

DEVON
ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

OIL CONSERVATION DIVISION

RECEIVED 405/235-3611

Fax 405/552-4550

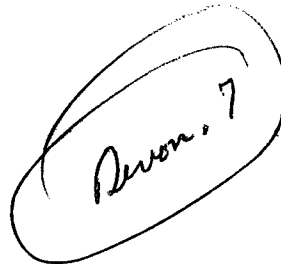
Fax 405/552-4552

March 19, 1996

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 770



Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location for the infill producing well located within the Russell-Turner Waterflood Project, at the following location:

WELL

LOCATION

Turner "A" #48

2350' FNL & 1330' FWL, Sec. 19-17S-31E

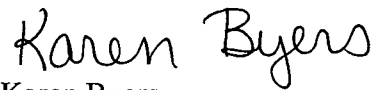
Attached is a plat of the Russell-Turner Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Russell-Turner Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to lease line. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The well will be drilled at the unorthodox location in order to prevent waste by developing an efficient production and injection pattern within the Russell-Turner Waterflood Project, which was approved under Order R - 3185. When fully developed this well will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

The Turner "A" #49 is offset on four sides of the 40 acre tract by either Avon Energy Corporation or Devon Energy Operating Corporation. Avon Energy Corp. is a closely related company to Devon Energy Operating Corp, and therefore does not require notice. One of the diagonal tracts has wells operated by Mack Energy Corporation. Enclosed is a copy of the letter sent to Mack Energy giving required notice.

Should you require any additional information regarding the unorthodox location, please notify me at 405-552-4527.

Sincerely,

A handwritten signature in black ink that reads "Karen Byers". The script is cursive and fluid, with the first letters of each name being capitalized and prominent.

Karen Byers
Engineering Technician

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

SUBMIT IN TRIPLICATE*

(See other instructions on

Form approved.

OPERATOR'S COPY

LEASE DESIGNATION AND SERIAL NO.
LC 029395-A

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a TYPE OF WORK: DRILL ☒ DEEPEN ☐
b TYPE OF WELL: OIL WELL ☒ GAS WELL ☐ Other ☐ SINGLE ZONE ☐ MULTIPLE ZONE ☐

2 NAME OF OPERATOR
DEVON ENERGY OPERATING CORPORATION
3 ADDRESS AND TELEPHONE NO.
20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560

4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)*
At surface 2350' FNL & 1330' FWL UNORTHODOX LOCATION: Subject to
At top proposed prod. zone (SAME) Like Approval
By State

6. IF INDIAN, ALLOTTEE OR TRIBE NAME
NA7. UNIT AGREEMENT NAME
NA8. FARM OR LEASE NAME, WELL NO.
Turner "A" #48

9. API WELL NO.

10. FIELD AND POOL, OR WILDCAT
GRAYBURG-JACKSON11. SEC., T., R., M., OR BLOCK AND SURVEY OR AREA
SECTION 19-T17 S- R31 E12. COUNTY OR PARISH
EDDY13. STATE
NM14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*
4.5 miles east & .2 mile north of Loco Hills, N.M.15. DISTANCE FROM PROPOSED
LOCATION TO NEAREST
PROPERTY OR LEASE LINE, FT. 290'
(Also to nearest ddr unit line if any)16. NO. OF ACRES IN LEASE
609.4317. NO. OF ACRES ASSIGNED
TO THIS WELL
4018. DISTANCE FROM PROPOSED LOCATION*
TO NEAREST WELL, DRILLING, COMPLETED,
OR APPLIED FOR, ON THIS LEASE, FT. 100'19. PROPOSED DEPTH
4200'20. ROTARY OR CABLE TOOLS*
Rotary21. ELEVATIONS (Show whether DF, RT, GR, etc.)
3630'

Roswell Controlled Water Basin

22. APPROX. DATE WORK WILL START*
January 15, 1996

23. PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
12 1/4"	8 5/8" J-55	24.0#	320'	125 sk Lite cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4200'	550 sk Lite cmt + 425 sk Class "H"

We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4200' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are outlined in the following exhibits and attachments.

