NSL 10/25/99 #11+12



September 29, 1999

CERTIFIED MAIL # Z-781-289 810

Michael E. Stogner State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division 2040 South Pacheco Santa Fe, New Mexico 87505

Mr. Stogner:

Pursuant to Division Rule 104.F., Devon Energy Corporation (Nevada) ("Devon") applies for administrative approval of unorthodox oil well locations for the following wells:

35-19 Logan 35 Federal #11 1310' FSL & 400' FEL SE/4 SE/4, Section 35-T17S-R27E Eddy County, New Mexico *35-D* Logan 35 Federal #12 580' FSL & 1030' FEL SE/4 SE/4, Section 35-T17S-R27E Eddy County, New Mexico

The wells will be drilled to test the Glorieta-Yeso formation (Red Lake; Q-GB-SA & Glorieta-Yeso, NE Pools). The pools are subject to statewide rules, with 40 acre well units, and wells to be located no closer than 330 feet to a quarter-quarter section line. Form C-102 is attached for each well as Exhibit A.

The original location proposed by Devon for the Logan 35 Federal #11 was at an orthodox location at 330' FEL & 990' FSL. The current location is non-standard due to topographic reasons.

The original location proposed by Devon for the Logan 35 Federal #12 was at an orthodox location at 580' FSL & 990' FEL. The current location is non-standard due to topographic reasons.

Attached Exhibit B (topographic map) and Exhibit C (aerial photo) show the proximity of the location of the Logan 35 Federal #11 to a highway and pipeline and the Logan 35 Federal #12 to a pipeline and electric line. Due to these features, the Bureau of Land Management requires Devon to move the wells to the proposed locations.

Attached, as Exhibit D is a land plat of the area. The wells are only moving toward Devonoperated acreage, and thus no other operator has been notified of this application. The lease on which the proposed wells are located is a federal lease and there is no effect on the royalty owners.

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260

FAX 405/552-4550

Telephone 405/235-3611

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Logan 35 Federal #11 Logan 35 Federal #12 NSL Approval September 29, 1999 Page Two

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State of New Mexico Energy, Minerals and Natural Resources Dept. Oil Conservation Division

Directional drilling to an orthodox location is not feasible because it would add 40% to the cost of the wells, and increase operational costs by 30%. Because these wells are not prolific producers (averaging 40 BOPD), the added costs would make the wells uneconomic.

The subject pool is continuous across this area, trending in a northeast-southwest direction. Thus, geology is not a factor in these well locations. Although no decision has yet been made, Devon is considering the possibility of a future waterflood for these pools and the proposed wells fit into a waterflood pattern.

Based on the foregoing, we request approval of the above locations. Please call me at (405) 552-4515 if you need anything further on this matter.

Very truly yours,

DEVON ENERGY CORPORATION (NEVADA)

Jolija Kuteloms

Tonja Rutelonis Engineering Technician

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Attachments: Exhibit A (2)
Exhibit B (2)
Exhibit C
Exhibit D

Exhibit A	7
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State of New Mexico

Energy, Minerals and Natural Resources Department

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

P.O. Box 1980, Hobbs, NM 88240

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DISTRICT I

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410 Form C-102 Revised February 10, 1994 Instruction on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

OIL CONSERVATION DIVISION P.0. Box 2088

Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

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96836 Red Lake; Glorieta-Yes	Red Lake; Glorieta-Yeso, NE & Q-GB-SA									
Property Code Property Name Well Number										
23714 LOGAN "35" FEDERAL	LOGAN "35" FEDERAL 11									
OGRID No. Operator Name	Elevation									
6137 DEVON ENERGY CORPORATION	3642'									
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DISTRICT I P.O. Box 1980, Hobbs, NM 88240

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

DISTRICT III 1000 Rio Brazos Rd., Astec, NM 87410

Exhibit A

State of New Mexico

Energy, Minerals and Natural Resources Department

Form C-102 Revised February 10, 1994 Instruction on back Submit to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies

