. <b>10</b> 1	116-101-11	
DATE	N	LOGGED IN KN TYPE NSL APP NO. /29039620
		ABOVE THIS LINE FOR DIVISION USE ONLY
		NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505 Deven SFS
		ADMINISTRATIVE APPLICATION CHECKLIST
	ication Acronyr [NSL-Non-St [DHC-Dov [PC-P	MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE anderd Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] whole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure increase] allified Enhanced Oli Recovery Certification] [PPR-Positive Production Response]
[1]	[A]	PPLICATION - Check Those Which Apply for [A]      Location - Spacing Unit - Simultaneous Dedication      NSL    NSP      SD      OCT    6 2001      k One Only for [B] or [C]      Commingling - Storage - Measurement      DHC    CTB      PLC    PC      OLS    OLM      Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
	[D]	WFX  PMX  SWD  IPI  EOR  PPR    Other:  Specify
[2]	NOTIFICAT [A]	TION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Working, Royalty or Overriding Royalty Interest Owners
	[ <b>B</b> ]	Offset Operators, Leaseholders or Surface Owner
	[C]	Application is One Which Requires Published Legal Notice
	[D]	Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E]	For all of the above, Proof of Notification or Publication is Attached, and/or,
	<b>[F</b> ]	Waivers are Attached
[3]	SUBMIT AC	CURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this application until the required information/and notifications are submitted to the Division.

OF APPLICATION INDICATED ABOVE.

application until the required in Note: Stateme		ons are submi	tted to the Divisi		
James Bruce	( laues D	Wer	Attorney	for Applicant	= 10/1 <i>5</i> /10(
<sup>1</sup> rint or Type Name	Signature	(	Title		Date
JAMES BRUCE			jamesbru		
P. O. BOX 1056 Santa Fe. NM 87504			e-mail Address	5	
	l				

# JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 13, 2001

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Dear Mr. Stogner:

Devon SFS Operating, Inc. ("Devon") applies for administrative approval of an unorthodox gas well location for the following well:

<u>Well</u>: <u>Location</u>: 1980 feet FSL & 660 feet FWL <u>Unit</u>: <u>W½</u> of Section 15, Township 15 South, Range 28 East, N.M.P.M., Chaves County, New Mexico

The well will be drilled to test the Morrow formation (Undesignated Buffalo Valley-Pennsylvanian Gas Pool). Under the special rules for said pool, spacing is 320 acres. However, wells must be located in the northwest quarter or southeast quarter of a section, and be no closer than 990 feet to the outer boundary of the quarter section. Thus, the location is unorthodox because it is in the "wrong" quarter section, and it is too close to the quarter section line. A Form C-102 for the well is being prepared, and will be submitted shortly.

The application is based on geologic reasons. Attached as Exhibit A is a net sand isopach of the Atoka and Morrow formations, the primary producing zones in the area. The thickest sands are in the southwest quarter of the section. Although there is a potential location in the southeast quarter with equivalent sand thickness, the sand begins thinning as you move to the east, and lack of well control to the east indicates that it is a better to remain in the southwest quarter.

A land plat of the area is attached as Exhibit B. The offset operators/lessees are as follows:

1. <u>Section 9</u>: Yates Petroleum Corporation

- 2. <u>Section 10</u>: Santa Fe Snyder Corporation (now Devon) Yates Petroleum Corporation
- 3. <u>Section 11</u>: Chi Energy, Inc. Yates Petroleum Corporation
- 4. <u>Section 14</u>: Concho Resources, Inc. (now Devon)
- 5. <u>Section 23</u>: Santa Fe Snyder Corporation (now Devon) Yates Petroleum Corporation
- 6. <u>Section 22</u>: Santa Fe Snyder Corporation (now Devon)
- 7. <u>Section 21</u>: Branex Resources, Inc. Harvey E. Yates Company
- 8. <u>Section 16</u>: Yates Petroleum Corporation

A copy of the notice letter sent to the offsets is attached hereto as Exhibit C.

