TYPE SWD

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -1220 South St. Francis Drive, Santa Fe, NM 87505



Stephanie.Porter@dvn.com e-mail Address

		ADMINISTRATIVE AFFEIGATION	OTILORLIO I
Т	HIS CHECKLIST IS M	IANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEP WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL	
Applic	cation Acronym		
	[DHC-Dow [PC-Po	• • • • • • • • • • • • • • • • • • • •	PLC-Pool/Lease Commingling] I-Off-Lease Measurement] enance Expansion] sure Increase]
[1]	[A]	PPLICATION - Check Those Which Apply for [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD Cone Only for [B] or [C] Commingling - Storage - Measurement DHC CTB PC C	Cotton Draw Unot # 30-015-29728 Devon Eneary T
	[C]	Injection - Disposal - Pressure Increase - Enhanced C ☐ WFX ☐ PMX ☒ SWD ☐ IPI ☐	EOR 🔲 PPR
	[D]	Other: Specify	=
[2]	NOTIFICAT [A]	TION REQUIRED TO: - Check Those Which Apply, of Working, Royalty or Overriding Royalty Interest	or Does Not Apply
	[B]	☐ Offset Operators, Leaseholders or Surface Owne	ा
	[C]	Application is One Which Requires Published L	egal Notice
	[D]	Notification and/or Concurrent Approval by BL. U.S. Bureau of Land Management - Commissioner of Public Lands, State	
	[E]	For all of the above, Proof of Notification or Pul	plication is Attached, and/or,
	[F]	☐ Waivers are Attached	
[3]		CCURATE AND COMPLETE INFORMATION REATION INDICATED ABOVE.	QUIRED TO PROCESS THE TYPE
	oval is accurate a cation until the re	TION: I hereby certify that the information submitted and complete to the best of my knowledge. I also under equired information and notifications are submitted to the Statement must be completed by an individual with managerial	stand that no action will be taken on this e Division.
	Note	/ /	6/1/2/2
	or Type Name	Signature Oper Title	ations Technician Date

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505

FORM C-108 Revised June 10, 2003

APPLICATION FOR AUTHORIZATION TO INJECT

I.	PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage Application qualifies for administrative approval? X Yes No
II.	OPERATOR:Devon Energy Production Company, LP
	ADDRESS:333 West Sheridan Avenue, Oklahoma City, Oklahoma 73102-5010
	CONTACT PARTY:Stephanie A. PorterPHONE: _405-552-7802
III.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.
IV.	Is this an expansion of an existing project? Yes X No If yes, give the Division order number authorizing the project:
V.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
VII.	Attach data on the proposed operation, including:
	 Proposed average and maximum daily rate and volume of fluids to be injected; Whether the system is open or closed; Proposed average and maximum injection pressure; Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and, If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
*VIII.	Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
IX.	Describe the proposed stimulation program, if any.
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
*XI.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	NAME: Stephanie A. Porter TITLE: Operations Technician SIGNATURE: DATE: DATE: DATE:
*	E-MAIL ADDRESS: Stephanie.Porter dvn.com If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal:

III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:
 - (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
 - (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
 - (3) A description of the tubing to be used including its size, lining material, and setting depth.
 - (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.
 - (1) The name of the injection formation and, if applicable, the field or pool name.
 - (2) The injection interval and whether it is perforated or open-hole.
 - (3) State if the well was drilled for injection or, if not, the original purpose of the well.
 - (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
 - (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

Proposed Injection Well: Cotton Draw Unit #84

30-015-29728 API: 30-29728

APPLICATION FOR INJECTION

Form C-108 Section III

III. Well Data--On Injection Well

A. Injection Well Information

(1) Lease Well No

Cotton Draw Unit #84

Eddy County, NM

Location Sec,Twn,Rnge

Cnty, State

2645' FSL & 3455' FEL-Sec 2-T25S-R31E

- C-10Z

2615 FSL & 1160 FEL

(2) Casing

18-5/8", 87.5#, K-5, BTC, @ 700' Cmt w/1350 sx, circ cmt to surf

13-3/8", 68#, N-80, BTC, @ 4350' Cmt'd w/3250 sx, circ cmt to surf

9-5/8", 47/53.5#, P-110-55 LTC, @ 12200'

Cmt'd w/6056, cbl 4090

7 5/8", 39#, P110 liner, @ 14657' Cmt w/650 sx, tol @ 11858'

7", 35#, TCA-80, LTC, @ 11687' 5-1/2" x 7" X/O @ 11687' Cmt w/400 sx, etoc @ 11256'

5 1/2", 20#, P110 SLX, @ 16295' Cmt w/650 sx, tol @ 14289'

(3) Injection Tubing

3-1/2" 9.3# P-110 8rd EUE IPC tubing

(4) Packer

5-1/2" Baker DB Packer @ +/- 16180'

B. Other Well Information

(1) Injection Formation:

Paduca; Devonian, NW

Field Name: (To Be Assigned)

(2) Injection Interval:

16,295 - 16,585'

(3) Original Purpose of Wellbore:

Oil & Gas Producer, SWD Injector

(4) Other perforated intervals:

Devonian: Open Hole - 16,295-16,585'

(5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well if any.

Rustler 666'; Salado 1034' (Barren); Lamar 4356 (Oil)'; Ramsey 4375 (Oil); Cherry Canyon 5350' (Oil); Brushy Canyon 7051 (Oil); Bone Spring 8273' (Oil); Wolfcamp 12132 (Gas); Strawn 13626' (Gas); Atoka 13757' (Gas); Morrow 14408' (Gas); Mississippian 15896' (Barren); Woodford 16202' (Barren); Devonian/Silurian 16349' (Barren)

Proposed Injection Well: Cotton Draw Unit #84

API: 30-015-29728

APPLICATION FOR INJECTION Form C-108 Section VII to XIII

VII Attach data on the proposed operation, including:

(1) Proposed average injection rate:

5000 BWPD

Proposed maximum injection rate:

10000 BWPD

(2) The system will be a closed system.

(3) Proposed average injection pressure:

1629 psi

Proposed max injection pressure:

3259 psi

- (4) The injection fluid will be produced water from area wells producing from the Bone Spring and/or Delaware formations that will be injected into the Delaware/Silurian formation.
- (5) A representative water analysis is submitted for Bone Spring and Delaware formation.

VIII Geologic Injection Zone Data

The injection zone is the Devonian/Silurian formation from 16295 - 16585'. The gross injection interval is 290' thick. The Devonian formation is a Permian aged sandstone. The average depth to fresh water is less than 800' in this area.

IX Proposed Stimulation

Based on injectivity results this interval could be stimulated with ~30,000 gals HCL.

X Log Data

Logs have been provided with previous completion report filed.

XI Fresh Water Analysis

A Fresh Water Analysis Report for the Paduca Delaware Water Well, in Sec 2-T25S-R31E located @ Lat 32.09' 56.7" Long -103.44' 51.3" has been provided.

XII Geologic / Engineering Statement

An examination of this area has determined there are no open faults or other hydrologic connection between the disposal zone and any underground drinking water.

Engineering: Devon respectfully requests permission to convert the Cotton Draw Unit #84 to a salt water disposal well. This wells average production is 120 mcf/d in gas, and 486 bbi water, currently this well has been shut in since June 6, 2013 due to the production of formation solids. It is currently completed to the Devonian and produces below a 5-1/2" liner set at 16,295' thru 4-1/2" one hole with a TD of 16,585'. The conversion would consist of removing the existing 3-1/2" production string and installing a 3-1/2" internally plastic coated injection string, with a packer set at +/-16,535'. The formation will be treated with 30,000 gals of 15% HCl acid. Current and proposed well bore diagrams attached.

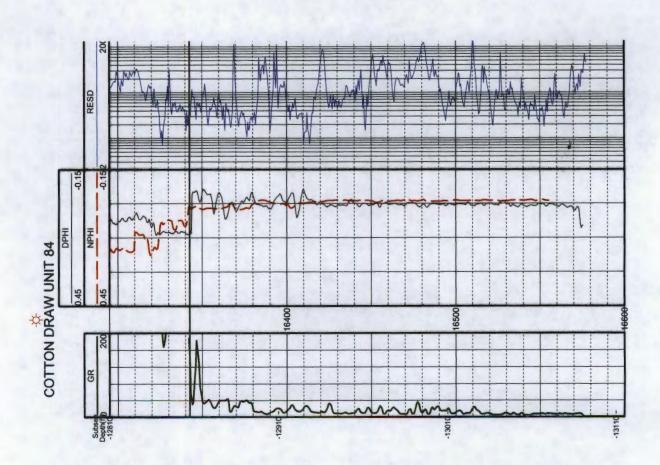
Reservoir: At current production rates and high water hauling cost of \$2.80/bbl this well produces uneconomically. Devon has been told by Enterprise that due to the H2S content of the Devonian gas, our market for this and other Devonian producers will disappear within 6 months. There are 2 wells within a ½ mile radius, the CDU 65 and the CDU 76. The CDU 65 is an active SWD well that injects into the Delaware, and the CDU 76 which is another Devonian producer which also produces uneconomically and will lose its market at the same time, this well will is planned to be TA'd to evaluate it for up hole or conversion potential.

Geology: The Devonian is highly fractured and believed to act like an infinite reservoir in the vertical direction, therefore making it an ideal SWD candidate. This closest Devonian SWD well is the CDU 89 which is 1.2 miles from the CDU 84 and due to the vertically fractured nature of the Devonian and the distance between the two it is believed that these wells will not communicate. Beyond the CDU 76 there is one more Devonian producer in the area the, CDU 86, which is 1.4 miles from the CDU 84. But, due to the vertically fractured nature of the Devonian and the distance between the two it is not believed the two will communicate.

Craig Harran, Geologist Direct #: (405)-228-7711 Cell #: (405)-626-2369 10/23/13 Date:/

XIII Proof of Notice

Proof of notice to surface owner, and public legal notification are attached.

