

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

OCD Hobbs

FORM APPROVED  
OMB NO. 1004-0135  
Expires: July 31, 2010

**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.*

**SUBMIT IN TRIPLICATE - Other instructions on reverse side.**

5. Lease Serial No.  
NMLC029405B

6. If Indian, Allottee or Tribe Name

7. If Unit or CA/Agreement, Name and/or No.

1. Type of Well  
☒ Oil Well ☐ Gas Well ☐ Other

8. Well Name and No.  
RUBY FEDERAL 20

2. Name of Operator  
CONOCOPHILLIPS COMPANY  
Contact: SUSAN B MAUNDER  
E-Mail: Susan.B.Maunder@conocophillips.com

9. API Well No.  
30-025-40894-00-S1

3a. Address  
MIDLAND, TX 79710

3b. Phone No. (include area code)  
Ph: 281-206-5261

10. Field and Pool, or Exploratory  
MALJAMAR

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)  
Sec 18 T17S R32E NESE 2310FSL 910FEL

AUG 08 2014

11. County or Parish, and State  
LEA COUNTY, NM

RECEIVED

**12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA**

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	Subsurface Commingling
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

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

ConocoPhillips Company respectfully requests approval to Downhole Commingle production in this well according to procedures outlined in the attached document entitled, ?Procedure: GB, SA & Yeso Recompletion?.

DHC-4678

See eOA

Our intent is to commingle the production of this well immediately following a production test. The information will be used to confirm our allocation discussed in the previously submitted document entitled, ?Field Study: Maljamar-Yeso West and Grayburg-San Andres Pools Commingle, Dated: April 23, 2014?. Please refer to this document for discussion supporting this request.

The Field Study has been discussed with Mr. Fernandez, BLM representative, by COP representative Ms. Maunder.

SEE ATTACHED FOR  
CONDITIONS OF APPROVAL



14. I hereby certify that the foregoing is true and correct.

Electronic Submission #249558 verified by the BLM Well Information System  
For CONOCOPHILLIPS COMPANY, sent to the Hobbs  
Committed to AFMSS for processing by CATHY QUEEN on 06/19/2014 (14CQ014386)

Name (Printed/Typed) SUSAN B MAUNDER

Title SENIOR REGULATORY SPECIALIST

Signature

(Electronic Submission)

Date 06/13/2014

SEE ATTACHED FOR  
CONDITIONS OF APPROVAL

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved By EDWARD FERNANDEZ

Title PETROLEUM ENGINEER

Date 08/05/2014

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office Hobbs

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

\*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\* BLM REVISED \*\*

SEE ATTACHED FOR  
CONDITIONS OF APPROVAL

AUG 11 2014

fm

**Additional data for EC transaction #249558 that would not fit on the form**

**32. Additional remarks, continued**

COPC will include an updated allocation with the subsequent report. Furthermore, COPC will update our field study to include an economic summary of the commingled production and submit separately.

Attached supporting documents include:

- Procedure: GB, SA & Yeso Recompletion
- Wellbore Diagram
- C-102 for each zone to be commingled
- BLM ? Downhole Commingling Worksheet
- Email from NM OCD approving our Downhole Commingling request.

Thank you for your time in reviewing this request. Your efforts are appreciated.



