4/01/2015

L7B

pmAm 150915 7832

E-mail Address

ABOVE THIS LINE FOR DIVISION USE ONLY

## **NEW MEXICO OIL CONSERVATION DIVISION**

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



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											Erin.W	Vorkma	an@dv	vn.com	_



# RECEIVED OCD

March 30, 2015

2015 APR - 1 P 1: 24

Mr. Richard Ezeanyim State of New Mexico Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, New Mexico 87505

Re: Central Tank Battery

Cotton Draw 111 & Cotton Draw 112 Sec. 35-T24S-R31E & Sec. 26-T24S-R31E Leases: NM E-9127 & NMNM012121

API: 30-015-36197 & 30-015-36435 Pool: 13370 Cotton Draw; Brushy Canyon

Eddy County, New Mexico

Dear Mr. Ezeanyim:

Please find attached the OCD C-107B Sundry Notice of Intent for a Central Tank Battery for the aforementioned wells.

The working interest, royalty interest, and overriding interest owners are not identical; parties have been notified by certified mail (see attached).

Should you require any additional information or assistance, please do not hesitate to contact me at (405)-552-7970.

Sincerely,

rin Workman

Regulatory Compliance Professional

**Enclosures** 

District I 1625 N. French Drive, Hobbs, NM 88240 District II 1301 W. Grand Ave, Artesia, NM 88210 District III 1000 Rio Brazos Road, Aztec, NM 87410

1220 S. St Francis Dr. Santa Fe, NM 87505

E-MAIL ADDRESS:

Erin.workman@dvn.com

District IV

State of New Mexico Energy, Minerals and Natural Resources Department

Form C-107-B Revised June 10, 2003

#### **OIL CONSERVATION DIVISION**

1220 S. St Francis Drive Santa Fe, New Mexico 87505

Submit the original application to the Santa Fe office with one copy to the appropriate District Office.

APPLICATI	ON FOR SURFACE	COMMINGLING	G (DIVERSE )	OWNERSHIP)							
OPERATOR NAME: De	von Energy Production Co.,	LP									
OPERATOR ADDRESS: 33:	3 W Sheridan Avenue, Oklal	noma City, OK 73102									
APPLICATION TYPE:											
☐ Pool Commingling ☐ Lease Com	mingling Pool and Lease Co	mmingling Off-Lease	Storage and Measure	ement (Only if not Surface	e Commingled)						
LEASE TYPE:	☐ State ☑ Fede	ral									
	Is this an Amendment to existing Order?										
Have the Bureau of Land Management (BLM) and State Land office (SLO) been notified in writing of the proposed commingling											
⊠Yes □No											
(A) POOL COMMINGLING Please attach sheets with the following information											
Gravities / BTU of Calculated Gravities / Calculated Value of											
(1) Pool Names and Codes	Non-Commingled Production	BTU of Commingled Production		Commingled Production	Volumes						
	rioduction	rioduction		Floduction							
					·						
(2)					<u></u>						
<ul><li>(2) Are any wells producing at top</li><li>(3) Has all interest owners been no</li></ul>		nnosed comminaling?	Yes □No.								
(4) Measurement type:  Meter											
(5) Will commingling decrease the	value of production? Yes	☐No If "yes", descri	be why commingling	ng should be approved							
1		SE COMMINGLIN									
(1) 5 131	Please attach sheet	s with the following in	nformation								
<ul><li>(1) Pool Name and Code.</li><li>(2) Is all production from same so</li></ul>	rce of supply? ⊠Yes □N	io.									
(3) Has all interest owners been no			⊠Yes □N	lo							
1 · · · · ·	ing 🛮 Other (Tank gauging a										
· · · · · · · · · · · · · · · · · · ·	(C) POOL and	LEASE COMMIN	GLING	·							
	Please attach sheet	s with the following in	nformation								
(1) Complete Sections A and E.		<u> </u>									
	(D) OFF-LEASE ST	OPACE and MEA	SUDEMENT								
	` ,	ets with the following									
(1) Is all production from same sou		<del></del>		· · - · - · - · - · - · - · - · - ·	-						
(2) Include proof of notice to all in	lerest owners.										
(E) ADDITIONAL INFORMATION (for all application types)											
Please attach sheets with the following information  (1) A schematic diagram of facility, including legal location.											
(2) A plat with lease boundaries showing all well and facility locations. Include lease numbers if Federal or State lands are involved.											
(3) Lease Names, Lease and Well Numbers, and API Numbers.											
I hereby certify that the information above is true and complete to the best of my knowledge and belief.											
r necessity that the information a	0 1 1/2 -										
SIGNATURE: TITLE: Regulatory Compliance Prof. DATE: 03.30.15											
	<u> </u>	<del></del>	<u>-</u>								
TYPE OR PRINT NAME:	Erin Workman	TELEPHON	NE NUMBER:	405-552-7970	<u>)                                    </u>						

