

Well Name	Well Number	US Well Number	Lease Number	Case Number	Operator
STRAY CAT 8-5	664H		NMNM98826	NMNM98826	DEVON
STRAY CAT 8-5	774H		NMNM98826	NMNM98826	DEVON
STRAY CAT 8-5	814H		NMNM98826	NMNM98826	DEVON

Notice of Intent

Sundry ID: 2765813

Type of Submission: Notice of Intent

Date Sundry Submitted: 12/13/2023

Date proposed operation will begin: 12/13/2023

Type of Action: Variance

Time Sundry Submitted: 09:51

Procedure Description: Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections' 5M BOPE requirements. APD ID: 10400091814 (Stray Cat 8-5 Fed Com 664H) APD ID: 10400091817 (Stray Cat 8-5 Fed Com 774H) APD ID: 10400091818 (Stray Cat 8-5 Fed Com 814H)

NOI Attachments

Procedure Description

Verbal_approval_20231213094639.pdf

Conditions of Approval

Specialist Review

Stray_Cat_8_5_Fed_Com_664H_774H_814H_Sundry_ID_2765813_20231213141418.pdf

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: SHAYDA OMOUMI

Signed on: DEC 13, 2023 12:42 PM

Name: DEVON ENERGY PRODUCTION COMPANY LP

Title: Regulatory Compliance Associate 3

Street Address: 333 W SHERIDAN AVE

City: OKLAHOMA CITYState: OK

Phone: (405) 235-3611

Email address: SHAYDA.OMOUMI@DVN.COM

Field

Representative Name:

Street Address:

City:State:Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Name: LONG VO

BLM POC Title: Petroleum Engineer

BLM POC Phone: 5759885402

BLM POC Email Address: LVO@BLM.GOV

Disposition: Approved

Disposition Date: 12/13/2023

Signature: Long Vo

From: [Vo, Long T](#)
To: [Wardhana, Krisna](#)
Subject: Re: [EXTERNAL] Offline Cementing Variance Request
Date: Friday, December 1, 2023 10:13:53 AM
Attachments: [image001.png](#)
[Outlook-ypgifys4.png](#)
[Outlook-oozwqcfg.png](#)

Yes, that is correct, the BLM has your variance proposal on file, please only submit the language within your offline cementing proposal.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Friday, December 1, 2023 10:07 AM
To: Vo, Long T <lvo@blm.gov>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

Does that mean I can proceed with submitting sundries with the variance? Or were you looking for something else?

Krisna Wardhana

Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Friday, December 1, 2023 10:03 AM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Krisna,

Please submit the variance proposal.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Friday, December 1, 2023 9:35 AM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Morning Long,

Please see our formal variance request below:

Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections' 5M BOPE requirements.

Krisna Wardhana
Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 4:01 PM

To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Good Afternoon Krisna,

Thank you for the clarification, could you please submit a formal variance request to offline cement per our phone conversation. Please give justification for the variance request to meet or exceed the minimum requirements. This is similar to the way the break testing variance is submitted.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Thursday, November 30, 2023 2:45 PM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

That kill line is connected to the other lower casing valve and communicates to the backside. In the event we are using that kill line, we would be bullheading the well and will not be taking returns.

Krisna Wardhana

Drilling Engineer

Krisna.wardhana@dvn.com

Cell – (661) 868-9418

Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 1:50 PM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

For question #4: Is the Manifold #2 connected to the Kill Line? I don't see a bypass that would flow from the return line to the Manifold #2.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Thursday, November 30, 2023 1:11 PM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

Please see the responses below and attached REV3 document.

Krisna Wardhana

Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 11:00 AM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract)

<Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>

Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Good morning Krisna,

Could you clarify a few more things?

1. What is the half round labeled on the diagram? **Its an equivalent to an open top tank for a close loop system.**
2. On the U-choke 10M the Manifold #2 (BACKUP) is labeled in the middle of the manifold, is this to reference that the U-choke is the Manifold #2? **No, Manifold #2 is separate (shown on bottom right hand corner of the slide). I've attached an updated copy to clarify that.**
3. Could you clarify the cement truck line connections running to the cement head and the kill line? **It is the cementing iron that is rigged up with valves just like any other cement jobs**
4. What is the procedure to run the Manifold #2 and when will it be utilized? **In the event manifold #1 gets plugged up or issues with the valves on Manifold #1, we will switch over to manifold #2. We would stop pumping and line up the valves starting with the U-Choke towards manifold #2 (close valves to manifold #1 and open up valves to Manifold #2)**
5. How will the KWM line tie into the kill line? There's only the Cement Truck running to the casing valve. Where is the KWM mixed? **KWM would be mixed in the drilling rig and there would be a line connected from the pits to the cement truck. Cement truck would be pumping the KWM to kill the well if there is an influx.**

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Sent: Wednesday, November 29, 2023 3:58 PM

To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Long,

Please see attached revised PPT addressing your bullet points below.

