

Form 3160-3
(June 2015)FORM APPROVED
OMB No. 1004-0137
Expires: January 31, 2018

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
APPLICATION FOR PERMIT TO DRILL OR REENTER

1a. Type of work: <input type="checkbox"/> DRILL <input type="checkbox"/> REENTER 1b. Type of Well: <input type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other 1c. Type of Completion: <input type="checkbox"/> Hydraulic Fracturing <input type="checkbox"/> Single Zone <input type="checkbox"/> Multiple Zone		5. Lease Serial No. 6. If Indian, Allottee or Tribe Name 7. If Unit or CA Agreement, Name and No. 8. Lease Name and Well No.
2. Name of Operator		9. API Well No. 30 015 48560
3a. Address	3b. Phone No. (include area code)	10. Field and Pool, or Exploratory
4. Location of Well (Report location clearly and in accordance with any State requirements. *) At surface At proposed prod. zone		11. Sec., T. R. M. or Blk. and Survey or Area
14. Distance in miles and direction from nearest town or post office*		12. County or Parish
13. State		
15. Distance from proposed* location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any)	16. No of acres in lease	17. Spacing Unit dedicated to this well
18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft.	19. Proposed Depth	20. BLM/BIA Bond No. in file
21. Elevations (Show whether DF, KDB, RT, GL, etc.)	22. Approximate date work will start*	23. Estimated duration
24. Attachments		

The following, completed in accordance with the requirements of Onshore Oil and Gas Order No. 1, and the Hydraulic Fracturing rule per 43 CFR 3162.3-3 (as applicable)

- | | |
|---|---|
| 1. Well plat certified by a registered surveyor.
2. A Drilling Plan.
3. A Surface Use Plan (if the location is on National Forest System Lands, the SUPO must be filed with the appropriate Forest Service Office). | 4. Bond to cover the operations unless covered by an existing bond on file (see Item 20 above).
5. Operator certification.
6. Such other site specific information and/or plans as may be requested by the BLM. |
|---|---|

25. Signature	Name (Printed/Typed)	Date
Title		
Approved by (Signature)	Name (Printed/Typed)	Date
Title		
Office		

Application approval 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.
Conditions of approval, if any, are attached.

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.

(Continued on page 2)

*(Instructions on page 2)



Additional Operator Remarks

Location of Well

0. SHL: NWNW / 200 FNL / 105 FWL / TWSP: 24S / RANGE: 31E / SECTION: 25 / LAT: 32.1950507 / LONG: -103.7397064 (TVD: 0 feet, MD: 0 feet)

PPP: NENE / 100 FNL / 890 FEL / TWSP: 24S / RANGE: 31E / SECTION: 26 / LAT: 32.1953247 / LONG: -103.7429223 (TVD: 11760 feet, MD: 11937 feet)

BHL: SENE / 2620 FNL / 890 FEL / TWSP: 24S / RANGE: 31E / SECTION: 35 / LAT: 32.1738815 / LONG: -103.7429362 (TVD: 11801 feet, MD: 19554 feet)

BLM Point of Contact

Name: Candy Vigil

Title: LIE

Phone: (575) 234-5982

Email: cvigil@blm.gov

CONFIDENTIAL

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: (575) 748-1283 Fax: (575) 748-9720
District III
1000 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

¹ API Number 30 015 48560	² Pool Code [98220]	³ Pool Name PURPLE SAGE; WOLFCAMP
⁴ Property Code 300635	⁵ Property Name COTTON DRAW UNIT	⁶ Well Number 625H
⁷ OGRID No. 6137	⁸ Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.	⁹ Elevation 3548.1

¹⁰ Surface Location

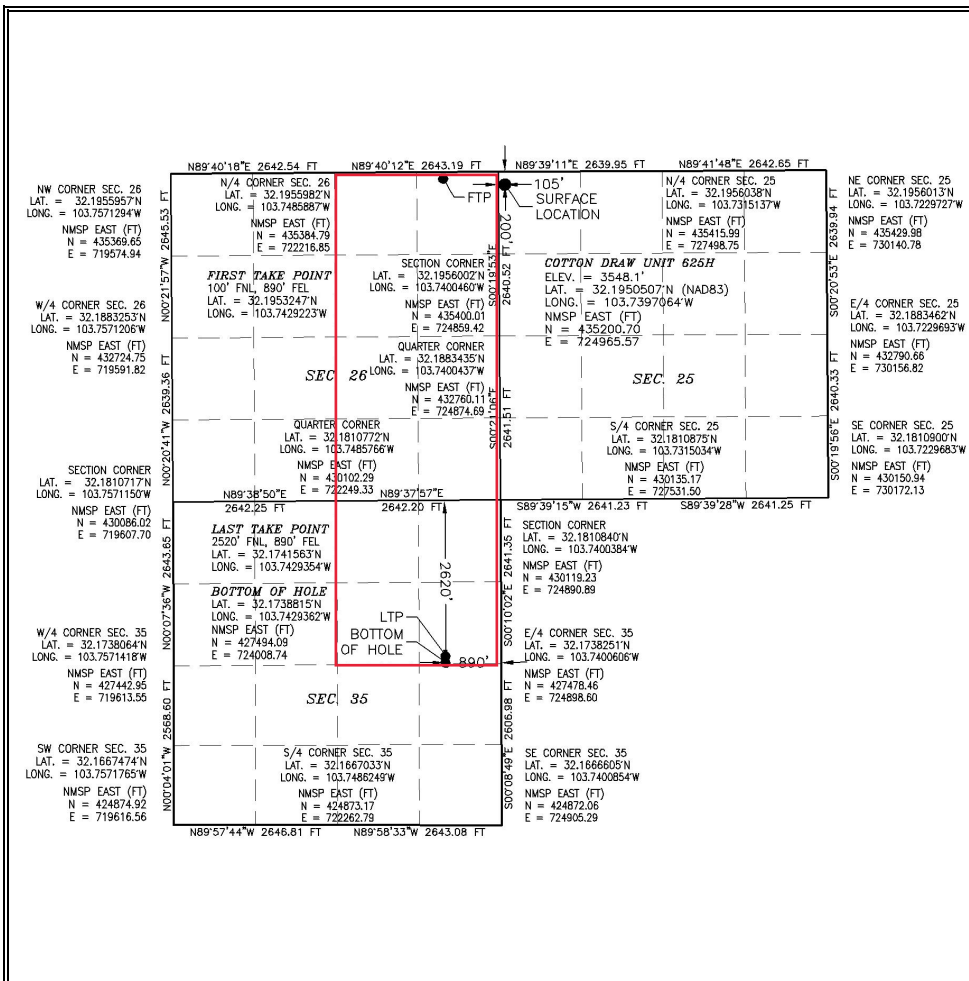
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
D	25	24 S	31 E		200	NORTH	105	WEST	EDDY

¹¹ 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
H	35	24 S	31 E		2620	NORTH	890	EAST	EDDY

¹² Dedicated Acres 480	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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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.

¹⁷ 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 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.

Jenny Harms 11-17-2020
Signature Date

Printed Name
JENNY.HARMS@DVN.COM
E-mail Address

¹⁸ 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 supervision, and that the same is true and correct to the best of my belief.

OCTOBER 14, 2020

Date of Survey

Signature and Seal of Professional Surveyor:
Certificate Number: **12797**
Surveyor No. **8567**

Intent ☒ As Drilled ☐

API #		
Operator Name: DEVON ENERGY PRODUCTION COMPANY, L.P.	Property Name: COTTON DRAW UNIT	Well Number 625H

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
	26	24S	31E		36 FNL		890 FEL		EDDY
Latitude 32.19540586					Longitude -103.74292234				NAD 83

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
A	26	24S	31E		100	NORTH	890	EAST	EDDY
Latitude 32.1953247					Longitude 103.7429223				NAD 83

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
H	35	24S	31E		2520	NORTH	890	EAST	EDDY
Latitude 32.1741563					Longitude 103.7429354				NAD 83

Is this well the defining well for the Horizontal Spacing Unit? ☐ NOIs this well an infill well? ☐ YES

If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.

API #		
Operator Name:	Property Name:	Well Number

KZ 06/29/2018

State of New Mexico
Energy, Minerals and Natural Resources Department

Submit Electronically
Via E-permitting

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

NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

Section 1 – Plan Description

Effective May 25, 2021

I. Operator: DEVON ENERGY PRODUCTION COMPANY, LP **OGRID:** 6137 **Date:** 6 / 7 / 2021

II. Type: ☒ Original ☐ Amendment due to ☐ 19.15.27.9.D(6)(a) NMAC ☐ 19.15.27.9.D(6)(b) NMAC ☐ Other.

If Other, please describe: _____

III. Well(s): Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D
See attachment.						

IV. Central Delivery Point Name: See attachment [See 19.15.27.9(D)(1) NMAC]

V. Anticipated Schedule: Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow Back Date	First Production Date
See attachment						

VI. Separation Equipment: ☒ Attach a complete description of how Operator will size separation equipment to optimize gas capture.

VII. Operational Practices: ☒ Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.

VIII. Best Management Practices: ☒ Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

NATURAL GAS MANAGEMENT PLAN

Section 1 - Plan Description

III. Well(s): Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

								Anticipated		
Well Name	API	ULSTR	FOOTAGES			Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D	Central Delivery Point Name:	
COTTON DRAW UNIT 601H		26-245-31E	1135	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 602H		26-245-31E	1165	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 603H		26-245-31E	1195	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 604H		26-245-31E	1225	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 605H		26-245-31E	2530	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 606H		26-245-31E	2560	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 607H		26-245-31E	2590	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 608H		26-245-31E	2620	FWL	385	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 609H		26-245-31E	1415	FEL	180	FNL	2000	5000	7000	COTTON DRAW 25 CTB 5
COTTON DRAW UNIT 610H		26-245-31E	1385	FEL	180	FNL	2000	5000	7000	COTTON DRAW 25 CTB 5
COTTON DRAW UNIT 611H		26-245-31E	1355	FEL	180	FNL	2000	5000	7000	COTTON DRAW 25 CTB 5
COTTON DRAW UNIT 612H		26-245-31E	1325	FEL	180	FNL	2000	5000	7000	COTTON DRAW 25 CTB 5
COTTON DRAW UNIT 520H		26-245-31E	1130	FWL	535	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 521H		26-245-31E	1160	FWL	535	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 522H		26-245-31E	1190	FWL	535	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 523H		26-245-31E	2540	FEL	535	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 524H		26-245-31E	2510	FEL	535	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 525H		26-245-31E	1385	FEL	305	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 526H		26-245-31E	1355	FEL	305	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2
COTTON DRAW UNIT 527H		26-245-31E	1325	FEL	305	FNL	4500	15000	15000	COTTON DRAW 26 CTB 2

V. Anticipated Schedule: Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow back Date	First Production Date
COTTON DRAW UNIT 601H	n/a	1/21/2022	2/20/2022	6/20/2022	6/20/2022	6/20/2022
COTTON DRAW UNIT 602H	n/a	10/31/2021	11/30/2021	3/30/2022	3/30/2022	3/30/2022
COTTON DRAW UNIT 603H	n/a	2/16/2022	3/18/2022	7/16/2022	7/16/2022	7/16/2022
COTTON DRAW UNIT 604H	n/a	12/14/2021	1/13/2022	5/13/2022	5/13/2022	5/13/2022
COTTON DRAW UNIT 605H	n/a	11/12/2021	12/12/2021	4/11/2022	4/11/2022	4/11/2022
COTTON DRAW UNIT 606H	n/a	12/17/2021	1/16/2022	5/16/2022	5/16/2022	5/16/2022
COTTON DRAW UNIT 607H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 608H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 609H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 610H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 611H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 612H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 520H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 521H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 522H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 523H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 524H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 525H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 526H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022
COTTON DRAW UNIT 527H	n/a	6/7/2022	7/7/2022	11/4/2022	11/4/2022	11/4/2022

Section 2 – Enhanced Plan

EFFECTIVE APRIL 1, 2022

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

☒ Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

IX. Anticipated Natural Gas Production:

Well	API	Anticipated Average Natural Gas Rate MCF/D	Anticipated Volume of Natural Gas for the First Year MCF

X. Natural Gas Gathering System (NGGS):

Operator	System	ULSTR of Tie-in	Anticipated Gathering Start Date	Available Maximum Daily Capacity of System Segment Tie-in

XI. Map. ☐ Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

XII. Line Capacity. The natural gas gathering system ☐ will ☐ will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

XIII. Line Pressure. Operator ☐ does ☐ does not anticipate that its existing well(s) connected to the same segment, or portion, of the natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by the new well(s).

☐ Attach Operator's plan to manage production in response to the increased line pressure.

XIV. Confidentiality: ☐ Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information provided in Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of the specific information for which confidentiality is asserted and the basis for such assertion.

Section 3 - Certifications

Effective May 25, 2021

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

☒ Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or

☐ Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.

If Operator checks this box, Operator will select one of the following:

Well Shut-In. ☐ Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

Venting and Flaring Plan. ☐ Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- (b) power generation for grid;
- (c) compression on lease;
- (d) liquids removal on lease;
- (e) reinjection for underground storage;
- (f) reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- (h) fuel cell production; and
- (i) other alternative beneficial uses approved by the division.

Section 4 - Notices

1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

(a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or

(b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.

2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

Signature: <i>Catherine Lebsack</i>	<i>JW</i>
Printed Name: Catherine Lebsack	
Title: Vice President	
E-mail Address:	
Date: <i>6-12-2021</i>	
Phone:	

OIL CONSERVATION DIVISION
(Only applicable when submitted as a standalone form)

Approved By:
Title:
Approval Date:
Conditions of Approval:



VI. Separation Equipment

Devon Energy Production Company, L.P. utilizes a "stage separation" process in which oil and gas separation is carried out through a series of separators operating at successively reduced pressures. Hydrocarbon liquids are produced into a high-pressure inlet separator, then carried through one or more lower pressure separation vessels before entering the storage tanks. The purpose of this separation process is to attain maximum recovery of liquid hydrocarbons from the fluids and allow maximum capture of produced gas into the sales pipeline. Devon utilizes a series of Low-Pressure Compression units to capture gas off the staged separation and send it to the sales pipeline. This process minimizes the amount of flash gas that enters the end-stage storage tanks that is subsequently vented or flared.



VII. Operational Practices

Devon Energy Production Company, L. P. will employ best management practices and control technologies to maximize the recovery and minimize waste of natural gas through venting and flaring.