#### APPLICATION FOR A CENTRAL TANK BATTERY

#### Proposal for the Cotton Draw 111, & 112 leases:

Devon Energy Production Company, LP is requesting approval for A Central Tank Battery for the following wells. These wells were deemed non-commercial under lease #NM709286G.

State Lease: NM	I E-9127				Oil		
Well Name	Location	API#	Pool 13370	BOPD	Gravity	Mcfpd	BTU
Cotton Draw #111	NENW, Sec. 36-24S-31E	30-015-36197	Cotton Draw; Brushy Canyon	9.910	39.8	43.04	1235.8
Federal Lease: 1	NMNM012121 Royalty Ra	ate 12.5			Oil		
Well Name	Location	API#	Pool 13370	BOPD	Gravity	Mcfpd	BTU
Cotton Draw #112	NENE, Sec. 35-24S-31E	30-015-36435	Cotton Draw; Brushy Canyon	8.520	40	22.36	1302.9

These Cotton Draw Unit wells were deemed non-commercial and was placed back to the appropriate single lease. A map is enclosed showing the Federal Leases and well locations in Sec. 35 & 36-24S-31E. The Cotton Draw 90 well has been plugged and abandoned, but we are utilizing the battery at that location for the Cotton Draw 111 & 112.

#### Oil & Gas metering:

The Cotton Draw 90 Facility has separate production facilities for each well and they have a common SUG CDP #39962 which is located in Sec. 35-NWSW-T24S-R31E in Eddy County, New Mexico. Gas volumes from the Cotton Draw 111 will be determined by using gas allocation meter #390-33-075. The Cotton Draw #112 will be producing into its own separator/heater treater. Oil production will go into one of two tanks that will be utilized by the Cotton Draw 112 only. Gas for the Cotton Draw 112 will be allocated using allocation meter #390-33-259. The oil will be measured by tank gauging to obtain daily production volumes. Gas Production will be allocated on a daily basis utilizing the subtraction method from the SUG CDP meter #39962 and the allocation meters #390-33-075 & #390-33-259. The gas production from the wells listed above will be measured, commingled, and sold off lease.

These meters, including the Cotton Draw 111allocation meter will be calibrated on a regular basis per API, NMOCD, and BLM specifications. The BLM and OCD will be notified of any future changes in the facilities.

#### **Process and Flow Descriptions:**

The flow of produced fluids is shown in detail on the enclosed facility diagram, along with a description of each vessel and a map which shows the lease boundaries, location of wells, facility, and gas sales meter. The proposed commingling is appropriate based on category 3 of the BLM's guidance in IM 2013-152. The proposed commingling is the only economical way that Devon can sell the gas due to low volume gas production by the Cotton Draw 112. SUG will not install another meter and it is not economical in order to produce approximately 600 MCF per month from the Cotton Draw 112. This proposal will maximize the ultimate recovery of oil and/or gas from the federal leases and will reduce environmental impacts by minimizing surface disturbance and emissions. The proposed commingling will reduce operating expenses, as well as, not adversely affect federal royalty income, production accountability, or the distribution of royalty.

Devon Energy Production Company, LP understands the requested approval will not constitute the granting of any right-of-way or construction rights not granted by the lease instrument. ROW approved on January 4, 2008 #NM-119479 approved Feb. 21, 2008 #NM-11989, for gas sales SUG line #39962.

The working interest, royalty interest, and overriding interest owners are not identical; parties have been notified by certified mail (see attacked).

