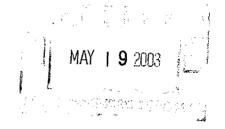
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**Devon Energy Corporation** 20 North Broadway Oklahoma City, Oklahoma 73102-8260 Fax 405-552-8113

May 13, 2003

New Mexico Oil Conversation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505 Attn: Michael Stogner

Re: Old Ranch Knoll 8 Fed Com #8 Section 8-T22S-R24E Eddy County, New Mexico



# Gentlemen:

Devon Energy Production Company, L.P. (Devon), as Operator, intends to drill the referenced Cisco Canyon well to a depth of approximately 8,600'. Devon initially attempted to stake and permit this well at an orthodox location of 1650' FSL & 990' FWL. However, due to the proximity of the extreme slope of the surface the Bureau of Land Management (BLM) required Devon to move the location. The closest drillable location as approved by the BLM is located 1500' FSL & 1080' FWL which is an unorthodox location as it is closer than 330' to the quarter/quarter line pursuant to the Indian Basin Upper Penn Associated Pool Rules.

Inasmuch as this well will be producing from an unorthodox location from that permitted by the Indian Basin Upper Penn Associated Pool Rules, Devon respectfully requests that the Commission administratively approve this application for an unorthodox location in accordance with Division Rule 104(F)(3). This unorthodox location is interior to the spacing unit; therefore Yates-Petroleum Corporation as the only other interest owner in the designated spacing unit has been given notice of this application.

Attached you will find a land plat reflecting Yates Petroleum Corporation as the only affected party, a net Cisco Canyon Isopach map, a State of New Mexico form C-102 and a topographic map.

If there are any questions or if additional information is required feel free to call me at (405) 552-4633.

Yours very truly,

DEVON ENERGY PRODUCTION COMPANY, L.P.

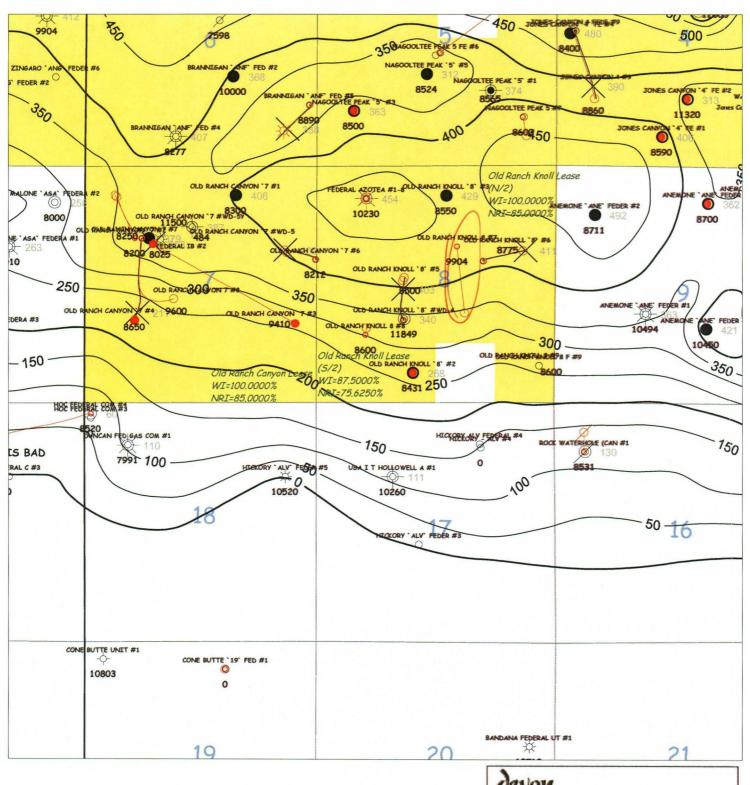
Ken Grav

Senior Land Advisor

Kg/

Enclosure

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# Indian Basin Area Eddy County, NM Old Ranch Knoll 8 Federal #8 Proposed Location Isopach: Net Feet of Cisco-Canyon Dolomite 18 4/15/2003