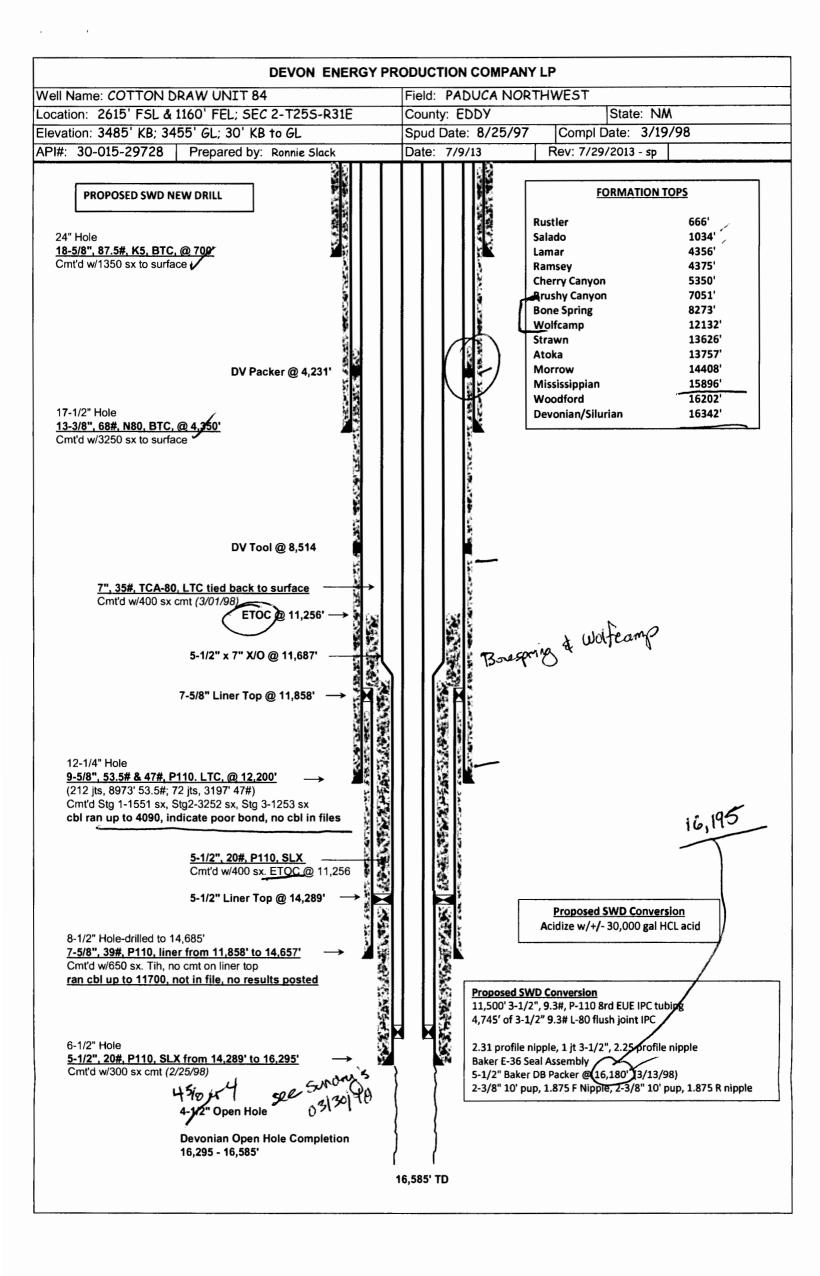


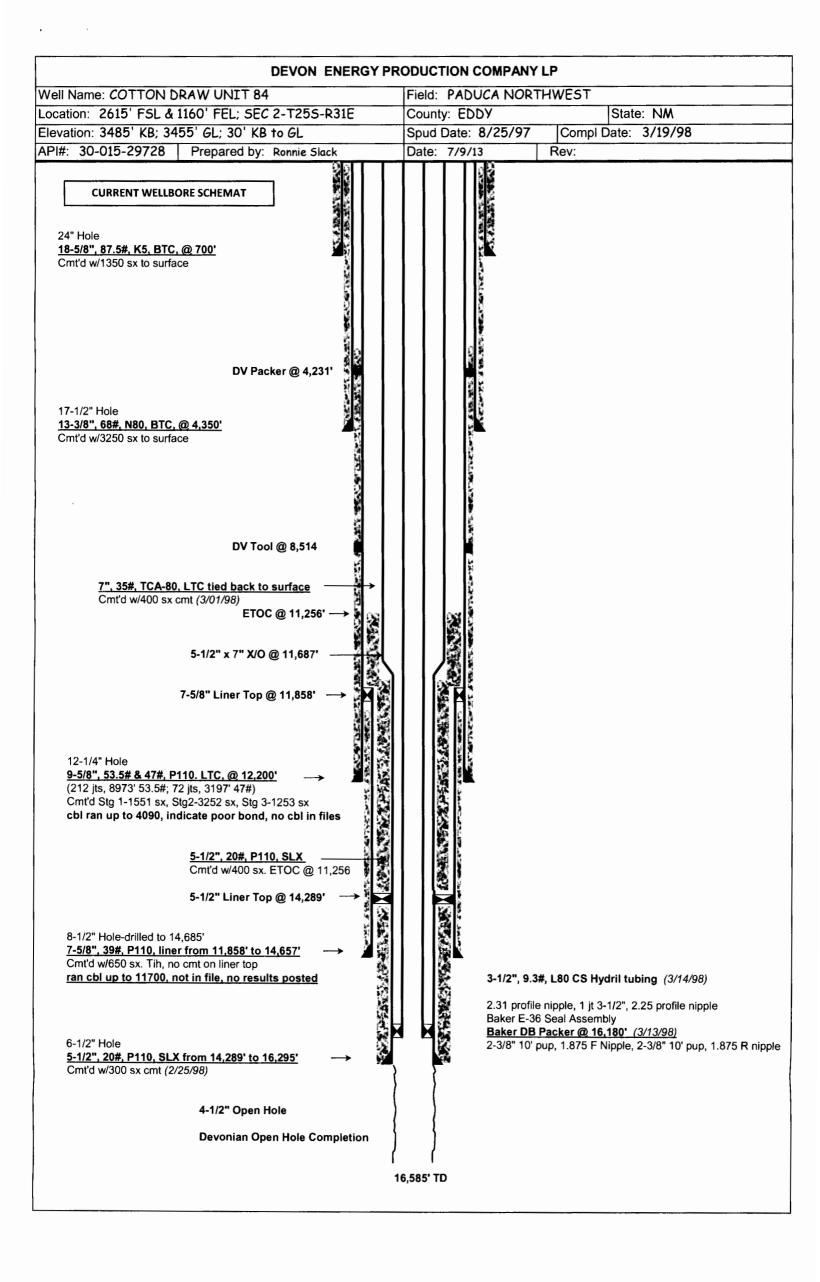
INJECTION WELL DATA SHEET

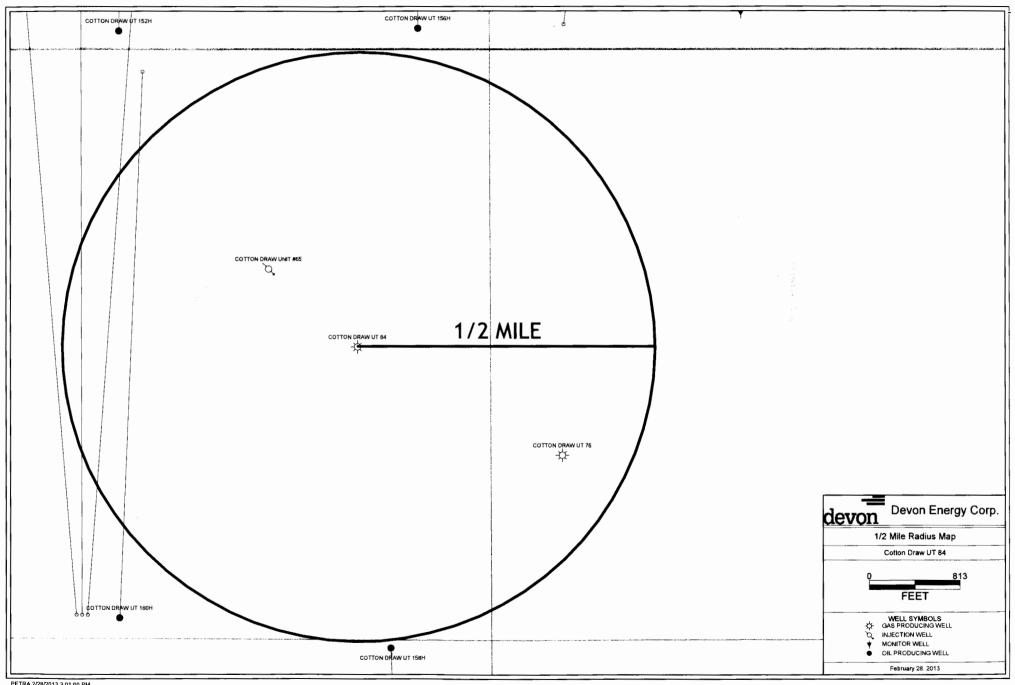
OPERATOR:Devon Energ	gy Production Company, LP		
WELL NAME & NUMBER:	_COTTON DRAW UNIT #84		
WELL LOCATION: 2615' F	SL & 1160' FEL I	Sec 2	T25SR31E
FOOT	AGE LOCATION	UNIT LETTER SECTIO	N TOWNSHIP RANGE
WELLBORE SC DEVON ENERGY F Well Name: COTTON DRAW UNIT 84	RODUCTION COMPANY LP		LL CONSTRUCTION DATA Jurface Casing
Veil Name: Co110N Dkw 0N1 1 84 Location: 2615' FSL & 1160' FEL; SEC 2-T255-R31E Elevation: 3485' KB; 3455' GL; 30' KB to GL API#: 30-015-29728 Prepared by: Ronnie Slock	Field: PADUCA NORTHWEST	Hole Size:24"	Casing Size: 18-5/8,87.5# @ 700'
PROPOSED SWD NEW DRILL	FORMATION TOPS	Cemented with: _1350sx.	orft ³
24" Hole 18-6/8", 87.66, KS, BTC, @ 700"	Rustler 666' Salado 1034' Lamar 4356'		Method Determined: Circ. cement
Cmt'd w/1350 ex to surface	Ramsay 4375' Cherry Canyon 5350' Brushy Canyon 7051' Bone Spring 8273' Wolfcamp 12332'	Inte	ermediate Casing
DV Packer @ 4,231	Strawn 13626' Atoka 13757' Morrow 14408' Mississippian 15896'	Hole Size: 17-1/2"	Casing Size:_13-3/8", 68#, @ 4350'
17-1/2" Hole 13-3/4", 686, MSG, BTG, @ 4,380" Cmfd w/3250 ax to surface	Woodford 16202' Devonlan/Silurian 16342'	Cemented with:3250 sx.	orft³
	The state of the s	Top of Cement:Surface	Method Determined: Circ. cement_
DV Tool @ 8,814	100		ermediate Casing
7". 356. TCA-89. LTC tied back to surface Cmfd w/400 ex cmt (3/01/08) ETOC (2) 11,256"	The state of the s	Hole Size:12-1/4"	Casing Size: _9-5/8", 47/53.5#, @ 1220
8-1/2" x 7" 3/0 @ 11,887		Cemented with:6056 sx.	
7-8/8" Liner Top @ 11,888'>		Top of Cement: 4090	Method Determined: CircCBL
12-1/4" Hole 9-69" - 53.88 & 476, P118, LTC, @ 12-200"	2000	Pro	oduction Casing
(212 jis, 8873 53.5#; 72 jis, 3197 47#) Cmfd Stg 1-1551 ex, Stg2-3252 ex, Stg 3-1263 ex obl ran up to 4696, indicate poor bond, no obl in files	THE STATE OF THE S	Hole Size: 8-1/2"	Casing Size:_7-5/8", 39#, @ 14657'
5-1/2", 209, P119, SLX Cmtd w/400 ax. ETOC @ 11,256			orft³
6-1/2" Liner Top @ 14,286" → 8-1/2" Hole-drilled to 14,885" 7-6/8", 384, P119, liner from 11,858' to 14,867. →	Proceed SWD Conversion Acidize w/+/- 30,000 gal HCL acid		Method Determined: Calc TOC_
Cmfd w/650 ex. Tih, no cmt on liner top ran del up to 11709, not in file, no results posted	Proposed SWD Conversion 11,500'3-1/2", 9.3#, P-110 Brd EUE IPC tubing	Total Depth: _5-1/2" 20# 16295 TD @	16585
6-1/2" Hole 5-1/2", 289, P110, SLX from 14,299' to 16,295' —> Cmt'd w/300 ax cmt (2/25/96)	4,745' of 3-1/2" 9.38 L-80 flush joint IPC 2.31 profile nipple, 1 t 3-1/2", 2.25 profile nipple Baker E-36 Seal Assembly 5-1/2" Baker DB Packer (#) 16,180" (3/13/98) 2-3/8" 10" pup, 1.875 F Nipple, 2-3/8" 10" pup, 1.875 R nipple	Injection	Interval (Open Hole)
4-1/2" Open Hele Deventan Open Hole Completion			295' to 16585'
16,295 - 16,58E	16,666' TD		
		(Perforated or	Open Hole; indicate which)