Signed:

Printed Name: Erin Workman

Title: Regulatory Compliance Professional

Date: 03.30.15



March 30, 2015

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Interest Owners

Re: Central Tank Battery

Cotton Draw 111 & Cotton Draw 112
Sec. 35-T24S-R31E & Sec. 26-T24S-R31E
Leases: NM E-9127 & NMNM012121
API: 30-015-36197 & 30-015-36435
Pool: 13370 Cotton Draw; Brushy Canyon

**Eddy County, New Mexico** 

#### Gentlemen:

This is to advise you that Devon Energy Production Company, LP, is filing an application with the New Mexico Oil Conservation Division ("NMOCD") seeking approval for a Central Tank Battery of Cotton Draw 111H and Cotton Draw 112H.

A copy of our approval from the BLM and the application submitted to the Division is attached.

Any objections or requests that a hearing should be held regarding this application must be submitted to the New Mexico Oil Conservation Division Santa Fe office within 20 days from the date of this letter.

Should you have any questions or need further assistance, please do not hesitate to contact me at (405) 552-7970.

Sincerely,

Erin Workman

Regulatory Compliance Professional

**Enclosures** 

# **CERTIFIED MAILING LIST**

Well Name: Cotton Draw 111H & 112H

Date Mailed: 03.30.15

Repondent Name/Address:	Certified Mailing Number:
Ballard E. Spencer Trust Inc. PO Box 6 Artesia, NM 88211	91 7199 9991 7035 6397 5340
Robert E Ferguson & Rosemary Ferguson Trustees of the Ferguson Family Trust 713 Clayton Ave Artesia, NM 77210	91 7199 9991 7035 6397 5357
Jan Elise McWhirter Fescenmeyer 7105 Battle Creek Rd. Ft Worth, TX 76116	91 7199 9991 7035 6397 5364
Leda Zelios 618 Pecan Creek Dr. Sunnyvale, TX 75182	91 7199 9991 7035 6397 5371
Wells Fargo Bank, N.A. Trustee of Irene L. Southard Management Trust PO Box 5383 Denver, CO 80217	91 7199 9991 7035 6397 5388
Douglas A. Denton 1501 Princeton Ave. Midland, TX 79701	91 7199 9991 7035 6397 5395
JADT Minerals, Ltd. PO Box 190229 Dallas, TX 75219-0229	91 7199 9991 7035 6397 5401
Richard C. Gibson PO Box 3317 Midland, TX 79702	91 7199 9991 7035 6397 5418
Mr. Pete Martinez State Land Office Oil & Gas Division 310 Old Santa Fe Trail Santa Fe, NM 87501	91 7199 9991 7035 6397 5425

DISTRICT I 1625 N. French Dr., Hobbs, NM 88240 DISTRICT II 1301 W. Grand Avenue, Artemia, NM 88210

State of New Mexico Energy, Minerals and Natural Resources Department Form C-102 Revised October 12, 2005

Submit to Appropriate District Office

State Lease - 4 Copies Fee Lease - 3 Copies

#### DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV 1220 S. St. Francis Dr., Santa Fe, NM 87506 OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

☐ AMENDED REPORT

#### WELL LOCATION AND ACREAGE DEDICATION PLAT

30-015-36197	Pool Code 13370	Cotton Draw; Brushy Canyon	
Property Code 300635	Cotto	on Draw	Well Number
OGRID No. 6137		Prator Name CODUCTION COMPANY LP	Elevation 3503

#### Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
С	36	24 S	31 E		660	NORTH	1980	WEST	EDDY

#### Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint of	Infill Co	nsolidation (	Code Oro	der No.				

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	STANDARD UNIT HAS BEEN AFFROY	
1980'-	SURFACE LOCATION Lat - N32*10'45.40" Long - W103*44'01.12" SPC- N.: 429472.956 E.: 426872.698 (NAD-83)	OPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organisation either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the digision.  O2/16/15
		Surveyor Certification  I hereby certify that the well location shown on this plat was plotted from field notes of
. — — — — — — — — — — — — — — — — — — —		actual surveys made by me or under my supervison, and that the same is true and correct to the best of my belief.  FEBRUARY 7 2008  Date Surveys L.  Signature Scall ones. Professional Surveyor Co.
 	]   	Certificate No. Gary L. Jones 7977  BASIN SURVEYS