Drilling Program

Exhibits #1/1-A = Blowout Prevention Equipment

Exhibit #2 = Location and Elevation Plat

Exhibit #3/3-A = Road Map and Topo Map

Exhibit #4 = Wells Within 1 Mile Radius

Exhibit #5 = Production Facilities Plat

Exhibit #6 = Rotary Rig Layout

Exhibit #7 = Casing Design

H2S Operating Plan

Approval Subject to
General Requirements and
Special Stipulations
Attached

The undersigned accepts all applicable terms, condition, stipulations and restrictions concerning operations conducted on the leased land or portions thereof, as described below:

Lease No. LC029395-A

Legal Description: Section 19-T17N-R31E

Bond Coverage: Statewide in CO, NM, UT, & WY

BLM Bond No.: CO1151

RECEIVED
DEC 8 10 46 AM '95

RECEIVED

4. ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

SIGNED Randy JacksonTITLE RANDY JACKSON
DISTRICT ENGINEERDATE 12/5/95

(This space for Federal or State office use)

ERMIT NO. _____

APPROVAL DATE _____

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

CONDITIONS OF APPROVAL, IF ANY:

APPROVED BY Yolanda VegaTITLE AREA MANAGERDATE 3-11-96

See Instructions On Reverse Side

The 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction

CT I
Box 1580
S. 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

STRICT II
O. Drawer DD
Artesia, NM 88211-0719

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

☐ AMENDED REPORT

DISTRICT III
1000 Rio Brazos Rd.
Aztec, NM 87410

DISTRICT IV
P. O. Box 2088
Santa Fe, NM 87507-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		2 Pool Code		3 Pool Name	
				Grayburg Jackson (SR, QN, GB, SA)	
4 Property Code		5 Property Name			6 Well Number
16001		TURNER A			48
7 OGRID No.		8 Operator Name			9 Elevation
136025		DEVON ENERGY OPERATING CORP.			3630'

10 SURFACE LOCATION

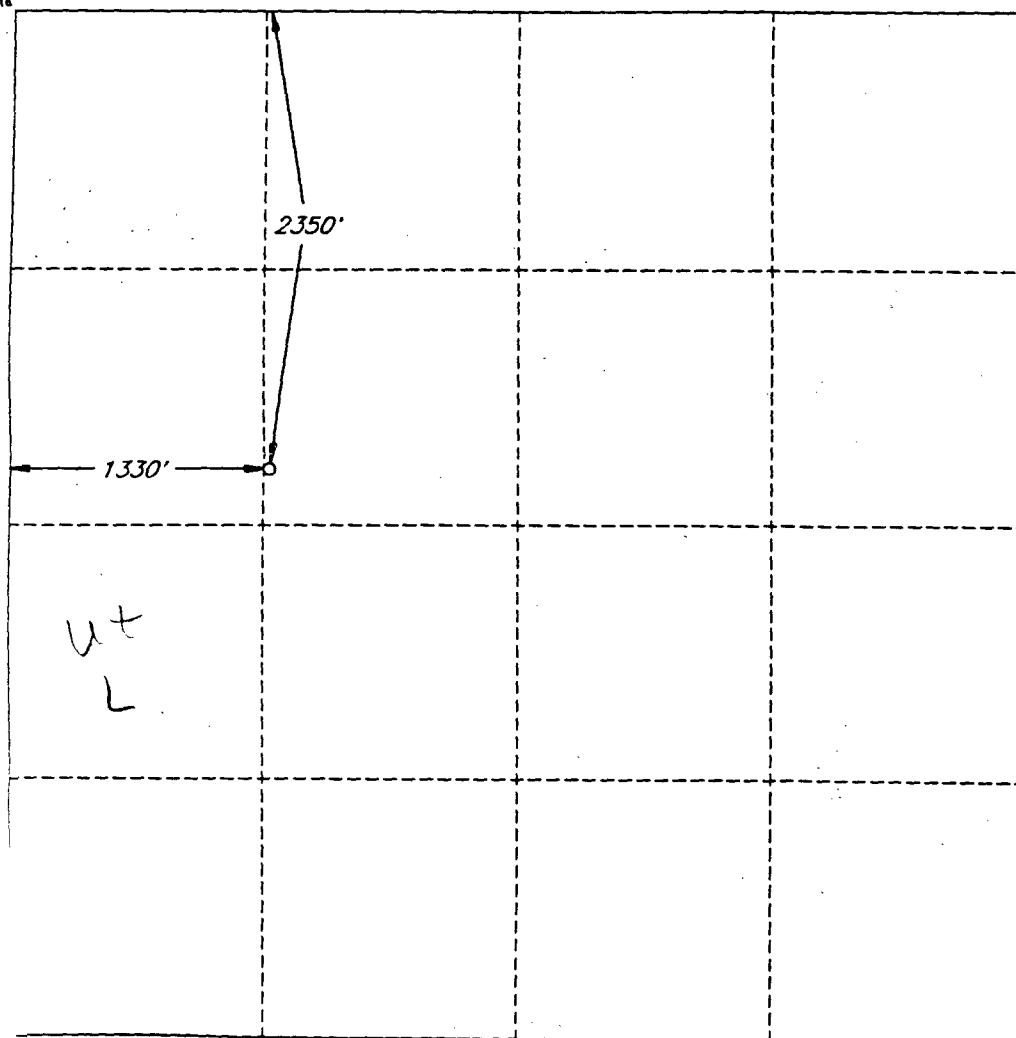
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
F	19	17 SOUTH	31 EAST, N.M.P.M.		2350'	NORTH	1330'	WEST	EDDY

"BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE

UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County

12 Dedicated Acres	13 Joint or Infill	14 Consolidation Code	15 Order No.
40			

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.

Signature

Randy Jackson

Printed Name

Randy Jackson

Title

District Engineer

Date

12/5/95

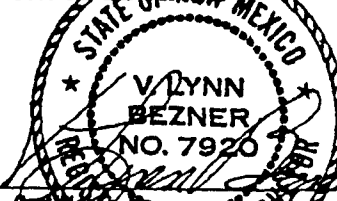
SURVEYOR CERTIFICATION

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 29, 1995

Signature and Seal of
Professional Surveyor



V. L. BEZNER SR. P.S. #7920

JOB #41653-32-98 SW / VHB

DEVON ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 19, 1996

Mack Energy Corporation
P. O. Box 400
Duncan, OK 73534

Certified Letter #: Z 731-697 769

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwigths Production Data show that you operate the following wells in 17S-31E:

State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Karen Byers

Karen Byers
Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico
Bureau of Land Management - Carlsbad, New Mexico

DEVON
ENERGY
OPERATING
CORPORATION

OIL CONSERVATION DIVISION
RECEIVED 405/235-3611
20 North Broadway, Suite 1500 Fax 405/552-4550
Oklahoma City, Oklahoma 73102 AM 8 52 Fax 405/552-4552

March 20, 1996

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 775

Re: Non - Standard Location Approval

Dear Sir:

We recently applied for approval of a Non-standard location on the Turner A #48. The offset operator of this well was Mack Energy. We sent notice to Mack Energy Co. in Duncan, OK. Enclosed is a copy of the certified letter we are sending to Mack Energy Corporation in Artesia, the correct offset operator.

Sincerely,

Karen Byers

Karen Byers
Engineering Technician

DEVON ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 20, 1996

Mack Energy Corporation
P. O. Box 960
Artesia, New Mexico 88211-0960

Certified Letter #: Z 731-697 774

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

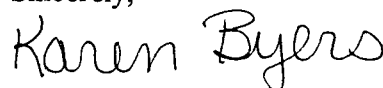
State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,



Karen Byers
Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico
Bureau of Land Management - Carlsbad, New Mexico

Devon Energy Operating Corporation
20 N. Broadway, Suite 1500
Oklahoma City, OK 73112
(405) 552-4527

Fax Cover Sheet

March 28, 1996

Turner "A" Well No. 48

Mike Stogner
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
Fax # (505)827-8177

Number of pages (including cover sheet): 9

From: Karen Byers

Message: This letter was sent to you by certified mail on 3/19/96. As of today, we have yet to receive the card which shows you received it. I am faxing a copy to avoid any further delays.

**DEVON
ENERGY
OPERATING
CORPORATION**

**20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102**

**405/235-3611
Fax 405/552-4550
Fax 405/552-4552**

**DEVON
ENERGY
OPERATING
CORPORATION**

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 19, 1996

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 770

Re: Non - Standard Location Approval

Dear Sir:

It is requested that administrative approval be granted under Rule 104F, (1) for unorthodox location for the infill producing well located within the Russell-Turner Waterflood Project, at the following location:

WELL

LOCATION

Turner "A" #48

2350' FNL & 1330' FWL, Sec. 19-17S-31E

Attached is a plat of the Russell-Turner Waterflood Project showing the project boundaries that are adjacent to the subject well. Forms 3160 - 3 and C - 102 are attached for the well listed above. The Russell-Turner Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to lease line. It will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The well will be drilled at the unorthodox location in order to prevent waste by developing an efficient production and injection pattern within the Russell-Turner Waterflood Project, which was approved under Order R - 3185. When fully developed this well will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

The Turner "A" #49 is offset on four sides of the 40 acre tract by either Avon Energy Corporation or Devon Energy Operating Corporation. Avon Energy Corp. is a closely related company to Devon Energy Operating Corp, and therefore does not require notice. One of the diagonal tracts has wells operated by Mack Energy Corporation. Enclosed is a copy of the letter sent to Mack Energy giving required notice.