## Procedure: GB, SA & Yeso Recompletion

### **PLEASE USE NEW DOWNHOLE EQUIPMENT**

- 127 joints 2-7/8", 6.5lb/ft, j-55 grade
  - 80 joints sucker rod 7/8" SPCL APP
  - 69 joints sucker rod 3/4" SPCL APP
  - 14 joints sinker bar 1 1/2" Grade C
  - 1 rod insert pump Don-nan sand Diverter 1 3/4"
1. Before the arrival of the rig, kill the well with fresh water.(turn off BPU)
  2. Before the frac date, spot 14 clean 500 bbl frac tanks
  3. Make sure project supervisor has casing collar log on location
  4. Conduct safety meeting with JSA with all personnel and contractors on location
  5. Nipple down well head, Rig up pulling unit.
  6. Pull out of hole with rods & pump, inspect rods for wear and replace as necessary.  
send rods to TRC for inspection & pump to Don nan. Inspection report to be sent to  
**Michael.Sendze@conocophillips.com**, contact: 432 238 7537
  7. Nipple up BOP, & pull out of hole with production tubing, laying down tubing on tubing racks.  
send tubing to tuboscope for inspection. Inspection report to be sent to  
**Michael.Sendze@conocophillips.com**, contact: 432 238 7537
  8. Pick up & Run in Hole with 139 joints of 2-7/8", N-80, 6.5 lb/ft work string and 10K CBP set CBP at 4300 ft, (uppermost paddock perforation is at 5400ft). pressure test the work string to 6500psi (max casing pressure) **check casing collar log to make sure we do not set plug on a collar**
  9. Circulate well to PBD = 4300 ft, with fresh water down 5-1/2", 17 lb/ft, L-80 casing
  10. Close pipe rams and test bridge plug to 4800psi surface pressure (6611 psi BHP). If it holds then proceed, if it doesn't reset 10K CBP (check casing collar log to make sure we are not on a collar)
  11. Raise work string to 4200ft (135 joints), spot 1000 gals of 15% NE Fe HCL, acid column (3200ft-4200ft), perforations (3534 ft-3714ft)
  12. Pull out of hole laying down the work string, rig down and release rig
  13. Rig up SLB perforating Services
  14. Perforate at the below depths. **Perforate at the uppermost perfs first**

**Perforating gun required: 3-3/8 "SLB power jet HMX 3406 22.7g-EHD 0.36"**

Zone	Ruby Federal 20					
	Top	Bottom	Feet	SPF	Phase angle	shots
GB 4	3534	3546	12	2	60	24
	3567	3578	11	2	60	22
GB 5	3616	3624	8	2	60	16
	3634	3640	6	2	60	12
GB 6	3665	3674	9	2	60	18
	3707	3714	7	2	60	14

Rig down SLB perforating services.

15. Pump 35bbl of fresh water down 5 -1/2", 17lb/ft L-80 casing to push acid into perforations. Record ISIP, SITP 5 mins, 10mins, 15 mins
16. Nipple up 10k Frac stack and Halliburton Frac service provider
  - Set treating lines pop off 4800psi
  - Set pump trips 4500 psi
  - Test surface lines 5500psi
17. Frac the **GB 4, 5 and 6, 3534ft to 3714ft** , ONE STAGE FRAC, & Frac down casing
  - Acidize 3534-3714 (106 perforations) with 140 bbls (5880 gal) of 15% NE Fe HCL & 120 ball sealers (1.1 sg)
  - Acid treating rate 20 BPM down 5-1/2" 17lb/ft casing
  - Pump 10 bbl of 15% FE Ne HCL acid,
  - Pump 120 bbls of 15% FE Ne HCL, with 120 balls, i.e 1 ball per barrel
  - Then pump 10 bbls of 15% FE Ne HCL
  - Then pump 100 bbl of fresh water (20 BPM)
  - Proceed to Frac the GB 4, 5 &6. 3534ft to 3714 ft. Frac treating rate 50 BPM

**Use the schedule below from Halliburton to frac, Halliburton frac procedure is attached at the end of this procedure**

# START RESIN COAT ACTIVATOR ON STAGE PRIOR TO RESIN COATED SAND

Casing (Surface)								
Tri-Stage	Stage Desc.	Flow Path	Fluid Desc.	Rate-Liq+Prop	Clean Vol.	Proppant	Proppant Cont.	Prop. Mass
1-1	Load Well	IN	Treated Water	5	500		0	0
1-2	Acid Ball Out	IN	15% Ferriek SC Acid (0.3%)	20	5000		0	0
1-3	Displacement	IN	Treated Water	20	6500		0	0
1-4	Pad	IN	Delta Frac 140 - R (17)	50	4000		0	0
1-5	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	5000	Common White-100 Mesh, SSA-2	0.25	2000
1-6	Pad	IN	Delta Frac 140 - R (17)	50	3000		0	0
1-7	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	12000	Premium White-20/40	0.5	6000
1-8	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	11000	Premium White-20/40	1	11000
1-9	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	10000	Premium White-20/40	2	20000
1-10	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	9000	Premium White-20/40	3	27000
1-11	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	8000	Premium White-20/40	4	38000
1-12	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	5200	Premium White-20/40	5	26000
1-13	Proppant Laden Fluid	IN	Delta Frac 140 - R (17)	50	5400	CRC-20/40	5	32000
1-14	Flush	IN	Water Frac G - R (18)	50	3450		0	0
Totals					93050			160000