- During drilling operations, Devon will utilize flares and/or combustors to capture and control natural gas, where technically feasible. If flaring is deemed technically in-feasible, Devon will employ best management practices to minimize or reduce venting to the extent possible.
- During completions operations, Devon will utilize Green Completion methods to capture gas produced during well completions that is otherwise vented or flared. If capture is technically in-feasible, flares and/or combustors will be used to capture and control flow back fluids entering into frac tanks during initial flowback. Upon indication of first measurable hydrocarbon volumes, Devon will turn operations to onsite separation vessels and flow to the gathering pipeline.
- During production operations, Devon will take every practical effort to minimize waste of natural gas through venting and flaring by:
 - Designing and constructing facilities in a manner consistent to achieve maximum capture and control of hydrocarbon liquids & produced gas
 - Utilizing a closed-loop capture system to collect and route produced gas to sales line via low pressure compression, or to a flare/combustor
 - Flaring in lieu of venting, where technically feasible
 - Utilizing auto-ignitors or continuous pilots, with thermocouples connected to Scada, to quickly detect and resolve issues related to malfunctioning flares/combustors
 - Employ the use of automatic tank gauging to minimize storage tank venting during loading events
 - Installing air-driven or electric-driven pneumatics & combustion engines, where technically feasible to minimize venting to the atmosphere
 - Confirm equipment is properly maintained and repaired through a preventative maintenance and repair program to ensure equipment meets all manufacturer specifications
 - Conduct and document AVO inspections on the frequency set forth in Part 27 to detect and repair any onsite leaks as quickly and efficiently as is feasible



VIII. Best Management Practices during Maintenance

Devon Energy Production Company, L.P. will utilize best management practices to minimize venting during active and planned maintenance activities. Devon is operating under guidance that production facilities permitted under NOI permits have no provisions to allow high pressure flaring and high pressure flaring is only allowed in disruption scenarios so long as the duration is less than eight hours. When technically feasible, flaring during maintenance activities will be utilized in lieu of venting to the atmosphere. Devon will work with third-party operators during scheduled maintenance of downstream pipeline or processing plants to address those events ahead of time to minimize venting. Actions considered include identifying alternative capture approaches or planning to temporarily reduce production or shut in the well to address these circumstances.



U.S. Department of the Interior
BUREAU OF LAND MANAGEMENT

Drilling Plan Data Report

06/01/2021

APD ID: 10400065591

Submission Date: 11/21/2020

Highlighted data
reflects the most
recent changes

Operator Name: DEVON ENERGY PRODUCTION COMPANY LP

Well Name: COTTON DRAW UNIT

Well Number: 625H

[Show Final Text](#)

Well Type: OIL WELL

Well Work Type: Drill

Section 1 - Geologic Formations

Formation ID	Formation Name	Elevation	True Vertical Depth	Measured Depth	Lithologies	Mineral Resources	Producing Formation
1168282	UNKNOWN	3548	0	0	OTHER : SURFACE	NONE	N
1168283	RUSTLER	2888	660	660	SANDSTONE	NONE	N
1168284	SALADO	2538	1010	1010	SALT	NONE	N
1168286	BELL CANYON	-852	4400	4400	SANDSTONE	NATURAL GAS, OIL	N
1168285	BASE OF SALT	-852	4400	4400	ANHYDRITE	NATURAL GAS, OIL	N
1168287	CHERRY CANYON	-1812	5360	5360	SANDSTONE	NATURAL GAS, OIL	N
1168288	BRUSHY CANYON	-3132	6680	6680	SANDSTONE	NATURAL GAS, OIL	N
1168295	BONE SPRING LIME	-4742	8290	8290	LIMESTONE	NATURAL GAS, OIL	N
1168289	BONE SPRING	-5752	9300	9300	SANDSTONE	NATURAL GAS, OIL	N
1168291	BONE SPRING 2ND	-6372	9920	9920	SANDSTONE	NATURAL GAS, OIL	N
1168296	BONE SPRING LIME	-6892	10440	10440	LIMESTONE	NATURAL GAS, OIL	N
1168292	BONE SPRING 3RD	-7667	11215	11215	SANDSTONE	NATURAL GAS, OIL	N
1168293	WOLFCAMP	-8152	11700	11700	SHALE	NATURAL GAS, OIL	Y
1168294	STRAWN	-10152	13700	13700	LIMESTONE	NATURAL GAS, OIL	N

Section 2 - Blowout Prevention

COTTON DRAW UNIT 625H

1. Geologic Formations

TVD of target	11801	Pilot hole depth	N/A
MD at TD:	19554	Deepest expected fresh water	

Basin

Formation	Depth (TVD) from KB	Water/Mineral Bearing/Target Zone?	Hazards*
Rustler	660		
Salt	1105		
Base of Salt	4310		
Lamar	4385		
Delaware	4560		
Cherry Canyon	5440		
Brushy Canyon	6790		
1st Bone Spring Lime	8360		
Bone Spring 1st	9420		
Bone Spring 2nd	9975		
3rd Bone Spring Lime	10490		
Bone Spring 3rd	11250		
Wolfcamp	11760		

*H₂S, water flows, loss of circulation, abnormal pressures, etc.

COTTON DRAW UNIT 625H

2. Casing Program (Primary Design)

Hole Size	Csg. Size	Wt (PPF)	Grade	Conn	Casing Interval		Casing Interval	
					From (MD)	To (MD)	From (TVD)	To (TVD)
17 1/2	13 3/8	48	H40	STC	0	685	0	685
9 7/8	8 5/8	32	P110	TLW	0	11250	0	11250
7 7/8	5 1/2	17	P110	BTC	0	19554	0	11801

• All casing strings will be tested in accordance with Onshore Oil and Gas Order #2 IILB.1.h Must have table for contingency casing.

3. Cementing Program (Primary Design)

Casing	# Sks	TOC	Wt. ppg	Yld (ft3/sack)	Slurry Description
Surface	534	Surf	13.2	1.44	Lead: Class C Cement + additives
Int 1	429	Surf	9	3.27	Lead: Class C Cement + additives
	465	4000' above	13.2	1.44	Tail: Class H / C + additives
Int 1 Intermediate Squeeze	As Needed	Surf	13.2	1.44	Squeeze Lead: Class C Cement + additives
	429	Surf	9	3.27	Lead: Class C Cement + additives
	465	4000' above	13.2	1.44	Tail: Class H / C + additives
Production	117	9363	9	3.27	Lead: Class H / C + additives
	1084	11363	13.2	1.44	Tail: Class H / C + additives

Casing String	% Excess
Surface	50%
Intermediate 1	30%
Intermediate 1 (Two Stage)	25%
Prod	10%

COTTON DRAW UNIT 625H

4. Pressure Control Equipment (Three String Design)

BOP installed and tested before drilling which hole?		Size?	Min. Required WP	Type	✓	Tested to:	
Int 1		13-5/8"	5M	Annular		X	50% of rated working pressure
				Blind Ram		X	5M
				Pipe Ram			
				Double Ram		X	
				Other*			
Production		13-5/8"	5M	Annular (5M)		X	50% of rated working pressure
				Blind Ram		X	5M
				Pipe Ram			
				Double Ram		X	
				Other*			
				Annular (5M)			
				Blind Ram			
				Pipe Ram			
				Double Ram			
				Other*			
N	A variance is requested for the use of a diverter on the surface casing. See attached for schematic.						
Y	A variance is requested to run a 5 M annular on a 10M system						

COTTON DRAW UNIT 625H

5. Mud Program (Three String Design)

Section	Type	Weight (ppg)
Surface	FW Gel	8.5-9
Intermediate	DBE / Cut Brine	10-10.5
Production	OBM	10-10.5

Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all times.

What will be used to monitor the loss or gain of fluid?	PVT/Pason/Visual Monitoring
---	-----------------------------

6. Logging and Testing Procedures

Logging, Coring and Testing	
X	Will run GR/CNL from TD to surface (horizontal well - vertical portion of hole). Stated logs run will be in the Completion Report and submitted to the BLM.
	No logs are planned based on well control or offset log information.
	Drill stem test? If yes, explain.
	Coring? If yes, explain.

Additional logs planned		Interval
	Resistivity	Int. shoe to KOP
	Density	Int. shoe to KOP
X	CBL	Production casing
X	Mud log	Intermediate shoe to TD
	PEX	

7. Drilling Conditions

Condition	Specify what type and where?
BH pressure at deepest TVD	6443
Abnormal temperature	No

Mitigation measure for abnormal conditions. Describe. Lost circulation material/sweeps/mud scavengers.

Hydrogen Sulfide (H₂S) monitors will be installed prior to drilling out the surface shoe. If H₂S is detected in concentrations greater than 100 ppm, the operator will comply with the provisions of Onshore Oil and Gas Order #6. If Hydrogen Sulfide is encountered measured values and formations will be provided to the BLM.

N	H ₂ S is present
Y	H ₂ S plan attached.

8. Other facets of operation

Is this a walking operation? Potentially

- 1 If operator elects, drilling rig will batch drill the surface holes and run/cement surface casing; walking the rig to next wells on the pad.
- 2 The drilling rig will then batch drill the intermediate sections and run/cement intermediate casing; the wellbore will be isolated with a blind flange and pressure gauge installed for monitoring the well before walking to the next well.
- 3 The drilling rig will then batch drill the production hole sections on the wells with OBM, run/cement production casing, and install TA caps or tubing heads for completions.

NOTE: During batch operations the drilling rig will be moved from well to well however, it will not be removed

COTTON DRAW UNIT 625H

from the pad until all wells have production casing run/cemented.

Will be pre-setting casing? Potentially

- 1 Spudder rig will move in and batch drill surface hole.
 - a. Rig will utilize fresh water based mud to drill surface hole to TD. Solids control will be handled entirely on a closed loop basis.,
- 2 After drilling the surface hole section, the spudder rig will run casing and cement following all of the applicable rules and regulations (OnShore Order 2, all COAs and NMOCD regulations).
- 3 The wellhead will be installed and tested once the surface casing is cut off and the WOC time has been reached.
- 4 A blind flange with the same pressure rating as the wellhead will be installed to seal the wellbore. Pressure will be monitored with a pressure gauge installed on the wellhead.
- 5 Spudder rig operations is expected to take 4-5 days per well on a multi-well pa.
- 6 The NMOCD will be contacted and notified 24 hours prior to commencing spudder rig operations.
- 7 Drilling operations will be performed with drilling rig. A that time an approved BOP stack will be nipped up and tested on the wellhead before drilling operations commences on each well.
 - a. The NMOCD will be contacted / notified 24 hours before the drilling rig moves back on to the pad with the pre-set surface casing.

Attachments

X Directional Plan
 Other, describe



Commitment Runs Deep



Design Plan
Operation and Maintenance Plan
Closure Plan

SENM - Closed Loop Systems
June 2010

I. Design Plan

Devon uses MI SWACO closed loop system (CLS). The MI SWACO CLS is designed to maintain drill solids at or below 5%. The equipment is arranged to progressively remove solids from the largest to the smallest size. Drilling fluids can thus be reused and savings is realized on mud and disposal costs. Dewatering may be required with the centrifuges to insure removal of ultra fine solids.

The drilling location is constructed to allow storm water to flow to a central sump normally the cellar. This insures no contamination leaves the drilling pad in the event of a spill. Storm water is reused in the mud system or stored in a reserve fluid tank farm until it can be reused. All lubricants, oils, or chemicals are removed immediately from the ground to prevent the contamination of storm water. An oil trap is normally installed on the sump if an oil spill occurs during a storm.

A tank farm is utilized to store drilling fluids including fresh water and brine fluids. The tank farm is constructed on a 20 ml plastic lined, bermed pad to prevent the contamination of the drilling site during a spill. Fluids from other sites may be stored in these tanks for processing by the solids control equipment and reused in the mud system. At the end of the well the fluids are transported from the tank farm to an adjoining well or to the next well for the rig.

Prior to installing a closed-loop system on site, the topsoil, if present, will be stripped and stockpiled for use as the final cover or fill at the time of closure.

Signs will be posted on the fence surrounding the closed-loop system unless the closed-loop system is located on a site where there is an existing well, that is operated by Devon.

II. Operations and Maintenance Plan

Primary Shakers: The primary shakers make the first removal of drill solids from the drilling mud as it leaves the well bore. The shakers are sized to handle maximum drilling rate at optimal screen size. The shakers normally remove solids down to 74 microns.



devon

A 3D isometric diagram illustrating the layout of a drilling fluid treatment system. The system consists of several interconnected units: a primary shaker (1) for initial solids removal, a mud cleaner (2) for finer filtration, a centrifuge (3) for separating fine solids from the fluid, a dewatering system (4) for removing water from the solids, and a series of cuttings boxes (5) for storing the separated solids. The treated fluid then flows through a process tank (6) and a sump pump (7) before being returned to the drilling rig. A reserve fluids tank (8) is also shown for emergency use. The entire system is connected by a network of pipes and hoses, with a red line indicating the main fluid flow path. A legend on the right side of the diagram identifies each component by a numbered orange circle.

- 1 Primary Shakers
- 2 Mud Cleaner
- 3 Centrifuge
- 4 Dewatering System
- 5 Cuttings Boxes
- 6 Process Tank
- 7 Sump Pump
- 8 Reserve Fluids

Dewatering System: The dewatering system is a chemical mixing and dosing system designed to enhance the solids removal of the centrifuge. Not commonly used in shallow wells. It may contain pH adjustment, coagulant mixing and dosing, and polymer mixing and dosing. Chemical flocculation binds ultra fine solids into a mass that is within the centrifuge operating design. The

dewatering system improves the centrifuge cut point to infinity or allows for the return of clear water or brine fluid. This ability allows for the ultimate control of low gravity solids.

Cuttings Boxes: Cuttings boxes are utilized to capture drill solids that are discarded from the solids control equipment. These boxes are set upon a rail system that allows for the removal and replacement of a full box of cuttings with an empty one. They are equipped with a cover that insures no product is spilled into the environment during the transportation phase.

Process Tank: (Optional) The process tank allows for the holding and process of fluids that are being transferred into the mud system. Additionally, during times of lost circulation the process tank may hold active fluids that are removed for additional treatment. It can further be used as a mixing tank during well control conditions.

Sump and Sump Pump: The sump is used to collect storm water and the pump is used to transfer this fluid to the active system or to the tank for to hold in reserve. It can also be used to collect fluids that may escape during spills. The location contains drainage ditches that allow the location fluids to drain to the sump.