Should you require any additional information regarding the unorthodox location, please notify me at 405-552-4527.

Sincerely,

Karen Byers

Karen Byers
Engineering Technician

03/28/96
3160-2
number 1990)

THU 13:33 FAX 405 552 4550

DEVON ENERGY

004

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

SUBMIT IN TRIPL

Form approved.

OPERATOR'S COPY

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1. TYPE OF WORK: DRILL ☒ DEEPEN ☐
2. TYPE OF WELL: OIL ☒ GAS ☐ Other ☐ SINGLE ☐ MULTIPLE ☐

3. NAME OF OPERATOR
DEVON ENERGY OPERATING CORPORATION

4. ADDRESS AND TELEPHONE NO.
20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560

5. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)
At surface 2350' FWL & 1330' FWL UNORTHODOX LOCATION: Like Approval by State

6. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE
1.5 miles east & .2 mile north of Loco Hills, N.M.

7. DISTANCE FROM PROPOSED LOCATION TO NEAREST PROPERTY OR LEASE LINE, FT. 290'
(Also include distance to nearest well, drilling, completed, or applied for, on this lease, ft. 100')

8. DISTANCE FROM PROPOSED LOCATION TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 100'

9. ELEVATIONS (Show whether DT, RT, CR, etc.)
30'

10. DESIGNATION AND SERIAL NO.
LC 029395-A

11. IF INDIAN, ALLOTTEE OR TRUST NAME
NA

12. UNIT AGREEMENT NAME
NA

13. FARM OR LEASE NAME, WELL NO.
Tract "A" #48

14. API WELL NO.

15. FIELD AND BOWL, OR UPLAND
GRAYBURG-JACKSON

16. SEC., T., R., N., OR BLOCK AND SURVEY OR AREA
SECTION 19-T17S-R31E

17. COUNTY OR PARISH
EDDY

18. STATE
NM

19. NO. OF ACRES IN LEASE
609.43

20. NO. OF ACRES ASSIGNED TO THIS WELL
40

21. APPROX. DATE WORK WILL START
JANUARY 15, 1996

Roswell Controlled Water Basin

PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
1/4"	8 5/8" J-55	24.0N	320'	125 sk lube cut + 200 sk Class "C"
3/8"	5 1/2" J-55	15.5N	4200'	550 sk lube cut + 435 sk Class "H"

We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4200' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are outlined in the following exhibits and attachments.

Drilling Program

- Exhibits #1/1-A = Blowout Prevention Equipment
- Exhibit #2 = Location and Elevation Plat
- Exhibit #3/3-A = Road Map and Topo Map
- Exhibit #4 = Wells Within 1 Mile Radius
- Exhibit #5 = Production Facilities Plat
- Exhibit #6 = Rotary Rig Layout
- Exhibit #7 = Casing Design
- S Operating Plan

The undersigned accepts all applicable terms, condition, stipulations and restrictions concerning operations conducted on the leased land or portions thereof, as described below:

Lease No. LC029395-A
Legal Description: Section 19-T17N-R31E
Bond Coverage: Statewide in CO, NM, UT, & WY
BLM Bond No.: C01151

Approval Subject to
General Requirements and
Special Stipulations
Attached

MOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout prevention program, if any.

SIGNED Randy Jackson

TITLE RANDY JACKSON
DISTRICT ENGINEER

DATE 12/5/95

space for Federal or State office use)

IT NO. _____ APPROVAL DATE _____

ion approval shall warrant or certify that the applicant holds legal or equitable title to these rights in the subject lease which would entitle the applicant to conduct operations thereon.