Let us know if you have any questions.

Krisna Wardhana

Drilling Engineer

Krisna.wardhana@dvn.com

Cell – (661) 868-9418

Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>

Sent: Thursday, November 16, 2023 1:51 PM

To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>; Walls, Christopher <cwalls@blm.gov>

Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Krisna,

Could you clarify and add a few things with an update power point?

1. What are the offline cementing equipment rated at and what are the working pressures?
2. Could you include the offline cementing instrumentation diagram with flow path and any connected cementing equipment? Please also include the shoe assembly diagram.
3. Please include line tied to the gas scrubber. (Gas influx before or during cementing).
 - a. Please include a well control procedure when gas influx is present.
4. Please include a panic line flowing to the pit.
5. Please confirm the well is static and that the floats are holding before removing the cementing equipment and installing the TA cap with pressure monitoring device.
6. Please send me the data sheet for the circulation plug/BPV within the pack off profile and the pressure seal on the backside.
7. If the barrier seals do not pass the pressure test, what is the contingency plan?

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Sent: Thursday, November 16, 2023 11:10 AM

To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>

Subject: [EXTERNAL] Offline Cementing Variance Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Long,

As discussed over the phone, Devon is requesting an offline cementing variance for the intermediate string.

Please see attached powerpoint attached highlighting our proposal and procedure for offline cementing.

Krisna Wardhana

Drilling Engineer

Krisna.wardhana@dvn.com

Cell – (661) 868-9418

Office – (405) 552-4724



Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly

prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

Well Name	Well Number	US Well Number	Lease Number	Case Number	Operator
STRAY CAT 8-5	664H		NMNM98826	NMNM98826	DEVON
STRAY CAT 8-5	774H		NMNM98826	NMNM98826	DEVON
STRAY CAT 8-5	814H		NMNM98826	NMNM98826	DEVON

Notice of Intent

Sundry ID: 2765813

Type of Submission: Notice of Intent

Type of Action: Variance

Date Sundry Submitted: 12/13/2023

Time Sundry Submitted: 09:51

Date proposed operation will begin: 12/13/2023

Procedure Description: Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections' 5M BOPE requirements. APD ID: 10400091814 (Stray Cat 8-5 Fed Com 664H) APD ID: 10400091817 (Stray Cat 8-5 Fed Com 774H) APD ID: 10400091818 (Stray Cat 8-5 Fed Com 814H)

NOI Attachments

Procedure Description

Verbal_approval_20231213094639.pdf

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: SHAYDA OMOUMI**Signed on:** DEC 13, 2023 12:42 PM**Name:** DEVON ENERGY PRODUCTION COMPANY LP**Title:** Regulatory Compliance Associate 3**Street Address:** 333 W SHERIDAN AVE**City:** OKLAHOMA CITY**State:** OK**Phone:** (405) 235-3611**Email address:** SHAYDA.OMOUMI@DVN.COM**Field****Representative Name:****Street Address:****City:****State:****Zip:****Phone:****Email address:**

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

All Previous COAs Still Apply. Variance request procedure is approved as written, please see below general conditions for variance.

Offline Cementing

Operator has been **(Approved)** to pump the proposed cement program offline in the **Intermediate(s)** interval.

Offline cementing should commence within 24 hours of landing the casing for the interval.

Notify the BLM 4hrs prior to cementing offline at **Eddy County: 575-361-2822**.

GENERAL REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)

☒ Eddy County

EMAIL or call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220,

BLM_NM_CFO_DrillingNotifications@BLM.GOV

(575) 361-2822

☒ Lea County

Call the Hobbs Field Station, 414 West Taylor, Hobbs NM 88240,
(575) 689-5981

1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - Notify the BLM when moving in and removing the Spudder Rig.
 - Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - BOP/BOPE test to be conducted per **43 CFR part 3170 Subpart 3172** as soon as 2nd Rig is rigged up on well.
2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the dog house or stairway area.
3. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well – vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a

digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

A. CASING

1. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.
2. Wait on cement (WOC) for Potash Areas: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi for all cement blends, 2) until cement has been in place at least 24 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
3. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
4. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
6. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
7. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.

8. Whenever a casing string is cemented in the R-111-P potash area, the NMOCD requirements shall be followed.

B. PRESSURE CONTROL

1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in **43 CFR part 3170 Subpart 3172** and **API STD 53 Sec. 5.3**.
2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.
3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172.6(b)(9) must be followed.
 - e. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - a. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after

installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead cement), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).