DISTRICT I 1625 N. French Dr., Hobbs, NM 88240

DISTRICT II
1301 W. Grand Avenue, Artesia, NM 88210

State of New Mexico Energy, Minerals and Natural Resources Department Form C-102 Revised October 12, 2005

Submit to Appropriate District Office

State Lease - 4 Copies Fee Lease - 3 Copies

#### DISTRICT III 1000 Rio Brazos Rd., Aztec, NM 87410

DISTRICT IV 1220 S. St. Francis Dr., Santa Fe, NM 87506 OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

☐ AMENDED REPORT

#### WELL LOCATION AND ACREAGE DEDICATION PLAT

30-015-36435	13370	Cotton Draw; Brushy Canyon		
Property Code 300635		Property Name Cotton Draw		
ogrid no. 6137	Operator DEVON ENERGY PRODU		Elevation 3497	

#### Surface Location

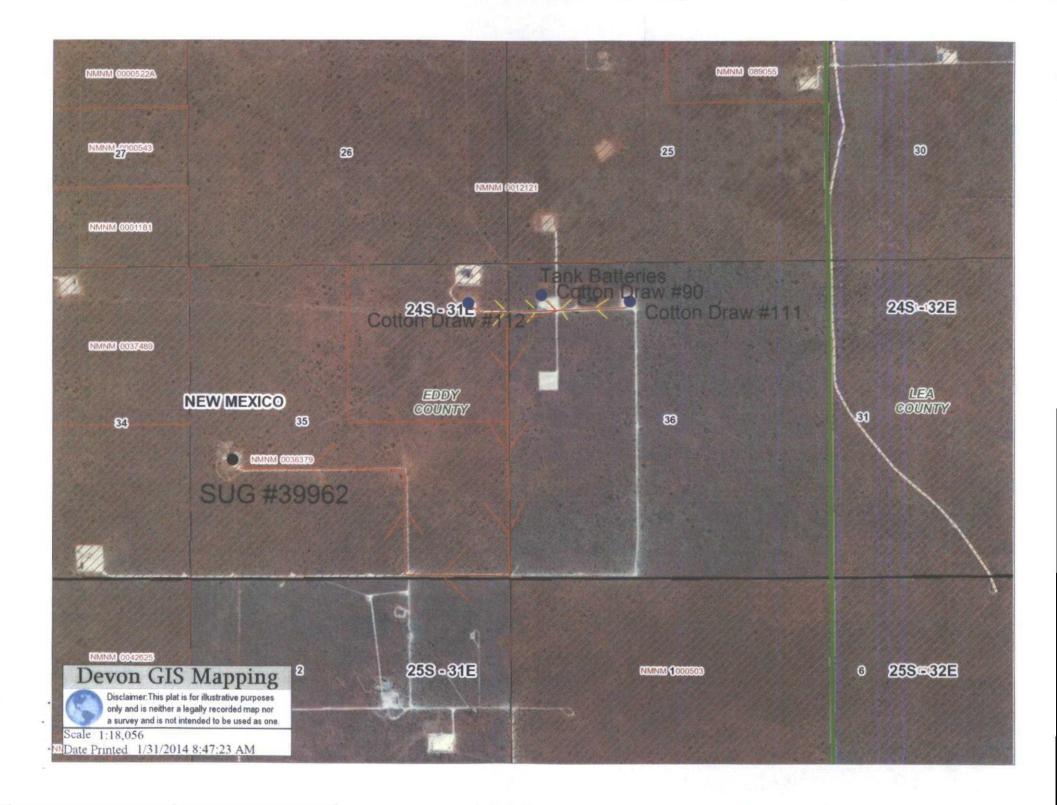
1	UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
l	Α	35	24 S	31 E		660	NORTH	660	EAST	EDDY

#### Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres	Joint o	r Infill Co	nsolidation	Code Or	der No.				

