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Devon Energy Corporation 20 North Broadway Oklahoma City, Oklahoma 73102-8260 Fax 405-552-8113

12/22/02

NSL

November 25, 2002

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505 Attn: Michael Stogner

Re: Old Ranch Knoll 8 Fed Com #9 Section 8-T22S-R24E Eddy County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. (Devon) as Operator, intends to drill the referenced Cisco Canyon well to a depth of approximately 8,600'. Devon initially attempted to stake and permit this well at a location of 850' FSL & 660' FEL. However, due to the extreme slope of the surface the Bureau of Land Management (BLM) required Devon to move the location. The closest drillable location as approved by the BLM is located to the South and East to a location 810' FSL & 350' FEL which is an unorthodox location pursuant to the Indian Basin Upper Penn Associated Pool Rues.

Inasmuch as this well will be producing from an unorthodox location from that permitted by the Indian Basin Upper Penn Associated Pool Rules, Devon respectfully requests that the Commission administratively approve this application for an unorthodox location in accordance with Division Rule 104(F)(3). This well will be the third well drilled in the designated spacing unit as the Old ranch Knoll #2 and #7 have been previously drilled, with the Old Ranch Knoll #8 planned for early in 2003. Our records reflect that Yates Petroleum Corporation, Yates Drilling Company, MYCO Industries, Inc. and Abo Petroleum Corporation are the offsetting interest owners affected by this application.

Attached you will find a land plat reflecting Yates, etal as the affected parties, a net Cisco Canyon Isopach map, a State of New Mexico form C-102 and a topographic map. You will note that the well is being permitted as a deviated well with an orthodox bottom hole location of 850' FSL & 660' FEL. However, given the fact that Devon has been required by the BLM to move this well to an unorthodox location, Devon would prefer to drill this well vertically and avoid the unnecessary expense of drilling a deviated well.

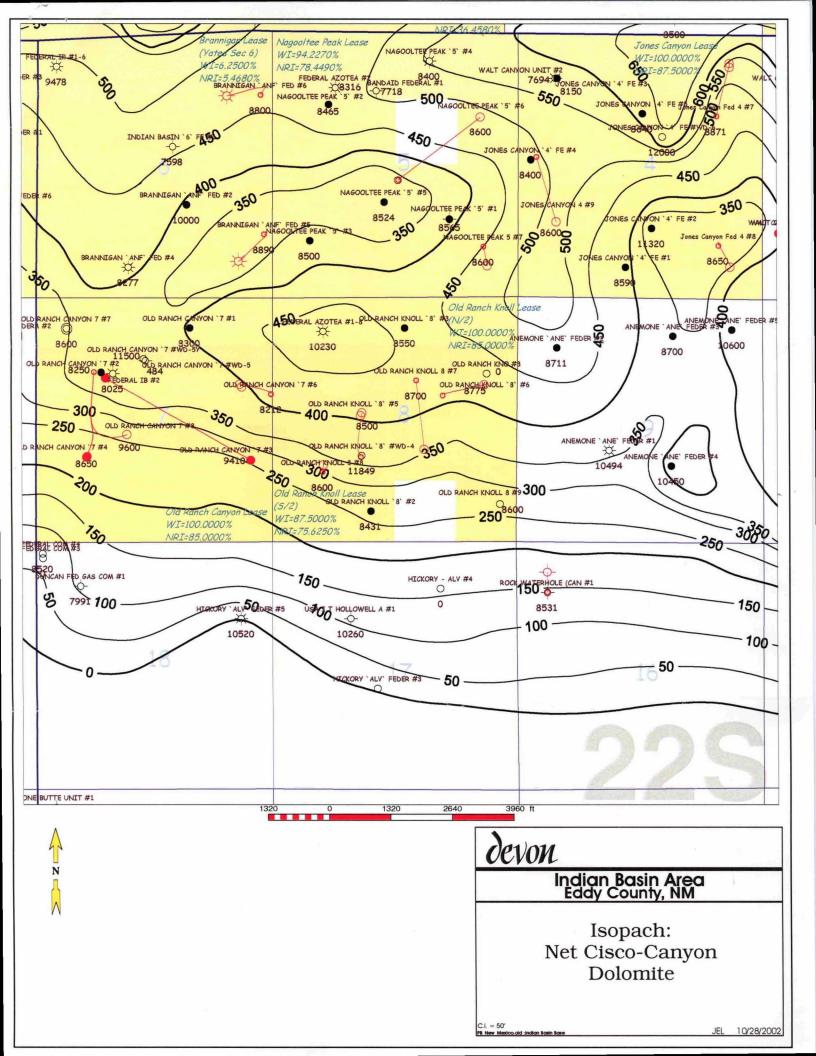
Feel free to call me at (405) 552-4633 if there are any questions or concerns regarding this application.