- b. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the cement plug. The BOPE test can be initiated after bumping the cement plug with the casing valve open. (only applies to single stage cement jobs, prior to the cement setting up.)
- c. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to **43 CFR part 3170 Subpart 3172** with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for water basin (8 hours) or potash (24 hours) or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- d. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- e. The results of the test shall be reported to the appropriate BLM office.
- f. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- g. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- h. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per **43 CFR**

part 3170 Subpart 3172.

C. DRILLING MUD

Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation, and shall be used until production casing is run and cemented.

D. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area.

Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

Form 3160-5
(June 2019)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0137
Expires: October 31, 2021

SUNDRY NOTICES AND REPORTS ON WELLS
Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.

5. Lease Serial No. **MULTIPLE**

6. If Indian, Allottee or Tribe Name
MULTIPLE

SUBMIT IN TRIPLICATE - Other instructions on page 2		7. If Unit of CA/Agreement, Name and/or No. MULTIPLE
1. Type of Well ☐ Oil Well ☐ Gas Well ☐ Other		8. Well Name and No. MULTIPLE
2. Name of Operator DEVON ENERGY PRODUCTION COMPANY LP		9. API Well No. MULTIPLE
3a. Address 333 WEST SHERIDAN AVE, OKLAHOMA CITY,	3b. Phone No. (include area code) (405) 235-3611	10. Field and Pool or Exploratory Area MULTIPLE
4. Location of Well (Footage, Sec., T.,R.,M., or Survey Description) MULTIPLE		11. Country or Parish, State MULTIPLE

12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA				
TYPE OF SUBMISSION	TYPE OF ACTION			
☒ Notice of Intent	☐ Acidize	☐ Deepen	☐ Production (Start/Resume)	☐ Water Shut-Off
☐ Subsequent Report	☐ Alter Casing	☐ Hydraulic Fracturing	☐ Reclamation	☐ Well Integrity
☐ Final Abandonment Notice	☐ Casing Repair	☐ New Construction	☐ Recomplete	☒ Other
	☐ Change Plans	☐ Plug and Abandon	☐ Temporarily Abandon	
	☐ Convert to Injection	☐ Plug Back	☐ Water Disposal	

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleate horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be perfonned or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has detennined that the site is ready for final inspection.)

Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections 5M BOPE requirements.

APD ID: 10400091814 (Stray Cat 8-5 Fed Com 664H)
APD ID: 10400091817 (Stray Cat 8-5 Fed Com 774H)
APD ID: 10400091818 (Stray Cat 8-5 Fed Com 814H)

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed) SHAYDA OMOUMI / Ph: (405) 235-3611	Title Regulatory Compliance Associate 3
Signature (Electronic Submission)	Date 12/13/2023

THE SPACE FOR FEDERAL OR STATE OFFICE USE		
Approved by	Title	Date
Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.	Office	

Title 18 U.S.C Section 1001 and Title 43 U.S.C Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c) and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

Additional Information

Batch Well Data

STRAY CAT 8-5 FED COM 664H, US Well Number: null, Case Number: NMNM98826, Lease Number: NMNM98826,
Operator:DEVON ENERGY PRODUCTION COMPANY LP

STRAY CAT 8-5 FED COM 774H, US Well Number: null, Case Number: NMNM98826, Lease Number: NMNM98826,
Operator:DEVON ENERGY PRODUCTION COMPANY LP

STRAY CAT 8-5 FED COM 814H, US Well Number: null, Case Number: NMNM98826, Lease Number: NMNM98826,
Operator:DEVON ENERGY PRODUCTION COMPANY LP

CONFIDENTIAL

From: [Vo, Long T](#)
To: [Wardhana, Krisna](#)
Subject: Re: [EXTERNAL] Offline Cementing Variance Request
Date: Friday, December 1, 2023 10:13:53 AM
Attachments: [image001.png](#)
[Outlook-vpgifys4.png](#)
[Outlook-oozwqcfg.png](#)

Yes, that is correct, the BLM has your variance proposal on file, please only submit the language within your offline cementing proposal.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Friday, December 1, 2023 10:07 AM
To: Vo, Long T <lvo@blm.gov>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

Does that mean I can proceed with submitting sundries with the variance? Or were you looking for something else?

Krisna Wardhana

Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Friday, December 1, 2023 10:03 AM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Krisna,

Please submit the variance proposal.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Friday, December 1, 2023 9:35 AM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Morning Long,

Please see our formal variance request below:

Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections' 5M BOPE requirements.