18. Record ISIP, 5 min, 10 min and 15 mins in well view
19. Rig down frac service provider (Halliburton).
20. Let resin coated sand (CRC-20/40) sit for 24 hours till we flow back
21. Flow back the well till its dead
22. Move in with Rig and Rig up
23. Pick up & Run in hole with 4-3/4" bit & 135 joints of 2-7/8", N-80, 6.5lb/ft work string, clean out sand to PBD=4300ft with fresh water.
24. Spot 500 gals of 15% NE Fe HCL down work string. Acid column (3800 ft-4300ft)
25. Pull out of hole with work string and bit
26. rig up SLB perforating services
27. Perforating gun required: 3-3/8 "SLB power jet HMX 3406 22.7g EHD 0.36"
28. Perforate the zones in the table below. Perforate the top perms first

Ruby Federal 20						
Zone	Top	Bottom	Feet	SPF	Phase angle	shots
SA 7	3854	3874	20	2	60	40
	3937	3947	10	2	60	20
SA 9	4009	4019	10	2	60	20
	4100	4110	10	2	60	20

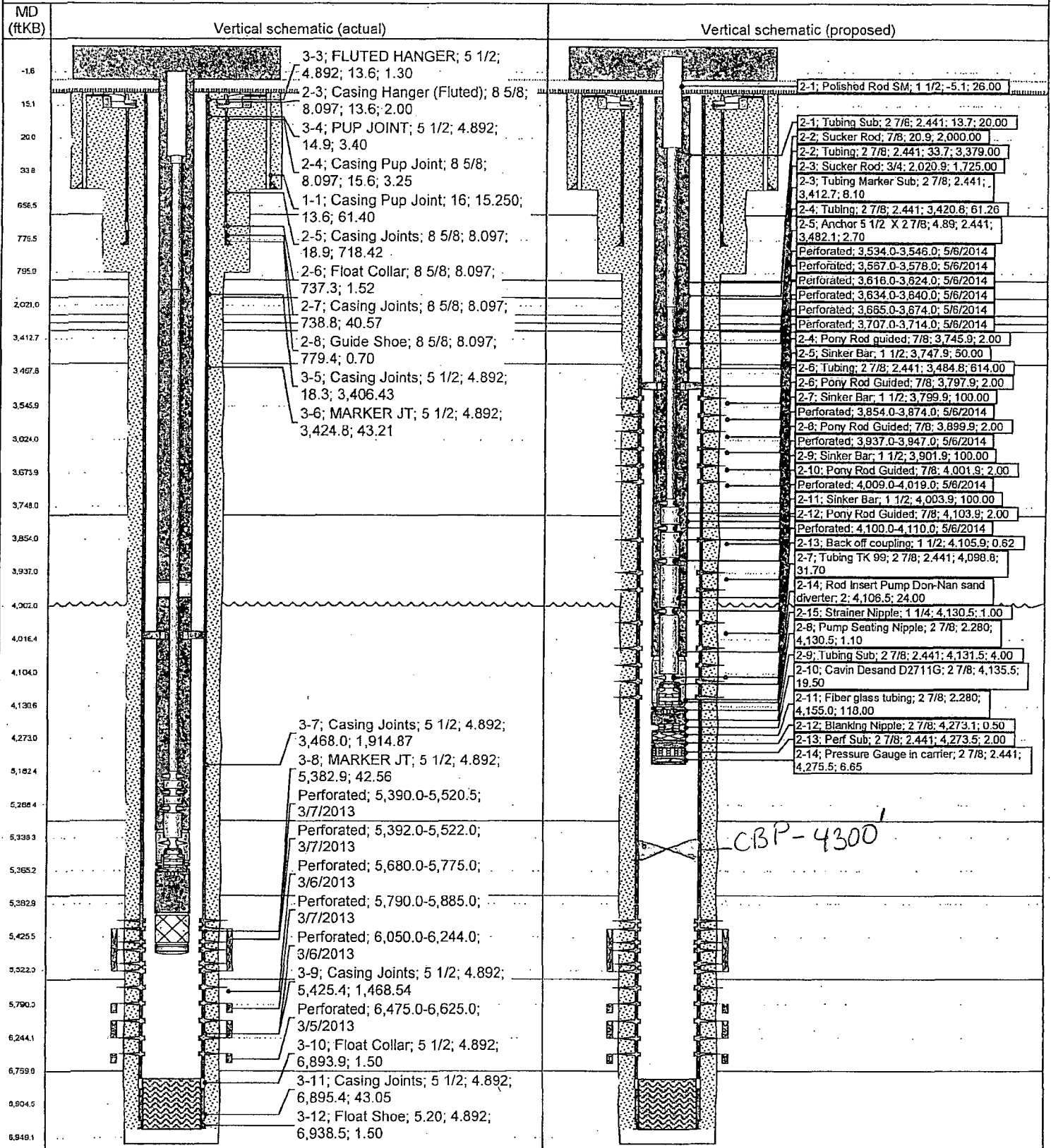
29. Run in hole with 123 joints of 2-7/8", N-80, 6.5lb/ft work string & packer. set packer at 3800 ft. test work string to 6500 psi going in the hole. **Check casing collar logs to make sure we don't set packer on casing collar**
30. Pump down work string 10 bbl. of 15% Fe Ne HCL, then 100 bbl. of 15% Fe Ne HCL with **150 rubber ball sealers (1.1 sg)**, pump 10 bbl. of 15% Fe Ne HCL pump at 20 BPM till acid ball out
31. Pump 100 bbl of fresh water down work string, to ensure proper acid treatment record ISIP, 5 min, 10 mins & 15 mins in well view.
32. Release packer & Pull out of hole with work string & packer.
33. Flow back the well till its dead