Please call me if you need any further information on this matter.

Very truly yours,

*James* 

Attorney for Devon SFS Operating, Inc.

TTA 2.3.92 Sidwest Inv.Co.	Ralph Nis Margaret TDOSe State	28 Rodman Corp. Srate 1 To Battr DIA 10 - 4 - 11 1 State	35 551      M.H.      M.H.      7      1        M.H.      Sen      1      1      1        Sen      Sen      U.S.      1        LG 5557      LH 2064      U.S.      1        LG 5557      S525      McGrath      Exmith        J      OF      Sun - 57      TO 1922        J      State      Jula 315.70      Jula 315.70	0/47-23-75 26 MAY MDLAND U S. 102800 41	Shere So. Roy, 4.1.94 Sozor 7.1.93 Scsa Scsa U.S.	30.92 Z
iavenor Oper., etal v. 2829 ra-59 	Yates P++ stal 11 - 1 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -	Yales Pet, etal 10 - 1 - 2003 VA-1841 15 523 10 - 1 - 2003 VA-1841 10 - 1 - 2003 10 - 2 - 200 10 - 200 10 - 20	McCiellan Oil 9 - 1 - 93 V-2876 235	Chevron (1) 22 (1) 2583 (1) Sun 2; Stavens; (1) 8 2 (2) 83 (1) Sun 2; Stavens; (1) 8 2 (2) - 35	Read E, 1 Stevensl Amoco, <u>22</u> Sun H 8.7 1 8 10418 Votes Pet, etal	39 43 Tots Part. 9 199 190.85 54 39.85 54 39.87 54
54 - 75 Mil. Slobo	Stafe Reading & Bates : HBP	Tates Pet., etai	Tates Pet. etal	1, 2,1,94 V.2830 V.2653 V. 2653 V. State	2 - 1 - 144 V-28 31 26 53 State	39.20 d <sup>4</sup> 39.36 d <sup>1</sup> 40.09 ARCO
er 1 L-3686 9500-1 L rd Orlg 1 340-1 1 344 1 340-69 6 [Grt.West]	C.B.Read O	3 - 1 - 2009 10 2026 36 22 Yates Pet, etal 10 - 1 - 2003 VA - 18 42 16 57 3 1/1 re	3: 1: 2009 102024 - ⊥ 25≌ ⊥ -	() (Tathes Pat Pt1)) Chi ger 35 213/ () 4 - 12 - 1 - 2003 VA - 132 0 - 13 0 - 2 Chi Sept. Chi Sept.	Yates Pet etal 101103 11600 101103 11600 105 105 105 105 105 105 105 1	9-1-7008 101705 11202 39.41 3
I Davoil HBC 9:3359 WM:St. 10.4 Mil State (Westway Pet.)	Read & Stevens 1. Reading & Bates 10 Bate State	U.S. Yates Pat atal	13 - 1 - 20084L  -Swo 102025 - Opp 2522 - 1 Burren	M + Chapman Marrial L - 446 Sarras Urban disc.) State State State	9.1.2008	17 71 - 49 Valce Pet 9 4 (1159) 10 162 - 5 53 4 /
HBU, N/2 x-6844 (Franklin, Aston & Fair) State		Yotes Pet, etal 3 - 1 - 2009 Depco - 1 - 102077 Pegle 37 - 37 - 37 Fegle	9 1.2009 61.2004 103263 622 17599 504 J.E.Hammonds 50416 175740 910263 17599 10263 17599 10263 17599 10263 17599 10263 17599 10263 17599 10263 17599 10265 17599 10265 17599 17599 10265 17599 17599	Chi Ener. 6-1-2006 (12-1-2003) 96840 90 00 92163	(Morolo) 96842 654 8 duiter 3 sarings 95.1 67500 5.1 67500 8 duiter 12	9 39.91 21
ns-572 Oon Becking, M.I. 4 Louis Heich 313 2 Luia Heich 313 96 King - St. HBC 16820 S/2 State	Yates Pet, etal II-I-2003 Benca Jink Ca.2 V 5399 Benca Jink Ca.2 IG 27 Benca Jink Ca.2 Begle Em. Begle Em. IMI. State	YatesPet.eial 10.1.2003 V.5373 10322 (Riley)- 1.3 State Pig.10.31.61	Yates Pet, etal 6 - 2004 1627 State 9 - 2004 1627 State 9 - 2004 1027 State 1027 State 10269 1000 1000 1000 1000 1000 1000 1000 10	Chi Ener. 6-1-2006   \$6841-35 <u>90</u>     <i>U.S.</i>	A Margio	72.29 1722.20