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

SURFACE LOCATION Lat - N32*10'45.38" Long - W103*44'31.84" SPC- N.: 429456.079 E.: 724232.519 (NAD-83)	,099	OPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organisation either owns a working interest or unleased mineral interest in the land including the proposed bottom hale location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.  O2.16.15  Signature Date  Erin Workman, Regulatory Comp. Prof.  Printed Name
		I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervison and that the same is true and correct to the best of my belief.  FEBRUARY 7, 2008  Date Surveyor Signature & Scalure Professional Marveyor Certificate No. Gary L. Jones 7977  BASIN SURVEYS





March 30, 2014

Mr. Pete Martinez State Land Office Oil & Gas Division 310 Old Santa Fe Trail Santa Fe, New Mexico 87501

Re: Central Tank Battery

Cotton Draw 111 & Cotton Draw 112 Sec. 35-T24S-R31E & Sec. 26-T24S-R31E Leases: NM E-9127 & NMNM012121 API: 30-015-36197 & 30-015-36435 Pool: 13370 Cotton Draw; Brushy Canyon

Eddy County, New Mexico

#### Dear Mr. Jones:

Please find enclosed the SLO Commingle Pre-Application, our \$30.00 application fee, and a copy of the application with the C-107B Sundry Notice of Intent for a Central Tank Battery of the aforementioned wells that was submitted for approval. A copy of that approval will be submitted upon receipt. Working, royalty, and overriding interest owners are not identical and have been notified of this proposal via certified mail (see attached).

Should you require any additional information or assistance, please do not hesitate to contact me at (405) 552-7970

Sincerely

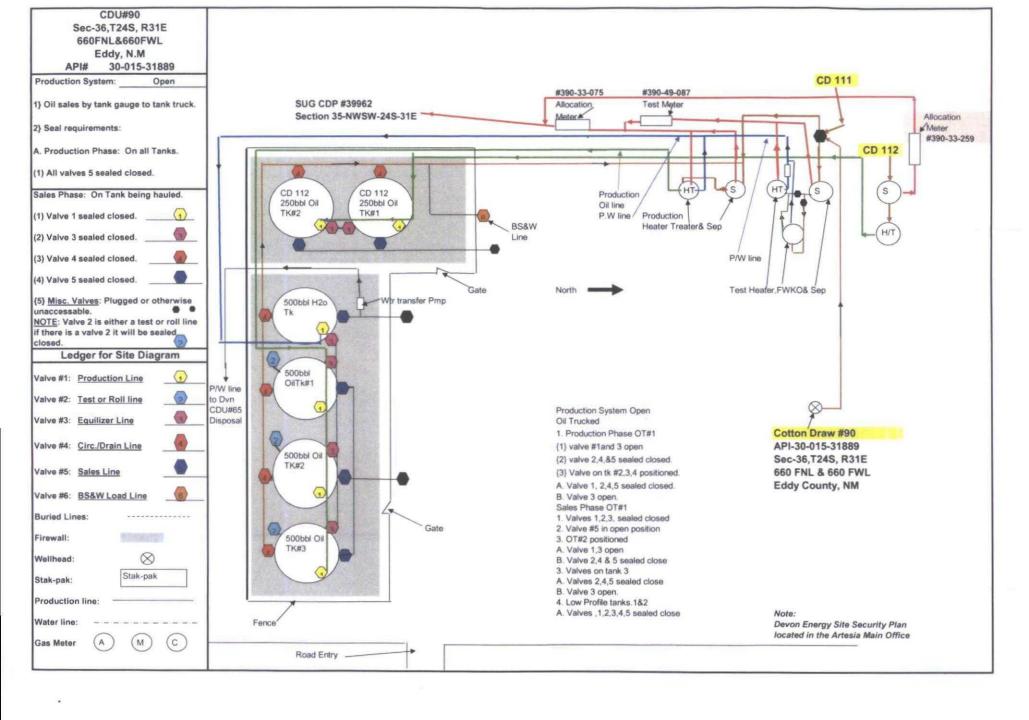
Regulatory Compliance Professional

**Enclosures** 

# NEW MEXICO STATE LAND OFFICE Commingle PRE-Application ONLINE Version

Please provide the following requested information so that the SLO staff can determine whether or not you qualify to submit a commingle application package.