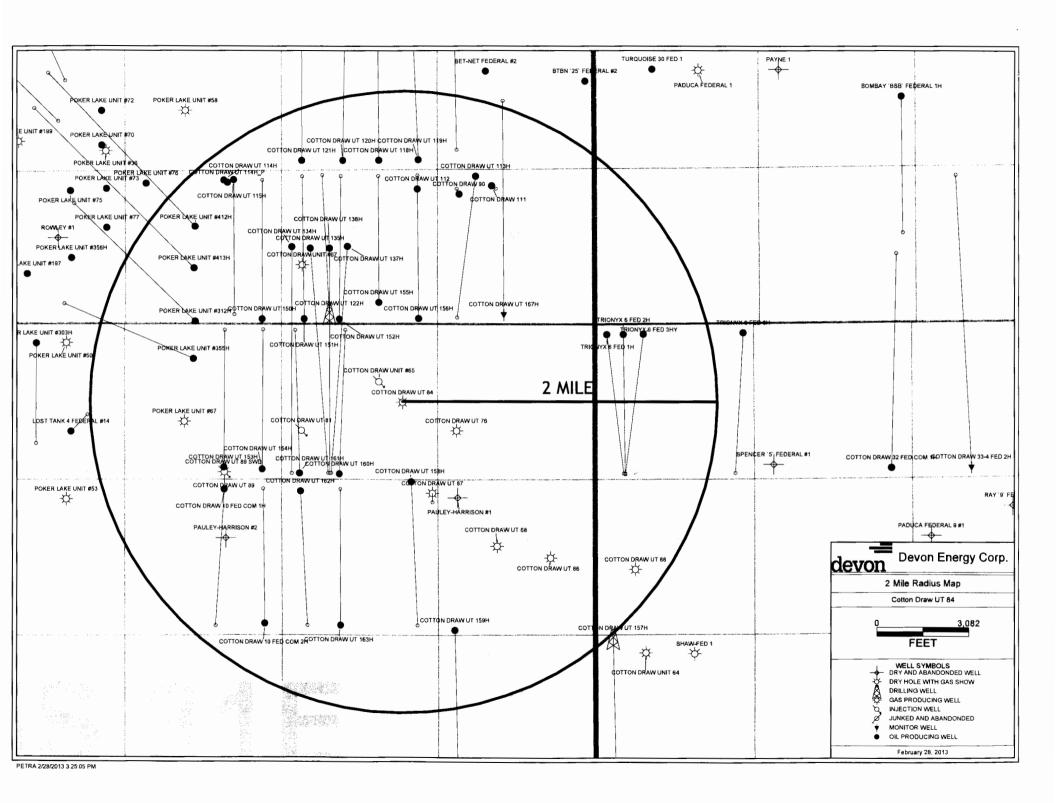
INJECTION WELL DATA SHEET

	Tubing Size: 3-1/2" Lining Material:IPC
Тур	pe of Packer:5-1/2" Baker DB Packer
Pac	eker Setting Depth: +/- 16180' max distance 100-fe ->= 16195' depth
	ner Type of Tubing/Casing Seal (if applicable):
	Additional Data
1.	Is this a new well drilled for injection? <u>No</u>
	If no, for what purpose was the well originally drilled?Oil & Gas Producer, SWD Injector
2.	Name of the Injection Formation: Paduca; Devonian, NW
3.	Name of Field or Pool (if applicable): To be Assigned by NMOCD
4.	Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail, i.e. sacks of cement or plug(s) used.
	Devonian: Open Hole – 16,295-16,585'
5.	Give the name and depths of any oil or gas zones underlying or overlying the proposed injection zone in this area:
	Rustler 666'; Salado 1034' (Barren); Lamar 4356 (Oil)'; Ramsey 4375 (Oil); Cherry Canyon 5350' (Oil) Brushy Canyon 7051 (Oil)'; Bone Spring 8273' (Oil); Wolfcamp 12132 (Gas)'; Strawn 13626' (Gas); Atoka 13757' (Gas); Morrow 14408' (Gas); Mississippian 15896' (Barren); Woodford 16202' (Barren); Devonian/Silurian 16349' (Barren)









16295' - 16585'															
Well Name	API NO	County	Surf Location	Sec T	Twn Rnge	е Туре	Status	Spud Date	Comp Date	TD	PBTD	Comp Zone	Comp Interval-Ft	Casing Program	Cement / TOC
Cotton Draw 65	30-015-10843	3 Eddy	1980' FNL 1980' FEL	2 2	25S 31E	E Inj	Active	7/8/1966	6/3/1967	19546	8180	Delaware Wolfcamp Morrow Devonian			1300 sx / surface 4300 sx / surface 4450 sx / 3555 ts 2350 sx / 11553 tol
			1680' FSL 1660' FWL	1 2	25S_ 31E	Gas	Active	10/27/1996	5/1/1997	16623	16623	Devonian	16400-16623'	18-5/8", 87.5#, @ 700' 13-3/8", 68#, @ 4578' 9-5/8", 53.5#, @ 12033' 7", 38#, @ 11552' 7-5/8" liner, 39#, @ 14698 5-1/2", 20# @ 16307	1350 sx / surface 3300 sx / surface 4250 sx / surface 700 sx / 11656 tol 240 sx / 11552 tol
Cotton Draw Unit 84	30-015-29728	3 Eddy	2615' FSL 1160' FEL	2 2	25S 31E	: Gas	Active	8/25/1997	3/19/1998	16585	16585	Devonian	16295-16585'	18-5/8", 87.5#, @ 700' 13-3/8", 68#, @ 4350' 9-5/8", 53.5/47#, @ 12200' 7", 35#, @ 11687' 7-5/8", 39#, @ 14657' 5-1/2", 20# @ 16295'	1350 sx / surface 3250 sx / surface 6056 sx / 4090 cbl 400 sx / etoc 11256 650 sx / 11858 tol 300 sx / 14289 tol
SWD-699: Be	ell Caragan	- and	Cherny	Can	yon 1	14542	<u>-</u> '657	141							
>0	SWD-699 4 IF	SWD - 699 4 IPI - 170 otton Draw Unit 76 30-015-29252 otton Draw Unit 84 30-015-29728	SWD-699 4 TPI-170 Stotton Draw Unit 76 30-015-29252 Eddy Stotton Draw Unit 84 30-015-29728 Eddy	30-015-10843 Eddy 1980' FEL SWD - 699 4 TPT - 170 atton Draw Unit 76 30-015-29252 Eddy 1660' FWL atton Draw Unit 84 30-015-29728 Eddy 1160' FEL	Sotton Draw 65 30-015-10843 Eddy 1980' FEL 2 2 SWD - 699 4 TPT - 170 Sotton Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 2 Sotton Draw Unit 84 30-015-29728 Eddy 1160' FEL 2 2	30-015-10843 Eddy 1980' FEL 2 25S 31E SWO - GIP 4 TPT - 170 otton Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 25S 31E otton Draw Unit 84 30-015-29728 Eddy 1160' FEL 2 25S 31E	SuD - GIP DIT - 170 SuD - GIP DIT - 170 Sutton Draw Unit 76 30-015-29252 Eddy 1680' FSL 1 25S 31E Gas Sutton Draw Unit 84 30-015-29728 Eddy 1160' FSL 2 25S 31E Gas	SUD - G19 A TPT - 170 Sutton Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 25S 31E Gas Active 2615' FSL 2 25S 31E Gas Active 2615' FSL 30-015-29728 Eddy 30-015-29728 Edd	Sotton Draw 65 30-015-10843 Eddy 1980' FEL 2 25S 31E Inj Active 7/8/1966 SWD - 699 4 TPT - 170 otton Draw Unit 76 30-015-29252 Eddy 1680' FSL 1 25S 31E Gas Active 10/27/1996	SUD - G9 4 TPT - 170 Sutton Draw Unit 76 30-015-29252 Eddy 1680' FSL 1 25S 31E Inj Active 7/8/1966 6/3/1967 5/1/1998 5/1/1997 5/1/1997 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/1/1997 5/1/1998 5/	SuD - G19 4 TPT - 170 Stron Draw Unit 76 30-015-29252 Eddy 1980' FSL 1 25S 31E Inj Active 7/8/1966 6/3/1967 19546 Substron Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 25S 31E Gas Active 10/27/1996 5/1/1997 16623 Substron Draw Unit 84 30-015-29728 Eddy 2615' FSL 1160' FEL 2 25S 31E Gas Active 8/25/1997 3/19/1998 16585	SWD - G9 2 TPT - 170 Stron Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 25S 31E Gas Active 10/27/1996 5/1/1997 16623 16623 Stron Draw Unit 84 30-015-29728 Eddy 1160' FEL 2 25S 31E Gas Active 8/25/1997 3/19/1998 16585 16585	Folton Draw 15 30-015-10843 Eddy 1980' FRL 2 25S 31E Inj Active 7/8/1966 6/3/1967 19546 8180 Devonian Supplied Fig. 170 Setton Draw Unit 76 30-015-29252 Eddy 1660' FWL 1 25S 31E Gas Active 10/27/1996 5/1/1997 16623 16623 Devonian Setton Draw Unit 84 30-015-29728 Eddy 1160' FEL 2 25S 31E Gas Active 8/25/1997 3/19/1998 16585 Devonian Setton Draw Unit 84 30-015-29728 Eddy 1160' FEL 2 25S 31E Gas Active 8/25/1997 3/19/1998 16585 Devonian	1980' FNL 1980	1278-1287 (squeezed off) 1278-1287 (s

Cotton Draw Unit 84 C108 Application for Injection **Injection Water Analysis Delaware Formation Devon Energy Production Co LP**

North Permian Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-8121 Lab Team Leader - Sheila Hernandez (432) 495-7240

Water Analysis Report by Baker Petrolite

Company: **DEVON ENERGY CORPORATION** Region: **PERMIAN BASIN**

Sales RDT: 33521.1

Account Manager: GENE ROGERS (575) 910-1022

633542

Area:

ARTESIA, NM

Sample #:

125781

Lease/Platform:

NEW MEXICO COM UNIT

Analysis ID #: Analysis Cost:

\$90.00

Entity (or well #):

UNKNOWN

Sample Point:

Formation:

