

devon

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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

MAY 19 2003

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.

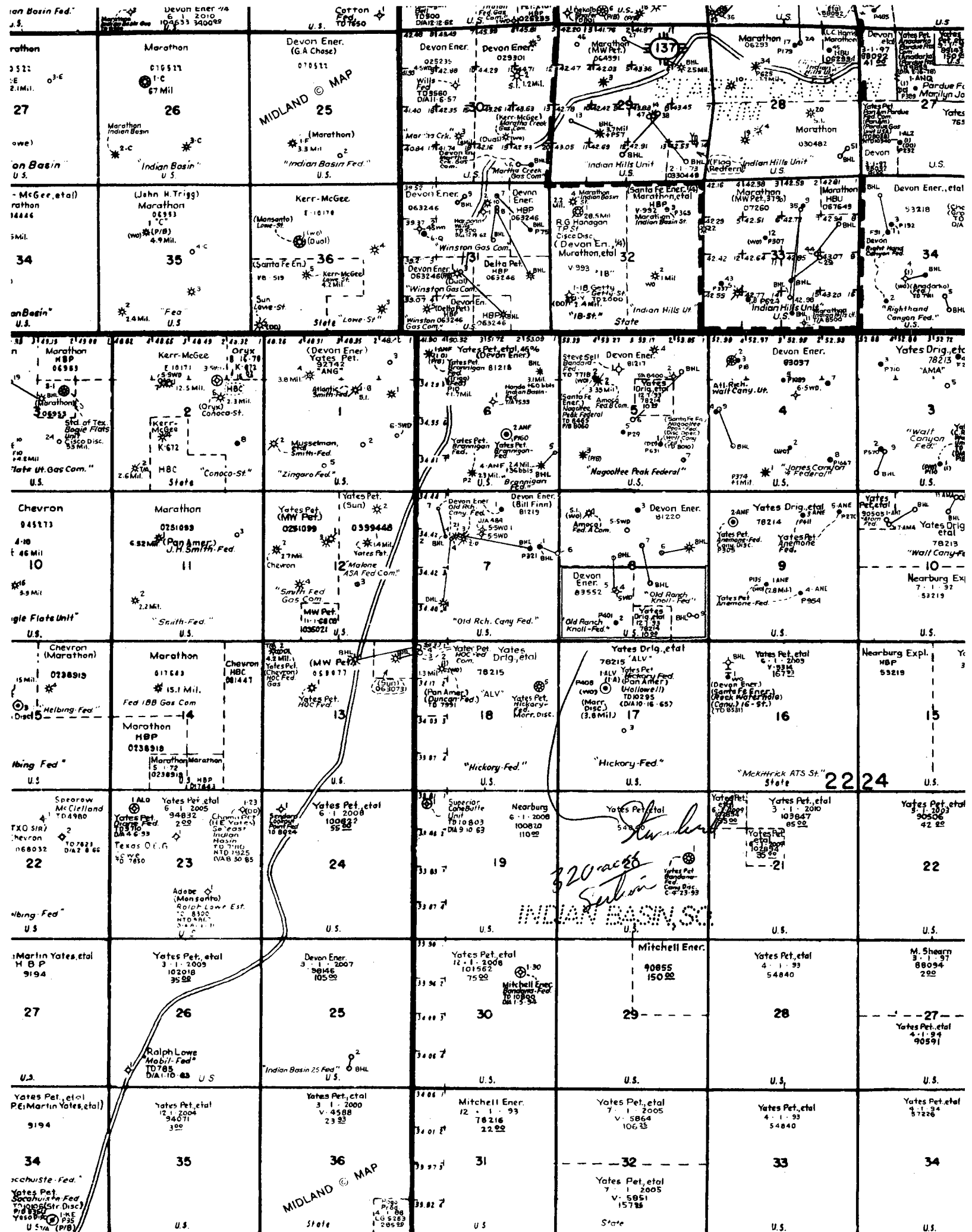
Yours very truly,

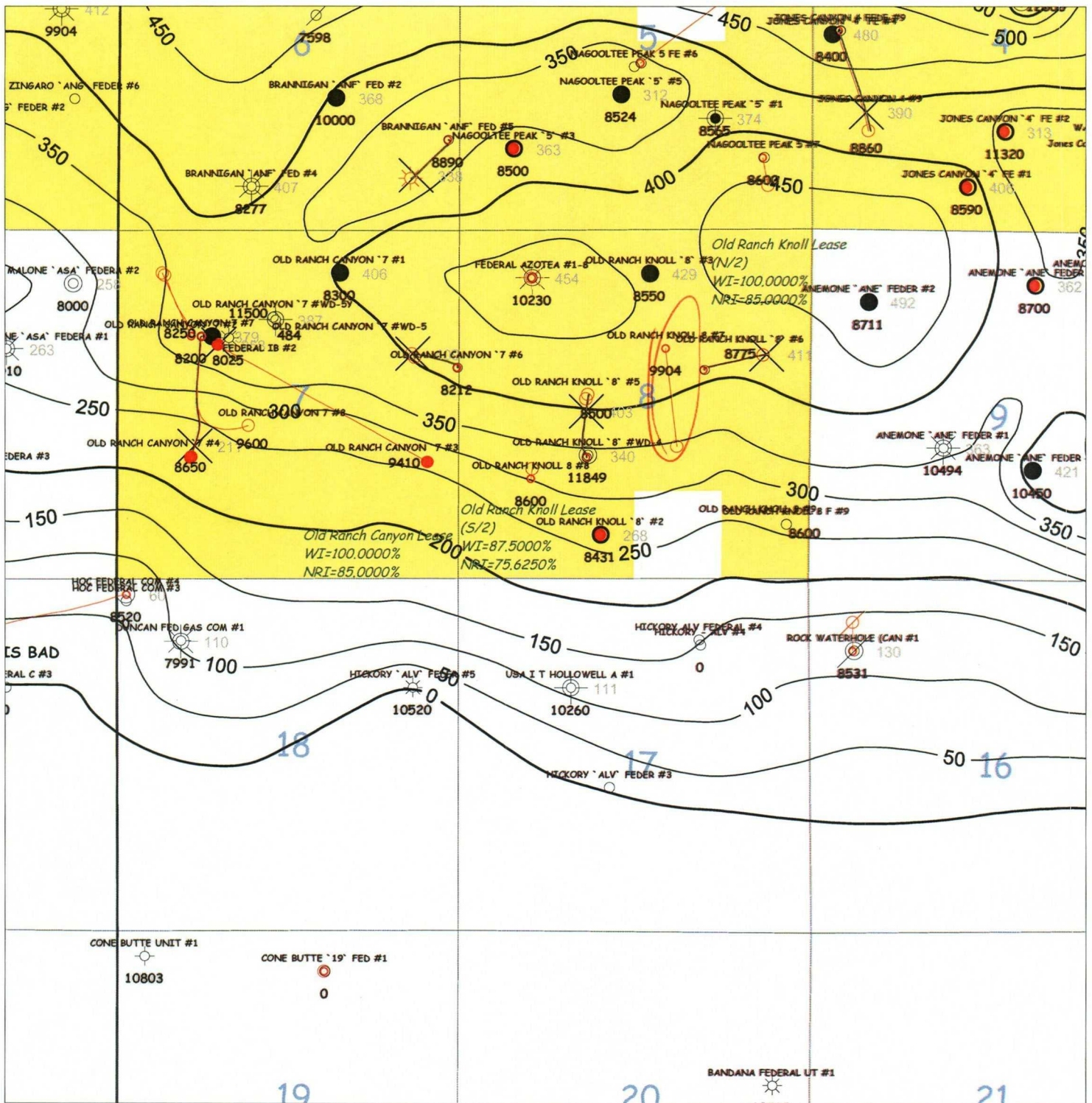
DEVON ENERGY PRODUCTION COMPANY, L.P.



Ken Gray
Senior Land Advisor

Kg/
Enclosure





devon

**Indian Basin Area
Eddy County, NM**

**Old Ranch Knoll 8 Federal #8
Proposed Location**

**Isopach:
Net Feet of Cisco-Canyon
Dolomite**

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

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

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

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

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

OIL CONSERVATION DIVISION

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

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-015-	Pool Code 33658	Pool Name Indian Basin (Upper Penn) Assoc.
Property Code 16875	Property Name OLD RANCH KNOLL 8 FEDERAL COM.	Well Number 8
OGRID No. 6137	Operator Name DEVON ENERGY PRODUCTION, CO., LP	Elevation 4145