Name: Erin Workman	Company:	Devon Energy	Devon Energy Production Co., LP		
Address: 333 West Sheridan Ave		City	окс		
Telephone: (405) 552-7970 Fax:	·	State	OK_Zip	73102	
The State Land Office rule that ap Mexico State Trust Lands is Rule 100.53 If you have any questions, please contact	. The rule is at the Oil, Gas, a	tached to the bott nd Minerals Divi	tom of this for sion at 505-8	rm. 27-5791.	
1. Briefly describe what you propose t	o do. The Cotton Drav	90 Facility has separate produ	uction facilities for each	well and has a common SUG	
CDP #39962 which is located in Sec. 35-NWSW-T24S-R31E in Eddy Cou	nty, New Mexico. Gas volu	mes from the Cotton Draw 111	will be determined by u	sing gas allocation meter	
# 390-33-075. The Cotton Draw #112 will be producing into its own separate	rator/heater treater. Oil pro	duction will go into one of two t	anks that will be utilized	by the Cotton Draw 112 only.	
Gas for the Cotton Draw 112 will be allocated using allocation meter #39	0-33-259. The oil will be m	easure by tang gauging to obta	in daily production volun	nes. Gas Production will be	
allocated on a daily basis utilizing the subtraction method from 2. Fill in the following information for					
Well name & number Cotton Draw 111		Lea	ase # NM E-912	7	
Lessee of Record Devon Energy Production Comp.	any, LP.				
Legal land description: Subdivisions		·			
Sect 36 T 24S R 31E NMPM E	ddy			County NM	
Pool 13370 Cotton Draw; Brushy Canyon					
Well name & number Cotton Draw 112		Le	ease # NMNM013	2121	
Lessee of Record Devon Energy Production Comp	any, LP	·			
Legal land description: Subdivisions					
Sect 35 T 24S R 31E NMPM				County NM	
Pool 13370 Cotton Draw; Brushy Canyon					
Well name & number		I			
Lessee of Record				<u>-</u>	
Legal land description: Subdivisions		<u> </u>	·		
SectT RNMPM			(	County NM	
Pool					



# **Cotton Draw 111 Gas Production**

Well ID	WC ID	WC Name	Well API	Year	Month	Prod
10466	1	COTTON DRAW UN 111	300153619700	2014	07	449
10466	1	COTTON DRAW UN 111	300153619700	2014	08	249
10466	1	COTTON DRAW UN 111	300153619700	2014	09	285
10466	1	COTTON DRAW UN 111	300153619700	2014	10	86
10466	1	COTTON DRAW UN 111	300153619700	2014	11	0
10466	1	COTTON DRAW UN 111	300153619700	2014	12	0

## **Cotton Draw 112 Gas Production**

Well II	WÇ ID	WC Name	Well API	Year	Month	Theo	Prod	Prod HV	Flare
9218	1 , 5	COTTON DRAW UN 112	300153643500	2014	07	805	′. * 7 <u>7</u> 9	1,254	0
9218	1	COTTON DRAW UN 112	300153643500	2014	08	762	679	1,244	0
9218	1 . `	COTTON DRAW UN 112	300153643500	2014	09 🚵	, 432	400	清清,1,268	0.0
9218	1	COTTON DRAW UN 112	300153643500	2014	10	65	339	1,062	0
9218	1 .,	COTTON DRAW UN 112	300153643500	2014	11 🚉	₹ 300	300	1,000	表 0
9218	1	COTTON DRAW UN 112	300153643500	2014	12	310	310	1,000	0

#### **Cotton Draw 111 Water**

Well ID	WC ID	WC Name	Alt WC Key	Well API	Frq	Year	Month	Wtr Prod
10466	1	COTTON DRAW UN 1115	8979742	300153619700%	M: XX	2014	07.	<i>,</i> 1,872.25
10466	1	COTTON DRAW UN 111	8979742	300153619700	М		08	2,168.28
10466 🚉	1	COTTON DRAW UN 111%	8979742 🔆 🗒	300153619700	M~c. ⊿ii.	2014	٠ 🛴 🧖	1,946:27
10466	1	COTTON DRAW UN 111	8979742	300153619700	М	2014	10	2,237.67
10466	1	COTTON DRAW UN 111.	8979742	300153619700	Marketin	2014	11	1,749.43
10466	1	COTTON DRAW UN 111	8979742	300153619700	М	2014	12	1,676.65
								25,787.55

