



United States Department of the Interior

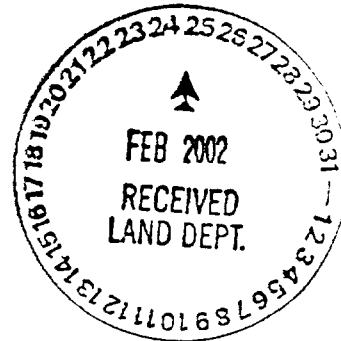
BUREAU OF LAND MANAGEMENT

Roswell Field Office
2909 West Second Street
Roswell, New Mexico 88201

IN REPLY REFER TO

148000112391
NMNM70798X
3180 (06300)

FEB 10 2002



Ocean Energy, Inc.
Attn: Mr. Derold Maney
1001 Fannin, Suite 1600
Houston, Texas 77002-6794

Re: Commercial Well Determination
Burton Flat Deep Unit #13
660' FSL, 19800' FEL, Section 28, T. 20 S., R. 28 E.
Eddy County, New Mexico

Pursuant to your letter dated January 31, 2002, this office concurs with your determination that the Burton Flat Deep Unit #13 is not capable of producing unitized substances from the Strawn formation in paying quantities as defined in Section 11 of the Burton Flat Deep Unit agreement. This well is therefore not entitled to be part of the Strawn participating area and production from this formation should be handled on a lease basis.

Your application for the Initial Strawn B Participating Area is now being returned.

If you have any questions, please contact Alexis C. Swoboda, P.E. at 505-627-0228.

Sincerely,

Larry D. Bray
Assistant Field Manager
Lands and Minerals

OIL CONSERVATION DIVISION

CASE NUMBER 12932

Ocean EXHIBIT 9