CTIONS OF APPROVAL, IF ANY:

VED BY Uplanda Vega

TITLE AREA MANAGER

DATE 3-11-96

See Instructions On Reverse Side

U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statement or representations as to any matter within its jurisdiction

03/28/96 THU 13:33 FAX 405 552 4550
S. NM 88241-1980

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

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

DISTRICT II

O. Drawer DD
Artesia, NM 88211-0719

DISTRICT III

1000 Rio Brazos Rd.
Aztec, NM 87410

DISTRICT IV

P. O. Box 2088
Santa Fe, NM 87507-2088

OIL CONSERVATION DIVISION

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

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

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		2 Pool Code		3 Pool Name Grayburg Jackson (SR, QN, GB, SA)	
4 Property Code 16001		5 Property Name TURNER A			6 Well Number 48
7 OGRID No. 136025		8 Operator Name DEVON ENERGY OPERATING CORP.			9 Elevation 3830'

" SURFACE LOCATION

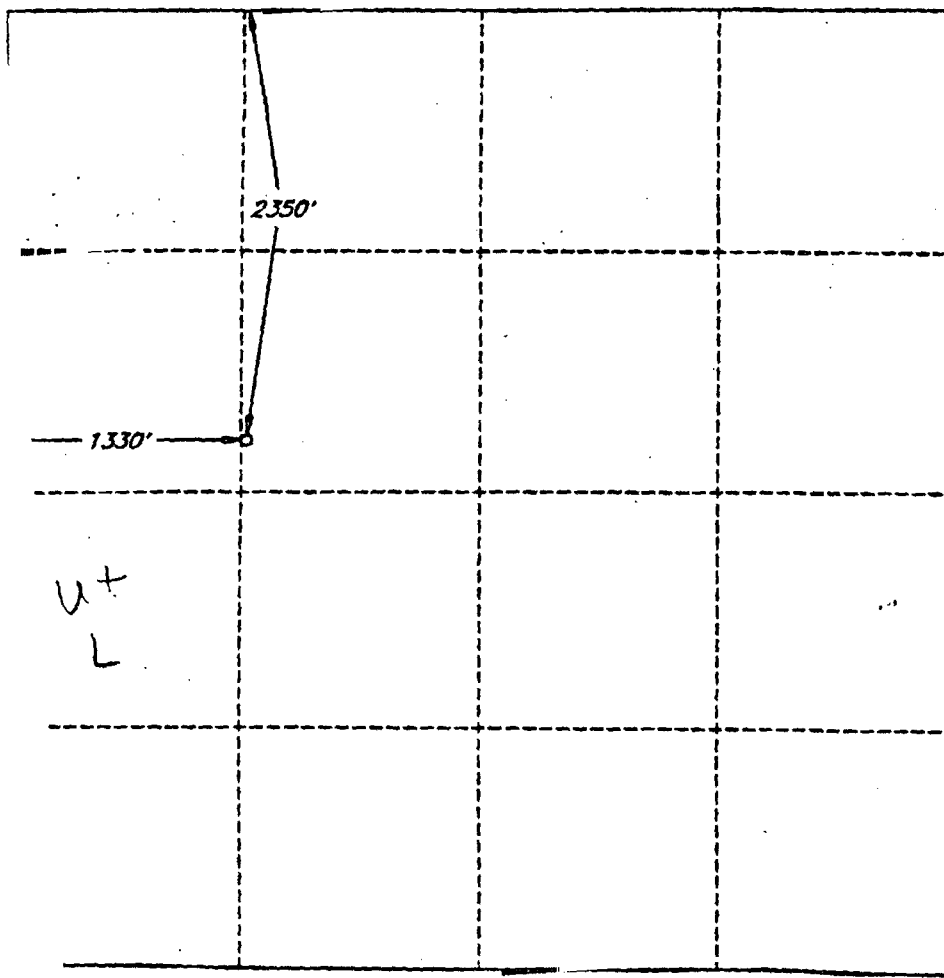
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
F	19	17 SOUTH	31 EAST, N.M.P.M.		2350'	NORTH	1330'	WEST	EDDY

"BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE

UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County

10 Dedicated Acres 40	11 Joint or Infill	12 Consolidation Code	13 Order No.
--------------------------	--------------------	-----------------------	--------------

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.

Signature

Randy Jackson

Printed Name

Randy Jackson

Title

District Engineer

Date

12/15/95

SURVEYOR CERTIFICATION

I hereby certify that the well
location shown on this plat was
platted 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.