ad 6, Franklin, Aston vera 1	Louis Dreyfus (PG & E Gas,etal) 24 (PG & E Cas,etal) 25 (25 - 55." 77	Yates Pet, etal V 4459	Santa Fe Snyder 9 1 2009 103263 1759	Cancho Res. 5 -1-2006 0 -968 44 602 Depco Papalotes Fed. T09740 DIA91580 14	11 Concho Res. 11 6-1-2006 11 96843 65°2	10.17 // 1 HEYCO 1 1.1.33 17219 20.13.1 Kincald Watson Watson-Fed to 180-7-11 DIA10-7-11 10.11-7
Hist ntury Dil, Inc. 3 HBP Reads 2365 Stevens Itevens Rose To 9200 U.S.	First Century L. JOI Inc. Watsing First Watsing Field Gell Field Jak 25 State State State State State	тріоl6: 4-471 3-471 (К.МST) * Windmill-St.* (К.МST) * Windmill-St.* (К.МST) * Windmill-St.* Кобс State 15	28 <i>u.s</i> .	Misica Oliver-Fend. T0351 04 51051 ↓ ↓ L.S.	v.5.	40.13 7 <sup>1</sup> (HEYCO) (1-1 83) (17219)
1	Mountain States Pet Pt LG-5257 HBP M2 HBC 3 5 7 1.8 State State State Pt LG-5257 HBP M2 HBC 3 5 7 1.8 Pt States Pt Sta	Primero Oper. V8-223 HEYCO, etal Mtn.Sts.) 17219 17219	Santa Fe Snyder 9 1 2009 103263 17509 Santa Fe Snyder Santa Fe Snyder Feet	Santa Fe Snyder LCT 9 1: 2010 Frostman 10: 209 Ftd 36009 Ftd 23 Marbob (McClellan)	Amoco	20 Jazza L 729 Filzgerald Kelk Farm
U.S. col Matador 1 03213 ~ 4 Exco Res.,etol 035718 74 7-30	Exco Res.etal HBP 036718 B355 B355 B355 B355 B355 B355 B355 B35	Erem Disc.        \$100 rt	U.S. D.G. Guuzaies 10327 1022 1022 1022 1022 1022 1022 1022 10	(McClellan) (Do) 1 /M-Cat pt (Dahren - 20) U.S. Santa Fe Snuder 9 (Dahren - 20) 10 (20) 10 (20)	Heron      L. 801      Just "Mehurin"        State      Ust "Mehurin"        Sun      J.M. Kellu, Est        Harr      To troo"        Sate      L. 1573 Of Kas        Armaco      Franker        Stone      Stone        Harr      L. 1573 Of Kas        Harr      L. 1573 Of Kas        Harr      L. 1573 Of Kas        Harr      Franker        Franker      To to Sate        Horr      To to Sate        Horr      Stone        Horr      Stone        Horr      Stone	U.S. State U.S. State Add A State Add Add Add Add Add Add Add Add Add Add
	29 Indres Per enti 6-1-2000 750-99 u.s. 5+a+e	28 Murchison DEG 1 ( Windmill Fed. Com. U.S.	27	26 27 50 America di Constanti Starte To 1504 Midwest Inv. Co.	91:2010 105210   Elk Oil	HA Elk Oil ALC.
(Exco, Res.) HBP 02 IS669 U.S.O HBC Ener: E/2 Meso	U.S. 51076 Martador Petr 11 Martador Petr 11	Chi Ener 3 1 2010 1 9 - 1 - 2010 103663 105210 23529 45022	Yartes Pet I HEYCO, etal 12:1:53 I1:63 12:352 I.7219 3522 I. W:gzell, etal W:gzell, etal 26:4040 - Fed.	Midwest Inv. Co. Balle Formers	I Amoco HBP I HBC ElkOil L 803   K-SIO9 (Amoco 5.25   HBC L 803   K-SIO9 (Amoco	Al JE T K-4 SA SA 0:92-1 D GOPAO Christine Out Ca.
3 Com: 1 Ocean 1 Ocean 1 Coran 1 Co	3:7 Mil. Million Control Cont	33	34 E      For do - Fed.        Sonto Fe Mins, etol      for 2738        V-3125      3697        3697      FAH        Sonto Fed.      Wright        State      UA        Sonto Fed.      For 2738        Sonto Fed.      For 1739        Sonto Fed.      For 1847        State      UA        State      UA	Yates Pet. eta 823 6-1-96 V-3739 20	EXHIBIT B B C EXHIBIT ates Pet, e ates Pet, e ates Pet, e ates Pet, e ates Pet, e ates Pet, e ates Pet, e b ates Pet, e ates Pet, e at	tal 193053 tal 19305

# JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 13, 2001

#### CERTIFIED MAIL RETURN RECEIPT REQUESTED

Branex Resources, Inc. 403 North Pennsylvania Roswell, New Mexico 88201

Harvey E. Yates Company P.O. Box 1933 Roswell, New Mexico 88202

Yates Petroleum Corporation 105 South Fourth Street Artesia, New Mexico 88210

Chi Energy, Inc. P.O. Box 1799 Midland, Texas 79702

Ladies and Gentlemen:

Enclosed is a copy of an application, filed with the Oil Conservation Division by Devon SFS Operating, Inc., requesting administrative approval of an unorthodox oil well location in the Pennsylvanian formation in the W% of Section 15, Township 15 South, Range 28 East, NMPM, Chaves County, New Mexico. If you object to the well's location, you must notify the Division in writing no later than Friday, November 2, 2001 (1220 South St. Francis Drive, Santa Fe, New Mexico 87505; attention: Michael E. Stogner). Failure to object will preclude you from contesting this matter at a later date.

Ver truly yours,

Attorney Devon SFS Operating, Inc.



	COUNTY Chaves POOL Buffalo Valley Pernsultantan Gas	720 -
	COUNTY Chaves  POOL Buffalo Valley Plennsultanian Gas    TOWNSHIP 15 Jouth  RANGE 28 East  NMPM	
		1997
,		ten neter in Specification
1		2
]		go tha in th tha
-		
ŀ		
$\mathbf{C}$	30 - 29 - 28 - 27 - 26 - 25 - 25	- <b>1</b>
		Na ingga s Tangan si
. [		
L	W = 110	1. 1.
4	Ext: Sec. 6(R-4086, 2-1-71)- 5/ Sec. 6(R-4146, 6-1-71)- 3/ Sec. 7. 5/ Sec. 18(12-1-72) Ext: S/2 Sec. 8(R-5361, 3-1-77) Ext: N/2 Sec. 7(R-5511, 9-1-77)	•
	Ext: 1/2 Sec 8 (R-5361, 3-1-77) Ex1: 1/2 Sec 7 (R-5511, 9-1-77) Ext: 1/2 Sec 17 (R-5667, 4-1-78)	
	Ext: 5/2 Sec. 17 (R-5987, 4-1-79) Ext: 1/2 Sec. 20 (R-6274, 3-1-80)	
- · .	FXT: W/2 SEC &I (R-9096, 1-1-90) Fxt: 5/2 Sec. 16, NEA Sec. 21 (R-11384, 5-25-00)	
-		ಹೆಸಲ್ಲಾಳಕ್ಕಿ
-	مرجعه در المرجعة المرجعة محمد المرجعة الم	
-		
-		
-		· · ·
(		÷.
	357	
. –		