Well ID	WC ID	WC Name	Alt WC Key	Well API	Year	Month	Wtr Prod
9218	1. 3.39	COTTON DRAW UN 112	8980954	300153643500	201,4	07 5 3	2,813.00
9218	1	COTTON DRAW UN 112	8980954	300153643500	2014	08	2,482.00
9218	1 3 7	COTTON DRAW UN 112	8980954	300153643500	2014	09	<b>½</b> 2,019.00
9218	1	COTTON DRAW UN 112	8980954	300153643500	2014	10	2,078.00
9218	1	COTTON DRAW UN 112	8980954	300153643500	2014	11 L	\$ 2,429.00
9218	1	COTTON DRAW UN 112	8980954	300153643500	2014	12	2,316.00

14,137.00

Cotton Draw 111 - OiL

Well ID	WC ID	WC Name	Well API	Month	Year	Prod	Wtr Prod
10466	1	COTTON DRAW UN 111	300153619700	07	2014	251.24	1,872.25
10466	1	COTTON DRAW UN 111	300153619700	08	2014	213.95	2,168.28
10466	1	COTTON DRAW UN 111	300153619700	09	2014	244.74	1,946.27
10466	1	COTTON DRAW UN 111	300153619700	10	2014	180.43	2,237.67
10466	1	COTTON DRAW UN 111	300153619700	11	2014	129.82	1,749.43
10466	1	COTTON DRAW UN 111	300153619700	12	2014	128.71	1,676.65

1148.89

# Cotton Draw 112 - Oil

Well ID	WC	WC Name	Month	Year	Prod	Loss	Wtr Prod
9218	1 .	COTTON DRAW UN 112	07	2014:	,343.2	0	- 2,813.00
9218	1	COTTON DRAW UN 112	08	2014	407.8	0	2,482.00
9218	1 : :	COTTON DRAW UN 112	09 👙	2014	286	0	2,019.00
9218	1	COTTON DRAW UN 112	10	2014	285.9	0	2,078.00
9218	1	COTTON DRAW UN 112	11.	2014	270.1	. 0	2,429.00
9218	1	COTTON DRAW UN 112	12	2014	202.6	0	2,316.00

Form (1160-5 (August 2007)

# UNITED STANDPERATOR'S COPY DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

FORM APPROVED OMB NO. 1004-0135 , 2010

Expires: J	<u> </u>	<u>31</u>
Lease Serial No.		

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.					121 ottee or Tribe Name	
SUBMIT IN T	SUBMIT IN TRIPLICATE - Other instructions on reverse side.					
1. Type of Well  Oil Well Gas Well	Type of Well					
2. Name of Operator						
3a. Address 333 WEST SHERIDAN AVE OKLAHOMA CITY, OK 731		3b. Phone No. (incl Ph: 405-552-79		e) 10. Field and Po PADUCA	ool, or Exploratory	
	4. Location of Well (Footage, Sec., T., R., M., or Survey Description)					
Sec 35 T24S R31E NENE 6	60FNL 660FEL			EDDY COL	JNTY, NM '	
12. CHECK API	PROPRIATE BOX(ES) T	O INDICATE NA	TURE OF	NOTICE, REPORT, OR O	THER DATA	
. TYPE OF SUBMISSION	1		TYPE O	FACTION		
Notice of Intent	☐ Acidize	□ Dеереп		☐ Production (Start/Resum	e) Water Shut-Off	
	☐ Alter Casing	□ Fracture ˆ	freat	□ Reclamation	☐ Well Integrity	
☐ Subsequent Report	Casing Repair	□ New Con	struction	☐ Recomplete	Other	
☐ Final Abandonment Notice	Change Plans	Plug and	Abandon	☐ Temporarily Abandon	Off-Lease Measurement	
	Convert to Injection	Plug Back	(	■ Water Disposal	·	
If the proposal is to deepen directio Attach the Bond under which the w following completion of the involve testing has been completed. Final Adetermined that the site is ready for Devon Energy Production Costorage for the following well Cotton Draw 90 30-015-31889  NWNW Sec. 36, T24S, R31E 49460 Paddica: Delaware	ork will be performed or provided operations. If the operation re Abandonment Notices shall be fill final inspection.)  ompany, LP respectfully rels:	e the Bond No. on file vesults in a multiple com led only after all require equests an Off-Leas	vith BLM/BIA pletion or rec ements, include	A. Required subsequent reports shompletion in a new interval, a Forr ling reclamation, have been compl	all be filed within 30 days n 3160-4 shall be filed once	
49460 Paduca; Delaware  Cotton Draw 111 30-015-36197  NENW Sec. 36-24S-31E 13370 Cotton Draw; Brushy (	STATELL			E ATTACHED FO NDITIONS OF A		
14. I hereby certify that the foregoing i	Electronic Submission #2 For DEVON ENERG	SY PRODUCT <b>(</b> ON CO	) LP, sent	Il Information System to the Carlsbad 04/30/2014 (14MMS0040SE)		
Name(Printed/Typed) ERIN L W	/ORKMAN	Title	REGUL	ATORY COMPLIANCE ASS	SOC.	
Signature (Electronic	Submission)	Date	01/31/2	014		
	THIS SPACE FO	R FEDERAL OF	STATE	OFFICE USE		
Approved By O. D. 2	thock &	Title	EPS	•	Date 12/15/14	
Conditions of approval, if any, are attache certify that the applicant holds legal or eq which would entitle the applicant to condu	uitable title to those rights in the	not warrant or subject lease Office	e CF	9		