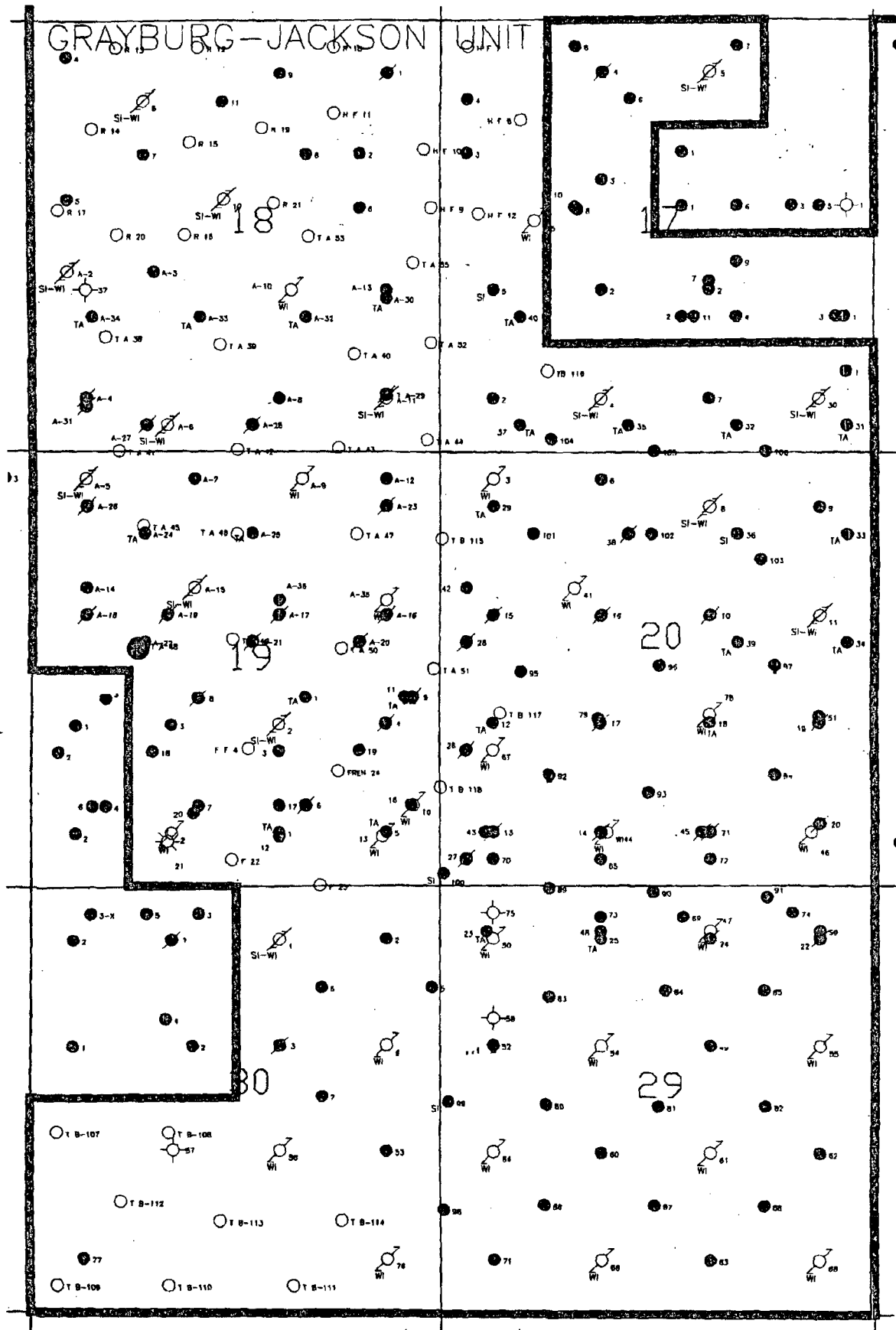
Date of Survey

SEPTEMBER 29, 1995

Signature and Seal
Professional Surveyor

V. LYNN
BEZNER
NO. 7920
V. E. BEZNER AND SONS, INC. #7920

JOB #41659-32-98 SW / VHB



**DEVON ENERGY
OPERATING
CORPORATION**

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 19, 1996

Mack Energy Corporation
P. O. Box 400
Duncan, OK 73534

Certified Letter #: Z 731-697 769

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwigths Production Data show that you operate the following wells in 17S-31E:

State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Karen Byers

Karen Byers
Engineering Technician

cc: Oil Conservation Division - Santa Fe, New Mexico
Bureau of Land Management - Carlsbad, New Mexico

**DEVON
ENERGY
OPERATING
CORPORATION**

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
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March 20, 1996

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Certified Letter # Z 731 697 775

Re: Non - Standard Location Approval

Dear Sir:

We recently applied for approval of a Non-standard location on the [REDACTED] The offset operator of this well was Mack Energy. We sent notice to Mack Energy Co. in Duncan, OK. Enclosed is a copy of the certified letter we are sending to Mack Energy Corporation in Artesia, the correct offset operator.