34. Pick up & run in hole with 2-7/8", N-80, 6.5lb/ft work string & 4-3/4" bit and Tag for Fill. PBD=4300ft. if we loose weight on string before PBD, note depth in well view and circulate well with fresh water for 2 hours to PBD=4300ft
35. Pull out of hole with work string & bit.
36. Pick up & Run in hole with **New 2-7/8 J-55 production tubing** & new static sparktek pressure gauge, test production tubing to 5000 psi. Pump 5 gal of corrosion inhibitor (**champion-Corton R-2525; SG 0.91**)
37. Nipple down BOP, Run in hole with New Rods and Pump. (see pre-pull attached on the next page)
38. In case of any problems with Sparktek gauge contact Eby Bothe (432)-580-8200 with precision pressure data
39. Space out pump, hang well on, Turn on BPU & Test pump action; wait for tubing to pressure up then shut down pump. **Rig down & Release rig**
40. Shut in well for 48 hours.
41. Start well, run well for **60 days**.
42. Place well on test
43. please obtain static & producing fluid level put data in advocet
44. ConocoPhillips Maintenance Lead Mario Corral (575) 704-2209

### Most Recent Job

#### Jobs

Job Category	Primary Job Type	Secondary Job Type	Actual Start Date	End Date
COMPLETIONS	INITIAL COMPLETION		3/4/2013	3/20/2013

VERTICAL - Original Hole, 5/30/2014 12:00:47 PM



**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone: (505) 748-1283 Fax: (505) 334-6170  
**District III**  
1030 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170  
**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

**State of New Mexico**  
**Energy, Minerals & Natural Resources Department**  
**OIL CONSERVATION DIVISION**  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**Form C-102**  
**Revised August 1, 2011**  
Submit one copy to appropriate  
District Office