ONGARD 10/22/01 09:47:01 CMD : C101-APPLICATION FOR PERMIT TO DRILL OG6C101 OGOMES -TPXW OGRID Idn : 20305 API Well No: 30 5 63371 APD Status(A/C/P): A Opr Name, Addr: DEVON SFS OPERATING INC Aprvl/Cncl Date : 04-05-2001 20 N. BROADWAY STE 1500 OKLAHOMA CITY, OK 73102 Prop Idn: 27868 STOCK TANK 15 FEDERAL COM Well No: 1 U/L Sec Township Range Lot Idn North/South East/West Surface Locn : L 15 15S 28E FTG 1980 F S FTG 660 F W OCD U/L : L API County : 5 Work typ(N/E/D/P/A) : N Well typ(O/G/M/I/S/W/C): G Cable/Rotary (C/R) : F Lease typ(F/S/P/N/J/U/I): F Ground Level Elevation : 3574 State Lease No: NM 103623 Multiple Comp (S/M/C) : S Prpsd Depth : 9500 Prpsd Frmtn : WILDCAT MORROW E0009: Enter data to modify record PF03 EXIT PF04 GOTO PF05 PF06 CONFIRM PF09 PRINT PF10 C102 PF11 HISTORY PF12 PF01 HELP PF02 PF07 PF08