WELLHEAD

Sumn	nary		Ar	alysis of Sa	mple 633542 @ 75	Ŧ	
Sampling Date:	10/19/12	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date: Analyst:	10/31/12 SANDRA GOMEZ	Chloride: Bicarbonate: Carbonate:	143232.0 73.2 0.0	4040.05 1.2 0.	Sodium: Magnesium: Calcium:	67508.7 3523.0 15857.0	2936.46 289.82 791.27
TDS (mg/l or g/m3): Density (g/cm3, tonn Anion/Cation Ratio:	232774.2 e/m3): 1.16 1	Sulfate: Phosphate: Borate: Silicate:	887.0	18.47	Strontium: Barium: Iron: Potassium:	440.0 0.1 8.0 1245.0	10.04 0. 0.29 31.84
Carbon Dioxide: Oxygen: Comments:	240 PPM	Hydrogen Sulfide: pH at time of sampling	ı:	0 PPM 7.07	Aluminum: Chromium: Copper: Lead:		
osimisms.		pH at time of analysis: pH used in Calculation		7.07	Manganese: Nickel:	0.200	0.01

Cond	itions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl											
Temp	Gauge Press. psi		Calcite Gypsum CaCO ₃ CaSO ₄ *2H ₂ 0			Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press		
F		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi		
80	0	0.83	4.20	0.00	3.08	0.04	33.62	0.05	21.57	-0.49	0.00	0.04		
100	0	0.83	4.76	-0.07	0.00	0.03	27.18	0.03	12.89	-0.69	0.00	0.05		
120	0	0.83	5.32	-0.13	0.00	0.05	41.47	0.02	9.53	-0.86	0.00	0.07		
140	0	0.84	5.88	-0.18	0.00	0.09	71.16	0.03	10.65	-1.01	0.00	0.09		

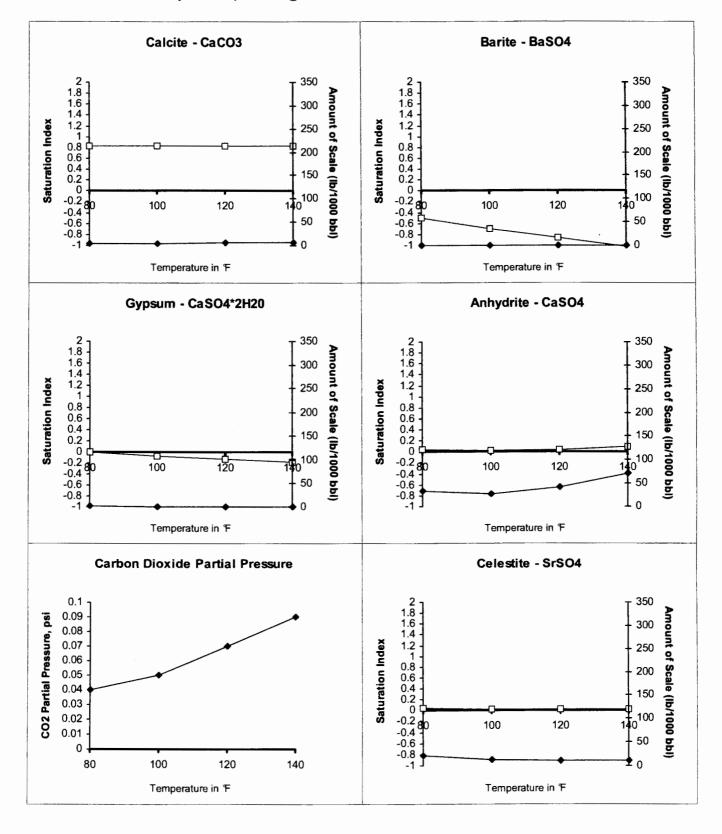
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633542 @ 75 F for DEVON ENERGY CORPORATION, 10/31/12



Cotton Draw Unit 84 C108 Application for Injection **Injection Water Analysis Bone Spring Formation Devon Energy Production Co LP**

North Permian Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-8121 Lab Team Leader - Sheila Hernandez (432) 495-7240

Water Analysis Report by Baker Petrolite

Company:

DEVON ENERGY CORPORATION

Sales RDT:

33521.1

Region:

PERMIAN BASIN

Account Manager: GENE ROGERS (575) 910-1022

Area:

ARTESIA, NM

Sample #:

633540

Lease/Platform:

CAPELLA UNIT

Analysis ID #:

125780

Entity (or well #):

Analysis Cost:

\$90.00

Formation:

UNKNOWN

Sample Point:

WELLHEAD

Summary		Aı	nalysis of Sa	mple 633540 @ 75	Ŧ	
Sampling Date: 10/19/12	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date: 10/31/12	Chloride:	120450.0	3397.46	Sodium:	62153.2	2703.51
Analyst: SANDRA GOMEZ	Bicarbonate:	61.0	1.	Magnesium:	1705.0	140.26
TD0 (Carbonate:	0.0	0.	Calcium:	10875.0	542.66
TDS (mg/l or g/m3): 199313.2	Sulfate:	1966.0	40.93	Strontium:	431.0	9.84
Density (g/cm3, tonne/m3): 1.142	Phosphate:			Barium:	0.5	0.01
Anion/Cation Ratio: 1	Borate:			iron:	33.0	1.19
	Silicate:			Potassium:	1637.0	41.86
				Aluminum:		
Carbon Dioxide: 250 PPM	Hydrogen Sulfide:		0 PPM	Chromium:		
Oxygen:	all at time of complicat		6.69	Copper:		
Comments:	pH at time of sampling:		0.09	Lead:		
	pH at time of analysis:			Manganese:	1.500	0.05
	pH used in Calculation	ո։	6.69	Nickel:		

Cond	itions		Values C	alculated	at the Give	n Conditi	ons - Amou	ints of Sc	ale in lb/10	00 bbl		
Temp	Gauge Press.	1	alcite aCO ₃	Gypsum CaSO ₄ *2H ₂ 0			ydrite aSO ₄		estite rSO ₄		rite aSO ₄	CO ₂ Press
F	psi	Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi
80	0	0.21	1.16	0.21	402.17	0.23	344.60	0.47	167.23	0.63	0.29	0.08
100	0	0.27	1.74	0.14	287.31	0.23	339.39	0.44	161.74	0.44	0.29	0.1
120	0	0.33	2.03	0.08	177.94	0.25	363.40	0.43	159.42	0.27	0.00	0.12
140	0	0.38	2.60	0.03	77.54	0.29	409.12	0.43	159.42	0.12	0.00	0.15

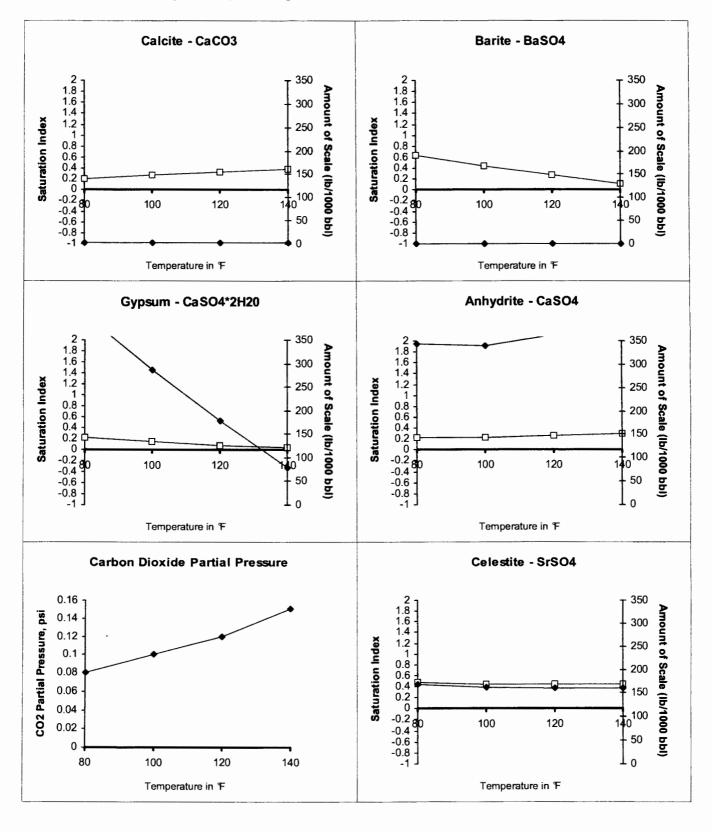
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633540 @ 75 F for DEVON ENERGY CORPORATION, 10/31/12



Cotton Draw Unit 84 C108 Application for Injection Injection Water Analysis Delaware Formation Devon Energy Production Co LP

North Permian Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-8121

Lab Team Leader - Sheila Hernandez

(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:

DEVON ENERGY CORPORATION

Sales RDT:

33521.1

Region:

PERMIAN BASIN

Account Manager: GENE ROGERS (575) 910-1022

Area:

ARTESIA, NM

Sample #:

633541

\$90.00

Lease/Platform:

BROWN BEAR

Analysis ID #: Analysis Cost: 125782

Entity (or well #):

Summary

UNKNOWN

Formation: Sample Point:

Sampling Date:

Analysis Date:

TDS (mg/l or g/m3):

Anion/Cation Ratio:

Carbon Dioxide:

Oxygen:

Comments:

Density (g/cm3, tonne/m3):

Analyst:

WELLHEAD

Analysis of Sample 633541 @ 75 F mg/l meq/l 10/19/12 **Anions** Cations mg/l meq/l 10/31/12 52707.0 1486.67 Chloride: Sodium: 23678.3 1029.95 SANDRA GOMEZ Bicarbonate: 109.8 1474.0 121.26 1.8 Magnesium: Carbonate: 0.0 0. Calcium: 6421.0 320.41 85195.9 Sulfate: 77.0 Strontium: 161.0 1.6 3.67 1.061 Phosphate: Barium: 0.3 O. Borate: 23.0 Iron: 0.83 Silicate: Potassium: 542.0 13.86 Aluminum: 130 PPM 0 PPM Hydrogen Sulfide: Chromium: Copper: pH at time of sampling: 6.73 Lead: pH at time of analysis: Manganese: 2.500 0.09 pH used in Calculation: 6.73 Nickel:

Cond	itions		Values C	alculated	at the Give	n Conditi	ons - Amou	unts of Sc	ale in lb/10	00 bb!		
Temp	Gauge Calcite Press. CaCO ₃		Gypsum CaSO ₄ *2H ₂ 0		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press	
F	psi	Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi
80	0	0.21	2.90	-1.27	0.00	-1.30	0.00	-1.08	0.00	-0.71	0.00	0.15
100	0	0.29	4.19	-1.31	0.00	-1.28	0.00	-1.09	0.00	-0.88	0.00	0.19
120	0	0.38	5.80	-1.34	0.00	-1.22	0.00	-1.08	0.00	-1.03	0.00	0.24
140	0	0.47	7.41	-1.35	0.00	-1.15	0.00	-1.07	0.00	-1.16	0.00	0.29

