

NSL 5/18/98

April 22, 1998

New Mexico Energy, Mineral & Natural Resources Dept.
Oil Conservation Division
Attention: Mike Stogner
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

CERTIFIED MAIL: Z 076 700 859

Re: Non - Standard Location Approval

12036

Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox location at the following location:

WELL	LOCATION
Turner B #115	1050' FNL & 25' FWL, Sec. 20-17S-31E

Forms 3160 - 3 and C - 102 are attached for the well listed above.

The above location does not conform to Rule 104. C. I. because it is located closer than 330' to the governmental quarter - quarter section boundary. 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 injection pattern within the Russell - Turner Waterflood Project, which was approved under Order R - 3185 and to avoid an archaeological site. 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.

Since we are the operator of the offsetting 40 acre tracts, no notice is necessary. Interest owners that have production in offsetting 40 acre tracts were notified by certified mail. Copies of this notification to each interest owner along with the certified mail number is attached. Copies of the return receipts will be forwarded to you when they are received.

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

Sincerely,

Karen Byers
Karen Byers
Engineering Technician

Enclosures

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

SUBMIT IN
(See other instructions on
reverse side)

IN. IN. OR CORR. DIVISION
811 S. 1st Form approved.

Astoria, Nev. 7924
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 CORPORATION (Nevada) 6137

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 1050' FNL & 25' FWL
UNORTHODOX LOCATION
At top proposed prod. zone (SAME)

14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*
5 miles east & 1 mile north of Loco Hills, N.M.

15. DISTANCE FROM PROPOSED LOCATION TO NEAREST PROPERTY OR LEASE LINE, FT.
25'

16. NO. OF ACRES IN LEASE
609.43

17. NO. OF ACRES ASSIGNED TO THIS WELL
40

18. DISTANCE FROM PROPOSED LOCATION* TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT.
600'

19. PROPOSED DEPTH
4200'

20. ROTARY OR CABLE TOOLS*
Rotary

21. ELEVATIONS (Show whether DF, RT, GR, etc.)
3663'

22. APPROX. DATE WORK WILL START*
October 1, 1997

RECORDED IN DISTRICT WATER BUREAU

PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
17 1/2"	13 3/8" H-40	48.0#	40'	Cemented to surface w/Redimix
12 1/4"	8 5/8" J-55	24.0#	400' 425' WITNESS	125 sk PSL C + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4200'	350 sk PSL C + 425 sk Cl B w/10% OY

We plan to circulate cement to surface on all casing strings. Devon Energy Corporation (Nevada) 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

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 20-T17N-
Bond Coverage: Nationwide
BLM Bond No.: CO1104

APPROVAL SUBJECT TO
GENERAL REQUIREMENTS AND
SPECIAL STIPULATIONS
ATTACHED

oos
4/7/98

IN 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.

24. SIGNED Randy Jackson TITLE RANDY JACKSON DISTRICT ENGINEER DATE 7/7/97

*(This space for Federal or State office use)

PERMIT 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 (ORIG. SGD.) ARMANDO A. LOPEZ TITLE Acting ADM MINERALS DATE 4-7-98
See Instructions On Reverse Side

