NSL 3/23/98

Devon 16

devon

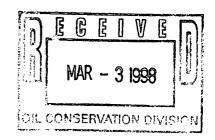
ENERGY CORPORATION Oklah

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260 Telephone 405/235-3611 FAX 405/552-4550

March 2, 1998

VIA OVERNIGHT DELIVERY

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.(2), Devon Energy Corporation (Nevada) ("Devon") applies for administrative approval of an unorthodox oil well location for the following well:

Carter Collier 5 Federal #9 330' FNL & 2360' FEL SW/4 NE/4, Section 5-T18S-R27E Eddy County, New Mexico

The well will be drilled to test the San Andres formation (Red Lake-Queen-Grayburg-San Andres Pool). The pool is subject to statewide rules, with 40 acre well units, and wells to be located no closer then 330 feet to a quarter-quarter section line. Attached as Exhibit A is a Form C-102 for the well.

The original location proposed by Devon was at an orthodox location 330' FNL & 2310' FEL. The current location is non-standard due to topographic reasons.

Attached, as Exhibit B is a topographic map, which shows the proximity of the location of the Carter Collier 5 Federal #9 to the county road. Due to this feature, the Bureau of Land Management required Devon to move the well to the proposed location.

Attached, as Exhibit C is a land plat of the area. Offset operators in the subject pool include

SDX Nearburg Midland, Texas Midland, Texas Carter Collier 5 Federal #9 NSL Approval February 27, 1998 Page Two State of New Mexico Energy, Minerals and Natural Resources Dept. Oil Conservation Division

They have been notified of this application by certified mail, and a copy of the notice letter is attached also as Exhibit D.

The lease on which the proposed well is located, and the offsetting leases, are both federal leases, and there is no effect on the royalty owners.

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

The subject pool is continuous across this area, trending in a northeast-southwest direction. Thus, geology is not a factor in this well location. Although no decision has yet been made, Devon is considering the possibility of a future waterflood for this pool, and the proposed well fits into a waterflood pattern. (A well at an orthodox location would be better for a waterflood pattern but the BLM will not allow a well at the location we desire.)

Based on the foregoing, we request approval of the above location. Please call me at (405) 552-4509 if you need anything further on this matter.

Very truly yours,

DEVON ENERGY CORPORATION (NEVADA)

E. L. Buttross, Jr.

E.J. Buttross Jr.

District Engineer

ELB\dk Enclosures

cc: Jim Bruce

DISTRICT I P.O. Box 1980, Hobbs, NM 88240

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

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

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

OIL CONSERVATION DIVISION

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

EXHIBIT AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number				Pool Code		Pool Name					
					Red	l Lake (Q-GB-	SA)				
Property Code				Well Number							
				Cart	er Collier 5	Federal		9			
OGRID No.			Operator Name						Elevation		
			Devon Energy Corporation					3474'			
					Surface Loca	ation					
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
Lot 2	5	18 S	27 E		330	North	2360	East	Eddy		
			Bottom	Hole Loc	cation If Diffe	erent From Sur	face				
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
			<u> </u>								
Dedicated Acre	s Joint o	or Infill Co	nsolidation (Code Or	der No.						

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

	OR A NON-STAN	DARD UNIT HAS BEE	EN APPROVED BY TH	HE DIVISION
Lot 4	 	5.9° 0 3477.8° 9.5° 3480.6°	2360'	OPERATOR CERTIFICATION I hereby certify the the information contained herein is true and complete to the best of my knowledge and belief. Signature
				E.L. Buttross, Jr. Printed Name District Engineer Tiue November 14, 1997 Date 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 supervison and that the same is true and correct to the best of my belief. October 30,1997 Date Surveyed
	1			Signature 4 Seal of Professional Surveyor W.O. No. 7576g Certificate No. Gary L. Jones 7977 BASIN SURVEYS