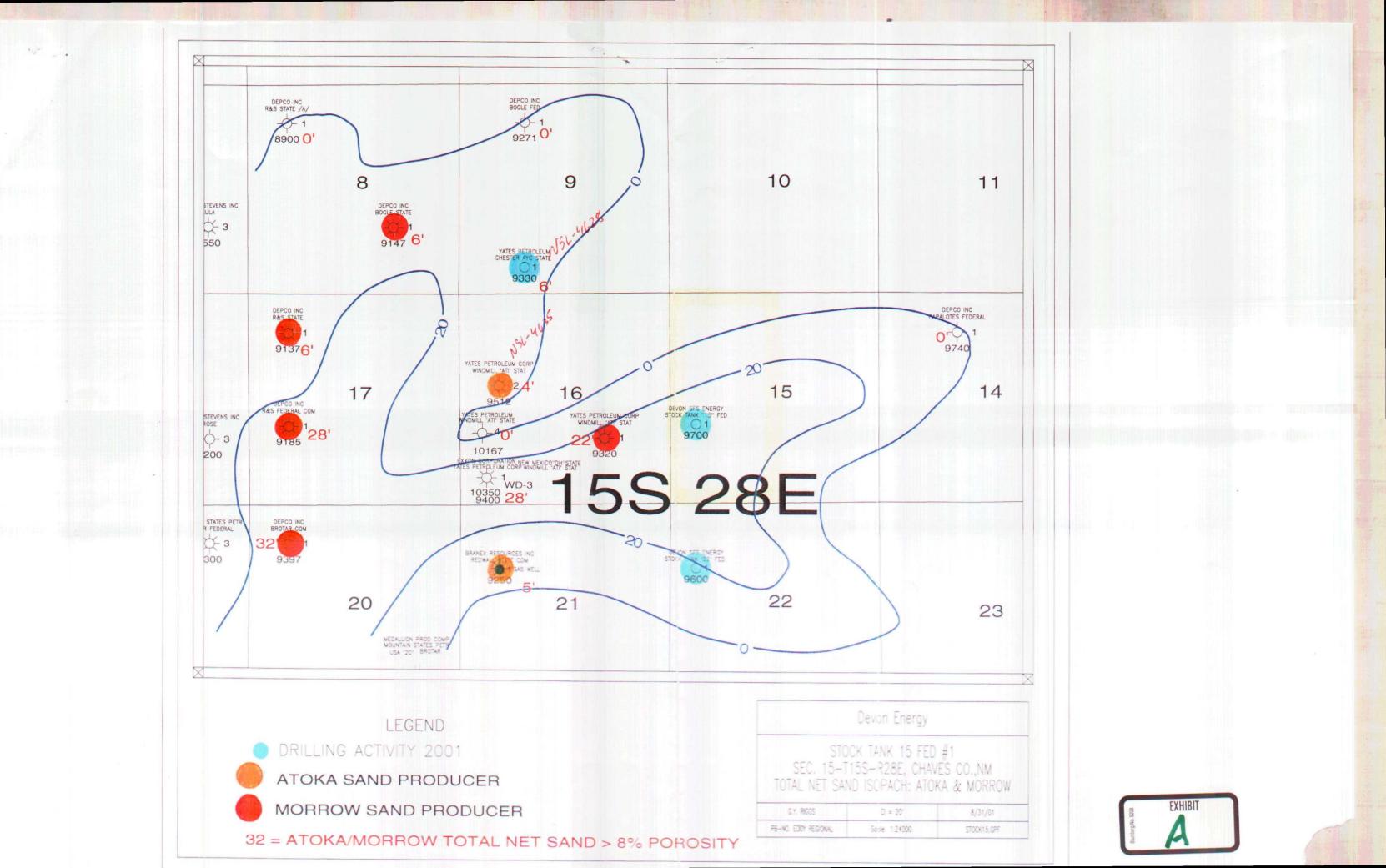
··----

CMD : OG5SECT Sec : 15 Twp : 15S	ONGARD INQUIRE LAND D Rng : 28E Section	10/22/01 09:46:35 OGOMES -TPXW PAGE NO: 1		
D	C	В	A	
40.00	40.00	40.00	40.00	
Federal owned	Federal owned	Federal owned	Federal owned	
E	   F	G	H	
40.00	40.00	40.00	40.00	
Federal owned	   Federal owned	Federal owned	Federal owned	
PF01 HELP PF02 PF07 BKWD PF08 FW			PF06 PF12	
FFOT BRAD FFOO FAI			1112	

···· · · · · · · · ·

### Date: 10/22/2001 Time: 10:18:49 AM

CMD : OG5SECT	ONGARD INQUIRE LAND	10/22/01 09:46:41 OGOMES -TPXW PAGE NO: 2				
Sec : 15 Twp : 15S	Rng: 28E Section	Rng : 28E Section Type : NORMAL				
L	K	J				
40.00	40.00	40.00	40.00			
Federal owned A	Federal owned	   Federal owned   	Federal owned			
	N	0				
40.00	40.00	40.00	40.00			
Federal owned	Federal owned	Federal owned	Federal owned			
		1				
PF01 HELP PF02 PF07 BKWD PF08 FW	PF03 EXIT PI D PF09 PRINT PI		PF06 PF12			



AND PRIME

AN

And Bearing

. ANE

\*\*

# JAMES BRUCE

ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 19, 2001

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re:	<u>Well</u> :	Stock Tank "15" Fed. Well No. 1
	Location:	1980 feet FSL & 660 feet FWL
	Unit:	W½ of Section 15, Township 15 South, Range 28
		East, N.M.P.M., Chaves County, New Mexico

Dear Mr. Stogner:

Regarding the administrative application for an unorthodox location filed on the above well, enclosed is a copy of the Form C-102.

Very truly yours,

James Bruce

Attorney for Devon SFS Operating, Inc.