OIL CONSERVATION DIVISION

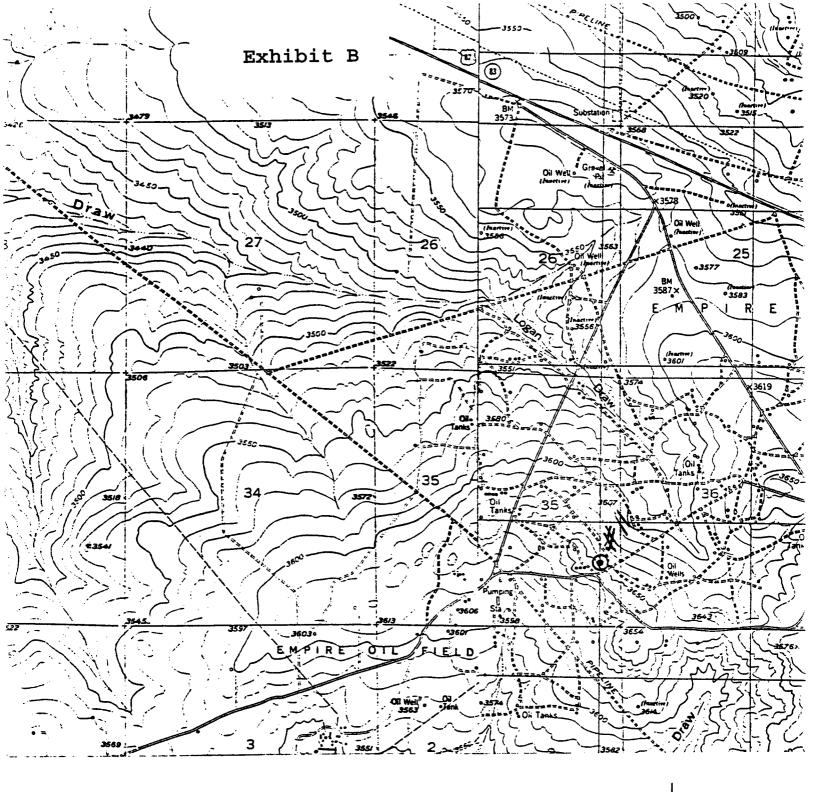
P.O. Box 2088

Santa Fe, New Mexico 87504-2088

□ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

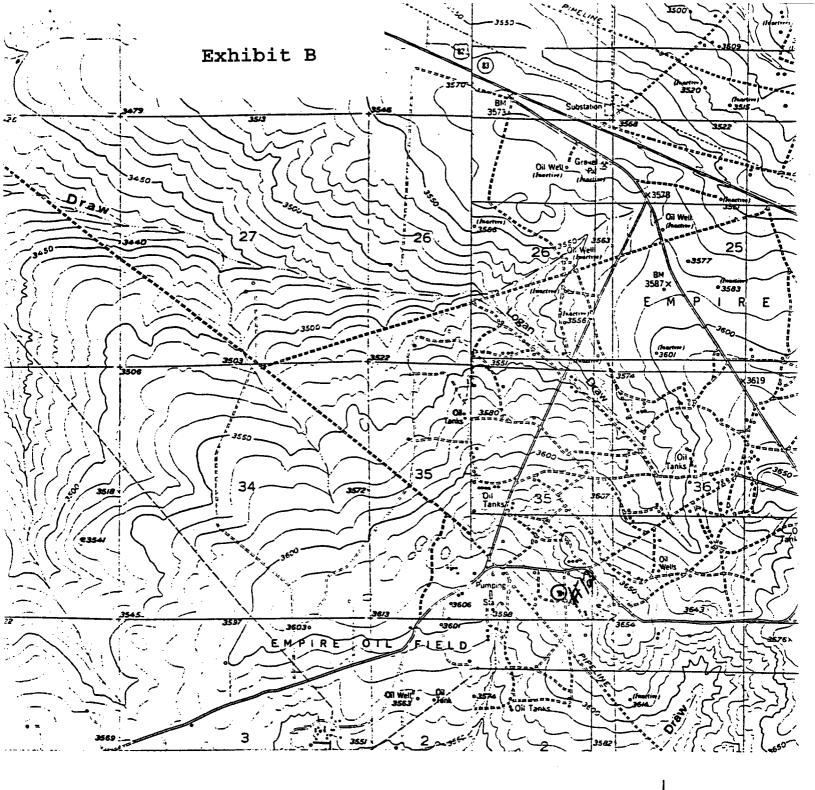
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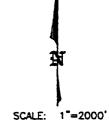
DEVON ENERGY CORP. LOGAN "35" FEDERAL #11 1310' FSL & 400' FEL Sec. 35, T-17-S, R-27-E, Eddy County, New Mexico.



BASIN SURVEYS P.O. BOX 1786-HOBBS, NEW MEXICO	2000'		2000'	400	00 Feet
W.O. Number: 9144 Drawn By: K. GOAD		-04-99	Sheet 1	of 1	Sheets



DEVON ENERGY CORP. LOGAN "35" FEDERAL #12 580' FSL & 1030' FEL Sec. 35, T-17-S, R-27-E, Eddy County, New Mexico.



BASIN SUBVEYS P.O. BOX 1786-HOBBS, NEW MEXICO	2000'	0	2000'	4000 Feet
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