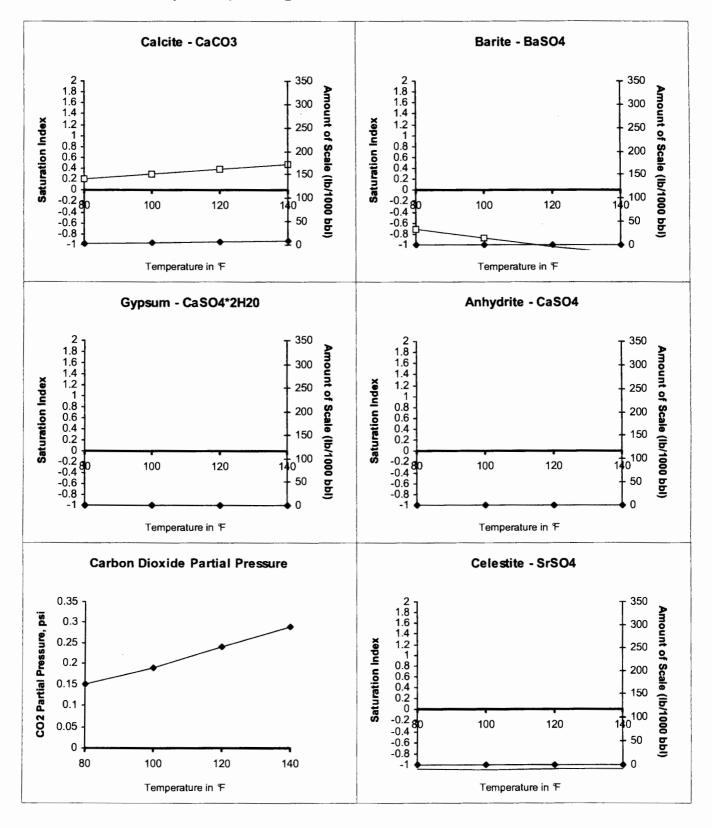
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633541 @ 75 F for DEVON ENERGY CORPORATION, 10/31/12



Fresh Water Analysis Report Paduca Delaware Water Well SEC 2-T25S-R31E

Lat 32.09' 56.7" Long -103.44' 51.3"

North Permian Basin Region P.O. Box 740

Sundown, TX 79372-0740

(806) 229-8121

Lab Team Leader - Sheila Hernandez

(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:

DEVON ENERGY CORPORATION

Sales RDT:

33521.1

Region:

PERMIAN BASIN

, 10000111111

Account Manager: GENE ROGERS (575) 910-1022

Area:

ARTESIA, NM

Sample #:

575022

Lease/Platform:

PADUCA LEASE

Analysis ID #:

113161

Entity (or well #):

FRESH WATER

Analysis Cost:

\$90.00

Formation:

UNKNOWN

Sample Point:

WELLHEAD

	Ana	ıl ys is of Saı	mple 575022 @ 75 ¶	=	
1 Anions	mg/l	meq/I	Cations	mg/l	meq/l
1 Chloride:	328.0	9.25	Sodium:	452.1	19.66
Bicarbonate:	24.4	0.4	Magnesium:	120.0	9.87
Carbonate:	0.0	0.	Calcium:	531.0	26.5
✓ Sulfate:	2248.0	46.8	Strontium:	7.0	0.16
Phosphate:			Barium:	0.1	0.
Borate:			iron:	0.5	0.02
Silicate:			Potassium:	9.5	0.24
			Aluminum:		
Hydrogen Sulfide:		0	Chromium:		
-11-44		-	Copper:		
pri at time of sampling:		′	Lead:		
pH at time of analysis:			Manganese:	0.025	0.
pH used in Calculation	:	7	Nickel:		
(Chloride: Bicarbonate: Carbonate: Sulfate: Phosphate: Borate: Silicate: Hydrogen Sulfide: pH at time of sampling: pH at time of analysis:	1 Anions mg/l 1 Chloride: 328.0 Bicarbonate: 24.4 Carbonate: 0.0 Sulfate: 2248.0 Phosphate: Borate: Silicate: Hydrogen Sulfide: pH at time of sampling:	1 Anions mg/l meq/l 1 Chloride: 328.0 9.25 Bicarbonate: 24.4 0.4 Carbonate: 0.0 0. Sulfate: 2248.0 46.8 Phosphate: Borate: Silicate: Hydrogen Sulfide: 0 pH at time of sampling: 7 pH at time of analysis:	Anions mg/l meq/l Cations Chloride: 328.0 9.25 Sodium: Bicarbonate: 24.4 0.4 Magnesium: Carbonate: 0.0 0. Calcium: Sulfate: 2248.0 46.8 Strontium: Phosphate: Borate: Silicate: Potassium: Hydrogen Sulfide: 0 Chromium: PH at time of sampling: 7 pH at time of analysis: Cations Magnesium: Barium: Iron: Potassium: Aluminum: Chromium: Copper: Lead: Manganese:	Chloride: 328.0 9.25 Sodium: 452.1 Bicarbonate: 24.4 0.4 Magnesium: 120.0 Carbonate: 0.0 0. Calcium: 531.0 Sulfate: 2248.0 46.8 Strontium: 7.0 Phosphate: Borate: Iron: 0.5 Silicate: Potassium: 9.5 Hydrogen Sulfide: 0 Chromium: Copper: PH at time of analysis: Carbonate: 0.025

Condi	itions		Values C	alculated	at the Give	n Conditi	ons - Amou	unts of Sc	ale in lb/10	00 ьы		
Temp	Gauge Press.	1	Calcite Gypsum CaCO ₃ CaSO ₄ 2H ₂ 0		į	ydrite aSO ₄		estite 'SO ₄	Barite BaSO ₄		CO ₂ Press	
F	psi	Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi
80	0	-0.84	0.00	-0.03	0.00	-0.10	0.00	-0.26	0.00	1.06	0.00	0.03
100	0	-0. 7 2	0.00	-0.04	0.00	-0.04	0.00	-0.26	0.00	0.90	0.00	0.04
120	0	-0.59	0.00	-0.03	0.00	0.04	55.87	-0.24	0.00	0.78	0.00	0.05
140	0	-0.45	0.00	-0.01	0.00	0.15	173.21	-0.21	0.00	0.68	0.00	0.06

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

Injection Water Analysis Report Mad Dog 15 #1 SEC 15-T23S-R34E (Devonian Formation Water)

North Permian Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-8121 Lab Team Leader - Sheila Hernandez (432) 495-7240

Water Analysis Report by Baker Petrolite

Company: **DEVON ENERGY CORPORATION** Sales RDT: 33517 Account Manager: FRANK GARDNER (575) 390-5194 Region: PERMIAN BASIN Area: JAL, NM Sample #: 481511 Lease/Platform: MAD DOG '15' LEASE Analysis ID #: 102920 Entity (or well #): Analysis Cost: \$90.00 Formation: **DEVONIAN** Sample Point: WELLHEAD

	F	Summary						
/I meq/I	mg/l	Cations	meq/l	mg/l	Anions	08/24/10	Sampling Date:	
3 1055.35	24262,3	Sodium:	1148.31	40711.0	Chloride:	09/13/10	Analysis Date:	
0 24.51	298.0	Magnesium:	6.	366.0	Bicarbonate:	LEAH DURAN	Analyst:	
0 91.47	1833.0	Calcium:	0.	0.0	Carbonate:		TD0 (// /	
0 1.26	55.0	Strontium:	29.23	1404.0	Sulfate:	69356	TDS (mg/l or g/m3):	
0.01	1.0	Barium:			Phosphate:	3): 1.051	Density (g/cm3, tonne/m3):	
5 0.16	4.5	Iron:			Borate:	1	Amon/Cation Ratio:	
.0 10.77	421.0	Potassium:			Silicate:			
		Aluminum:		,				
		Chromium:	153 PPM		Hydrogen Sulfide:	20 PPM	Carbon Dioxide:	
		Copper:	ا ۸ ه		-1.1 -4 4:4	N/A	Oxygen:	
	·	Lead:	0.4		pri at time of sampling:		Comments:	
0.01	0.200	Manganese:	1		pH at time of analysis:	:		
		Nickel:	8.4		pH used in Calculation:			
					•			
	4 421	Iron: Potassium: Aluminum: Chromium: Copper: Lead: Manganese:	8.4		Borate: Silicate: Hydrogen Sulfide: pH at time of sampling: pH at time of analysis:	20 PPM N/A	Anion/Cation Ratio: Carbon Dioxide: Oxygen: Comments:	

Condi	itions			Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl									
	Gauge Press		1	alcite aCO ₃	- 31	sum 04*2H ₂ 0	i	ydrite aSO ₄		estite 'SO ₄		rite aSO ₄	CO ₂ Press
F	psi	/	Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi
80	0	Ĺ	1.80	51.07	-0.42	0.00	-0.46	0.00	-0.15	0.00	1.22	0.65	0.01
100	0	1:	1.70	54.67	-0.46	0.00	-0.43	0.00	-0.16	0.00	1.04	0.65	0.02
120	0	/	1.62	58.60	-0.49	0.00	-0.38	0.00	-0.16	0.00	0.89	0.65	0.05
140	0	Ì	1.56	62.86	-0.51	0.00	-0.31	0.00	-0.15	0.00	0.76	0.33	0.08

Note 1: When assessing the severity of the scale problem, both the saturation index (Si) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

WATER ANALYSIS Bone Spring Formation Chimayo 16 ST #1

North Permian Basin Region P.O. Box 740 Sundown, TX 79372-0740 (806) 229-8121 Lab Team Leader - Sheila Hemandez (432) 495-7240

Water Analysis Report by Baker Petrolite

Company: **DEVON ENERGY CORPORATION** Sales RDT: 33521.1 Account Manager: GENE ROGERS (575) 910-1022 Region: PERMIAN BASIN Area: ARTESIA, NM Sample #: 492168 Lease/Platform: Analysis ID#: 100662 CHIMAYO UNIT Entity (or well #): 16-1 Analysis Cost: \$90.00 Formation: Bone Spring Sample Point: HEATER DUMP

Sumn	nary	Analysis of Sample 492168 @ 75 ℉						
Sampling Date:	05/12/10	Anions	mg/l	meq/l	Cations	mg/l	meq/I	
Analysis Date:	05/18/10	Chloride:	142827.0	4028,63	Sodium:	76546,4	3329.58	
Analyst:	STACEY SMITH	Bicarbonate:	73.0	1.2	Magnesium:	1589.0	130.72	
TDO ((1((1(1(1	205000	Carbonate:	0.0	0.	Calcium:	10332.0	515.57	
TDS (mg/l or g/m3):	235300.4	Sulfate:	1021.0	21.26	Strontium:	1192.0	27.21	
Density (g/cm3, tonne/m3): Anion/Cation Ratio:	/m3): 1.157	Phosphate:			Barium:	2.5	0.04	
Amon/Cation Ratio:	1	Borate:			iron:	379.0	13.7	
		Silicate:			Potassium:	1334.0	34.12	
					Aluminum:			
Carbon Dioxide:	1400 PPM	Hydrogen Sulfide:		17 PPM	Chromium:			
Oxygen:		pH at time of sampling:		6.5	Copper:			
Comments:				0.0	Lead:			
		pH at time of analysis:			Manganese:	4.500	0.16	
		pH used in Calculation	:	6.5	Nickel:			