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

## State of New Mexico

Energy, Minerals and Natural Resources Department

EXHIBIT 2

Form C-102

Revised February 10, 1994
Submit to Appropriate District Office

State Lease - 4 Copies Fee Lease - 3 Copies

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

DISTRICT IV

DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 67410

P.O. BOX 2088, SANTA FE, N.M. 87504-2088

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 Name		
30-015-	33658	Indian Basin (Upper Penn) Asso	oc.	
Property Code	Prop	erty Name	Well Number	
16875	OLD RANCH K	NOLL 8 FEDERAL COM.	8	
OGRID No.	Opera	Elevation		
6137 DEVON ENERGY PRODUCTION, CO., LP				

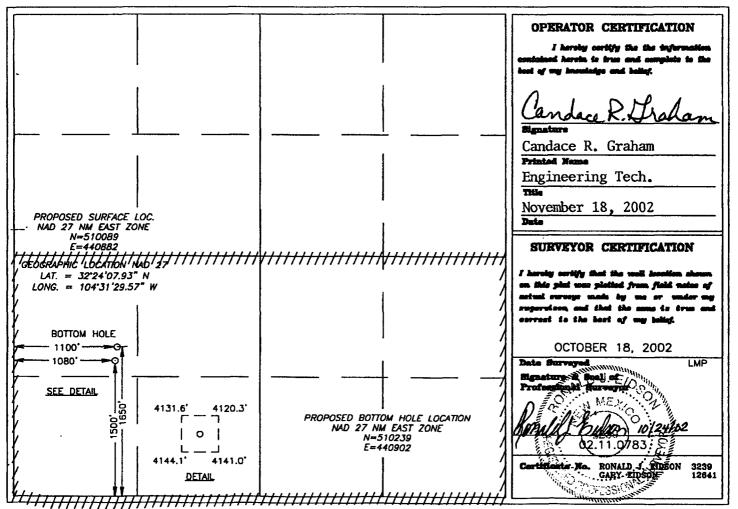
### Surface Location

ſ	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
	L	8	22 S	24 E		1500	SOUTH	1080	WEST	EDDY

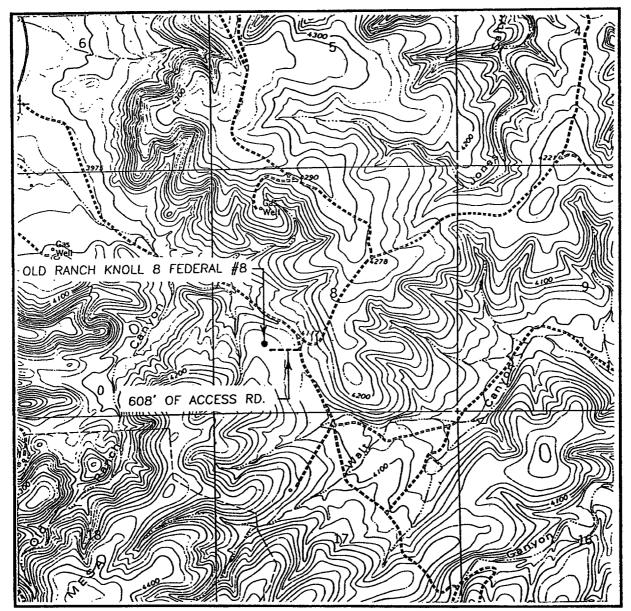
### Bottom Hole Location If Different From Surface

-	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
	<u>-</u> L	8	<del>22 S</del>	24 L		1650	SOUTH	1100	WEST	FDDY
ĺ	Dedicated Acres   Joint or Infill   Consolidation Code		Code Or	der No.						
	320									

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



# LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

CONTOUR INTERVAL: MARTHA CREEK, N.M. - 20'

SEC. 8	TWP. <u>22-S</u> RGE. <u>24-E</u>
SURVEY	N.M.P.M.
COUNTY	EDDY
DESCRIPTIO	ON 1500' FSL & 1080' FWL
ELEVATION	4145
OPERATOR.	DEVON ENERGY PRODUCTION, CO., LP
LEASE OLD	RANCH KNOLL 8 FEDERAL
	OPOGRAPHIC MAP
MAKIHA CI	REEK, N.M.

JOHN WEST SURVEYING HOBBS, NEW MEXICO (505) 393-3117