BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

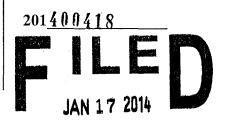
APPLICANT: DEVON ENERGY PRODUCTION COMPANY, L.P.

RELIEF SOUGHT: POOLING

LANDS COVERED: SECTION 22, TOWNSHIP 20 NORTH, RANGE 3 EAST, PAYNE COUNTY, OKLAHOMA

APPLICATION

CAUSE CD NO.



COURT CLERK'S OFFICE - OKC CORPORATION COMMISSION OF OKLAHOMA

Cashier: RBO PRODUCTION

\$100.00

Time: 14:14

CORP

COMES NOW the Applicant, Devon Energy Production Company, L.P., and shows the Honorable Corporation Commission the following:

PARTIES: 1.

1.2

1.1 Applicant is: Devon Energy Production Company, L.P. Devon Energy Center 333 W. Sheridan Ave. Oklahoma City, OK 73102

hereof.

2. **ALLEGATION OF FACTS:**

That heretofore by Order No. 606860, this Commission established Section 2.122-20N-3E, Payne County, Oklahoma, as a 640-acre drilling and spacing unit for the production of hydrocarbons from the Mississippian, Woodford, Sylvan and Viola common sources of supply.

Respondents are set out on the Exhibit "A" attached hereto and made a part

2.2 Applicant is the owner of an interest in oil and gas leases covering a portion of said drilling and spacing unit. Applicant proposes to drill a well at a legal location in said drilling and spacing unit to a depth sufficient to test the common sources of supply named above in garagraph 2.1, said well to be the permitted well for the drilling and spacing unit. Further, Applicant The parties named as respondents may be the owners of a right to drift at the 201400418 proposes to designate itself or another party as operator.

2.3 and produce from the spaced formations named above underlying Section 22-20N-3E, Payne Count Oklahoma. Applicant exercised due diligence to locate each respondent and a bona fide effort was AS/TRAN/PUD AP ERGY

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made to reach an agreement with each such respondent as to how the unit would be developed. Said respondents have not agreed to pool and develop their land or interests in the unit as a unit.

2.4 In order to prevent waste and to protect correlative rights and to avoid the drilling of unnecessary wells, the Commission should require said respondents to pool and develop their lands or interests in the unit as a unit.

3. LEGAL AUTHORITY: Title 52 O.S.A. §87.1.

4. **RELIEF SOUGHT**: That the Commission pool the interests and adjudicate the rights and equities of oil and gas owners in the Mississippian, Woodford, Sylvan and Viola common sources of supply underlying Section 22-20N-3E, Payne County, Oklahoma, all to be upon such terms and conditions as are just and reasonable and will afford all of the owners the opportunity to recover or receive without unnecessary expense, their just and fair share of all hydrocarbon substances produced therefrom, and that the Commission make definite provision for the payment of all actual costs and expenses of drilling and development, including a reasonable charge for supervision.

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WHEREFORE, Applicant prays that after due notice and hearing as required by law, the Commission should enter an order adjudicating the rights and equities and pooling the interests of all owners in the unit, and designating the Applicant or some other party as operator.

Respectfully submitted,

HARTZOG CONGER CASON & NEVILLE

By David E. Pepper, OBA #7035

1600 Bank of Oklahoma Plaza 201 Robert S. Kerr Avenue Oklahoma City, OK 73102 (405) 235-7000

ATTORNEYS FOR APPLICANT DEVON ENERGY PRODUCTION COMPANY, L.P.

For more information regarding this Application, contact Jared McAdams, Continental Land Resources, LLC, 825 S. Kelly Ave., Suite 120, Edmond, OK 73003, (405) 513-5536.

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EXHIBIT "A"

1. Virginia R. Keller 6502 Sunny Ct. McLean, VA 22102

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2. Ellen Sherman ADDRESS UNKNOWN