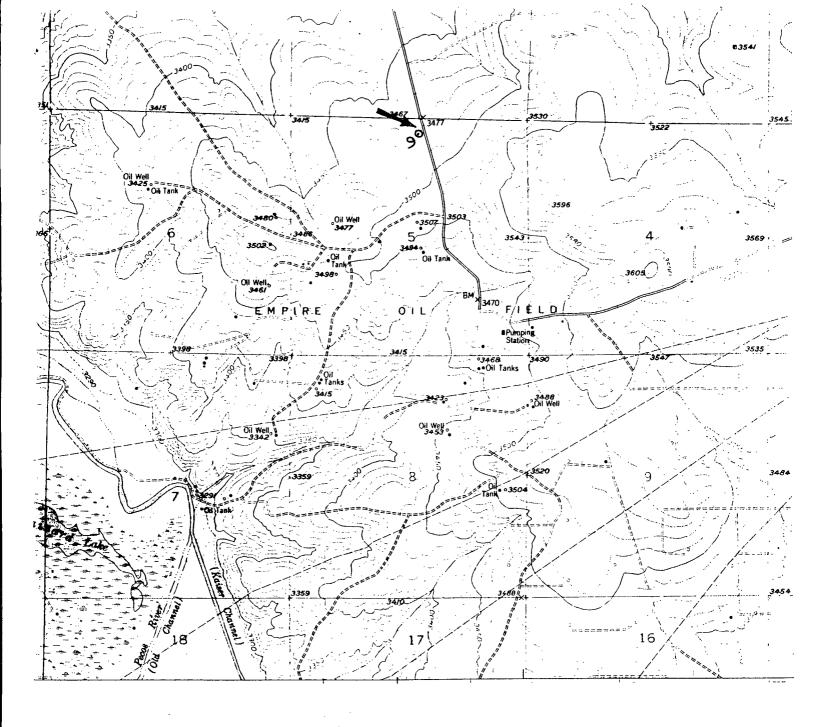


EXHIBIT B

Devon Energy Corporation Carter Collier 5 Federal No. 9 330' FNL & 2360' FEL Sec. 5, T-18-S, R-27-E, Eddy County, New Mexico.



SCALE: 1"=2000"

BASIN SURVEYS P.O. BO	1786-HOBBS, NEW MEXICO	2000	0	2000	4000 Feet
W.O. Number: 7576			-30-97	Sheet 1	of 1 Sheets