Sincerely,

Karen Byers

Karen Byers
Engineering Technician

**DEVON ENERGY
OPERATING
CORPORATION**20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 20, 1996

Mack Energy Corporation
P. O. Box 960
Artesia, New Mexico 88211-0960

Certified Letter #: Z 731-697 774

Dear Sir:

Devon Energy Operating Corp. has applied to the BLM for a permit to drill the Turner "A" #48. The proposed well site is within the boundaries of the Russell-Turner Waterflood Project in Eddy Co. New Mexico and offsets your wells in Units L, Sec. 19 - T17S - R31E. Dwights Production Data show that you operate the following wells in 17S-31E:

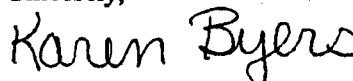
State BK #1, 3, & 5

The Turner "A" #48 will be located 2350' FNL & 1330' FWL, Sec. 19-17S-31E

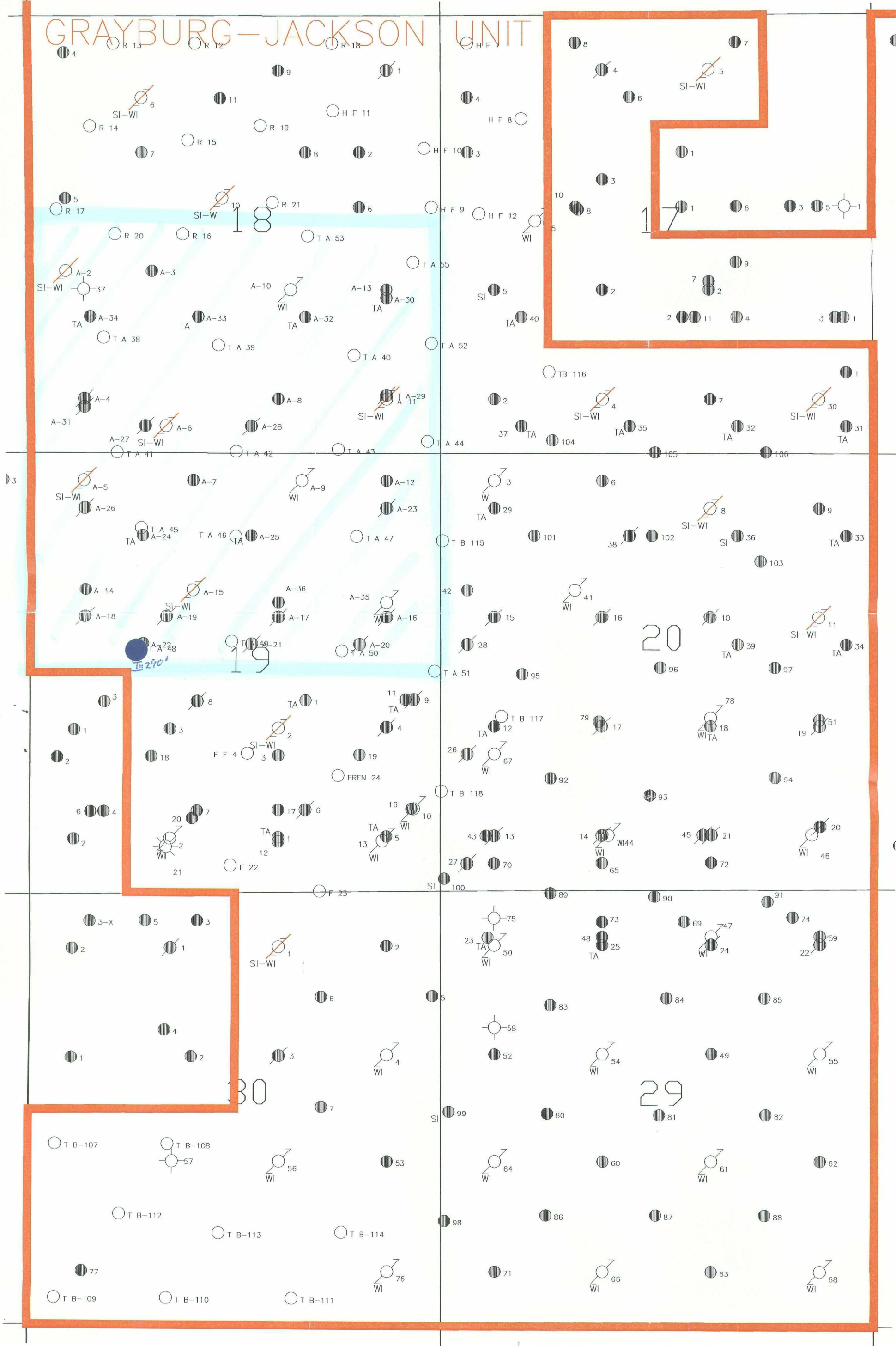
The State of New Mexico Oil Conservation Division has ruled that this is a "non - standard location" and requires that we obtain Non - Standard Location Approval from their Santa Fe Office before an allowable will be issued. The NSL approval process requires that we notify offset operators and Submit Proof of Notice. A non - standard location is defined as any location closer than 330' to the outer boundaries of a 40 acre drilling unit.