Reserve Fluids (Tank Farm): A series of frac tanks are used to replace the reserve pit. These are steel tanks that are equipped with a manifold system and a transfer pump. These tanks can contain any number of fluids used during the drilling process. These can include fresh water, cut brine, and saturated salt fluid. The fluid can be from the active well or reclaimed fluid from other locations. A 20 ml liner and berm system is employed to ensure the fluids do not migrate to the environment during a spill.

If a leak develops, the appropriate division district office will be notified within 48 hours of the discovery and the leak will be addressed. Spill prevention is accomplished by maintaining pump packing, hoses, and pipe fittings to insure no leaks are occurring. During an upset condition the source of the spill is isolated and repaired as soon as it is discovered. Free liquid is removed by a diaphragm pump and returned to the mud system. Loose topsoil may be used to stabilize the spill and the contaminated soil is excavated and placed in the cuttings boxes. After the well is finished and the rig has moved, the entire location is scrapped and testing will be performed to determine if a release has occurred.

All trash is kept in a wire mesh enclosure and removed to an approved landfill when full. All spent motor oils are kept in separate containers and they are removed and sent to an approved recycling center. Any spilled lubricants, pipe

dope, or regulated chemicals are removed from soil and sent to landfills approved for these products.

These operations are monitored by Mi Swaco service technicians. Daily logs are maintained to ensure optimal equipment operation and maintenance. Screen and chemical use is logged to maintain inventory control. Fluid properties are monitored and recorded and drilling mud volumes are accounted for in the mud storage farm. This data is kept for end of well review to insure performance goals are met. Lessons learned are logged and used to help with continuous improvement.

A MI SWACO field supervisor manages from 3-5 wells. They are responsible for training personnel, supervising installations, and inspecting sites for compliance of MI SWACO safety and operational policy.

III. Closure Plan

A maximum 340' X 340' caliche pad is built per well. All of the trucks and steel tanks fit on this pad. All fluid cuttings go to the steel tanks to be hauled by various trucking companies to an agency approved disposal.

Devon Energy

APD VARIANCE DATA

OPERATOR NAME: Devon Energy

1. SUMMARY OF Variance:

Devon Energy respectfully requests approval for the following additions to the drilling plan:

1. Potential utilization of a spudder rig to pre-set surface casing.

2. Description of Operations

1. A spudder rig contractor may move in their rig to drill the surface hole section and pre-set surface casing on this well.
 - a. After drilling the surface hole section, the rig will run casing and cement following all of the applicable rules and regulations (OnShore Order 2, all COAs and NMOCD regulations).
 - b. Rig will utilize fresh water based mud to drill surface hole to TD.
2. The wellhead will be installed and tested once the surface casing is cut off and the WOC time has been reached.
3. A blind flange with the same pressure rating as the wellhead will be installed to seal the wellbore. Pressure will be monitored with needle valves installed on two wingvalves.
 - a. A means for intervention will be maintained while the drilling rig is not over the well.
4. The BLM will be contacted and notified 24 hours prior to commencing spudder rig operations.
5. Drilling operation will be performed with the big rig. At that time an approved BOP stack will be nipped up and tested on the wellhead before drilling operations commences on each well.
 - a. The BLM will be contacted / notified 24 hours before the big rig moves back on to the pad with the pre-set surface casing.
6. Devon Energy will have supervision on the rig to ensure compliance with all BLM and NMOCD regulations and to oversee operations.
7. Once the rig is removed, Devon Energy will secure the wellhead area by placing a guard rail around the cellar area.



Fluid Technology

ContiTech Beattie Corp.
Website: www.contitechbeattie.com

Monday, June 14, 2010

RE: Drilling & Production Hoses
Lifting & Safety Equipment

To Helmerich & Payne,

A Continental ContiTech hose assembly can perform as intended and suitable for the application regardless of whether the hose is secured or unsecured in its configuration. As a manufacturer of High Pressure Hose Assemblies for use in Drilling & Production, we do offer the corresponding lifting and safety equipment, this has the added benefit of easing the lifting and handling of each hose assembly whilst affording hose longevity by ensuring correct handling methods and procedures as well as securing the hose in the unlikely event of a failure; but in no way does the lifting and safety equipment affect the performance of the hoses providing the hoses have been handled and installed correctly. It is good practice to use lifting & safety equipment but not mandatory.

Should you have any questions or require any additional information/clarifications then please do not hesitate to contact us.

ContiTech Beattie is part of the Continental AG Corporation and can offer the full support resources associated with a global organization.

Best regards,

Robin Hodgson
Sales Manager
ContiTech Beattie Corp

ContiTech Beattie Corp,
11535 Brittmoore Park Drive,
Houston, TX 77041
Phone: +1 (832) 327-0141
Fax: +1 (832) 327-0148
www.contitechbeattie.com



RIG 212



QUALITY DOCUMENT

PHOENIX RUBBER
INDUSTRIAL LTD.

7228 Szeged, Budapesti út 10. Hungary • H-6701 Szeged, P. O. Box 152
Phone: (3662) 566-737 • Fax: (3662) 566-738

SALES & MARKETING: H-1092 Budapest, Ráday u. 42-44. Hungary • H-1440 Budapest, P. O. Box 26
Phone: (361) 456-4200 • Fax: (361) 217-2972, 456-4273 • www.taurusemerge.hu

QUALITY CONTROL INSPECTION AND TEST CERTIFICATE				CERT. N°: 552	
PURCHASER: Phoenix Beattie Co.				P.O. N°: 1519FA-871	
PHOENIX RUBBER order N°: 170466		HOSE TYPE: 3" ID Choke and Kill Hose			
HOSE SERIAL N°: 34128		NOMINAL / ACTUAL LENGTH: 11,43 m			
W.P. 68,96 MPa 10000 psi		T.P. 103,4 MPa 15000 psi		Duration: 60 min.	
Pressure test with water at ambient temperature <p style="text-align: center;">See attachment. (1 page)</p>					
↑ 10 mm = 10 Min. → 10 mm = 25 MPa					
COUPLINGS					
Type	Serial N°		Quality	Heat N°	
3" coupling with 4 1/16" Flange end	720 719		AISI 4130	C7626	
			AISI 4130	47357	
API Spec 16 C Temperature rate: "B"					
All metal parts are flawless					
WE CERTIFY THAT THE ABOVE HOSE HAS BEEN MANUFACTURED IN ACCORDANCE WITH THE TERMS OF THE ORDER AND PRESSURE TESTED AS ABOVE WITH SATISFACTORY RESULT.					
Date:	Inspector		Quality Control		
29. April. 2002.			PHOENIX RUBBER Industrial Ltd. Hose Inspection and VERIFIED TRUE COPY PHOENIX RUBBER S.C.		

VERIFIED TRUE CO.
PHOENIX RUBBER CO.

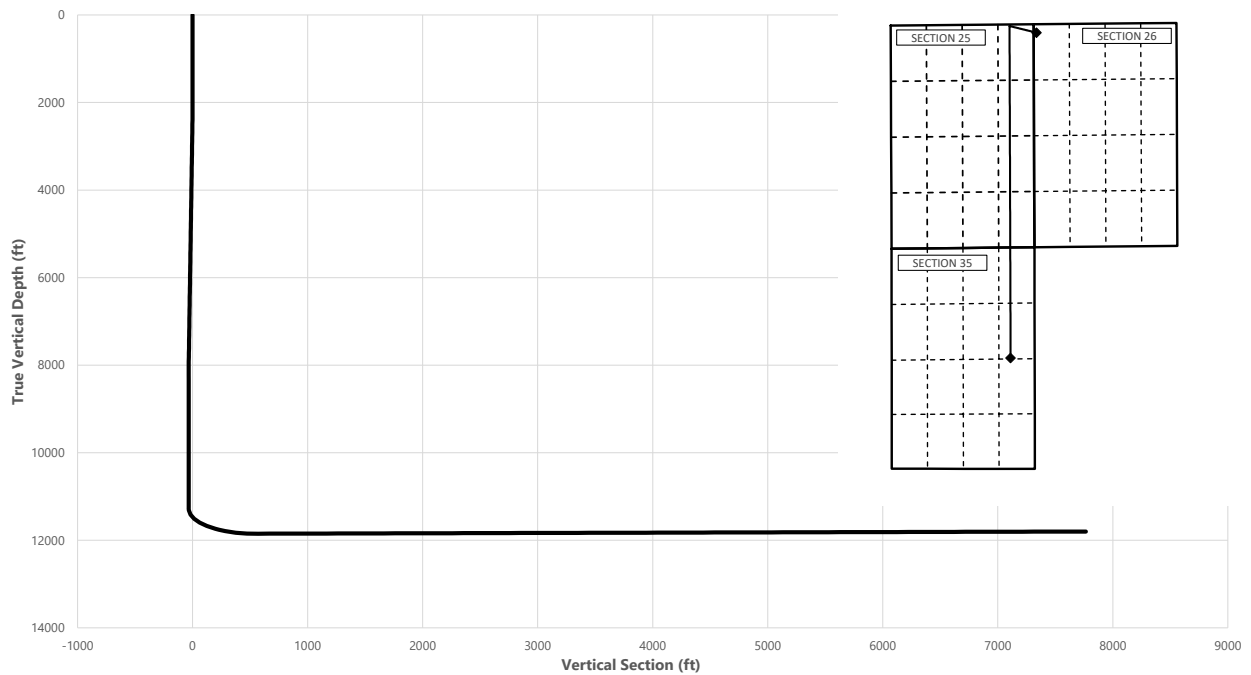
COTTON DRAW UNIT 625H



Well: COTTON DRAW UNIT 625H
 County: Eddy
 Wellbore: Permit Plan
 Design: Permit Plan #1

Geodetic System: US State Plane 1983
 Datum: North American Datum 1927
 Ellipsoid: Clarke 1866
 Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	SHL
2000.00	0.00	279.00	2000.00	0.00	0.00	0.00	0.00	Start Tangent
2500.00	10.00	279.00	2497.47	6.81	-42.99	-1.46	1.00	Hold Tangent
7805.64	10.00	279.00	7722.50	150.93	-952.96	-32.37	0.00	Drop to Vertical
8305.64	0.00	279.00	8219.97	157.74	-995.95	-33.83	2.00	Hold Vertical
11362.73	0.00	179.72	11277.06	157.74	-995.95	-33.83	0.00	KOP
12266.66	90.39	179.72	11850.00	-419.14	-993.08	538.31	10.00	Landing Point
19554.39	90.39	179.72	11800.00	-7706.61	-956.83	7765.78	0.00	BHL



Key Depths	MD (ft)	TVD (ft)
Rustler	0.00	0.00
Salt	1105.00	1105.00
Base of Salt	4340.50	4310.00
Lamar	4416.65	4385.00
Delaware	4594.35	4560.00
Cherry Canyon	5487.93	5440.00
Brushy Canyon	6858.75	6790.00
1st Bone Spring Lime	8445.67	8360.00
Bone Spring 1st	9505.67	9420.00
Bone Spring 2nd	10060.67	9975.00
3rd Bone Spring Lime	10575.67	10490.00
Bone Spring 3rd	11335.67	11250.00
Wolfcamp / Point of Penetration	11937.20	11760.00
EXIT	19474.39	11800.56

SHL
 KOP
 Point of Penetration
 Exit
 BHL

MD (ft)	TVD (ft)	Lat (°)	Long (°)	Section Footages
0.00	0.00	32.1950	-103.7398	200' FNL, 105' FWL of Sec 25 in T24S, R31E
11362.73	11277.06	32.1954	-103.7430	36' FNL, 890' FEL of Sec 26 in T24S, R31E
11937.20	11760.00	32.1953	-103.7429	100' FNL, 890' FEL of Sec 26 in T24S, R31E
19474.39	11800.56	32.1742	-103.7429	2520' FNL, 890' FEL of Sec 35 in T24S, R31E
19554.39	11800.00	32.1738	-103.7430	2620' FNL, 890' FEL of Sec 35 in T24S, R31E

COTTON DRAW UNIT 625H



Well: COTTON DRAW UNIT 625H
 County: Eddy
 Wellbore: Permit Plan
 Design: Permit Plan #1

