

June 10, 2010

Office of Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Devon Energy Corporation (DVN) appears poised to disregard Rule 14a-8 proposal after failure to obtain no action relief

Ladies and Gentlemen:

Devon Energy appears poised to disregard a Rule 14a-8 proposal on the grounds it failed to be seconded at its June 9, 2010 meeting. This letter is to appraise the Commission of the situation and to request regulatory intervention. A summary of the facts follows.

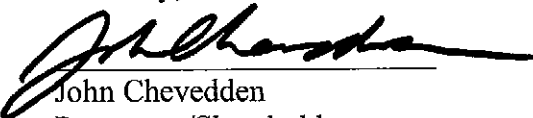
The proposal was for "simple majority voting." Devon Energy opposed the proposal and tried to block it with a formal no-action request to the SEC. That request was denied in *Devon Energy Corporation* (April 20, 2010). The proposal appeared as agenda item number 3 in the 2010 definitive proxy.

The proposal was moved by Ms. Julie Skye at the corporation's June 9, 2010 meeting in Oklahoma City. At that meeting, after the proposal was read, the chair asked if there was a second for the proposal. No one at the meeting chose to second the proposal. The Inspector of Election failed to report any vote on the rule 14a-8 proposal and failed to give an explanation for its failure.

In its response in *Motorola, Inc.* (October 8, 1987), the Staff affirmed standard procedure that shareowner proposals do not need to be seconded.

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Sincerely,



John Chevedden
Proponent/Shareholder

cc:

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