0/18/2001	13:36 F	AX 40555:	28113		DEVON	ENER(	ΞY			g 0 0 2
DISTRICT I	Mohile, Mit at	-	- 5   9 − 5 m, 4 m. 18 99   5 g m²  5 9	Z			w Mexico			ran C-102
DISTRICT 11				heg.	Minerale and	i Natarak	Anna Department	•	Revised May	
611 South First, 4	krtenie, XQL I	66210						Ösbmit	to Appropriate Dis State Louse	
DISTRICT III 1990 Rie Brazes B	51 A-1 10		ОTT	CON	aent	7 A 1997				- 9 Cepice
			OIL	CUN			ON DIVIS	ION		
DISTRICT IV	, Janks 70, J	GY 87586		Santa F		with Pa Mexic	caeco 20 87504-2088			
									C AMENDE	REPORT
		·			AND	ACRE	GE DEDICATI	ON PLAT		
API	Kumber			Feel Cule				Pool Nume		
Property 1	Code	[		FTOC		rty Nam		<u> </u>	Tell N	amber
		<u> </u>		3100	The second s	-	FEDERAL		1	
20305					-	ODED			Eleve	
		1			V 515 Surfac		ATING, INC.		357	4
UL or lot No.	Section.	Township	Range	Lot Ida	Juriac		North/Youth Mar	Feet from the	Tank Mark Mr.	-
L	15	15 S	28 E		19		SOUTH	660	Kast/Yost line	County
							rent From Sur		WEST	CHAVES
VL or lot No.	Section	Treahin	Range	Tol Ida	Feet fro		North/South Has	face Feel from the		
								seer stoll ris	East/West Has	County
Detinated Acres	Juint e	r hafili Co	melitation (	Code Or	der No.		,			L
320			·							
NO ALLO	WABLE N	OR & N	SSIGNED ( ION-STAN	to this ( Dard un	Comple: Tt has	FION L BÉEN	APPROVED BY	ESTS HAVE BE THE DIVISION	EN CONSOLIDA	TED
		-/-	77							
		/ /						11	R CERTIFICAT	I
						ļ			r versify the the inj is to true and unnat	
		/ /				1		best of my know		
						i			~ 4	
$\mathbf{Y}$	۲ /					Í		1 <u>C.a</u>	Rillio	20 fe.
7-7	-7+	· / · · · /	//	<b> </b>		-+-		E. L. But	tross, Jr.	
	/ X						• •	Frinted Name		[]
				ľ		1			ineering Ad	visor
	Ń					i		nue February	28 2001	
1.01 - 1935-00						i		Date	23, 2001	
Lon - W1040	7 34.2							SURVEYO	R CERTIFICAT	ION
r 7		/ /	7					-11	that the unit levels	[]
3571.5	3577.8'					i			plotted from field	
6	1 1	/ /				i		autual emerge	mode by ma er - that the asea (2)	under my    true and
						i		vorvest to the	best of my build	
3572.7	3577.3					1			nber 6, 2000	
	<u>_</u>	<u></u>	<	~		 	· · ·	Date Surveya		
	Ń				_	1		Trainelo	Mex A	
	ノレ	/ /				i		IN AVY	I ACTA	7 II
V X			/ /			I		112159A	torz MIL	$\sim$
	/ }		//			ļ		1 = Y MQ	No. 065 A	
//		/ /				3		Cardy Card He	Gory Langers	7977
			$\angle$			 			BROWNILLAN S	]]



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON Governor Jennifer A. Salisbury Cabinet Secretary

October 22, 2001

Lori Wrotenbery Director Oil Conservation Division

Devon SFS Operating, Inc. c/o James Bruce P. O. Box 1056 Santa Fe, New Mexico 87504

**Re:** Administrative application for an exception to the well location provisions [Rule 2 (b)] of the "Special Rules and Regulations for the Buffalo Valley-Pennsylvanian Gas Pool," as promulgated by Division Order No. R-8170, as amended.

Dear Mr. Bruce:

This letter acknowledges the receipt of your administrative application dated October 13, 2001 on behalf on Devon SFS Operating, Inc. for an unorthodox Morrow gas well location for the proposed Stock Tank "15" Federal Well No. 1 (API No. 30-005-63371), to be drilled 1980 feet from the South line and 660 feet from the West line (Unit L) of Section 15, Township 15 South, Range 28 East, NMPM, Chaves County, New Mexico. The Division received your application on October 16, 2001, and assigned it NMOCD application reference No. *pKRV0-129039620*. Please refer to this number in future correspondence with the Division.