Geodetic System: US State Plane 1983
 Datum: North American Datum 1927
 Ellipsoid: Clarke 1866
 Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	SHL
100.00	0.00	279.00	100.00	0.00	0.00	0.00	0.00	
200.00	0.00	279.00	200.00	0.00	0.00	0.00	0.00	
300.00	0.00	279.00	300.00	0.00	0.00	0.00	0.00	
400.00	0.00	279.00	400.00	0.00	0.00	0.00	0.00	
500.00	0.00	279.00	500.00	0.00	0.00	0.00	0.00	
600.00	0.00	279.00	600.00	0.00	0.00	0.00	0.00	
660.00	0.00	279.00	660.00	0.00	0.00	0.00	0.00	Rustler
700.00	0.00	279.00	700.00	0.00	0.00	0.00	0.00	
800.00	0.00	279.00	800.00	0.00	0.00	0.00	0.00	
900.00	0.00	279.00	900.00	0.00	0.00	0.00	0.00	
1000.00	0.00	279.00	1000.00	0.00	0.00	0.00	0.00	
1100.00	0.00	279.00	1100.00	0.00	0.00	0.00	0.00	
1105.00	0.00	279.00	1105.00	0.00	0.00	0.00	0.00	Salt
1200.00	0.00	279.00	1200.00	0.00	0.00	0.00	0.00	
1300.00	0.00	279.00	1300.00	0.00	0.00	0.00	0.00	
1400.00	0.00	279.00	1400.00	0.00	0.00	0.00	0.00	
1500.00	0.00	279.00	1500.00	0.00	0.00	0.00	0.00	
1600.00	0.00	279.00	1600.00	0.00	0.00	0.00	0.00	
1700.00	0.00	279.00	1700.00	0.00	0.00	0.00	0.00	
1800.00	0.00	279.00	1800.00	0.00	0.00	0.00	0.00	
1900.00	0.00	279.00	1900.00	0.00	0.00	0.00	0.00	
2000.00	0.00	279.00	2000.00	0.00	0.00	0.00	0.00	Start Tangent
2100.00	2.00	279.00	2099.98	0.27	-1.72	-0.06	2.00	
2200.00	4.00	279.00	2199.84	1.09	-6.89	-0.23	2.00	
2300.00	6.00	279.00	2299.45	2.45	-15.50	-0.53	2.00	
2400.00	8.00	279.00	2398.70	4.36	-27.54	-0.94	2.00	
2500.00	10.00	279.00	2497.47	6.81	-42.99	-1.46	1.00	Hold Tangent
2600.00	10.00	279.00	2595.95	9.52	-60.14	-2.04	0.00	
2700.00	10.00	279.00	2694.43	12.24	-77.29	-2.63	0.00	
2800.00	10.00	279.00	2792.91	14.96	-94.44	-3.21	0.00	
2900.00	10.00	279.00	2891.39	17.67	-111.59	-3.79	0.00	
3000.00	10.00	279.00	2989.87	20.39	-128.74	-4.37	0.00	
3100.00	10.00	279.00	3088.35	23.11	-145.89	-4.95	0.00	
3200.00	10.00	279.00	3186.83	25.82	-163.04	-5.54	0.00	
3300.00	10.00	279.00	3285.31	28.54	-180.19	-6.12	0.00	
3400.00	10.00	279.00	3383.79	31.26	-197.35	-6.70	0.00	
3500.00	10.00	279.00	3482.27	33.97	-214.50	-7.28	0.00	
3600.00	10.00	279.00	3580.75	36.69	-231.65	-7.87	0.00	
3700.00	10.00	279.00	3679.23	39.41	-248.80	-8.45	0.00	
3800.00	10.00	279.00	3777.72	42.12	-265.95	-9.03	0.00	
3900.00	10.00	279.00	3876.20	44.84	-283.10	-9.61	0.00	
4000.00	10.00	279.00	3974.68	47.55	-300.25	-10.20	0.00	
4100.00	10.00	279.00	4073.16	50.27	-317.40	-10.78	0.00	
4200.00	10.00	279.00	4171.64	52.99	-334.55	-11.36	0.00	
4300.00	10.00	279.00	4270.12	55.70	-351.71	-11.94	0.00	
4340.50	10.00	279.00	4310.00	56.80	-358.65	-12.18	0.00	Base of Salt
4400.00	10.00	279.00	4368.60	58.42	-368.86	-12.53	0.00	
4416.65	10.00	279.00	4385.00	58.87	-371.71	-12.62	0.00	Lamar
4500.00	10.00	279.00	4467.08	61.14	-386.01	-13.11	0.00	
4594.35	10.00	279.00	4560.00	63.70	-402.19	-13.66	0.00	Delaware
4600.00	10.00	279.00	4565.56	63.85	-403.16	-13.69	0.00	
4700.00	10.00	279.00	4664.04	66.57	-420.31	-14.27	0.00	
4800.00	10.00	279.00	4762.52	69.29	-437.46	-14.86	0.00	
4900.00	10.00	279.00	4861.00	72.00	-454.61	-15.44	0.00	
5000.00	10.00	279.00	4959.48	74.72	-471.76	-16.02	0.00	
5100.00	10.00	279.00	5057.97	77.43	-488.91	-16.60	0.00	
5200.00	10.00	279.00	5156.45	80.15	-506.06	-17.19	0.00	
5300.00	10.00	279.00	5254.93	82.87	-523.22	-17.77	0.00	
5400.00	10.00	279.00	5353.41	85.58	-540.37	-18.35	0.00	
5487.93	10.00	279.00	5440.00	87.97	-555.45	-18.86	0.00	Cherry Canyon
5500.00	10.00	279.00	5451.89	88.30	-557.52	-18.93	0.00	
5600.00	10.00	279.00	5550.37	91.02	-574.67	-19.52	0.00	
5700.00	10.00	279.00	5648.85	93.73	-591.82	-20.10	0.00	
5800.00	10.00	279.00	5747.33	96.45	-608.97	-20.68	0.00	
5900.00	10.00	279.00	5845.81	99.17	-626.12	-21.26	0.00	
6000.00	10.00	279.00	5944.29	101.88	-643.27	-21.85	0.00	
6100.00	10.00	279.00	6042.77	104.60	-660.42	-22.43	0.00	
6200.00	10.00	279.00	6141.25	107.31	-677.57	-23.01	0.00	
6300.00	10.00	279.00	6239.73	110.03	-694.73	-23.59	0.00	

COTTON DRAW UNIT 625H



Well: COTTON DRAW UNIT 625H
County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983
Datum: North American Datum 1927
Ellipsoid: Clarke 1866
Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
6400.00	10.00	279.00	6338.22	112.75	-711.88	-24.18	0.00	
6500.00	10.00	279.00	6436.70	115.46	-729.03	-24.76	0.00	
6600.00	10.00	279.00	6535.18	118.18	-746.18	-25.34	0.00	
6700.00	10.00	279.00	6633.66	120.90	-763.33	-25.92	0.00	
6800.00	10.00	279.00	6732.14	123.61	-780.48	-26.51	0.00	
6858.75	10.00	279.00	6790.00	125.21	-790.56	-26.85	0.00	Brushy Canyon
6900.00	10.00	279.00	6830.62	126.33	-797.63	-27.09	0.00	
7000.00	10.00	279.00	6929.10	129.05	-814.78	-27.67	0.00	
7100.00	10.00	279.00	7027.58	131.76	-831.93	-28.25	0.00	
7200.00	10.00	279.00	7126.06	134.48	-849.08	-28.84	0.00	
7300.00	10.00	279.00	7224.54	137.19	-866.24	-29.42	0.00	
7400.00	10.00	279.00	7323.02	139.91	-883.39	-30.00	0.00	
7500.00	10.00	279.00	7421.50	142.63	-900.54	-30.58	0.00	
7600.00	10.00	279.00	7519.99	145.34	-917.69	-31.17	0.00	
7700.00	10.00	279.00	7618.47	148.06	-934.84	-31.75	0.00	
7800.00	10.00	279.00	7716.95	150.78	-951.99	-32.33	0.00	
7805.64	10.00	279.00	7722.50	150.93	-952.96	-32.37	0.00	Drop to Vertical
7900.00	8.11	279.00	7815.68	153.26	-967.63	-32.87	2.00	
8000.00	6.11	279.00	7914.91	155.19	-979.86	-33.28	2.00	
8100.00	4.11	279.00	8014.50	156.59	-988.66	-33.58	2.00	
8200.00	2.11	279.00	8114.35	157.44	-994.02	-33.76	2.00	
8300.00	0.11	279.00	8214.33	157.74	-995.94	-33.83	2.00	
8305.64	0.00	279.00	8219.97	157.74	-995.95	-33.83	2.00	Hold Vertical
8400.00	0.00	179.72	8314.33	157.74	-995.95	-33.83	0.00	
8445.67	0.00	179.72	8360.00	157.74	-995.95	-33.83	0.00	1st Bone Spring Lime
8500.00	0.00	179.72	8414.33	157.74	-995.95	-33.83	0.00	
8600.00	0.00	179.72	8514.33	157.74	-995.95	-33.83	0.00	
8700.00	0.00	179.72	8614.33	157.74	-995.95	-33.83	0.00	
8800.00	0.00	179.72	8714.33	157.74	-995.95	-33.83	0.00	
8900.00	0.00	179.72	8814.33	157.74	-995.95	-33.83	0.00	
9000.00	0.00	179.72	8914.33	157.74	-995.95	-33.83	0.00	
9100.00	0.00	179.72	9014.33	157.74	-995.95	-33.83	0.00	
9200.00	0.00	179.72	9114.33	157.74	-995.95	-33.83	0.00	
9300.00	0.00	179.72	9214.33	157.74	-995.95	-33.83	0.00	
9400.00	0.00	179.72	9314.33	157.74	-995.95	-33.83	0.00	
9500.00	0.00	179.72	9414.33	157.74	-995.95	-33.83	0.00	
9505.67	0.00	179.72	9420.00	157.74	-995.95	-33.83	0.00	Bone Spring 1st
9600.00	0.00	179.72	9514.33	157.74	-995.95	-33.83	0.00	
9700.00	0.00	179.72	9614.33	157.74	-995.95	-33.83	0.00	
9800.00	0.00	179.72	9714.33	157.74	-995.95	-33.83	0.00	
9900.00	0.00	179.72	9814.33	157.74	-995.95	-33.83	0.00	
10000.00	0.00	179.72	9914.33	157.74	-995.95	-33.83	0.00	
10060.67	0.00	179.72	9975.00	157.74	-995.95	-33.83	0.00	Bone Spring 2nd
10100.00	0.00	179.72	10014.33	157.74	-995.95	-33.83	0.00	
10200.00	0.00	179.72	10114.33	157.74	-995.95	-33.83	0.00	
10300.00	0.00	179.72	10214.33	157.74	-995.95	-33.83	0.00	
10400.00	0.00	179.72	10314.33	157.74	-995.95	-33.83	0.00	
10500.00	0.00	179.72	10414.33	157.74	-995.95	-33.83	0.00	
10575.67	0.00	179.72	10490.00	157.74	-995.95	-33.83	0.00	3rd Bone Spring Lime
10600.00	0.00	179.72	10514.33	157.74	-995.95	-33.83	0.00	
10700.00	0.00	179.72	10614.33	157.74	-995.95	-33.83	0.00	
10800.00	0.00	179.72	10714.33	157.74	-995.95	-33.83	0.00	
10900.00	0.00	179.72	10814.33	157.74	-995.95	-33.83	0.00	
11000.00	0.00	179.72	10914.33	157.74	-995.95	-33.83	0.00	
11100.00	0.00	179.72	11014.33	157.74	-995.95	-33.83	0.00	
11200.00	0.00	179.72	11114.33	157.74	-995.95	-33.83	0.00	
11300.00	0.00	179.72	11214.33	157.74	-995.95	-33.83	0.00	
11335.67	0.00	179.72	11250.00	157.74	-995.95	-33.83	0.00	Bone Spring 3rd
11362.73	0.00	179.72	11277.06	157.74	-995.95	-33.83	0.00	KOP
11400.00	3.73	179.72	11314.30	156.53	-995.94	-32.63	10.00	
11500.00	13.73	179.72	11413.02	141.38	-995.86	-17.60	10.00	
11600.00	23.73	179.72	11507.60	109.31	-995.70	14.20	10.00	
11700.00	33.73	179.72	11595.18	61.31	-995.47	61.81	10.00	
11800.00	43.73	179.72	11673.10	-1.17	-995.15	123.78	10.00	
11900.00	53.73	179.72	11738.98	-76.23	-994.78	198.22	10.00	
11937.20	57.45	179.72	11760.00	-106.92	-994.63	228.65	10.00	Wolfcamp / Point of Penetration
12000.00	63.73	179.72	11790.82	-161.59	-994.36	282.88	10.00	
12100.00	73.73	179.72	11827.06	-254.66	-993.89	375.18	10.00	
12200.00	83.73	179.72	11846.58	-352.61	-993.41	472.32	10.00	
12266.66	90.39	179.72	11850.00	-419.14	-993.08	538.31	10.00	Landing Point

COTTON DRAW UNIT 625H



Well: COTTON DRAW UNIT 625H

County: Eddy

Wellbore: Permit Plan

Design: Permit Plan #1

Geodetic System: US State Plane 1983

Datum: North American Datum 1927

Ellipsoid: Clarke 1866

Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
12300.00	90.39	179.72	11849.77	-452.48	-992.91	571.37	0.00	
12400.00	90.39	179.72	11849.09	-552.47	-992.41	670.54	0.00	
12500.00	90.39	179.72	11848.40	-652.47	-991.91	769.71	0.00	
12600.00	90.39	179.72	11847.71	-752.47	-991.42	868.89	0.00	
12700.00	90.39	179.72	11847.03	-852.46	-990.92	968.06	0.00	
12800.00	90.39	179.72	11846.34	-952.46	-990.42	1067.23	0.00	
12900.00	90.39	179.72	11845.66	-1052.46	-989.92	1166.41	0.00	
13000.00	90.39	179.72	11844.97	-1152.45	-989.43	1265.58	0.00	
13100.00	90.39	179.72	11844.28	-1252.45	-988.93	1364.75	0.00	
13200.00	90.39	179.72	11843.60	-1352.45	-988.43	1463.93	0.00	
13300.00	90.39	179.72	11842.91	-1452.44	-987.93	1563.10	0.00	
13400.00	90.39	179.72	11842.23	-1552.44	-987.44	1662.27	0.00	
13500.00	90.39	179.72	11841.54	-1652.43	-986.94	1761.45	0.00	
13600.00	90.39	179.72	11840.85	-1752.43	-986.44	1860.62	0.00	
13700.00	90.39	179.72	11840.17	-1852.43	-985.94	1959.79	0.00	
13800.00	90.39	179.72	11839.48	-1952.42	-985.45	2058.97	0.00	
13900.00	90.39	179.72	11838.80	-2052.42	-984.95	2158.14	0.00	
14000.00	90.39	179.72	11838.11	-2152.42	-984.45	2257.31	0.00	
14100.00	90.39	179.72	11837.42	-2252.41	-983.95	2356.49	0.00	
14200.00	90.39	179.72	11836.74	-2352.41	-983.45	2455.66	0.00	
14300.00	90.39	179.72	11836.05	-2452.41	-982.96	2554.83	0.00	
14400.00	90.39	179.72	11835.37	-2552.40	-982.46	2654.00	0.00	
14500.00	90.39	179.72	11834.68	-2652.40	-981.96	2753.18	0.00	
14600.00	90.39	179.72	11833.99	-2752.40	-981.46	2852.35	0.00	
14700.00	90.39	179.72	11833.31	-2852.39	-980.97	2951.52	0.00	
14800.00	90.39	179.72	11832.62	-2952.39	-980.47	3050.70	0.00	
14900.00	90.39	179.72	11831.94	-3052.38	-979.97	3149.87	0.00	
15000.00	90.39	179.72	11831.25	-3152.38	-979.47	3249.04	0.00	
15100.00	90.39	179.72	11830.56	-3252.38	-978.98	3348.22	0.00	
15200.00	90.39	179.72	11829.88	-3352.37	-978.48	3447.39	0.00	
15300.00	90.39	179.72	11829.19	-3452.37	-977.98	3546.56	0.00	
15400.00	90.39	179.72	11828.51	-3552.37	-977.48	3645.74	0.00	
15500.00	90.39	179.72	11827.82	-3652.36	-976.98	3744.91	0.00	
15600.00	90.39	179.72	11827.13	-3752.36	-976.49	3844.08	0.00	
15700.00	90.39	179.72	11826.45	-3852.36	-975.99	3943.26	0.00	
15800.00	90.39	179.72	11825.76	-3952.35	-975.49	4042.43	0.00	
15900.00	90.39	179.72	11825.08	-4052.35	-974.99	4141.60	0.00	
16000.00	90.39	179.72	11824.39	-4152.35	-974.50	4240.78	0.00	
16100.00	90.39	179.72	11823.71	-4252.34	-974.00	4339.95	0.00	
16200.00	90.39	179.72	11823.02	-4352.34	-973.50	4439.12	0.00	
16300.00	90.39	179.72	11822.33	-4452.33	-973.00	4538.29	0.00	
16400.00	90.39	179.72	11821.65	-4552.33	-972.51	4637.47	0.00	
16500.00	90.39	179.72	11820.96	-4652.33	-972.01	4736.64	0.00	
16600.00	90.39	179.72	11820.28	-4752.32	-971.51	4835.81	0.00	
16700.00	90.39	179.72	11819.59	-4852.32	-971.01	4934.99	0.00	
16800.00	90.39	179.72	11818.90	-4952.32	-970.52	5034.16	0.00	
16900.00	90.39	179.72	11818.22	-5052.31	-970.02	5133.33	0.00	
17000.00	90.39	179.72	11817.53	-5152.31	-969.52	5232.51	0.00	
17100.00	90.39	179.72	11816.85	-5252.31	-969.02	5331.68	0.00	
17200.00	90.39	179.72	11816.16	-5352.30	-968.52	5430.85	0.00	
17300.00	90.39	179.72	11815.47	-5452.30	-968.03	5530.03	0.00	
17400.00	90.39	179.72	11814.79	-5552.29	-967.53	5629.20	0.00	
17500.00	90.39	179.72	11814.10	-5652.29	-967.03	5728.37	0.00	
17600.00	90.39	179.72	11813.42	-5752.29	-966.53	5827.55	0.00	
17700.00	90.39	179.72	11812.73	-5852.28	-966.04	5926.72	0.00	
17800.00	90.39	179.72	11812.04	-5952.28	-965.54	6025.89	0.00	
17900.00	90.39	179.72	11811.36	-6052.28	-965.04	6125.07	0.00	
18000.00	90.39	179.72	11810.67	-6152.27	-964.54	6224.24	0.00	
18100.00	90.39	179.72	11809.99	-6252.27	-964.05	6323.41	0.00	
18200.00	90.39	179.72	11809.30	-6352.27	-963.55	6422.58	0.00	
18300.00	90.39	179.72	11808.61	-6452.26	-963.05	6521.76	0.00	
18400.00	90.39	179.72	11807.93	-6552.26	-962.55	6620.93	0.00	
18500.00	90.39	179.72	11807.24	-6652.26	-962.05	6720.10	0.00	
18600.00	90.39	179.72	11806.56	-6752.25	-961.56	6819.28	0.00	
18700.00	90.39	179.72	11805.87	-6852.25	-961.06	6918.45	0.00	
18800.00	90.39	179.72	11805.18	-6952.24	-960.56	7017.62	0.00	
18900.00	90.39	179.72	11804.50	-7052.24	-960.06	7116.80	0.00	
19000.00	90.39	179.72	11803.81	-7152.24	-959.57	7215.97	0.00	
19100.00	90.39	179.72	11803.13	-7252.23	-959.07	7315.14	0.00	
19200.00	90.39	179.72	11802.44	-7352.23	-958.57	7414.32	0.00	

