

devon

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Richard Winchester
Land Advisor

Devon Energy Corporation
20 North Broadway
Oklahoma City, Oklahoma 73102-8260

Phone: (405) 228-4418
Fax: (405) 552-8113

March 17, 2004

Ms. Linda Hicks
ConocoPhillips Company
P.O. Box 2197
Houston, Texas 77252-2197

Re: Exception to NMOCD Rule 104.C.(2)(c)
State "R" # 4 Well
Outland Area
Lea County, New Mexico

Dear Ms. Hicks:


Attached, please find a copy of the Application of Devon Energy Production Company, L.P., for a temporary exception to NMOCD Rule 104.C.(2)(c), that would allow two operators in the Morrow formation for Lots 1-8 of Section 1, T21S-R34E, Lea County, New Mexico. Under this application, if approved by the NMOCD, Devon will be allowed to operate the State "R" # 4 well until payout of ConocoPhillips' non-consent penalty. The NMOCD will review this application at the examiner hearing on April 1, 2004. Please acknowledge ConocoPhillips' support of Devon in this matter in the space provided below and return one original at your earliest convenience. Please call me at (405) 228-4415 should you have any questions.

Sincerely,



Richard C. Winchester
Land Advisor

ConocoPhillips Company hereby supports Devon Energy Production Company, L.P.'s application to be the record operator of the State "R" # 4 well during the payout period for said well, as such period is defined in that certain Operating Agreement dated February 18, 1998, between Santa Fe Energy Resources, Inc., as Operator, and Phillips Petroleum Company, et al, as Non-Operators, covering Lots 1-8 of Section 1, T21S-R34E, Lea County, New Mexico, provided ConocoPhillips Company is permitted to remain as operator of the State "R" #1, located in the same section. ConocoPhillips Company

By: 
Title: J. P. Gregory
Attorney-in-Fact

Date: 3/26/04

OIL CONSERVATION DIVISION

CASE NUMBER

EXHIBIT NUMBER

4

TOTAL P.02