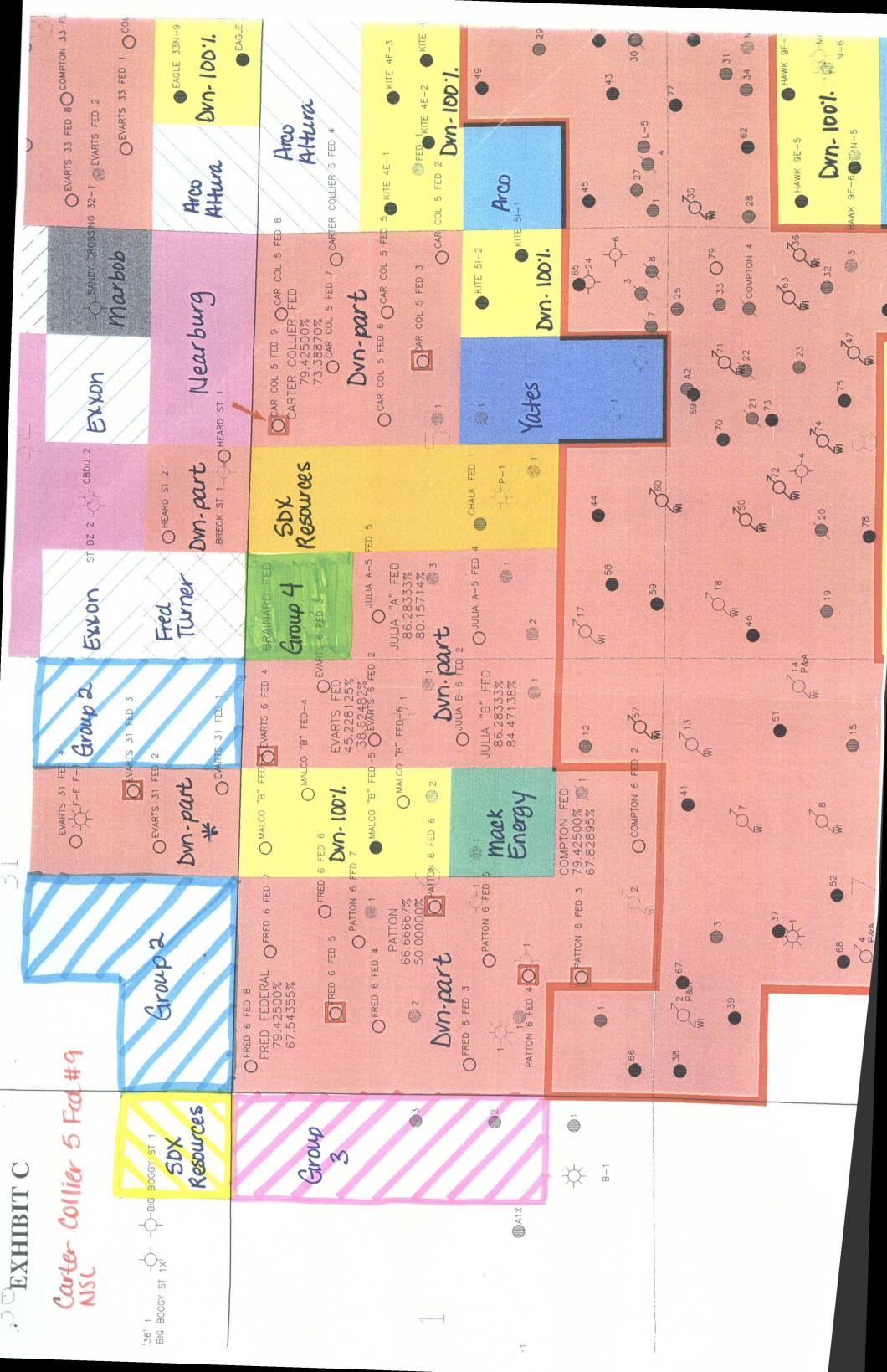


EXHIBIT D



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

Telephone 40 FAX 405/552

February 27, 1998

Certified Mail No. P 397 639 547

Nearburg Producing Company 3300 North "A" Street Building 2, Suite 120 Midland, TX 79705-5421

RE: Non-Standard Location Approval Proposed 2800' San Andres Test Carter Collier 5 Federal #9 330' FNL & 2360' FEL Sec. B-5-18S-27E Eddy County, New Mexico

Gentlemen:

Devon Energy Corporation (Nevada) has applied for "Non-Standard Location" approval for the referenced well. This unorthodox location is necessary due to the standard location being too close to the county road. (see attached topography map). The proposed wellsite offsets the following lease which our records indicate you operate in the south half of the SE/4 of Section 32-T17S-R27E.

Nearburg Producing Company

Carter Collier 5 Federal #9 Non-Standard Location Approval February 27, 1998 Page Two

The NMOCD Non-Standard Location Approval process requires that we notify offset operators and submit Proof of Notice.

Please accept this certified letter as notification. If you have any questions, please contact Ernie Buttross, Jr., at (405) 235-3611, X4509.

Sincerely yours,

DEVON ENERGY CORPORATION (NEVADA)

Diana Keys

Engineering Tech.

Vicina Kuzs

/dk

cc: Oil Conservation Division - Santa Fe, NM



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

Telephone 405/235-3611 FAX 405/552-4550

February 27, 1998

Certified Mail No. Z 397 639 548

SDX 511 West Ohio Suite 601 Midland, TX 79701

RE: Non-Standard Location Approval Proposed 2800' San Andres Test Carter Collier 5 Federal #9 330' FNL & 2360' FEL Section B-5-T18S-R27E Eddy County, New Mexico

Gentlemen:

Devon Energy Corporation (Nevada) has applied for "Non-Standard Location" approval for the referenced well. This unorthodox location is necessary due to the standard location being too close to the county road. (see attached topography map). The proposed wellsite offsets the following property which our records indicate you operate in Section 5-T18S-R27E.

Chalk Federal #1
Chalk Bluff Draw Unit #1

The NMOCD Non-Standard Location Approval process requires that we notify offset lease holders and submit Proof of Notice.

Carter Collier 5 Federal #9 Non-Standard Location Approval February 27, 1998 Page Two

SDX Resources

Please accept this certified letter as notification. If you have any questions, please contact Ernie Buttross, Jr., at (405) 235-3611, X4509.

Sincerely yours,

DEVON ENERGY CORPORATION (NEVADA)

Diana Kuys

Diana Keys

Engineering Tech.

/dk

cc: Oil Conservation Division - Santa Fe, NM