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November 9, 1998

Re: Catclaw Draw Morrow Gas Pool
Sections 17, 18, 20 & 30, T21S, R26E
Eddy County, New Mexico

Ms. Carla D. Wood
Devon Energy Corporation
20 N. Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

Case 12107

Dear Ms. Wood:

ICA is in receipt of your November 2, 1998, correspondence wherein you have proposed that the existing Catclaw Draw Morrow Gas Pool be revised and contracted by eliminating Sections 17, 18, 20 and 30, T21S, R26E, Eddy County, New Mexico from the existing dedicated acreage pool.

Secondly, you have proposed to add the subject Sections above to the Rules and Regulations of the Avalon Morrow Gas Pool thereby expanding said contract area to include the subject acreage.

It is our understanding that the impact and actual only major change involving the leasehold above would be that the size of spacing units, currently 640 acres for the Catclaw Draw Morrow Gas Pool, would now become 320 acres under the Avalon Morrow Gas Pool regulations and requirements.

In this regard, please accept this correspondence as ICA's consent for Devon Energy Corporation to proceed with its proposed field rule changes before the New Mexico Oil & Gas Conservation Division as described in your November 2, 1998, correspondence and with the understanding above.

ICA herein understands that there are no concerns at this time as to lease maintenance, the protection of correlative rights, or the prevention of waste to the issues of leasehold ownership and that the specific purpose for the proposed rule change is, as described above, a spacing redesignation.

By copy of this correspondence the New Mexico Oil & Gas Conservation Division is advised of our concurrence under this limited spectrum of notice and should there be any further requirements regarding this matter, please do not hesitate to direct them to the attention of the undersigned for fastest handling.

Sincerely,

Curtis N. Leonard
Counsel/Land Manager

CNL:lsj

cc: **New Mexico Oil & Gas Conservation Division**
2040 South Pacheco
Santa Fe, New Mexico 87505