

devon
ENERGY CORPORATION

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May 18, 1999

SENT BY FACSIMILE
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New Mexico Oil Conservation Commission
Attn: Ms. Lori Wrotenbery, Chairman
2040 South Pacheco
Santa Fe, New Mexico 87505
Facsimile No.: (505) 827-8177

Re: Case No. 12177
Application of the Oil Conservation
Division to Amend Rules 1201 to 1222
Hearing Date – May 19th, 1999

Ms. Wrotenbery:

Devon Energy Corporation (Nevada) ("Devon") is an operator and interest owner in numerous active oil and gas development and exploration activities within the State of New Mexico. As such, we believe Devon has standing to comment on the above-referenced subject.

Devon has reviewed the proposed amendments generated by the New Mexico Oil & Gas Association ("NMOGA") and conferred with representatives of NMOGA regarding the contents of the proposal. By virtue of this letter, Devon lends its concurrence to the proposal prepared and submitted by NMOGA.

Thank you for your continued cooperation. We look forward to reviewing the results of the hearing scheduled for this Wednesday.

Sincerely,

DEVON ENERGY CORPORATION (NEVADA)



Steve Cromwell
Land Manager

SC:GM:mb\case no. 12177

cc: Mr. W. Thomas Kellahin
Facsimile No.: (505) 982-2047

Mr. Richard Foppiano
Facsimile No.: (713) 350-4618