Krisna Wardhana
Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 4:01 PM

To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Good Afternoon Krisna,

Thank you for the clarification, could you please submit a formal variance request to offline cement per our phone conversation. Please give justification for the variance request to meet or exceed the minimum requirements. This is similar to the way the break testing variance is submitted.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Thursday, November 30, 2023 2:45 PM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

That kill line is connected to the other lower casing valve and communicates to the backside. In the event we are using that kill line, we would be bullheading the well and will not be taking returns.

Krisna Wardhana

Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 1:50 PM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: Re: [EXTERNAL] Offline Cementing Variance Request

For question #4: Is the Manifold #2 connected to the Kill Line? I don't see a bypass that would flow from the return line to the Manifold #2.

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>
Sent: Thursday, November 30, 2023 1:11 PM
To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Hi Long,

Please see the responses below and attached REV3 document.

Krisna Wardhana

Drilling Engineer
Krisna.wardhana@dvn.com
Cell – (661) 868-9418
Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>
Sent: Thursday, November 30, 2023 11:00 AM
To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>; Walls, Christopher <cwalls@blm.gov>
Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract)

<Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>

Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Good morning Krisna,

Could you clarify a few more things?

1. What is the half round labeled on the diagram? **Its an equivalent to an open top tank for a close loop system.**
2. On the U-choke 10M the Manifold #2 (BACKUP) is labeled in the middle of the manifold, is this to reference that the U-choke is the Manifold #2? **No, Manifold #2 is separate (shown on bottom right hand corner of the slide). I've attached an updated copy to clarify that.**
3. Could you clarify the cement truck line connections running to the cement head and the kill line? **It is the cementing iron that is rigged up with valves just like any other cement jobs**
4. What is the procedure to run the Manifold #2 and when will it be utilized? **In the event manifold #1 gets plugged up or issues with the valves on Manifold #1, we will switch over to manifold #2. We would stop pumping and line up the valves starting with the U-Choke towards manifold #2 (close valves to manifold #1 and open up valves to Manifold #2)**
5. How will the KWM line tie into the kill line? There's only the Cement Truck running to the casing valve. Where is the KWM mixed? **KWM would be mixed in the drilling rig and there would be a line connected from the pits to the cement truck. Cement truck would be pumping the KWM to kill the well if there is an influx.**

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Sent: Wednesday, November 29, 2023 3:58 PM

To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>; McCall, Keith (Contract) <Keith.McCall@dvn.com>; Hooks, Spencer <Spencer.Hooks@dvn.com>
Subject: RE: [EXTERNAL] Offline Cementing Variance Request

Long,

Please see attached revised PPT addressing your bullet points below.

Let us know if you have any questions.

Krisna Wardhana

Drilling Engineer

Krisna.wardhana@dvn.com

Cell – (661) 868-9418

Office – (405) 552-4724



From: Vo, Long T <lvo@blm.gov>

Sent: Thursday, November 16, 2023 1:51 PM

To: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>; Walls, Christopher <cwalls@blm.gov>

Subject: Re: [EXTERNAL] Offline Cementing Variance Request

Krisna,

Could you clarify and add a few things with an update power point?

1. What are the offline cementing equipment rated at and what are the working pressures?
2. Could you include the offline cementing instrumentation diagram with flow path and any connected cementing equipment? Please also include the shoe assembly diagram.
3. Please include line tied to the gas scrubber. (Gas influx before or during cementing).
 - a. Please include a well control procedure when gas influx is present.
4. Please include a panic line flowing to the pit.
5. Please confirm the well is static and that the floats are holding before removing the cementing equipment and installing the TA cap with pressure monitoring device.
6. Please send me the data sheet for the circulation plug/BPV within the pack off profile and the pressure seal on the backside.
7. If the barrier seals do not pass the pressure test, what is the contingency plan?

Regards,

Long Vo, EIT, M.Sc.

Petroleum Engineer SME
Carlsbad Field Office
Land and Minerals
Bureau of Land Management
Department of Interior
575-988-5402 Cell

From: Wardhana, Krisna <Krisna.Wardhana@dvn.com>

Sent: Thursday, November 16, 2023 11:10 AM

To: Vo, Long T <lvo@blm.gov>; Walls, Christopher <cwalls@blm.gov>

Cc: McDougal, Luke <Luke.McDougal@dvn.com>

Subject: [EXTERNAL] Offline Cementing Variance Request

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Long,

As discussed over the phone, Devon is requesting an offline cementing variance for the intermediate string.

Please see attached powerpoint attached highlighting our proposal and procedure for offline cementing.

Krisna Wardhana

Drilling Engineer

Krisna.wardhana@dvn.com

Cell – (661) 868-9418

Office – (405) 552-4724



Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly

prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
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Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 295184

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 295184
	Action Type: [C-103] NOI Change of Plans (C-103A)

CONDITIONS

Created By	Condition	Condition Date
pkautz	None	12/15/2023