COTTON DRAW UNIT 625H



Well: COTTON DRAW UNIT 625H
County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983
Datum: North American Datum 1927
Ellipsoid: Clarke 1866
Zone: 3001 - NM East (NAD83)

MD	INC	AZI	TVD	NS	EW	VS	DLS	Comment
(ft)	(°)	(°)	(ft)	(ft)	(ft)	(ft)	(°/100ft)	
19300.00	90.39	179.72	11801.75	-7452.23	-958.07	7513.49	0.00	
19400.00	90.39	179.72	11801.07	-7552.22	-957.58	7612.66	0.00	
19474.39	90.39	179.72	11800.56	-7626.61	-957.21	7686.44	0.00	EXIT
19500.00	90.39	179.72	11800.38	-7652.22	-957.08	7711.84	0.00	
19554.39	90.39	179.72	11800.00	-7706.61	-956.83	7765.78	0.00	BHL

13-5/8" 5M BOPE & Closed Loop Equipment Schematic



A multibowl wellhead may be used. The BOP will be tested per Onshore Order #2 after installation on the surface casing which will cover testing requirements for a maximum of 30 days. If any seal subject to test pressure is broken the system must be tested.

Devon proposes using a multi-bowl wellhead assembly. This assembly will only be tested when installed on the surface casing. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be 5000 (5M) psi.

- Wellhead will be installed by wellhead representatives.
- If the welding is performed by a third party, the wellhead representative will monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
- Wellhead representative will install the test plug for the initial BOP test.
- Wellhead company will install a solid steel body pack-off to completely isolate the lower head after cementing intermediate casing. After installation of the pack-off, the pack-off and the lower flange will be tested to 5M, as shown on the attached schematic. Everything above the pack-off will not have been altered whatsoever from the initial nipple up. Therefore the BOP components will not be retested at that time.
- If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head will be cut and top out operations will be conducted.
- Devon will pressure test all seals above and below the mandrel (but still above the casing) to full working pressure rating.
- Devon will test the casing to 0.22 psi/ft or 1500 psi, whichever is greater, as per Onshore Order #2.

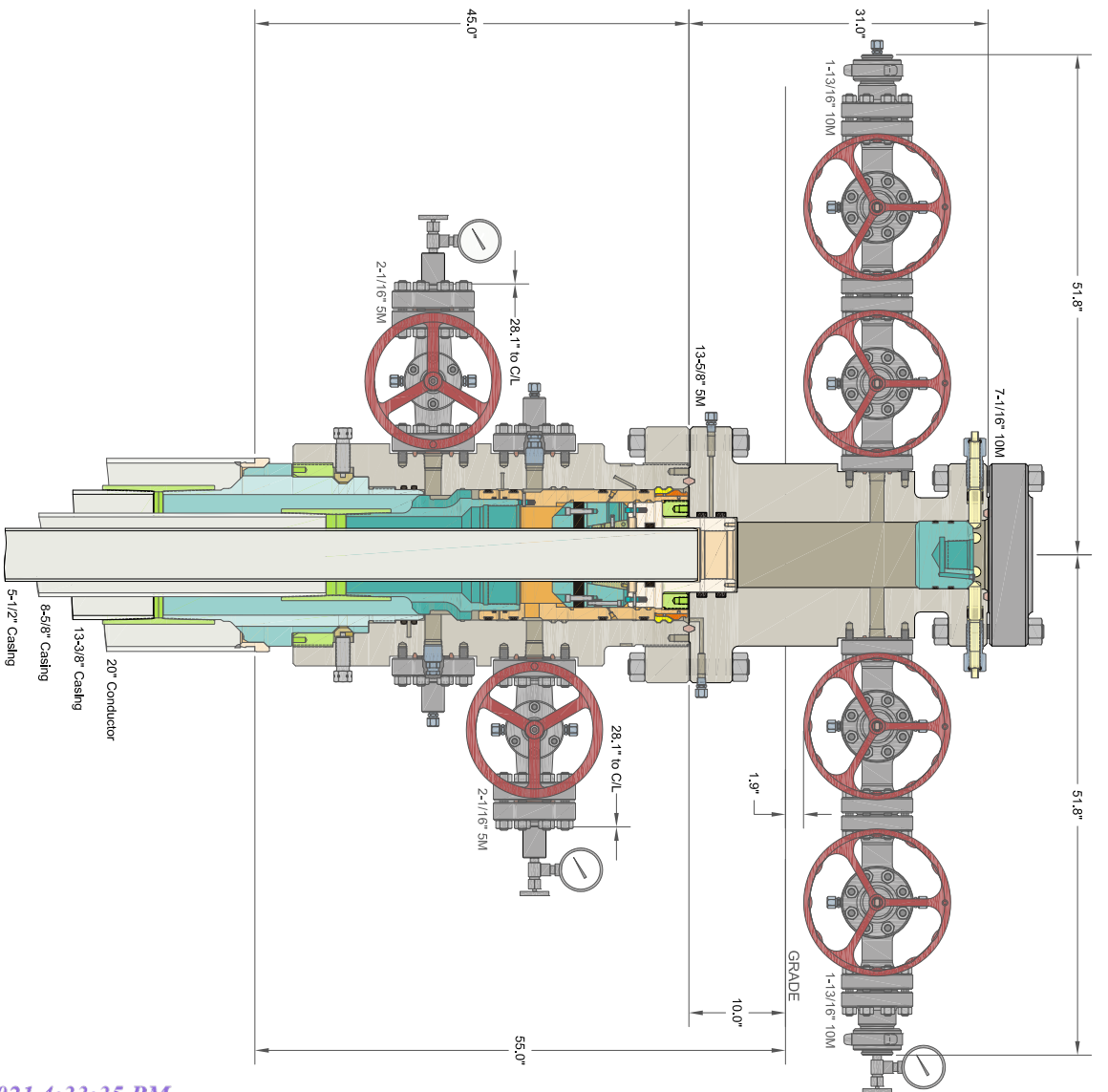
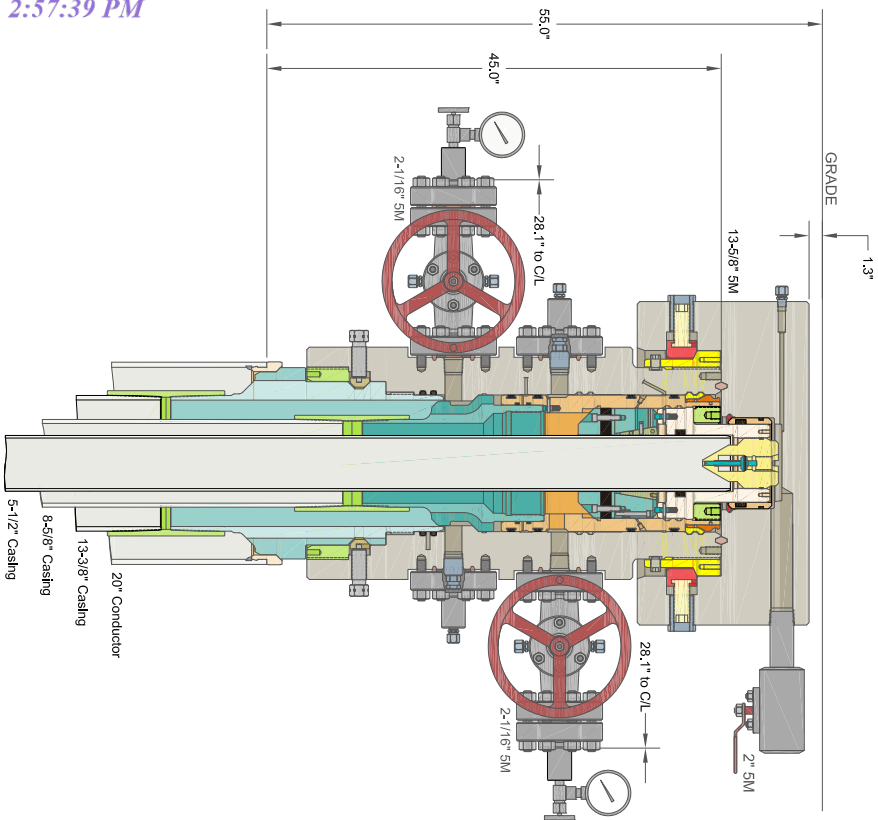
After running the surface casing, a 13-5/8" BOP/BOPE system with a minimum rating of 5M will be installed on the wellhead system and will undergo a 250 psi low pressure test followed by a 5,000 psi high pressure test. The 5,000 psi high and 250 psi low test will cover testing requirements a maximum of 30 days, as per Onshore Order #2. If the well is not complete within 30 days of this BOP test, another full BOP test will be conducted, as per Onshore Order #2.

After running the intermediate casing with a mandrel hanger, the 13-5/8" BOP/BOPE system with a minimum rating of 5M will already be installed on the wellhead.

The pipe rams will be operated and checked each 24 hour period and each time the drill pipe is out of the hole. These tests will be logged in the daily driller's log. A 2" kill line and 3" choke line will be incorporated into the drilling spool below the ram BOP. In addition to the rams and annular preventer, additional BOP accessories include a kelly cock, floor safety valve, choke lines, and choke manifold rated at 5,000 psi WP.

Devon's proposed wellhead manufactures will be FMC Technologies, Cactus Wellhead, or Cameron.

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CACTUS WELLHEAD LLC

20" x 13-3/8" x 8-5/8" x 5-1/2" MBU-3T-CFL-R-DBLO Wellhead Sys.
With Quick Connect Top TA Cap, 5-1/2" Emergency Slip Hanger
And 13-5/8" 5M x 7-1/16" 10M CTH-DBLHPS Tubing Head

DEVON ENERGY CORPORATION
DELAWARE BASIN

ALL DIMENSIONS APPROXIMATE

DRAWN	DLE	25FEB19
APPRV		
DRAWING NO.	SDT-1929	

13-5/8" 5M BOPE & Closed Loop Equipment Schematic



Casing Assumptions and Load Cases

Surface

All casing design assumptions were ran in Stress Check to determine safety factor which meet or exceed both Devon Energy and BLM minimum requirements. All casing strings will be filled while running in hole in order to not exceed collapse rating of the pipe.

Surface Casing Burst Design		
Load Case	External Pressure	Internal Pressure
Pressure Test	Formation Pore Pressure	Max mud weight of next hole-section plus Test psi
Drill Ahead	Formation Pore Pressure	Max mud weight of next hole section
Displace to Gas	Formation Pore Pressure	Dry gas from next casing point

Surface Casing Collapse Design		
Load Case	External Pressure	Internal Pressure
Full Evacuation	Water gradient in cement, mud above TOC	None
Cementing	Wet cement weight	Water (8.33ppg)

Surface Casing Tension Design	
Load Case	Assumptions
Overpull	100kips
Runing in hole	3 ft/s
Service Loads	N/A

Casing Assumptions and Load Cases

Intermediate

All casing design assumptions were ran in Stress Check to determine safety factor which meet or exceed both Devon Energy and BLM minimum requirements. All casing strings will be filled while running in hole in order to not exceed collapse rating of the pipe.

