2088

OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088

X AMENDED REPORT *changed unit configuration

Sonto Fe, NM 87507-2088 WELL LOCATION AND ACREAGE DEDICATION PLAT ² Pool Code ³ Pool Name 1 API Number Indian Basin (Upper Penn) Assoc. 33685 30-015-30873 Property Code Property Name • Well Number WINSTON GAS COM 20201 8 Production Company, L.P. OGRID No. Operator Name 6137 DEVON ENERGY CORPORATION-(NEVADA) 3829 "SURFACE LOCATION Lot Ida Feet from the North/South line Feet from the UL or lot no. Section Township Range East/West line County 21 SOUTH 24 EAST, N.M.P.M 938' NORTH 1873 **EDDY** В EAST "BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE Lot Ida Feet from the North/South line Feet from the East/West line UL or lot no. Section Township County 1980 21 SOUTH 24 EAST, N.M.P.M. SOUTH ane. EAST **EDDY** ** Order No. 1198* 692' * Consolidation Code 12 Dedicated Acres 13 Joint or Infill 320 NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION *╢┼┼┼┼┼╂╅┼┼┼╂*╢ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete 938

1873 SURFACE LOCATION BHI 6921 98

to the best of my knowledge and belief.

Signature Candace R. Alla

Printed Name Candace R. Graham

Title

Engineering Tech.

*July 15, 2002

SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Date of Survey

SEPTEMBER 8, 1999

Signature and Seal of

¥. L. BEZNER P.S. #7920

JOB #64996 / 51 NE / V.H.B.