Condi	itions	Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Tama	Gauge Press.	t	alcite aCO ₃		sum 04*2H ₂ 0	1	ydrite aSO ₄		estite rSO ₄		rite ISO ₄	CO ₂ Press
F	psi	Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	psi
80	0	0.18	1.40	-0.08	0.00	-0.03	0.00	0.58	321.11	1.00	1.12	0.14
100	0	0.24	1.95	-0.16	0.00	-0.05	0.00	0.55	310.50	0.80	1.12	0.18
120	0	0.30	2.51	-0.23	0.00	-0.04	0.00	0.54	304.91	0.62	1.12	0.21
140	0	0.35	3.35	-0.29 ´	0.00	-0.01	0.00	0.53	303.52	0.47	0.84	0.25

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

MAR-08-2004 MON 03:00 PM (08 Mar 04 07:14

WATER ANALYSIS Delaware Formation Apache 25 Fed 6

P. 03

,3821

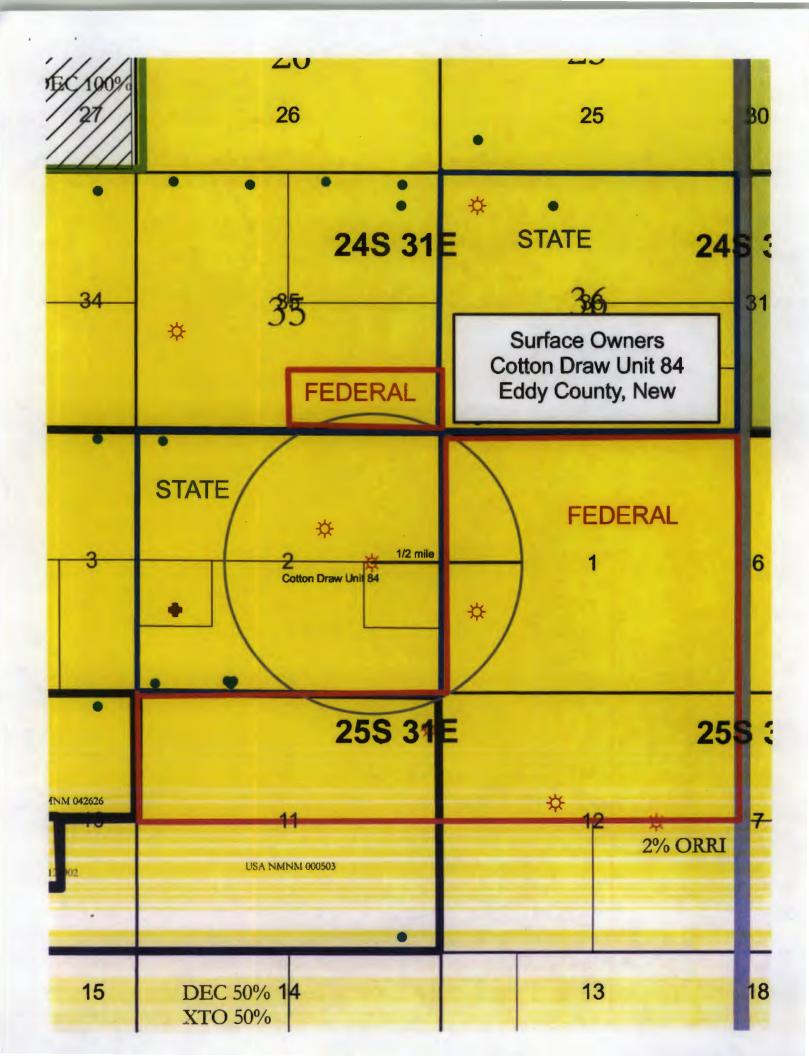
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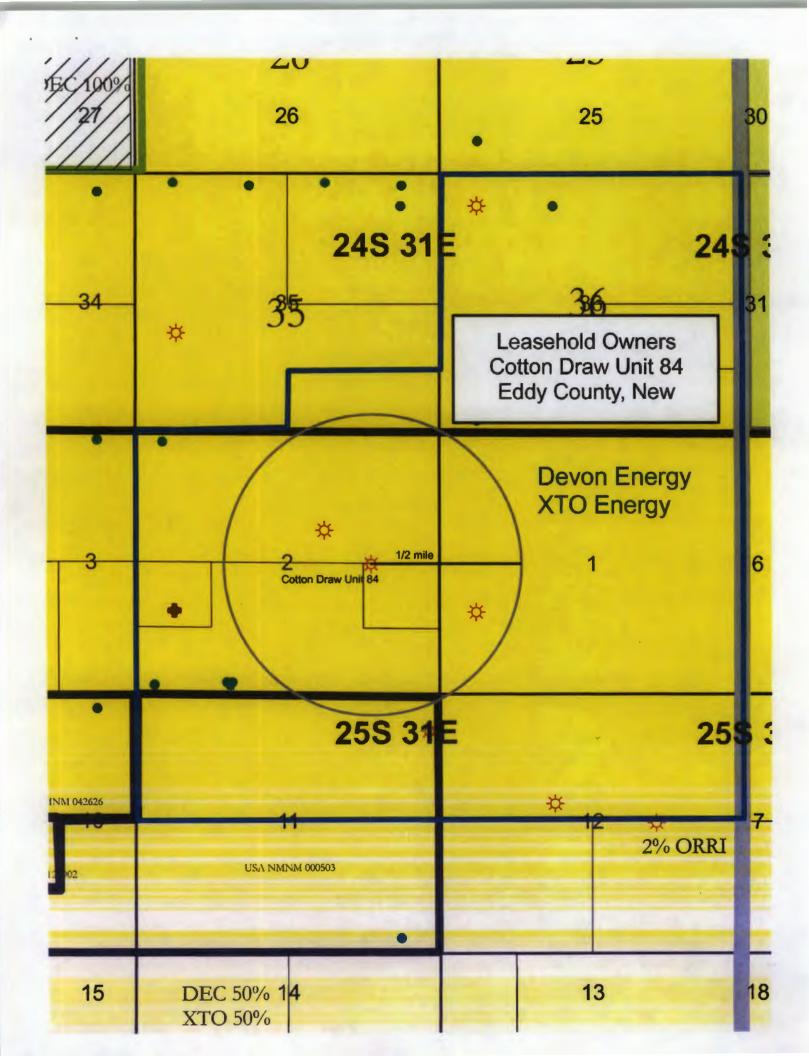


Laboratory Services, Inc. 4018 Flasta Drive Hobbs, New Mexico 88240 Talephone: (605) 397-3713

Water Analysis

COMPANY Devon Energy		
SAMPLE Apache 25-6		
SAMPLED BY		
DATE TAKEN REMARKS		144
REMARKS	··-	
Barium as Ba		
Carbonate alkalinity PPM	0	Washington and the second seco
Bicarbonate alkalinity PPM	80	
pH at Lab	6.05	
Specific Gravity @ 60°F	1.195	
Magnesium as Mg	59,566	
Total Hardness as CaCO3	102,700	
Chlorides as Cl	. 192,032	
Sulfate as SO4	200	
Iron as Fe	33	William
Potassium	. 85	
Hydrogen Sulfide	0	
Rw	0.046	8 23 ' C
Total Dissolved Solids	295,500	
Calcium as Ca	43,134	
Nitrate	35	
-		
	·	-
Poorder and the Poorder Adult		
Results reported as Parts per Million unless stated		, .
Langelier Saturation Index		
Banet Outration Mak	0.65	
	Analysis by:	vel alai a : Dil anno
•	Date:	Vickie Biggs
		3/3/74





Leasehold Ownership ½ mile Cotton Draw Unit 84

24S-31E Section 35: S/2 SE/4

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc.

810 Houston Street

Fort Worth, Texas 76102-6298 .500000

Total: 1.000000

24S-31E Section 36: All

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc. .500000

Total: 1.000000

25S-31E Section 1: All

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc. <u>.500000</u>

Total: 1.000000

25S-31E Section 2: All

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc. .500000

Total: 1.000000

25S-31E Section 11: N/2

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc. .500000

Total: 1.000000

25S-31E Section 12: N/2

Devon Energy Production Company, L.P. .500000

XTO Energy, Inc. <u>.500000</u>

Total: 1.000000

Section XIV--Proof of Notice to Surface Land Owner Devon Energy Prod Co LP C108 Application For Injection Proposed Well: Cotton Draw Unit 84

Proof of Notice to Surface Land Owner of well location site.

New Mexico State Land Office Attn: Donald Martinez – Surface Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87501 Certified receipt No. 7008 1830 0002 7421 6153

A copy of this application has been mailed to the above surface land owner by certified mail, pertaining to Devon Energy's application for salt water disposal in the Cotton Draw Unit 84.

Date Mailed:

Signature:

Stephanie A. Porter, Operations Technician Devon Energy Production Co., L.P.

333 West Sheridan Avenue

Oklahoma City, OK 73102

Date

Section XIV--Proof of Notice to Leasehold Operators Devon Energy Prod Co LP C108 Application For Injection Proposed Well: Cotton Draw Unit 84

Proof of Notice to Leasehold Operators within 1/2 mile of Cotton Draw Unit 76

XTO Energy, Inc 810 Houston Street Fort Worth, Texas 76102-6298 Certified receipt No. 7008 1830 0002 7421 6160

A copy of this application has been mailed to the above leasehold operators by certified mail, pertaining to Devon Energy's application for salt water disposal in the Cotton Draw Unit 84.

Date Mailed:

Signature: Stephanie A. Porter, Operations Technician

Devon Energy Production Co., L.F. 333 West Sheridan Avenue Oklahoma City, OK 73102

Affidavit of Publication

State of New Mexico, County of Eddy, ss.

Kathy McCarroll, being first duly sworn, on oath says:

That she is the Classified Supervisor of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

July 18 2013

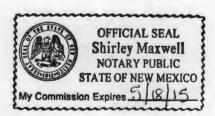
That the cost of publication is \$48.00 and that payment thereof has been made and will be assessed as court costs.

Subscribed and sworn to before me this

18th day of July , 2013 Shirley Majurell

My commission Expires on May 18, 2015

Notary Public



July 18, 2013 Legal Notice

Devon Energy Production
Company, LP, 233 West
Sheridan Avenue, Chilanoma City, OK 73102-2260
has filed form C-102 (Application for Authorization
to Inject) with the New
Mexico Oil Conservation
Division seeking adminitrative approval for an injection well. The existing
well, the Cotton Draw
Unit 84 is located at 2615'
FSL & 1160' FEL, Section
2, Township 25 South,
Range 31 East, in Eddy
County, New Mexico. Disposal water will be
sourced from area wells
producing from the Bone
Spring and/or Delaware
formations. The disposal
water will be injected into
the Devonian formation at
a depth of 16,295' to
16,585', open Inole, at a
maximum surface pressure of 3259 psi and a
maximum rate of 10,000
BWPD. Any interested
party who has an objection to this must give notice in writing to the Oil
Conservation Division,
1220 South Saint Francis
Drive, Santa Fe, New Mexico 87505, within (15)
days of this notice. Any
interested party with
guestions of comments
may contact Trevor.
(laassen at Dayon Energy
Corporation, 833 West
Sheridan Avenue, Oklahoma City, OK 73102-8280,
or call (405) 552-5069.