Intermediate Casing Burst Design		
Load Case	External Pressure	Internal Pressure
Pressure Test	Formation Pore Pressure	Max mud weight of next hole-section plus Test psi
Drill Ahead	Formation Pore Pressure	Max mud weight of next hole section
Fracture @ Shoe	Formation Pore Pressure	Dry gas

Intermediate Casing Collapse Design		
Load Case	External Pressure	Internal Pressure
Full Evacuation	Water gradient in cement, mud above TOC	None
Cementing	Wet cement weight	Water (8.33ppg)

Intermediate Casing Tension Design	
Load Case	Assumptions
Overpull	100kips
Runing in hole	2 ft/s
Service Loads	N/A

Casing Assumptions and Load Cases

Production

All casing design assumptions were ran in Stress Check to determine safety factor which meet or exceed both Devon Energy and BLM minimum requirements. All casing strings will be filled while running in hole in order to not exceed collapse rating of the pipe.

Production Casing Burst Design		
Load Case	External Pressure	Internal Pressure
Pressure Test	Formation Pore Pressure	Fluid in hole (water or produced water) + test psi
Tubing Leak	Formation Pore Pressure	Packer @ KOP, leak below surface 8.6 ppg packer fluid
Stimulation	Formation Pore Pressure	Max frac pressure with heaviest frac fluid

Production Casing Collapse Design		
Load Case	External Pressure	Internal Pressure
Full Evacuation	Water gradient in cement, mud above TOC.	None
Cementing	Wet cement weight	Water (8.33ppg)

Production Casing Tension Design	
Load Case	Assumptions
Overpull	100kips
Runing in hole	2 ft/s
Service Loads	N/A

PECOS DISTRICT SURFACE USE CONDITIONS OF APPROVAL

OPERATOR'S NAME:		Devon Energy Prod Co					
LEASE NO.:		LC062300					
WELL NAME & NO.:		Big Sinks Draw 25-24 Fed					
LOCATION:		Section 25, T. 25 S., R.319 E.					
COUNTY:		Eddy County, New Mexico					
Big Sinks Draw 25-24 Fed Com 831H				Big Sinks Draw Well Pad 1			
Surface	Section 25	T25S,	31E	2484 FNL,	1015	FWL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	1300	FWL,	Eddy County
Big Sinks Draw 25-24 Fed Com 302H				Big Sinks Draw Well Pad 2			
Surface	Section 25	T25S,	31E	2483 FNL,	2220	FWL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	2500	FWL,	Eddy County
Big Sinks Draw 25-24 Fed Com 712H				Big Sinks Draw Well Pad 2			
Surface	Section 25	T25S,	31E	2483 FNL,	2130	FWL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	1650	FWL,	Eddy County
Big Sinks Draw 25-24 Fed Com 613H				Big Sinks Draw Well Pad 3			
Surface	Section 25	T25S,	31E	2483 FNL,	1750	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	1750	FEL,	Eddy County
Big Sinks Draw 25-24 Fed Com 713H				Big Sinks Draw Well Pad 3			
Surface	Section 25	T25S,	31E	2483 FNL,	1780	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	2310	FEL,	Eddy County
Big Sinks Draw 25-24 Fed Com 733H				Big Sinks Draw Well Pad 3			
Surface	Section 25	T25S,	31E	2483 FNL,	1720	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	1650	FEL,	Eddy County
Big Sinks Draw 25-24 Fed Com 334H				Big Sinks Draw Well Pad 4			
Surface	Section 25	T25S,	31E	2482 FNL,	480	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	430	FEL,	Eddy County
Big Sinks Draw 25-24 Fed Com 734H				Big Sinks Draw Well Pad 4			
Surface	Section 25	T25S,	31E	2482 FNL,	450	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	330	FEL,	Eddy County
Big Sinks Draw 25-24 Fed Com 714H				Big Sinks Draw Well Pad 4			
Surface	Section 25	T25S,	31E	2482 FNL,	510	FEL,	Eddy County
Bottom Hole	Section 24	T25S,	31E	330 FNL,	990	FEL,	Eddy County

Arabian 30-19	FED	711H	Arabian 30 Well Pad 1						
Surface	Section	30	T25S,	R32E	749	FWL,	2482	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	330	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	621H	Arabian 30 Well Pad 1						
Surface	Section	30	T25S,	R32E	779	FWL,	2482	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	890	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	731H	Arabian 30 Well Pad 1						
Surface	Section	30	T25S,	R32E	809	FWL,	2482	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	990	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	712H	Arabian 30 Well Pad 2						
Surface	Section	30	T25S,	R32E	1744	FWL,	2486	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	1650	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	332H	Arabian 30 Well Pad 2						
Surface	Section	30	T25S,	R32E	1774	FWL,	2486	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	2210	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	732H	Arabian 30 Well Pad 2						
Surface	Section	30	T25S,	R32E	1804	FWL,	2486	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	2310	FWL,	20	FNL,	Lea County

Arabian 30-19	FED	713H	Arabian 30 Well Pad 3						
Surface	Section	30	T25S,	R32E	2365	FEL,	2488	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	2310	FEL,	20	FNL,	Lea County

Arabian 30-19	FED	623H	Arabian 30 Well Pad 3						
Surface	Section	30	T25S,	R32E	2335	FEL,	2488	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	1750	FEL,	20	FNL,	Lea County

Arabian 30-19	FED	733H	Arabian 30 Well Pad 3						
Surface	Section	30	T25S,	R32E	2305	FEL,	2488	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	1650	FEL,	20	FNL,	Lea County

Arabian 30-19	FED	714H	Arabian 30 Well Pad 5						
Surface	Section	30	T25S,	R32E	710	FEL,	2484	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	990	FEL,	20	FNL,	Lea County

Arabian 30-19	FED	334H	Arabian 30 Well Pad 5						
Surface	Section	30	T25S,	R32E	680	FEL,	2484	FNL,	LeaCounty
Bottom Hole	Section	19	T25S,	R32E	430	FEL,	20	FNL,	Lea County

Arabian 30-19	FED	734H	Arabian 30 Well Pad 5					
Surface	Section	30	T25S, R32E 650	FEL, 2484	FNL,	LeaCounty		
Bottom Hole	Section	19	T25S, R32E 330	FEL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	711H	Morab 29 Well Pad 1					
Surface	Section	29	T25S R32E 415	FWL, 2457	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 330	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	621H	Morab 29 Well Pad 1					
Surface	Section	29	T25S R32E 445	FWL, 2457	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 890	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	731H	Morab 29 Well Pad 1					
Surface	Section	29	T25S R32E 475	FWL, 2457	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 990	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	712H	Morab 29 Well Pad 2					
Surface	Section	29	T25S R32E 1480	FWL, 2459	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 1650	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	332H	Morab 29 Well Pad 2					
Surface	Section	29	T25S R32E 1510	FWL, 2459	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 2210	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	732H	Morab 29 Well Pad 2					
Surface	Section	29	T25S R32E 1540	FWL, 2459	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 2310	FWL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	713H	Morab 29 Well Pad 3					
Surface	Section	29	T25S R32E 2595	FWL, 2485	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 2310	FEL, 20	FNL,	Lea Count		
Morab 29-20	Fed Com	623H	Morab 29 Well Pad 3					
Surface	Section	29	T25S R32E 2625	FWL, 2485	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 1750	FEL, 20	FNL,	Lea County		
Morab 29-20	Fed Com	733H	Morab 29 Well Pad 3					
Surface	Section	29	T25S R32E 2655	FWL, 2485	FNL,	Lea County		
Bottom Hole	Section	20	T25S R32E 1650	FEL, 20	FNL,	Lea County		

Morab 29-20	Fed Com	714H	Morab 29 Well Pad 4						
Surface	Section 29	T25S	R32E	1425	FEL,	2475	FNL,	Lea County	
Bottom Hole	Section 20	T25S	R32E	990	FEL,	20	FNL,	Lea County	
Morab 29-20	Fed Com	334H	Morab 29 Well Pad 4						
Surface	Section 29	T25S	R32E	1395	FEL,	2475	FNL,	Lea County	
Bottom Hole	Section 20	T25S	R32E	430	FEL,	20	FNL,	Lea County	
Morab 29-20	Fed Com	734H	Morab 29 Well Pad 4						
Surface	Section 29	T25S	R32E	1365	FEL,	2475	FNL,	Lea County	
Bottom Hole	Section 20	T25S	R32E	330	FEL,	20	FNL,	Lea County	

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II. PERMIT EXPIRATION

If the permit terminates prior to drilling and drilling cannot be commenced within 60 days after expiration, an operator is required to submit Form 3160-5, Sundry Notices and Reports on Wells, requesting surface reclamation requirements for any surface disturbance. However, if the operator will be able to initiate drilling within 60 days after the expiration of the permit, the operator must have set the conductor pipe in order to allow for an extension of 60 days beyond the expiration date of the APD. (Filing of a Sundry Notice is required for this 60 day extension.)

III. ARCHAEOLOGICAL, PALEONTOLOGY & HISTORICAL SITES

Any cultural and/or paleontological resource discovered by the operator or by any person working on the operator's behalf shall immediately report such findings to the Authorized Officer. The operator is fully accountable for the actions of their contractors and subcontractors. The operator shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the Authorized Officer. An evaluation of the discovery shall be made by the Authorized Officer to determine the appropriate actions that shall be required to prevent the loss of significant cultural or scientific values of the discovery. The operator shall be held responsible for the cost of the proper mitigation measures that the Authorized Officer assesses after consultation with the operator on the evaluation and decisions of the discovery. Any unauthorized collection or disturbance of cultural or paleontological resources may result in a shutdown order by the Authorized Officer.

IV. NOXIOUS WEEDS

The operator shall be held responsible if noxious weeds become established within the areas of operations. Weed control shall be required on the disturbed land where noxious

weeds exist, which includes the roads, pads, associated pipeline corridor, and adjacent land affected by the establishment of weeds due to this action. The operator shall consult with the Authorized Officer for acceptable weed control methods, which include following EPA and BLM requirements and policies.

V. SPECIAL REQUIREMENT(S)

In May 2008, the Pecos District Special Status Species Resource Management Plan Amendment (RMPA) was approved and is being implemented. In addition to the standard practices that minimize impacts, as listed above, the following COA will apply:

- Timing Limitation Stipulation / Condition of Approval for lesser prairie-chicken, to minimize noise associated impacts which could disrupt breeding and nesting activities.
- Upon abandonment, a low profile abandoned well marker will be installed to prevent raptor perching.

Wildlife Escape Ramps

Devon would need to construct and maintain escape ramps according to the following criteria:

- Earthen escape ramps would be required to be constructed to sufficiently support livestock at no more than a 30-degree slope and spaced no more than 500 feet apart.
- If trench is left open under an 8-hour time period, it would not be required to have an escape ramp; however, before the trench is backfilled, Devon would inspect the trench for wildlife and remove any species that are trapped at a distance of at least 100 yards away from the trench.

Raptor Nest Mitigation

- A BLM Wildlife Biologist must be contacted by the operator prior to construction activities to determine if the raptor nest is active.
- Determination to deconstruct inactive nest prior to pad construction will be made by BLM Wildlife Biologist.
- Raptor nests on special, natural habitat features, such as trees, large brush, cliff faces and escarpments, will be protected by not allowing surface disturbance within up to 200 meters of nests or by delaying activity for up to 90 days, or a combination of both. Exceptions to this requirement for raptor nests will be considered if the nests expected to be disturbed are inactive, the proposed activity is of short duration (e.g. habitat enhancement projects, fences, pipelines), and will not result in continuing activity in proximity to the nest.
- Exhaust noise from pump jack engines must be muffled or otherwise controlled so as not to exceed 75 db measured at 30 ft. from the source of the noise.

Temporary Fencing Requirement

For the proposed Big Sinks 25 CTB 3 location, the BLM would require temporary fencing be installed before construction begins. This fencing would stay in place and be maintained throughout construction activities to protect nearby dune land habitat from harm.

Power Lines

Power lines shall be constructed and designed in accordance to standards outlined in "Suggested Practices for Avian Protection on Power lines: The State of the Art in 2006" Edison Electric Institute, APLIC, and the California Energy Commission 2006. The holder shall assume the burden and expense of proving that pole designs not shown in the above publication deter raptor perching, roosting, and nesting. Such proof shall be provided by a raptor expert approved by the Authorized Officer. The BLM reserves the right to require modification or additions to all power line structures placed on this right-of-way, should they be necessary to ensure the safety of large perching birds. The holder without liability or expense shall make such modifications and/or additions to the United States.

Watershed/Water Quality:

For all the proposed actions; the entire perimeter of the well pad and CTB sites will be bermed to prevent oil, salt, and other chemical contaminants from leaving the well pad.

- The compacted berm shall be constructed at a minimum of 12 inches high with impermeable mineral material (e.g. caliche).
- No water flow from the uphill side(s) of the pad shall be allowed to enter the well pad.
- The topsoil stockpile shall be located outside the bermed well pad.
- Topsoil, either from the well pad or surrounding area, shall not be used to construct the berm.
- No storm drains, tubing or openings shall be placed in the berm.
- If fluid collects within the bermed area, the fluid must be vacuumed into a safe container and disposed of properly at a state approved facility.
- The integrity of the berm shall be maintained around the surfaced pad throughout the life of the well and around the downsized pad after interim reclamation has been completed.
- Any access road entering the well pad shall be constructed so that the integrity of the berm height surrounding the well pad is not compromised. (Any access road crossing the berm cannot be lower than the berm height.)

Tank Battery:

- Tank battery locations will be lined and bermed. A 20 mil permanent liner will be installed with a 4 oz. felt backing to prevent tears or punctures. Tank battery berms must be large enough to contain 1 ½ times the content of the largest tank.
- Automatic shut off, check valves, or similar systems will be installed for tanks to minimize the effects of catastrophic line failures used in production or drilling.

Temporary Fence Crossing Requirement

Where entry is granted across a fence line, the fence must be braced and tied off on both sides of the passageway with H-braces prior to cutting. Once the work is completed, the fence will be restored to its prior condition, or better. The operator shall notify the private surface landowner or the grazing allotment holder prior to crossing any fences.

Cattle Guard Requirement

Where entry is granted across a fence line for an access road, the fence must be braced and tied off on both sides of the passageway with H-braces prior to cutting. Once the work is completed, the fence will be restored to its prior condition with an appropriately sized cattle guard sufficient to carry out the project. Any new or existing cattle guards on the access route shall be repaired or replaced if they are damaged or have deteriorated beyond practical use. The operator shall be responsible for the condition of the existing cattle guards that are in place and are utilized during lease operations. Once the road is abandoned, the fence would be restored to its prior condition, or better. The operator shall notify the private surface landowner or the grazing allotment holder prior to crossing any fences.