Surface Location

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

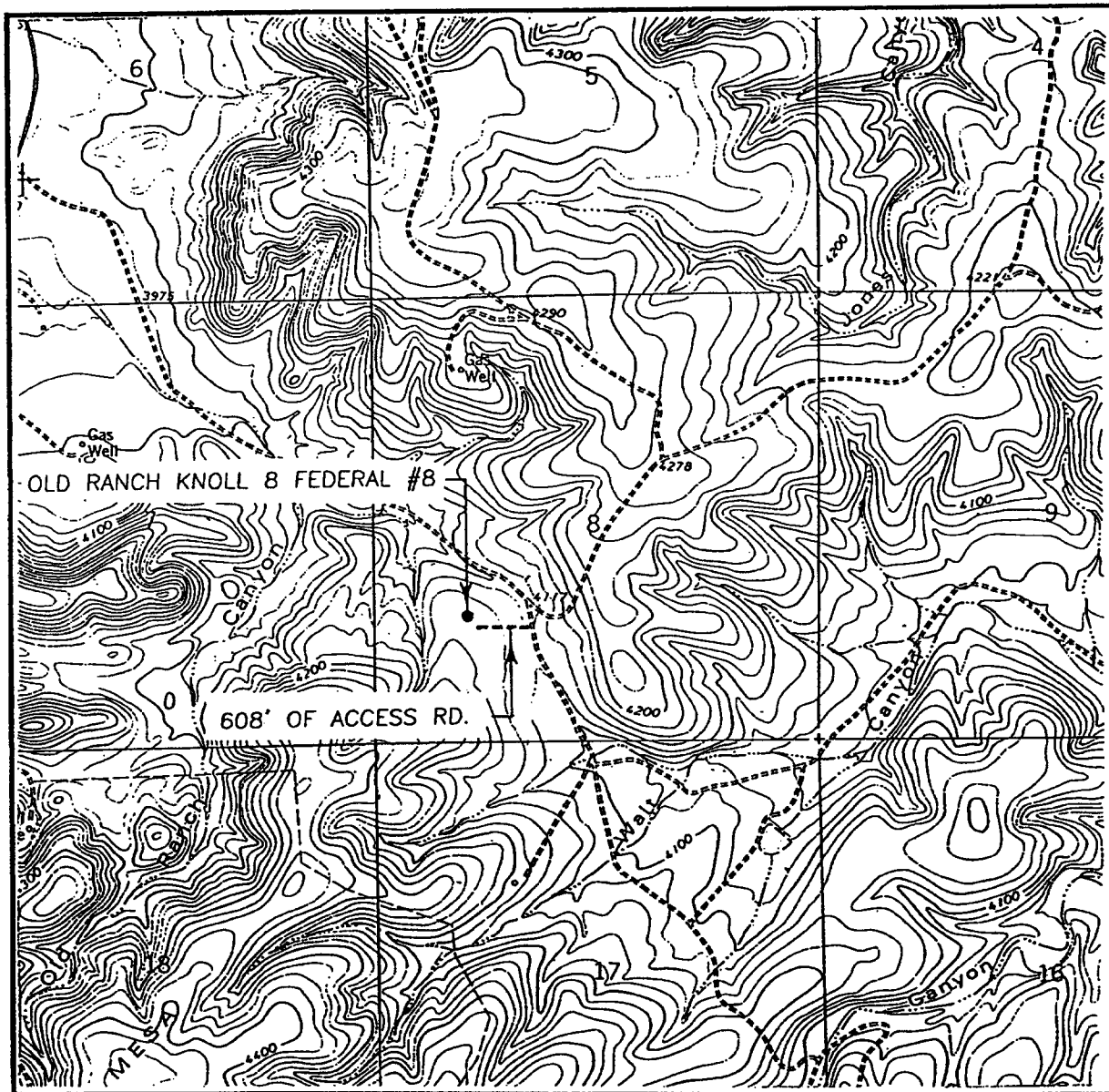
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
L	8	22 S	24 E		1650	SOUTH	1100	WEST	EDDY

Dedicated Acres 320	Joint or Infill	Consolidation Code	Order No.
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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

<p>PROPOSED SURFACE LOC. NAD 27 NM EAST ZONE N=510089 E=440882</p> <p>GEOGRAPHIC LOCATION NAD 27 LAT. = 32°24'07.93" N LONG. = 104°31'29.57" W</p> <p>BOTTOM HOLE 1100' 1080'</p> <p>SEE DETAIL</p> <p>4131.6' 4120.3' 4144.1' 4141.0'</p> <p>DETAIL</p> <p>PROPOSED BOTTOM HOLE LOCATION NAD 27 NM EAST ZONE N=510239 E=440902</p>	<p>OPERATOR CERTIFICATION</p> <p>I hereby certify the information contained herein is true and complete to the best of my knowledge and belief.</p> <p><i>Candace R. Graham</i> Signature Candace R. Graham Printed Name Engineering Tech. Title November 18, 2002 Date</p> <p>SURVEYOR CERTIFICATION</p> <p>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.</p> <p>OCTOBER 18, 2002</p> <p>Date Surveyed LMP Signature & Seal of Professional Surveyor RONALD J. EIDSON 02.11.0783 Certificate No. RONALD J. EIDSON 3239 GARY EIDSON 12641</p>
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LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

CONTOUR INTERVAL:
MARTHA CREEK, N.M. - 20'SEC. 8 TWP. 22-S RGE. 24-ESURVEY N.M.P.M.COUNTY EDDYDESCRIPTION 1500' FSL & 1080' FWLELEVATION 4145OPERATOR DEVON ENERGY
PRODUCTION, CO., LPLEASE OLD RANCH KNOLL 8 FEDERALU.S.G.S. TOPOGRAPHIC MAP
MARTHA CREEK, N.M.

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