Oil Conservation Division 811 S. First Street Artesia, New Mexico 88210

RE: Form C-108, Application for Authorization to Inject Cotton Draw Unit #84; API 30-015-29728

Eddy County, NM

Section 2, T25S, R31E

Dear Conservation Division-Artesia District Office:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject. The original application has been filed with the Oil Conservation Division-Santa Fe Office.

Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail.

If you have any questions, please contact Trevor Klaassen (405)-552-5069 or myself at (405)-552-7802.

Sincerely,

Stephanie A. Porter Operations Technician

SP/sp Enclosure



Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505

RE:

Form C-108, Application for Authorization to Inject

Cotton Draw Unit #84; API 30-015-29728

Eddy County, NM Section 2, T25S, R31E

Dear Santa Fe Oil Conservation Division:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject. Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail. A copy of this application has been filed with the OCD-Artesia office.

If you have any questions, please contact Trevor Klaassen at (405)-552-5069 or myself at (405)-552-7802.

Sincerely,

Stephanie A. Porter

Operations Technician

SP/sp

Enclosure



New Mexico State Land Office Surface Division Attn: Donald Martinez 310 Old Santa Fe Trail Santa Fe, New Mexico 87501

RE: Form C-108, Application for Authorization to Inject

Cotton Draw Unit #84; API 30-015-29728

Eddy County, NM Section 2, T25S, R31E

Dear New Mexico State Land Office:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject. Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail. A copy of this application has been filed with the OCD-Artesia office.

If you have any questions, please contact Trevor Klaassen at (405)-552-5069 or myself at (405)-552-7802.

Sincerely.

Stephanie A. Porter Operations Technician

SP/sp Enclosure



XTO Energy, Inc. 810 Houston Street Ft. Worth, Texas 76102-6298

Section 2, T25S, R31E

RE: Form C-108, Application for Authorization to Inject Cotton Draw Unit #84; API 30-015-29728 Eddy County, NM

Dear XTO Energy, Inc.:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject.

Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

As a requirement of the New Mexico Oil Conservation Division, we are notifying you because you have been identified as having leasehold ownership within the ½ mile review area around the Cotton Draw Unit #84 well. Any objections must be submitted in writing to NMOCD, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Objections must be received within (15) days of receipt of this letter.

If you have any questions, please contact Trevor Klaassen at (405)-552-5069 or myself at (405)-552-7802.

Sincerely,

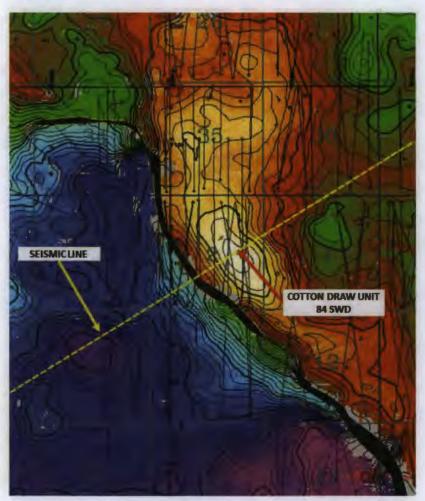
Stephanie A. Porter

Operations Technician

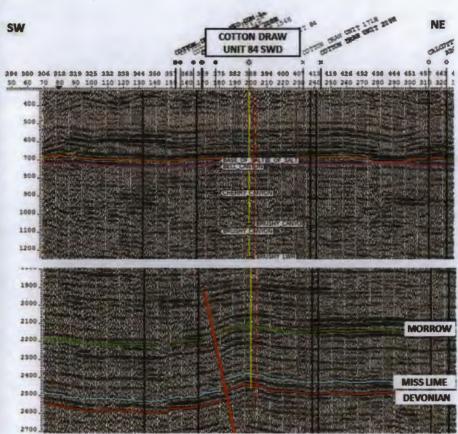
SP/sp

Enclosure

SLO/DEVON S	states dep	letion - SLO & D	evon ne	gotiated settle	iment Oct 8th
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MISS LIME TIME STRUCTURE MAP C.I.= 4 MSEC= 25 FT.



SOUTHWEST-NORTHEAST TRENDING 3D SEISMIC LINE OVER THE COTTON DRAW UNIT 84 SWD

Goetze, Phillip, EMNRD

From:

Holm, Anchor <aholm@slo.state.nm.us>

Sent:

Tuesday, October 08, 2013 1:18 PM

To:

'Gray, Ken'; Klaassen, Trevor

Cc:

Martinez, Pete; Jones, William V.; Warnell, Terry G.; Goetze, Phillip, EMNRD; Roybal,

Larry; Bloom, Gregory B.

Subject:

RE: Cotton Draw Unit #84

Ken,

I think that Larry Roybal or Greg Bloom of OGMD will be signing off on this.

Anchor Holm

GeoScientist/Petroleum Engineering Specialist NM State Land Office Oil, Gas and Minerals Division P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504-1148 Ph. 505-827-5759

aholm@slo.state.nm.us

From: Gray, Ken [mailto:Ken.Gray@dvn.com]
Sent: Tuesday, October 08, 2013 9:58 AM
Tot Holm, Anchor: Klasson, Troyer

To: Holm, Anchor; Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Anchor, I am preparing the agreements for the BFDU 44 SWD and the CDU 84 SWD and have checks to send along with agreements for SLO execution. Who will be signing on behalf of SLO? And in what capacity?

From: Holm, Anchor [mailto:aholm@slo.state.nm.us]

Sent: Thursday, September 26, 2013 9:19 AM

To: Gray, Ken; Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Ken,

I used the following for the SLO interest: 12.5% times $23\% = 0.1250 \times 0.23 = 0.02875$. The 23% I was given had been rounded down a little bit. However, I inadvertently did not include the 23% portion in my calculation.

Therefore, your calculation is correct. Thanks for the catch!

I recommend that the SLO change in the Advance Royalty Amount to \$4,319.01.

Thank you,

Anchor Holm

GeoScientist/Petroleum Engineering Specialist NM State Land Office Oil, Gas and Minerals Division P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504-1148 Ph. 505-827-5759

aholm@slo.state.nm.us

From: Gray, Ken [mailto:Ken.Gray@dvn.com]
Sent: Wednesday, September 25, 2013 3:44 PM

To: Holm, Anchor; Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Anchor, if I understand correctly you have placed a value of \$10,700 for SLO portion of the remaining (44, 027 MCF X \$3.40/mcf=\$149,691.80). Assuming we all agree on these estimates and projections, I can't get to your \$10,700 value. Based on our records the SLO has a 0.02885271 interest in the CDU Devonian P.A. X the \$149,691.80= \$4,319.01. I've never claimed to be a math whiz, so is there something I'm overlooking?

From: Holm, Anchor [mailto:aholm@slo.state.nm.us]

Sent: Tuesday, September 24, 2013 8:19 AM

To: Gray, Ken; Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Ken,

I conservatively estimate that the remaining recoverable reserves for this well are 44,027 Mcf valued at \$3.40 per Mcf with a lease royalty rate of 12.5% and a unit participation factor of 23%.

This well has produced consistently at this rate for nearly 5 years with a relatively constant water production rate. The gas market may change at the end of the year, but how much is uncertain. Also, if the price of gas increases above \$5.30/Mcf, the well will be fully economic. Thus, shut-in of the well until the gas market improves in the next few years may be a prudent option, since the water drive in the Devonian appears not to be strong. Rather the reservoir appears to produce the water from natural fractures and the gas from the matrix at the mature stage of its production.

Auchor Holm

GeoScientist/Petroleum Engineering Specialist NM State Land Office Oil, Gas and Minerals Division P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504-1148 Ph. 505-827-5759

aholm@slo.state.nm.us

From: Gray, Ken [mailto:Ken.Gray@dvn.com]
Sent: Monday, September 23, 2013 3:51 PM

To: Holm, Anchor; Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Anchor, do you have an estimate of the gross recoverable reserves that you used to come up with the value?

From: Holm, Anchor [mailto:aholm@slo.state.nm.us]

Sent: Monday, September 23, 2013 2:54 PM

To: Klaassen, Trevor; Gray, Ken

Cc: Martinez, Pete; Jones, William; Warnell, Terry; Phillip R. Goetze P.G. (Phillip.Goetze@state.nm.us)

Subject: RE: Cotton Draw Unit #84

Ken and Trevor,

I have reviewed the additional information you have provided regarding the Devonian gas reserves producible by the Cotton Draw Unit #4 well. Below is our review results and we request to know if Devon Energy is agreeable to the proposed terms. If agreeable, we will prepare a formal letter from the Commissioner of Public Lands including the following review:

DRAFT

Re:

Cotton Draw Unit #84, Lease K04562-0004

Conversion from Gas Producer to Salt Water Disposal

In the 82480 PADUCA; MORROW (GAS)Pool, Unit letter G, Section 02, Township 25 South, Range 31 East, Eddy

County, New Mexico

In response to your request for the New Mexico State Land Office to approve the conversion of the Cotton Draw Unit #84 well, which is currently producing sour gas and some water from the Devonian (gas) Pool. Our records, obtained through the Oil Conservation Division, indicate that the well located on the subject lease is producing in large enough amounts to hold the lease but currently has very marginal economics due to low gas prices. We are concerned that lease K-4562-4 will lose Devonian gas royalties due to our Common School beneficiary, if this well is converted to the salt water disposal (SWD) as proposed.

This Office has reviewed the following items which Devon Energy has submitted to us: the Plan of Development, Geologic Structure Map, and Economic Forecast for the subject gas well. We agree that the well is approaching it economic limit due to low gas prices, and understand that Devon Energy believes that their current gas market is to possibly discontinued next year. However, the Devonian Gas Pool is still capable of gas production and conversion to salt water disposal in the same zone will cause waste to occur and loss of royalty revenues to the State Land Office Beneficiary. The loss of royalty revenue is calculated to be \$10,700.00 based on the past 12 months of production history and a gas price of \$3.40/mcf.

As operator of the well, you are requested to remit to this office \$10,700.00 advance royalty payment within 30 days from the date of this letter.

Thank you,

Anchor Holm

GeoScientist/Petroleum Engineering Specialist NM State Land Office Oil, Gas and Minerals Division P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504-1148 Ph. 505-827-5759

aholm@slo.state.nm.us

From: Klaassen, Trevor [mailto:Trevor.Klaassen@dvn.com]

Sent: Wednesday, September 18, 2013 8:52 AM

To: Holm, Anchor

Cc: Martinez, Pete; Jones, William; Warnell, Terry

Subject: RE: Cotton Draw 84

Anchor,

I understand the concern to preserve producible gas reserves, and we certainly don't want to waste economic resources. But, this well is at the end its economic life anyway, if we weren't planning to convert this well it would probably be ready for P&A next year since it will lose its gas market and the wellbore has little to no economic value beyond that, other than as an SWD well. I attached a seismic map showing this well is on a structural high and is fault bounded. Referring to the decline curve I sent yesterday we have already produced more than the economic volumes of gas from this well, and are in fact losing money by producing more. If nothing else I could argue that if you believe the injection would displace the gas horizontally, theoretically the remaining gas could be produced by the offsetting Devonain producers, CDU 76 and CDU 86 in the future, so they would not be wasted. Or if you agree with some geologist who are working this area, who believe the Devonian is infinite acting in the vertical direction due to fracturing, any gas displaced downward could be recovered from the same wellbore once injection is stopped and the gas is allowed to gravity separate and migrate back to the well in the natural structural high.