Livestock Watering Requirement

Devon, in an agreement with the grazing allotment holder, would relocate a water pipeline affected by several proposed actions. Devon would also encase the water pipeline along its length where it would travel under access roads. See **Error! Reference source not found.** above.

Devon must contact the allotment holder prior to construction to identify the location of the pipelines. Devon must take measures to protect the pipelines from compression or other damages. If the pipelines are damaged or compromised in any way near the proposed project as a result of oil and gas activity, Devon is responsible for repairing the pipelines immediately. Devon must notify the BLM office (575-234-5972) and the private surface landowner or the grazing allotment holder if any damage occurs to structures that provide water to livestock.

During construction, Devon shall minimize disturbance to existing fences, water lines, troughs, windmills, and other improvements on public lands. Devon is required to promptly repair improvements to at least their former state. Functional use of these improvements will be maintained at all times. The holder will contact the grazing permittee/allottee prior to disturbing any range improvement projects. When necessary to pass through a fence line, the fence shall be braced on both sides of the passageway prior to cutting of the fence. No permanent gates will be allowed unless approved by the Authorized Officer.

Temporary Fencing Requirement

For the proposed Big Sinks 25 CTB 3 location, the BLM would require temporary fencing be installed before construction begins. This fencing would stay in place and be maintained throughout construction activities to protect nearby dune land habitat from harm.

VI. CONSTRUCTION

A. NOTIFICATION

The BLM shall administer compliance and monitor construction of the access road and well pad. Notify the Carlsbad Field Office at (575) 234-5909 at least 3 working days prior to commencing construction of the access road and/or well pad.

When construction operations are being conducted on this well, the operator shall have the approved APD and Conditions of Approval (COA) on the well site and they shall be made available upon request by the Authorized Officer.

B. TOPSOIL

The operator shall strip the top portion of the soil (root zone) from the entire well pad area and stockpile the topsoil along the edge of the well pad as depicted in the APD. The root zone is typically six (6) inches in depth. All the stockpiled topsoil will be redistributed over the interim reclamation areas. Topsoil shall not be used for berming the pad or facilities. For final reclamation, the topsoil shall be spread over the entire pad area for seeding preparation.

Other subsoil (below six inches) stockpiles must be completely segregated from the topsoil stockpile. Large rocks or subsoil clods (not evident in the surrounding terrain) must be buried within the approved area for interim and final reclamation.

C. CLOSED LOOP SYSTEM

Tanks are required for drilling operations: No Pits.

The operator shall properly dispose of drilling contents at an authorized disposal site.

D. FEDERAL MINERAL MATERIALS PIT

Payment shall be made to the BLM prior to removal of any federal mineral materials. Call the Carlsbad Field Office at (575) 234-5972.

E. WELL PAD SURFACING

Surfacing of the well pad is not required.

If the operator elects to surface the well pad, the surfacing material may be required to be removed at the time of reclamation. The well pad shall be constructed in a manner which creates the smallest possible surface disturbance, consistent with safety and operational needs.

F. EXCLOSURE FENCING (CELLARS & PITS)

Exclosure Fencing

The operator will install and maintain exclosure fencing for all open well cellars to prevent access to public, livestock, and large forms of wildlife before and after drilling operations until the pit is free of fluids and the operator initiates backfilling. (For examples of exclosure fencing design, refer to BLM's Oil and Gas Gold Book, Exclosure Fence Illustrations, Figure 1, Page 18.)

G. ON LEASE ACCESS ROADS

Road Width

The access road shall have a driving surface that creates the smallest possible surface disturbance and does not exceed fourteen (14) feet in width. The maximum width of surface disturbance, when constructing the access road, shall not exceed twenty-five (25) feet.

Surfacing

Surfacing material is not required on the new access road driving surface. If the operator elects to surface the new access road or pad, the surfacing material may be required to be removed at the time of reclamation.

Where possible, no improvements should be made on the unsurfaced access road other than to remove vegetation as necessary, road irregularities, safety issues, or to fill low areas that may sustain standing water.

The Authorized Officer reserves the right to require surfacing of any portion of the access road at any time deemed necessary. Surfacing may be required in the event the road deteriorates, erodes, road traffic increases, or it is determined to be beneficial for future field development. The surfacing depth and type of material will be determined at the time of notification.

Crowning

Crowning shall be done on the access road driving surface. The road crown shall have a grade of approximately 2% (i.e., a 1" crown on a 14' wide road). The road shall conform to Figure 1; cross section and plans for typical road construction.

Ditching

Ditching shall be required on both sides of the road.

Turnouts

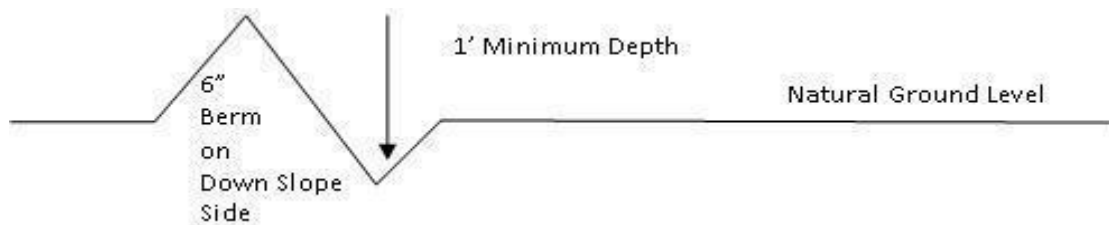
Vehicle turnouts shall be constructed on the road. Turnouts shall be intervisible with interval spacing distance less than 1000 feet. Turnouts shall conform to Figure 1; cross section and plans for typical road construction.

Drainage

Drainage control systems shall be constructed on the entire length of road (e.g. ditches, sidehill outslowing and insloping, lead-off ditches, culvert installation, and low water crossings).

A typical lead-off ditch has a minimum depth of 1 foot below and a berm of 6 inches above natural ground level. The berm shall be on the down-slope side of the lead-off ditch.

Cross Section of a Typical Lead-off Ditch



All lead-off ditches shall be graded to drain water with a 1 percent minimum to 3 percent maximum ditch slope. The spacing interval are variable for lead-off ditches and shall be determined according to the formula for spacing intervals of lead-off ditches, but may be amended depending upon existing soil types and centerline road slope (in %);

Formula for Spacing Interval of Lead-off Ditches

Example - On a 4% road slope that is 400 feet long, the water flow shall drain water into a lead-off ditch. Spacing interval shall be determined by the following formula:

$$400 \text{ foot road with } 4\% \text{ road slope: } \frac{400'}{4\%} + 100' = 200' \text{ lead-off ditch interval}$$

Cattle guards

An appropriately sized cattle guard sufficient to carry out the project shall be installed and maintained at fence/road crossings. Any existing cattle guards on the access road route shall be repaired or replaced if they are damaged or have deteriorated beyond practical use. The operator shall be responsible for the condition of the existing cattle guards that are in place and are utilized during lease operations.

Fence Requirement

Where entry is granted across a fence line, the fence shall be braced and tied off on both sides of the passageway prior to cutting. The operator shall notify the private surface

landowner or the grazing allotment holder prior to crossing any fences.

Public Access

Public access on this road shall not be restricted by the operator without specific written approval granted by the Authorized Officer.

Construction Steps

1. Salvage topsoil
2. Construct road

3. Redistribute topsoil
4. Revegetate slopes

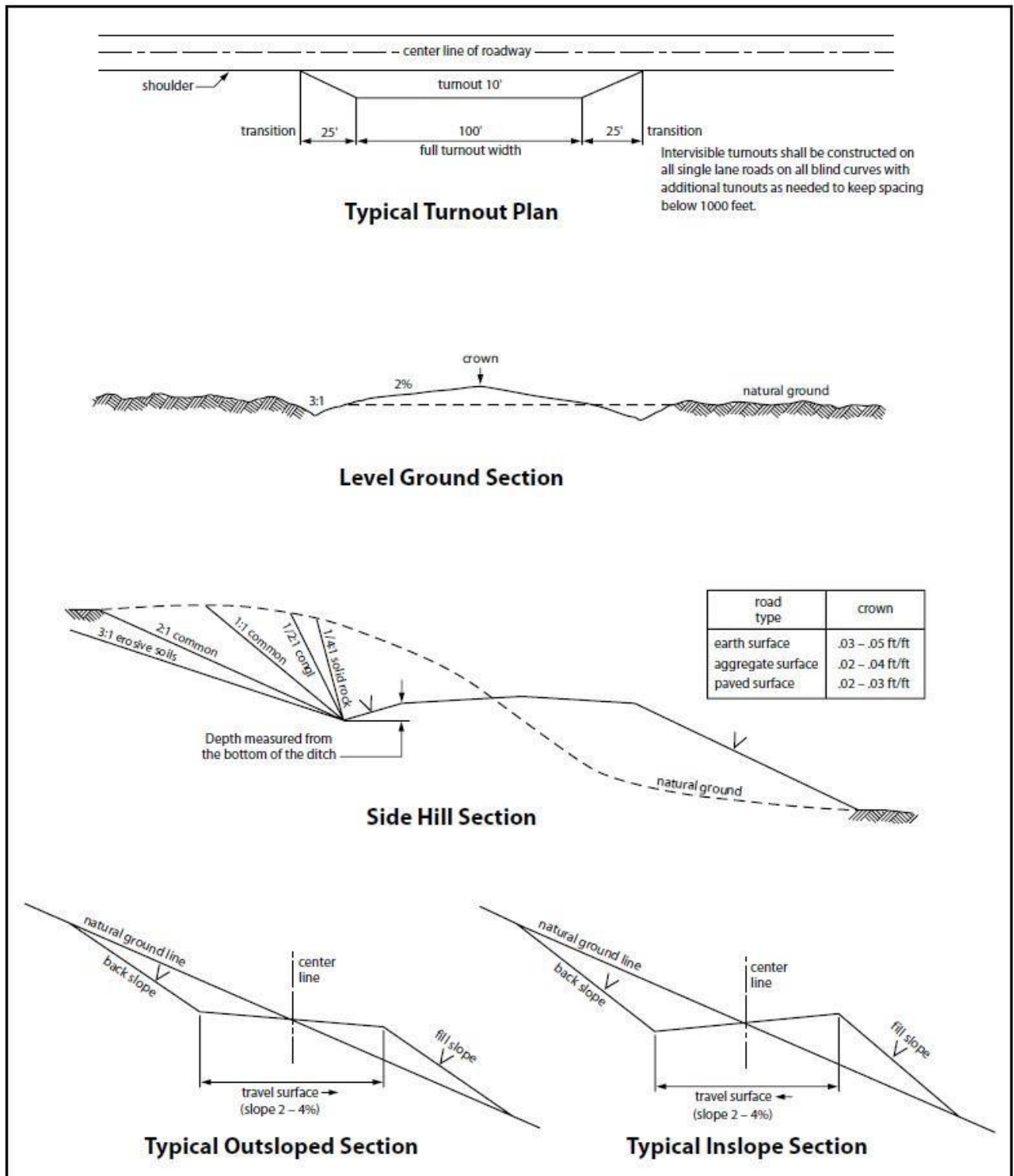


Figure 1. Cross-sections and plans for typical road sections representative of BLM resource or FS local and higher-class roads.

VII. PRODUCTION (POST DRILLING)

A. WELL STRUCTURES & FACILITIES

Placement of Production Facilities

Production facilities should be placed on the well pad to allow for maximum interim recontouring and revegetation of the well location.

Exclosure Netting (Open-top Tanks)

Immediately following active drilling or completion operations, the operator will take actions necessary to prevent wildlife and livestock access, including avian wildlife, to all open-topped tanks that contain or have the potential to contain salinity sufficient to cause harm to wildlife or livestock, hydrocarbons, or Resource Conservation and Recovery Act of 1976-exempt hazardous substances. At a minimum, the operator will net, screen, or cover open-topped tanks to exclude wildlife and livestock and prevent mortality. If the operator uses netting, the operator will cover and secure the open portion of the tank to prevent wildlife entry. The operator will net, screen, or cover the tanks until the operator removes the tanks from the location or the tanks no longer contain substances that could be harmful to wildlife or livestock. Use a maximum netting mesh size of 1 ½ inches. The netting must not be in contact with fluids and must not have holes or gaps.

Chemical and Fuel Secondary Containment and Exclosure Screening

The operator will prevent all hazardous, poisonous, flammable, and toxic substances from coming into contact with soil and water. At a minimum, the operator will install and maintain an impervious secondary containment system for any tank or barrel containing hazardous, poisonous, flammable, or toxic substances sufficient to contain the contents of the tank or barrel and any drips, leaks, and anticipated precipitation. The operator will dispose of fluids within the containment system that do not meet applicable state or U. S. Environmental Protection Agency livestock water standards in accordance with state law; the operator must not drain the fluids to the soil or ground. The operator will design, construct, and maintain all secondary containment systems to prevent wildlife and livestock exposure to harmful substances. At a minimum, the operator will install effective wildlife and livestock exclosure systems such as fencing, netting, expanded metal mesh, lids, and grate covers. Use a maximum netting mesh size of 1 ½ inches.

Open-Vent Exhaust Stack Exclosures

The operator will construct, modify, equip, and maintain all open-vent exhaust stacks on production equipment to prevent birds and bats from entering, and to discourage perching, roosting, and nesting. (*Recommended exclosure structures on open-vent exhaust stacks are in the shape of a cone.*) Production equipment includes, but may not be limited to, tanks, heater-treaters, separators, dehydrators, flare stacks, in-line units, and compressor mufflers.

Containment Structures

Proposed production facilities such as storage tanks and other vessels will have a secondary containment structure that is constructed to hold the capacity of 1.5 times the largest tank, plus freeboard to account for precipitation, unless more stringent protective requirements are deemed necessary.

Painting Requirement

All above-ground structures including meter housing that are not subject to safety requirements shall be painted a flat non-reflective paint color, **Shale Green** from the BLM Standard Environmental Color Chart (CC-001: June 2008).

B. PIPELINES

BURIED PIPELINE STIPULATIONS

A copy of the application (Grant, APD, or Sundry Notice) and attachments, including conditions of approval, survey plat and/or map, will be on location during construction. BLM personnel may request to you a copy of your permit during construction to ensure compliance with all stipulations.