☐ AMENDED REPORT

**WELL LOCATION AND ACREAGE DEDICATION PLAT**

<sup>1</sup> API Number 30-025-40894	<sup>2</sup> Pool Code 43329	<sup>3</sup> Pool Name Maljamar; Grayburg, San Andres
<sup>4</sup> Property Code	<sup>5</sup> Property Name Ruby Federal	<sup>6</sup> Well Number 20
<sup>7</sup> OGRID No. 217817	<sup>8</sup> Operator Name ConocoPhillips Company	<sup>9</sup> Elevation 3958'

**<sup>10</sup> Surface Location**

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
I	18	17S	32E		2310'	South	910'	East	Lea

**<sup>11</sup> 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

<sup>12</sup> Dedicated Acres 40	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No. DHC - 4678
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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.

<div style="position: relative; height: 300px;"> <div style="position: absolute; top: 0; right: 0; transform: rotate(90deg); transform-origin: right top;">Lease Boundary</div> <div style="position: absolute; bottom: 0; left: 0; transform: rotate(-90deg); transform-origin: left bottom;">Lease Boundary</div> <div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%);"> <div style="border: 1px solid black; width: 100px; height: 100px; position: relative;"> <div style="position: absolute; top: 0; right: 0;">910'</div> <div style="position: absolute; bottom: 0; left: 0;">2310'</div> </div> </div> </div>	<p><b><sup>17</sup> OPERATOR CERTIFICATION</b></p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this 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.</p> <p><i>Susan B. Maunder</i> 5/30/14 Signature Date</p> <p>Susan B. Maunder Printed Name</p> <p>Susan.B.Maunder@conocophillips.com E-mail Address</p>
	<p><b><sup>18</sup> SURVEYOR CERTIFICATION</b></p> <p>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 supervision, and that the same is true and correct to the best of my belief.</p> <p>Date of Survey</p> <p>Signature and Seal of Professional Surveyor:</p>
	<p>Certificate Number</p>



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**State of New Mexico**  
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**Form C-102**  
**Revised August 1, 2011.**  
Submit one copy to appropriate  
District Office  
☐ AMENDED REPORT

**WELL LOCATION AND ACREAGE DEDICATION PLAT**

<sup>1</sup> API Number 30-025-40894	<sup>2</sup> Pool Code 44500	<sup>3</sup> Pool Name Maljamar; Yeso West
<sup>4</sup> Property Code 38653	<sup>5</sup> Property Name Ruby Federal	<sup>6</sup> Well Number 20
<sup>7</sup> OGRID No. 217817	<sup>8</sup> Operator Name ConocoPhillips Company	<sup>9</sup> Elevation 3958'

**<sup>10</sup> Surface Location**

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**<sup>11</sup> Bottom Hole Location If Different From Surface**

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<sup>12</sup> Dedicated Acres 40	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No. DHC-4678						

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.

<div style="position: relative; height: 400px;"> <div style="position: absolute; top: 0; right: 0; transform: rotate(90deg);">Lease Boundary</div> <div style="position: absolute; left: 0; bottom: 0; transform: rotate(-90deg);">Lease Boundary</div> <div style="position: absolute; bottom: 0; right: 0;">Lease Boundary</div> <div style="position: absolute; top: 50%; left: 50%; transform: translate(-50%, -50%);"> <div style="border: 1px solid black; width: 100px; height: 100px; position: relative;"> <div style="position: absolute; top: 0; right: 0;">910'</div> <div style="position: absolute; bottom: 0; left: 0;">2310'</div> </div> </div> </div>	<b><sup>17</sup> OPERATOR CERTIFICATION</b> I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this 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. <u>Susan B. Maunder 5/30/14</u> Signature Date Susan B. Maunder Printed Name Susan.B.Maunder@conocophillips.com E-mail Address
	<b><sup>18</sup> SURVEYOR CERTIFICATION</b> 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 supervision, and that the same is true and correct to the best of my belief. Date of Survey Signature and Seal of Professional Surveyor:
	Certificate Number