Trevor Klaassen Engineer Devon Energy ph: 405-552-5069

From: Holm, Anchor [mailto:aholm@slo.state.nm.us]
Sent: Wednesday, September 18, 2013 8:35 AM

To: Klaassen, Trevor

Cc: Martinez, Pete; Jones, William; Warnell, Terry

Subject: RE: Cotton Draw 84

Trevor,

I have received your new well operating expense history and economic evaluation, and will review it as part of the Cotton Draw Unit plan of development.

When I have completed my review, I will discuss it with Will Jones, Terry Warnell and Pete Martinez. Pete will then send your our evaluation of this proposed conversion of a Devonian gas well to SWD service.

One concern is that the "gas zone' of the openhole likely should be isolated from the SWD zone(s). Thus, in the future, re-entry into that zone might be feasible.

Anchor Holm

GeoScientist/Petroleum Engineering Specialist
NM State Land Office
Oil, Gas and Minerals Division
P.O. Box 1148
310 Old Santa Fe Trail
Santa Fe, NM 87504-1148
Ph. 505-827-5759
aholm@slo.state.nm.us

From: Klaassen, Trevor [mailto:Trevor.Klaassen@dvn.com]

Sent: Tuesday, September 17, 2013 2:19 PM

To: Holm, Anchor **Cc:** Martinez, Pete

Subject: FW: Cotton Draw 84

Mr Holm.

Earlier we discussed the reserves estimate for the CDU 84, and its future lack of market due to the sour gas. I had my reservoir engineer run an economic analysis to include the operating costs. Currently we are truck hauling produced water at \$2.80/bbl for the area and the sour gas takes a \$0.14/mcf hit by the gas plant to process out the H2S. Then at the end of the year the gas plants will no longer take any sour gas so we will lose out market for this gas. Do you mind incorporating this information in to your own reserves estimates for this well. Attached is a PEEP economics case print out and the LOE for each of the Devonian wells in the area. Thank you.

Trevor Klaassen Engineer Devon Energy ph: 405-552-5069

From: Broussard, Andy

Sent: Tuesday, September 17, 2013 2:33 PM

To: Klaassen, Trevor

Subject: RE: Cotton Draw 84

Trevor,

Attached is a spreasheet w/ average LOE costs for the 3 Devonian producers. Average gross direct recuring LOE averaged to a bit over \$11,000/mo/well, so \$11M was used in the ecnomics run (plus the \$0.14/mcf for sour gas processing.) Despite the well making around 120 mcfd, this well is a dry gas producer that makes a lot of water in a busy area with high lease operating expenses. Thus, in the economics PDF, the Before Tax Undiscounted Cash Flow is currently negative. This well has reached it's economic limit and has no addititional reserves. Additioanly, we will lose the market for the sour gas around Jan 1, 2014, and the well's production does not justify any capital expenditures to find a new market for the gas.

From: Klaassen, Trevor

Sent: Tuesday, September 17, 2013 9:40 AM

To: Broussard, Andy; Gray, Ken; Hays, Ron; Cantrell, Cynthia

Subject: RE: Cotton Draw 76,84,86

I spoke with the SLO, they will be asking us to pay the royalties on the lost reserves in the CDU 84. Which isn't an issue it will be minimal, 1-3 yrs worth.

Ken, I left a message for Pete Martinez so we can get the paper work started on that. Anchor Holm gave him a range of reserves estimates for 1-3 yrs. Which I have no problem paying, economic or not. Do you mind trying to get ahold of him and seeing if we can ge that started?

Andy, I'll try to talk to a chem company and get a ball park estimate for what it would cost to treat out the H2S chemically. I wouldn't expect a quick answer they will probably want to do an analysis first. But, I'll try to get a rough number quick.

Trevor Klaassen Engineer **Devon Energy** ph: 405-552-5069

From: Broussard, Andy

Sent: Tuesday, September 17, 2013 9:35 AM

To: Cantrell, Cynthia; Klaassen, Trevor; Hernandez, Robert

Cc: Hays, Ron

Subject: RE: Cotton Draw 76,84,86

I appreciate everyone trying to track down info on this. I know that all options for continuing to produce the CDU 84 are uneconomic and not worth pursuing. I'm just trying to get some ballpark estimates of how much it would cost to treat the gas to show the state how uneconomic it is. If we can do 25% of the work for 75% of the answer that would be ideal for this estimate. If anyone has anything for me I'd appreciate it. Thanks.

Andy

From: Cantrell, Cynthia

Sent: Tuesday, September 17, 2013 9:22 AM To: Klaassen, Trevor; Hernandez, Robert

Cc: Broussard, Andy; Hays, Ron Subject: RE: Cotton Draw 76,84,86

OK. I won't pursue with SUG unless you tell me otherwise.

From: Klaassen, Trevor

Sent: Tuesday, September 17, 2013 9:19 AM To: Cantrell, Cynthia; Hernandez, Robert

Cc: Broussard, Andy; Hays, Ron Subject: RE: Cotton Draw 76,84,86

I wouldn't worry about looking at selling to SUG if we have to run a separate line. Would be completely uneconomic to do so.

Trevor Klaassen Engineer **Devon Energy** ph: 405-552-5069

From: Cantrell, Cynthia

Sent: Tuesday, September 17, 2013 9:14 AM **To:** Klaassen, Trevor; Hernandez, Robert

Cc: Broussard, Andy; Hays, Ron **Subject:** RE: Cotton Draw 76,84,86

Trevor,

See my initial email to Ron in the email chain below – Once Enterprise connects their Waha system (where these wells are now connected) to their Carlsbad System, they won't be able to take the H2S anymore. The CDU treater we have with DCP is for CO2, so it is not an option for H2S.

I haven't checked to see if Southern Union might be a possibility, and I'm not sure of the distance to their pipeline. I know they can take CO2, but I'm not very confident they can take the H2S.

Robert – I'll need to get a gas analysis on these to see if SUG is an option.

Thanks,

Cynthia

From: Klaassen, Trevor

Sent: Tuesday, September 17, 2013 9:05 AM

To: Cantrell, Cynthia

Cc: Broussard, Andy; Hays, Ron **Subject:** RE: Cotton Draw 76,84,86

Cynthia, can you verify that Enterprise is actually willing to process out the H2S from our Devonian gas for \$0.14/mcf? Does that apply to the entire gas sales volume or just the +/-500mcf that comes from the Devonain wells. Also, can you give us the \$/mcf we are getting paid in Cotton Draw. Thanks.

Trevor Klaassen Engineer Devon Energy ph: 405-552-5069

From: Hays, Ron

Sent: Tuesday, September 17, 2013 8:59 AM

To: Klaassen, Trevor

Subject: FW: Cotton Draw 76,84,86

From: Hays, Ron

Sent: Monday, September 16, 2013 2:45 PM

To: Broussard, Andy

Subject: FW: Cotton Draw 76,84,86

From: Cantrell, Cynthia

Sent: Wednesday, July 31, 2013 7:36 AM

To: Hays, Ron

Cc: Harran, Craig; Klaassen, Trevor; McCorkell, Dan; Kidd, Tracy

Subject: RE: Cotton Draw 76,84,86

Ron,

I think both DCP and Enterprise can take the gas if it's sweet. As to how much capacity they have, that depends on timing, etc. We have an offload point to Enterprise identified at the Cotton Draw 32 in Section 1-25S-31E (it is listed on our Enterprise agreement but no meter has been installed). DCP is going to be full at Cotton Draw sometime next year based on our drilling plans (possibly 3 rigs). In short, we're going to need Enterprise or some other outlet there as an offload. We probably need to make sure if this delivery point at Cotton Draw 32 will work to offload the entire Cotton Draw area or if we need to identify other points as well.

From: Hays, Ron

Sent: Wednesday, July 31, 2013 7:00 AM

To: Klaassen, Trevor

Cc: Cantrell, Cynthia; Harran, Craig **Subject:** FW: Cotton Draw 76,84,86

Trevor,

According to Cynthia (see below), in about 6 months these wells will not have a gas market due to H2S. Unless Cynthia finds someone out there other than Enterprise and DCP that could take this sour gas then we will need to find another use for these wells or P&A them as necessary.

Craig,

Is there anything uphole we would go for that an existing or future horizontal wouldn't be able to capture the reserves?

Cynthia,

If we found some sweet gas in a recompletion, could Enterprise or DCP take that gas and how much?

Thanks

Ron

From: Cantrell, Cynthia

Sent: Thursday, July 18, 2013 10:27 AM

To: Hays, Ron

Cc: McCorkell, Dan; Hise, Devyon; Thayer, Deana; Kidd, Tracy

Subject: Cotton Draw 76,84,86

Ron,

These are Devonian wells that are gathered by Enterprise on their Waha System. Volume is about 500 MCFD. Their Waha system has a treater for this gas, but in about 6 months they are planning to connect their Waha system to their Carlsbad system and will no longer be able to take this Devonian gas without treating. The agreement we have for Waha does not require them to take off-spec gas, but they have agreed to do so and they charge us a \$0.07/MCF purification fee and Acid Gas Disposal fee of \$0.07/MCF.

We'll need to either find another home for this or treat it. Seems like the best idea would be to connect it behind the CDU treater we installed if that makes sense from a location standpoint.

We have a little time, but let me know if you think that is feasible. I know DCP is getting full on their 10200 line, but since this isn't too much volume, we might be able to get it in. It would probably be best if we could bring it in behind another meter.

Thanks,	
Cynthia	
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Goetze, Phillip, EMNRD

From: Goetze, Phillip, EMNRD

Sent: Friday, September 06, 2013 1:31 PM

To: Martinez, Pete (PMartinez@slo.state.nm.us)

Cc: Ezeanyim, Richard, EMNRD; Shapard, Craig, EMNRD

Subject: SLO Input on Devon's Conversion of Cotton Draw Unit #84 to SWD

Pete:

Devon Energy has submitted a C-108 for conversion of a gas producer to a SWD on state land. The well is the Cotton Draw Unit #84 [API 30-015-29728; 2615 FSL, 1160 FEL, Sec 2, T25S, R31E; Pool: Paduca, Devonian, NW; PC: 96615]. Devon states that this well has an average production of 120 Mcf/d with 486 BW. The well has been shut-in since June 6 due to the production of formation solids. Devon also states that the ability to sale the gas is limited due to the H_2S content, high water hauling costs and the unavailability of a gas processor to accept their gas. It is Devon's contention that this well will be uneconomical in six months. Devon wishes to use these finding to request conversion of the CDU #84 into a Devonian injector (open hole 16295' to 16585') for salt water disposal. It should be noted that CDU #65 (30-015-10843; SWD-699), a SWD within the Area of Review for the CDU #84, and CDU #81 (30-015-29345; SWD-1248) just outside of the Area of Review are both injecting into the shallower Delaware Mtn Group.

Any comments by the SLO on the well economics described by Devon and Devon's request for SWD (flooding) in the Devonian formation. Any input would be appreciated. Thanks. PRG

Phillip R. Goetze, P.G.

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