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

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

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

DISTRICT III
 1000 Rio Brazos Rd.
 Aztec, NM 87410

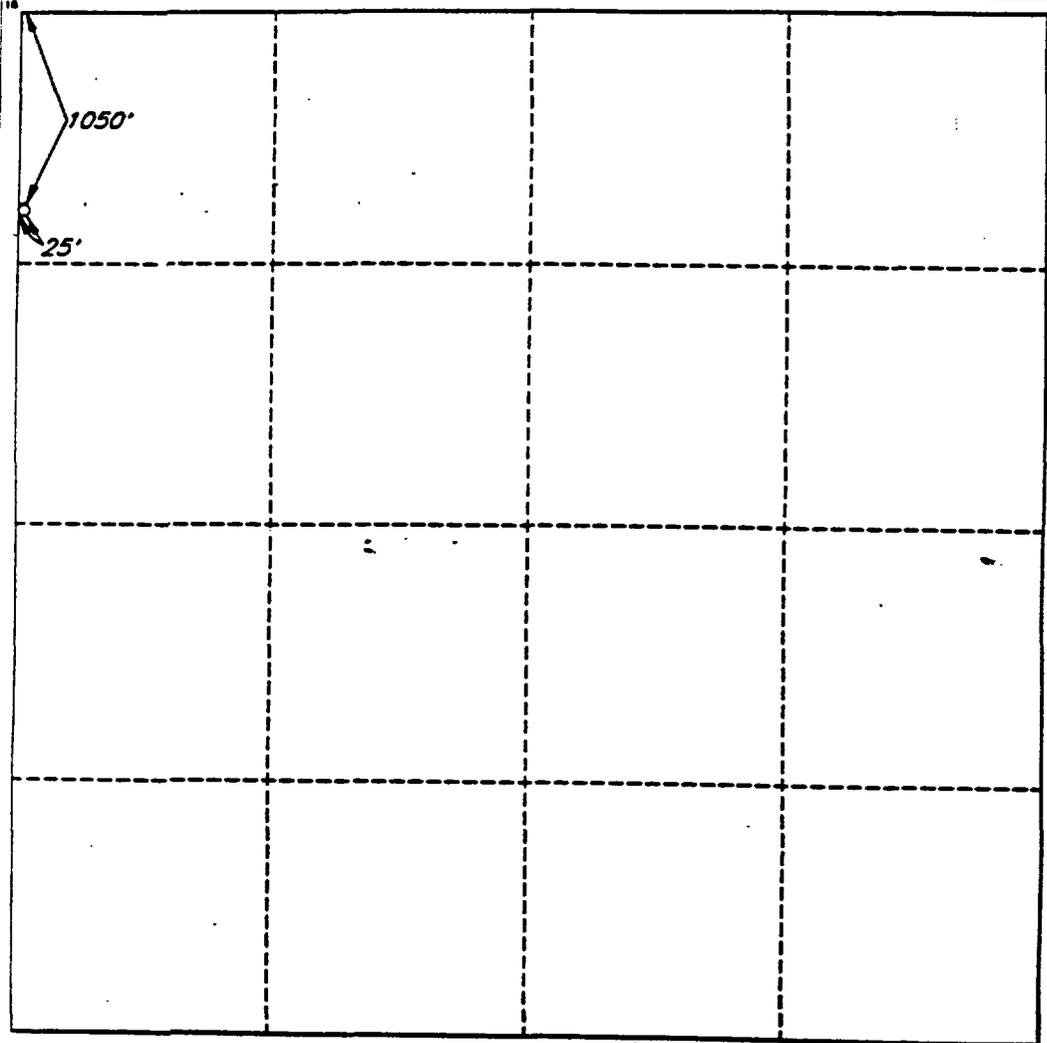
AMENDED REPORT

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					
4 Property Code 20057		5 Property Name TURNER B					6 Well Number 115		
7 OGRID No. 6137		8 Operator Name Devon Energy Corporation (Nevada)					9 Elevation 3663'		
10 SURFACE LOCATION									
UL or lot no. D	Section 20	Township 17 SOUTH	Range 31 EAST, N.M.P.M.	Lot Ida	Feet from the 1050'	North/South line NORTH	Feet from the 25'	East/West line WEST	County EDDY
11 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 40		13 Joint or Infill		14 Consolidation Code		15 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
 7/1/97

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 28, 1995

Signature and Seal of Professional Surveyor

V. LYNN BEZNER
 NO. 7926

V. J. [unclear] S. #7926

JOB #41633-5/ 98 SW / JSJ

April 22, 1998

J. K. Wallingford Trust
Rufus Wallingford & Martha West, Co-Trustees
757 N. Eldridge
Houston, TX 77079

Certified Letter #: Z 100 656 181

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

April 22, 1998

Rufus Wallingford
Browning Ferris Industries, Inc.
757 N. Eldridge at Memorial Dr.
Houston, TX 77079

Certified Letter #: Z 100 656 182

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

April 22, 1998

Sabine Royalty Trust
NationsBank of Texas, N.A., Escrow Agent
P. O. Box 840738
Dallas, TX 75284-0738

Certified Letter #: Z 100 656 183

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

devon
ENERGY CORPORATION

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

April 22, 1998

Martha A. West
39 Elkins Lake
Huntsville, TX 77340

Certified Letter #: Z 100 656 184

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

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

April 22, 1998

Marshall & Winston, Inc.
P. O. Box 50880
Midland, TX 79710-0880

Certified Letter #: Z 100 656 185

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

April 22, 1998

Braille Institute of America Inc., Acct 63100
C/O Trust Oil & Gas
NationsBank of Texas, N. A.
P. O. Box 840738
Dallas, TX 75284-0738

Certified Letter #: Z 100 656 186

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

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

April 22, 1998

Ward Investments, Ltd. Co.
101 South Fourth Street
Artesia, NM 88210

Certified Letter #: Z 100 656 187

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

devon
ENERGY CORPORATION

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

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

April 22, 1998

Selma Andrews Perpetual Charitable Trust #5188-02
C/O NationsBank of Texas, NA, TTEE
P. O. Box 840738
Dallas, TX 75284-0738

Certified Letter #: Z 100 656 188

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

April 22, 1998

Selma Andrews Trust #5188-01 F/B/O Peggy Barrett
C/O NationsBank of TX, NA, TTEE
P. O. Box 840738
Dallas, TX 75284-0738

Certified Letter #: Z 100 656 189

Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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

April 22, 1998

Mesa Oil Company
5205 N. O'Connor Blvd., Suite 1400
Irving, TX 75039

Certified Letter #: Z 100 656 190

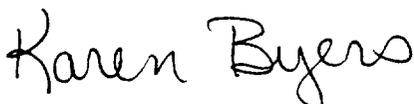
Dear Sir:

The BLM has issued Devon Energy Corp. a permit to drill Turner B #115. This well offsets Turner A wells in Unit M, Sec. 18 - T17S - R31E and Units A & H, Sec. 19-T17S-R31E. Our records show that show that you have an interest in the Turner A wells.

The Turner B #115 will be located 1050' FNL & 25' FWL, Sec. 20-17S-31E as shown on the enclosed plat. 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. A non - standard location is defined as any location closer than 330' to the outer boundaries of a lease. The NSL approval process requires that we notify offset operators and other interest owners and Submit Proof of Notice.

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

enclosure

cc

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