## BLM - Downhole Commingling Worksheet

<b>Operator: ConocoPhillips Company</b>				
<b>Lease/Well Name/Location: NMLC029405B/ Ruby Federal #20/ UL I, Sec. 18, 17S, 32E</b>				
Data	Formation One	Formation Two	Formation Three	Estimated Combined Production
Pool Name	Maljamar; Grayburg-San Andres	NA	Maljamar; Yeso West	--
Pool Code	38653	--	44500	--
State Form C-102 with dedicated acres provided	Yes	--	Yes	--
Formation Name	Grayburg-San Andres	--	Yeso	--
Top & Bottom of Pay Section ( <u>perforated</u> or open-hole interval)	3534 - 4110' perforated	--	5390 - 6625' perforated	--
Method of production	Artificial Lift	--	Artificial Lift	--
Bottom Hole Pressure (P <sub>i,r</sub> initial, reservoir & P <sub>b</sub> bottom hole, current)	P <sub>i,r</sub> = 1733 P <sub>b</sub> = 800 psi	--	P <sub>i,r</sub> = 2600 P <sub>b</sub> = 1300 psi	--
Reservoir Drive mechanism	Combination (Solution gas & water drive)	--	Combination (Solution gas & water drive)	--
Oil gravity and/or BTU	38.1	--	38.2	38.2
Average Sulphur Content (Wt%)	0.7069	--	0.6261	0.658
Oil Sample Analysis provided	yes	--	yes	--
Gas Analysis Provided	yes	--	yes	--
Produced Water Analysis provided	no	--	no	--
H2S present	5000 ppm	--	8 ppm	1028 ppm* (Results show most of the gas production from Yeso; also have a larger percentage of the total production)
Producing, Shut-in or New Zone	Producing	--	Shut in below BP	--
Date and Oil/Gas/Water rates of last production	Date: estimate 20 bopd/50 Mcfd/ 100 bwpd	--	Date: 04/08/14 20 bopd /48 Mcfd/ 279 bwpd	Oil/Gas/Water 40 / 98 / 379
Average decline% (provide back up data)	See Field Study	--	See Field Study	--
Fixed Allocation Percentage	Oil: 50% Gas: 51%	--	Oil: 50% Gas: 49%	--
Remarks: *For H2S calculation used following numbers: GBSA production share (0.4), GOR (1.8 Mcf/Stb), H2S (5000 ppm) & Yeso production share (0.6), GOR (4.5), H2S (8ppm)				
Operator Signature: <i>Susan B. Maunier</i>				
Date: <i>10-3-14</i>				

Attached Supporting Documents:

State Form C-102 with dedicated Acres Provided  
 Oil Sample Analysis provided (must be current)  
 Gas Analysis provided (must be current)  
 Produced Water Analysis provided (must be current)  
 Any additional supporting data (i.e. offset well production and decline curves, etc)

## **Conditions of Approval**

**Ruby Federal 20**

**30-025-40894**

**ConocoPhillips**

**August 6, 2014**

- 1. Step 41, 42 of operator's procedure; Operator to test well a minimum of 90 days.**
- 2. Operator to submit another NOI Sundry (with actual well production data) to remove CBP at approximately 4300 and DHC.**
- 3. Surface disturbance beyond the existing pad must have prior approval.**
- 4. Closed loop system required.**
- 5. A minimum of a 2000 (2M) BOP to be used. All blowout preventer (BOP) and related equipment (BOPE) shall comply with reasonable well control requirements. A two ram system with a blind ram and a pipe ram designed for the size of the work string shall be adequate. Tapered work strings will require an additional pipe ram. The manifold shall comply with Onshore Oil and Gas Order #2 Attachment I (2M Diagrams of Choke Manifold Equipment). The accumulator system shall have an immediately available power source to close the rams and retain 200 psi above pre-charge. The pre-charge test shall follow requirements in Onshore Order #2.**
- 6. Subsequent sundry and Completion report with well test and wellbore schematic required.**
- 7. Work to be completed in 90 days.**

**EGF 080614**