#### Additional data for EC transaction #234216 that would not fit on the form

#### 32. Additional remarks, continued

The Cotton Draw #90 has separate production facilities for each well and they have a common SUG CDP #39962 which is located in Sec. 35-T24S-R31E in Eddy County, New Mexico. Oil, gas, and water volumes from the Cotton Draw 90-6 111 will be determined by using the Well Test Method. The Cottor. Draw #112 will be producing into its own tank utilizing the tank gauge strapping method for well test. Well tests for these wells will be conducted at least once per month for a minimum of 24 hours. Gas Production will be allocated on a daily basis utilizing the subtraction method from the SUG CDP meter #39962 and the allocation meters #390-33-075, 390-49-087, & #390-33-259. The gas production from the wells listed above will be commingled, measured, and sold off lease.

Working, royalty, interest owners are not identical owners are not identical and have been notified of this proposal via certified mail (see attached).

Bureau of Land Management Carlsbad Field Office 620 East Greene Street Carlsbad, New Mexico 88220 575-234-5972

c. .

### Guidelines for Off-Lease Measurement, Storage and Surface Commingling Approvals

At a minimum the following information must be included with any application to combine, store or measure production off-lease:

- 1. A formal request (Sundry Notice Form 3160-5 or letter) for approval to combine, store, or measure production off-lease with an appropriate explanation and diagram(s) describing the proposed operation in detail.
- 2. A map showing the lease numbers and location of all leases and wells that will contribute production to the proposed commingling, off-lease measurement, and/or storage facility. All lease numbers, unitized or communitized areas, producing zones or pools must be clearly illustrated or detailed by suitable means. Any wells or leases proposed to be added to an approved commingling and off-lease storage and or measurement facility must be approved by the Authorized Officer prior to their being included in the facility.
- 3. An updated facility diagram which clearly identifies and places all equipment that will be utilized. A diagram which identifies all flow lines, sales points and give location of gas sales (transfer point) meter if it is not at this facility. Include gas sales and/or allocation meter station name and number and location of meter to include ¼ ¼, Section, Township and Range.
- 4. Estimated monthly production from each contributing well, including type of product, gravity, and/or BTU content.
- 5. Details of the proposed method for measuring and allocating production for each lease involved. Include calculated "beneficial use" volumes both on and off-lease.
- 6. A statement that all interest owners have been notified of the proposal.
- 7. Evidence that Federal or Indian royalties will not be reduced through approval of the application, and the proposed commingling of production is in the interest of conservation and will not result in improper measurement of production.
- 8. Detailed economic justification, when the application to combine production is based on economic necessity, i.e., that approval is necessary to extend the economic life of the Federal or Indian Lease(s). Commingling with State or Fee wells will be on a very limited basis and will have to prove this is the only economical way to keep that well/lease from being plugged.

Approval for combining production from various sources is a privilege which is granted to lessees for the purpose of aiding conservation and extending the economic life of leases. Applicants should be cognizant that failure to operate in accordance with the provisions outlined in the Authorized Officer's conditions of approval and/or subsequent stipulations or modifications will subject such approval to revocation.