Please accept this letter as the required notification. If you have any questions regarding this matter please notify me at 405 - 552 - 4527.

Sincerely,

Karen Byers
Engineering Techniciancc: Oil Conservation Division - Santa Fe, New Mexico
Bureau of Land Management - Carlsbad, New Mexico

GRAYBURG-JACKSON UNIT



CMD :

ONGARD

OG6C101

C101-APPLICATION FOR PERMIT TO DRILL

OGRID Idn : 136025 API Well No: 30 15 28869 APD Status(A/C/P): A
Opr Name, Addr: DEVON ENERGY OPERATING CORP Aprvl/Cncl Date : 03-11-1996
20 N BROADWAY
OKLAHOMA CITY,OK 73102

Prop Idn: 16001 TURNER A Well No: 48

	U/L	Sec	Township	Range	Lot Idn	North/South	East/West
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Surface Locn : F	19	17S	31E			FTG 2350 F N	FTG 1330 F W
OCD U/L : F		API	County	: 15			

Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): O Cable/Rotary (C/R) : R
Lease typ(F/S/P/N/J/U/I): F Ground Level Elevation : 3630

State Lease No: Multiple Comp (Y/N) : N
Prpsd Depth : 4200 Prpsd Frmtn : GRAYBURG-JACKSON

E0009: Enter data to modify record

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06 CONFIRM
PF07	PF08	PF09 PRINT	PF10 C102	PF11 HISTORY	PF12

CMD :
OG6IWC

ONGARD
INQUIRE WELL COMPLETIONS

04/08/96 08:07:13
OGOMES -EMF0

API Well No : 30 15 5240 Eff Date : 09-01-1994 WC Status : A
Pool Idn : 28509 GRAYBURG JACKSON;7 RVRs-QU-GB-SA
OGRID Idn : 136025 DEVON ENERGY OPERATING CORP
Prop Idn : 16001 TURNER A

Well No : 015
GL Elevation: 3658

U/L	Sec	Township	Range	North/South	East/West	Prop/Act (P/A)
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B.H. Locn	:	F	19	17S	31E	FTG 1650 F N FTG 1980 F W	A
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Lot Identifier:

Dedicated Acre:

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

M0025: Enter PF keys to scroll

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06
PF07	PF08	PF09	PF10 NEXT-WC	PF11 HISTORY	PF12 NXTREC

CMD :
OG6IWCM

ONGARD
INQUIRE WELL COMPLETIONS

04/08/96 08:08:07
OGOMES -EMF0

API Well No : 30 15 5247 Eff Date : 09-01-1994 WC Status : A
Pool Idn : 26790 FREN;SEVEN RIVERS
OGRID Idn : 136025 DEVON ENERGY OPERATING CORP
Prop Idn : 16001 TURNER A

Well No : 022
GL Elevation: 3646

	U/L	Sec	Township	Range	North/South	East/West	Prop/Act (P/A)
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B.H. Locn	: F	19	17S	31E	FTG 2310 F N	FTG 1650 F W	A

Lot Identifier:

Dedicated Acre: 40.00

Lease Type : F

Type of consolidation (Comm, Unit, Forced Pooling - C/U/F/O) :

E0044: You are currently using this function

PF01 HELP	PF02	PF03 EXIT	PF04 GoTo	PF05	PF06
PF07	PF08	PF09	PF10 NEXT-WC	PF11 HISTORY	PF12 NXTREC