



Devon Energy,  
333 West Sheridan Avenue  
Oklahoma City, OK 73102-5015

405 235 3611 Phone  
www.devonenergy.com

February 18, 2021

Susan Conrad  
Office of General Counsel  
Oklahoma Corporation Commission  
Oil and Gas Conservation Division  
PO Box 52000  
Oklahoma City, OK 73152-2000

**FILED**  
FEB 24 2021

COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

Ms. Conrad:

Devon Energy Production Company, L.P. ("Devon") appreciates the opportunity to submit comments on Cause No. CD 202002102, the Statewide Proration Formula for Unallocated Gas Wells for the period of April 1, 2021 through March 31, 2022. While Devon does not believe any sort of wellhead restriction should be in place, we support Staff's recommendation to set the proration factor at **the greater of seventy-five percent (75%) of the calculated wellhead absolute open flow potential. In addition, Devon requests that the Commission raise the minimum allowable gas rate wells to 3 million cubic feet per day (mmcf/d).** Devon believes an increase in the minimum allowable better reflects the more productive nature of modern horizontal wells.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Ketter", written over a horizontal line.

Aaron Ketter  
Vice President