Our preliminary review indicates that the information provided in the application is not sufficient to process an administrative order. While your geological data supports locating this well in the SW/4 rather then the NW/4 of Section 15 it is insufficient to support the 660 offset requests.

Since the submitted information is insufficient to review, the application was ruled as incomplete on October 22, 2001. Please submit the above stated information by Monday, October 29, 2001.

The Division cannot proceed with your application until the required information is submitted. Upon receipt, the Division will continue to process your application. The additional information can be faxed to (505) 476-3471, or mailed to the Division in Santa Fe. If the necessary information is not submitted, your application will be returned to you.

Should you have any questions concerning this matter, please contact me in Santa Fe at (505) 476-3465. Thank you.

Sincerely

Michael E. Stogner Chief Hearing Officer/Engineer

cc: New Mexico Oil Conservation Division – Artesia

÷,

#### JAMES BRUCE

Attorney at Law Post Office Box 1056 Santa Fe, New Mexico 87504 Telephone: (505) 982-2043 Fax: (505) 982-2151

FAX COVER SHEET

DELIVER TO: Michael E. Stogner

COMPANY: Oil Conservation Division

CITY: Santa Fe, New Mexico

FAX NUMBER: (505) 476-3471

NUMBER OF PAGES: 2 (Including Cover Sheet)

DATE SENT: 10/29/01

MEMC:

#### CONFIDENTIALITY NOTICE

This transmission contains information which may be confidential and/or legally privileged. The information is intended only for the above-named recipient. If you are not the intended recipient, copying or distribution of the information is prohibited. If you have received this transmission in error, please call us at the above number and return the document by United States mail. Thank you.

5059800151 P.01

JAME SERVICE.

PAGE 02

#### JAMES BRUCE ATTORNEY AT LAW

POST OFFICE BOX 1056 SANTA FE, NEW MEXICO 87504

3304 CAMINO LISA HYDE PARK ESTATES SANTA FE, NEW MEXICO 87501

(505) 982-2043 (505) 982-2151 (FAX)

October 29, 2001

#### <u>Via Fax</u>

Michael E. Stogner Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

> Re: <u>Well</u>: Stock Tank "15" Fed. Well No. 1 <u>Location</u>: 1980 feet FSL & 660 feet FWL <u>Unit</u>: W% of Section 15, Township 15 South, Range 28 East, N.M.P.M., Chaves County, New Mexico

#### Division Reference No. pKRV0-129039620

Dear Mr. Stogner:

Your letter of October 22, 2001, on the above administrative application, requests information to support a location <u>660</u> feet FWL. While Devon SFS Operating, Inc. ("Devon") believes that, based on well control, the well must be located in the SW4 of Section 15, it cannot provide you with information mandating a 660 foot location as opposed to a 990 foot location. Therefore, Devon requests that the application be <u>amended</u> to request a location <u>990</u> feet FWL and 1980 feet FSL. While the well would still be in the "wrong" quarter section, it would otherwise comply with the footage requirements of the pool rules for the Buffalo Valley-Pennsylvanian Gas Pool.

Please let me know if this is acceptable. Thank you for your attention to this matter.

Very truly yours,

Bruce E Gr

. . . . . . . . .

Torney for Devon SFS Operating, Inc.

. . . . . .

## New Mexico Oil Conservation Division---Enginnering Bureau Administrative Application Process Documentation

Date Application Received	10-16-2001		
Date of Preliminary Revie	10-22-2001		
(Note: Must be within 10	-days of received date)		
Results:A	م pplication Complete	Application Incomplete	
Date Incomplete Letter Se	ent:	10-22-2001	
Deadline to Submit Reque	10-29-2001		
Phone Call Date:		NR	
(Note: Only applies is req	uested data is not submitted	within the 7-day deadline)	
Phone Log Completed?	Yes	No	
Date Application Processe	11-5-01		

**Date Application Returned:** 

(Note: Only as a last resort & only after repeated attempts by the Division to obtain the necessary information to process the application)

Aformation en mithed 10-29-2001

1