Yours very truly,

DEVON ENERGY PRODUCTION COMPANY, L.P.

Ken Gray Senior Land Advisor Kg/WGC 9 UL

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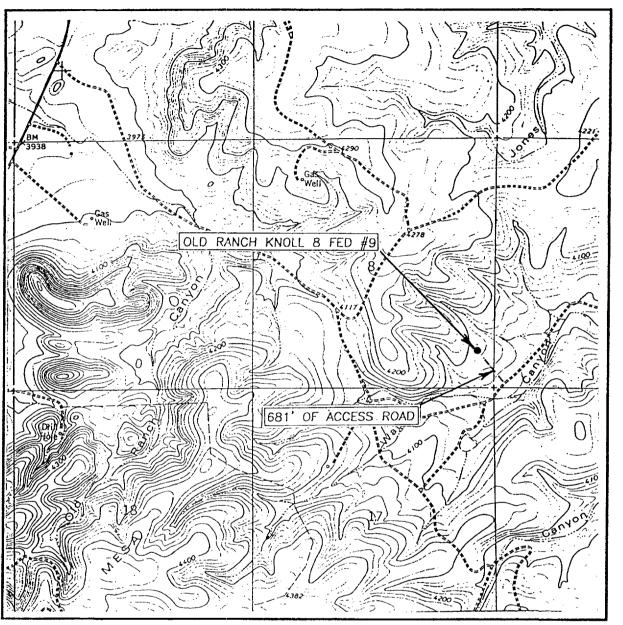
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EXHIBIT 2

LOCATION VERIFICATION MAP



SCALE: 1" = 2000'

SEC. 8 TWP. 22-S RGE. 24-E SURVEY N.M.P.M. COUNTY EDDY DESCRIPTION 810' FSL & 350' FEL ELEVATION 4086' OPERATOR DEVON ENERGY PROD, CO. L.P. LEASE OLD RANCH KNOLL 8 FEDERAL U.S.G.S. TOPOGRAPHIC MAP

MARTHA CREEK, N.M.

CONTOUR INTERVAL: 20' MARTHA CREEK, N.M.

JOHN WEST SURVEYING HOBBS, NEW MEXICO (505) 393-3117



Devon Energy Corporation 20 North Broadway Oklahoma City, Oklahoma 73102-8260 Fax 405-552-8113

November 25, 2002

Yates Petroleum Corporation Abo Petroleum Corporation Yates Drilling Company MYCO Industries, Inc. 105 South 4th Street Artesia, New Mexico 88210-2118

Attn: Janet Richardson

Re: Old Ranch Knoll 8 Fed Com #9 Section 8-T22S-R24E Eddy County, New Mexico

Gentlemen:

Devon Energy Production Company, L.P. ("Devon"), as Operator, has filed with New Mexico Oil Conservation Division, an Application for Administrative approval for an Unorthodox Well Location covering the referenced well for the reasons cited in the Application which is attached hereto. Our records reflect that, as an interest owner in Sections 9, 16 & 17-T22S-R24E, you are an affected owner.

In that regard, Devon respectfully requests that you waive any objection you may have to this Application by signing and returning one (1) copy of this letter to the undersigned at your earliest convenience.

Yours very truly,

DEVON ENERGY PRODUCTION COMPANY, L.P.

Ken Gray **/** Senior Land Advisor

Kg/old ranch knoll 8-9 ul Enclosure

Agree to waive objection to Devon's Application for Administrative approval of an Unorthodox Well Location covering the Old Ranch Knoll Fed Com 8-9.

Yates Petroleum Corporation

By:		
1	 _	

Title: _____

Yates Petroleum Corporation, et al November 25, 2002 Page Two

MYCO	Industries,	Inc
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By: _____

Name: _____

Title: _____

Abo Petroleum Corporation

Ву: _____

Name: _____

Title: _____

Yates Drilling Company

By:	

Name: _____

Title: _____