Holder agrees to comply with the following stipulations to the satisfaction of the Authorized Officer:

1. The Holder shall indemnify the United States against any liability for damage to life or property arising from the occupancy or use of public lands under this grant.
2. The Holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated. In any event, the holder shall comply with the Toxic Substances Control Act of 1976 as amended, 15 USC 2601 et seq. (1982) with regards to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation, and Liability Act, section 102b. A copy of any report required or requested by any Federal agency or State government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency or State government.
3. The holder agrees to indemnify the United States against any liability arising from the release of any hazardous substance or hazardous waste (as these terms are defined in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601, et seq. or the Resource Conservation and Recovery Act, 42 U.S.C. 6901, et seq.) on the Right-of-Way (unless the release or threatened release is wholly unrelated to the Right-of-Way holder's activity on the Right-of-Way), or resulting from the activity of the Right-of-Way holder on the Right-of-Way. This agreement applies without regard to whether a release is caused by the holder, its agent, or unrelated third parties.

4. If, during any phase of the construction, operation, maintenance, or termination of the pipeline, any oil or other pollutant should be discharged from the pipeline system, impacting Federal lands, the control and total removal, disposal, and cleaning up of such oil or other pollutant, wherever found, shall be the responsibility of holder, regardless of fault. Upon failure of holder to control, dispose of, or clean up such discharge on or affecting Federal lands, or to repair all damages resulting therefrom, on the Federal lands, the Authorized Officer may take such measures as he deems necessary to control and clean up the discharge and restore the area, including where appropriate, the aquatic environment and fish and wildlife habitats, at the full expense of the holder. Such action by the Authorized Officer shall not relieve holder of any responsibility as provided herein.
5. All construction and maintenance activity will be confined to the authorized right-of-way.
6. The pipeline will be buried with a minimum cover of 36 inches between the top of the pipe and ground level.
7. The maximum allowable disturbance for construction in this right-of-way will be 30 feet:
 - Blading of vegetation within the right-of-way will be allowed: maximum width of blading operations will not exceed 20 feet. The trench is included in this area. (*Blading is defined as the complete removal of brush and ground vegetation.*)
 - Clearing of brush species within the right-of-way will be allowed: maximum width of clearing operations will not exceed 30 feet. The trench and bladed area are included in this area. (*Clearing is defined as the removal of brush while leaving ground vegetation (grasses, weeds, etc.) intact. Clearing is best accomplished by holding the blade 4 to 6 inches above the ground surface.*)
 - The remaining area of the right-of-way (if any) shall only be disturbed by compressing the vegetation. (*Compressing can be caused by vehicle tires, placement of equipment, etc.*)
8. The holder shall stockpile an adequate amount of topsoil where blading is allowed. The topsoil to be stripped is approximately 6 inches in depth. The topsoil will be segregated from other spoil piles from trench construction. The topsoil will be evenly distributed over the bladed area for the preparation of seeding.
9. The holder shall minimize disturbance to existing fences and other improvements on public lands. The holder is required to promptly repair improvements to at least their former state. Functional use of these improvements will be maintained at all times. The holder will contact the owner of any improvements prior to disturbing them. When necessary to pass through a fence line, the fence shall be braced on both sides of the passageway prior to cutting of the fence. No permanent gates will be allowed unless approved by the Authorized Officer.
10. Vegetation, soil, and rocks left as a result of construction or maintenance activity will be randomly scattered on this right-of-way and will not be left in rows, piles, or berms, unless

otherwise approved by the Authorized Officer. The entire right-of-way shall be recontoured to match the surrounding landscape. The backfilled soil shall be compacted and a 6 inch berm will be left over the ditch line to allow for settling back to grade.

11. In those areas where erosion control structures are required to stabilize soil conditions, the holder will install such structures as are suitable for the specific soil conditions being encountered and which are in accordance with sound resource management practices.

12. The holder will reseed all disturbed areas. Seeding will be done according to the attached seeding requirements, using the following seed mix.

- | | |
|--|--|
| <input type="checkbox"/> seed mixture 1 | <input type="checkbox"/> seed mixture 3 |
| <input type="checkbox"/> seed mixture 2 | <input type="checkbox"/> seed mixture 4 |
| <input checked="" type="checkbox"/> seed mixture 2/LPC | <input type="checkbox"/> Aplomado Falcon Mixture |

13. All above-ground structures not subject to safety requirements shall be painted by the holder to blend with the natural color of the landscape. The paint used shall be color which simulates "Standard Environmental Colors" – **Shale Green**, Munsell Soil Color No. 5Y 4/2.

14. The pipeline will be identified by signs at the point of origin and completion of the right-of-way and at all road crossings. At a minimum, signs will state the holder's name, BLM serial number, and the product being transported. All signs and information thereon will be posted in a permanent, conspicuous manner, and will be maintained in a legible condition for the life of the pipeline.

15. The holder shall not use the pipeline route as a road for purposes other than routine maintenance as determined necessary by the Authorized Officer in consultation with the holder before maintenance begins. The holder will take whatever steps are necessary to ensure that the pipeline route is not used as a roadway. As determined necessary during the life of the pipeline, the Authorized Officer may ask the holder to construct temporary deterrence structures.

16. Any cultural and/or paleontological resources (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the Authorized Officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the Authorized Officer. An evaluation of the discovery will be made by the Authorized Officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures will be made by the Authorized Officer after consulting with the holder.

17. The operator shall be held responsible if noxious weeds become established within the areas of operations. Weed control shall be required on the disturbed land where noxious weeds exist, which includes associated roads, pipeline corridor and adjacent land affected by the establishment of weeds due to this action. The operator shall consult with the Authorized Officer for acceptable weed control methods, which include following EPA and BLM requirements and policies.

18. Escape Ramps - The operator will construct and maintain pipeline/utility trenches that are not otherwise fenced, screened, or netted to prevent livestock, wildlife, and humans from becoming entrapped. At a minimum, the operator will construct and maintain escape ramps, ladders, or other methods of avian and terrestrial wildlife escape in the trenches according to the following criteria:

- a. Any trench left open for eight (8) hours or less is not required to have escape ramps; however, before the trench is backfilled, the contractor/operator shall inspect the trench for wildlife, remove all trapped wildlife, and release them at least 100 yards from the trench.
- b. For trenches left open for eight (8) hours or more, earthen escape ramps (built at no more than a 30 degree slope and spaced no more than 500 feet apart) shall be placed in the trench.

19. Special Stipulations:

Lesser Prairie-Chicken

Oil and gas activities will not be allowed in lesser prairie-chicken habitat during the period from March 1st through June 15th annually. During that period, other activities that produce noise or involve human activity, such as the maintenance of oil and gas facilities, geophysical exploration other than 3-D operations, and pipeline, road, and well pad construction, will be allowed except between 3:00 am and 9:00 am. The 3:00 am to 9:00 am restriction will not apply to normal, around-the-clock operations, such as venting, flaring, or pumping, which do not require a human presence during this period. Normal vehicle use on existing roads will not be restricted. Exhaust noise from pump jack engines must be muffled or otherwise controlled so as not to exceed 75 db measured at 30 ft. from the source of the noise.

This authorization is subject to your Certificate of Participation and/or Certificate of Inclusion under the New Mexico Candidate Conservation Agreement. Because it involves surface disturbing activities covered under your Certificate, your Habitat Conservation Fund Account with the Center of Excellence for Hazardous Materials Management (CEHMM) will be debited according to Exhibit B Part 2 of the Certificate of Participation.

STANDARD STIPULATIONS FOR SURFACE INSTALLED PIPELINES

A copy of the application (Grant, Sundry Notice, APD) and attachments, including stipulations, survey plat and/or map, will be on location during construction. BLM personnel may request to you a copy of your permit during construction to ensure compliance with all stipulations.

Holder agrees to comply with the following stipulations to the satisfaction of the Authorized Officer:

1. The holder shall indemnify the United States against any liability for damage to life or property arising from the occupancy or use of public lands under this grant.
2. The holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated. In any event, the holder shall comply with the Toxic

Substances Control Act of 1976 as amended, 15 USC 2601 et seq. (1982) with regards to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation, and Liability Act, section 102b. A copy of any report required or requested by any Federal agency or State government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency or State government.

3. The holder agrees to indemnify the United States against any liability arising from the release of any hazardous substance or hazardous waste (as these terms are defined in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601, et seq. or the Resource Conservation and Recovery Act, 42 U.S.C. 6901, et seq.) on the Right-of-Way (unless the release or threatened release is wholly unrelated to activity of the Right-of-Way holder's activity on the Right-of-Way), or resulting from the activity of the Right-of-Way holder on the Right-of-Way. This agreement applies without regard to whether a release is caused by the holder, its agent, or unrelated third parties.

4. The holder shall be liable for damage or injury to the United States to the extent provided by 43 CFR Sec. 2883.1-4. The holder shall be held to a standard of strict liability for damage or injury to the United States resulting from pipe rupture, fire, or spills caused or substantially aggravated by any of the following within the right-of-way or permit area:

- a. Activities of the holder including, but not limited to construction, operation, maintenance, and termination of the facility.
- b. Activities of other parties including, but not limited to:
 - (1) Land clearing.
 - (2) Earth-disturbing and earth-moving work.
 - (3) Blasting.
 - (4) Vandalism and sabotage.
- c. Acts of God.

The maximum limitation for such strict liability damages shall not exceed one million dollars (\$1,000,000) for any one event, and any liability in excess of such amount shall be determined by the ordinary rules of negligence of the jurisdiction in which the damage or injury occurred.

This section shall not impose strict liability for damage or injury resulting primarily from an act of war or from the negligent acts or omissions of the United States.

5. If, during any phase of the construction, operation, maintenance, or termination of the pipeline, any oil, salt water, or other pollutant should be discharged from the pipeline system, impacting Federal lands, the control and total removal, disposal, and cleaning up

of such oil, salt water, or other pollutant, wherever found, shall be the responsibility of the holder, regardless of fault. Upon failure of the holder to control, dispose of, or clean up such discharge on or affecting Federal lands, or to repair all damages resulting therefrom, on the Federal lands, the Authorized Officer may take such measures as he deems necessary to control and clean up the discharge and restore the area, including, where appropriate, the aquatic environment and fish and wildlife habitats, at the full expense of the holder. Such action by the Authorized Officer shall not relieve the holder of any responsibility as provided herein.

6. All construction and maintenance activity will be confined to the authorized right-of-way width of 20 feet. If the pipeline route follows an existing road or buried pipeline right-of-way, the surface pipeline must be installed no farther than 10 feet from the edge of the road or buried pipeline right-of-way. If existing surface pipelines prevent this distance, the proposed surface pipeline must be installed immediately adjacent to the outer surface pipeline. All construction and maintenance activity will be confined to existing roads or right-of-ways.

7. No blading or clearing of any vegetation will be allowed unless approved in writing by the Authorized Officer.

8. The holder shall install the pipeline on the surface in such a manner that will minimize suspension of the pipeline across low areas in the terrain. In hummocky or dune areas, the pipeline will be "snaked" around hummocks and dunes rather than suspended across these features.

9. The pipeline shall be buried with a minimum of 24 inches under all roads, "two-tracks," and trails. Burial of the pipe will continue for 20 feet on each side of each crossing. The condition of the road, upon completion of construction, shall be returned to at least its former state with no bumps or dips remaining in the road surface.

10. The holder shall minimize disturbance to existing fences and other improvements on public lands. The holder is required to promptly repair improvements to at least their former state. Functional use of these improvements will be maintained at all times. The holder will contact the owner of any improvements prior to disturbing them. When necessary to pass through a fence line, the fence shall be braced on both sides of the passageway prior to cutting of the fence. No permanent gates will be allowed unless approved by the Authorized Officer.

11. In those areas where erosion control structures are required to stabilize soil conditions, the holder will install such structures as are suitable for the specific soil conditions being encountered and which are in accordance with sound resource management practices.

12. Excluding the pipe, all above-ground structures not subject to safety requirement shall be painted by the holder to blend with the natural color of the landscape. The paint used shall be a color which simulates "Standard Environmental Colors" – **Shale Green**, Munsell Soil Color No. 5Y 4/2; designated by the Rocky Mountain Five State

Interagency Committee.

13. The pipeline will be identified by signs at the point of origin and completion of the right-of-way and at all road crossings. At a minimum, signs will state the holder's name, BLM serial number, and the product being transported. Signs will be maintained in a legible condition for the life of the pipeline.

14. The holder shall not use the pipeline route as a road for purposes other than routine maintenance as determined necessary by the Authorized Officer in consultation with the holder. The holder will take whatever steps are necessary to ensure that the pipeline route is not used as a roadway.

15. Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery will be made by the authorized officer to determine appropriate cultural or scientific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures will be made by the authorized officer after consulting with the holder.

16. The operator shall be held responsible if noxious weeds become established within the areas of operations. Weed control shall be required on the disturbed land where noxious weeds exist, which includes the roads, powerline corridor, and adjacent land affected by the establishment of weeds due to this action. The operator shall consult with the Authorized Officer for acceptable weed control methods, which include following EPA and BLM requirements and policies.

17. Surface pipelines must be less than or equal to 4 inches and a working pressure below 125 psi.

18. Special Stipulations:

- a. **Lesser Prairie-Chicken:** Oil and gas activities will not be allowed in lesser prairie-chicken habitat during the period from March 1st through June 15th annually. During that period, other activities that produce noise or involve human activity, such as the maintenance of oil and gas facilities and pipeline, road, and well pad construction, will be allowed except between 3:00 am and 9:00 am. The 3:00 am to 9:00 am restriction will not apply to normal, around-the-clock operations, such as venting, flaring, or pumping, which do not require a human presence during this period. Normal vehicle use on existing roads will not be restricted.
- b. This authorization is subject to your Certificate of Participation and/or Certificate of Inclusion under the New Mexico Candidate Conservation Agreement. Because it involves surface disturbing activities covered under your Certificate, your Habitat Conservation Fund Account with the Center of Excellence for Hazardous

Materials Management (CEHMM) will be debited according to Exhibit B Part 2 of the Certificate of Participation.

C. ELECTRIC LINES

STANDARD STIPULATIONS FOR OVERHEAD ELECTRIC DISTRIBUTION LINES

A copy of the grant and attachments, including stipulations, survey plat and/or map, will be on location during construction. BLM personnel may request to you a copy of your permit during construction to ensure compliance with all stipulations.

Holder agrees to comply with the following stipulations to the satisfaction of the Authorized Officer:

1. The holder shall indemnify the United States against any liability for damage to life or property arising from the occupancy or use of public lands under this grant.
2. The holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated. In any event, the holder shall comply with the Toxic Substances Control Act of 1976 as amended, 15 USC 2601 et seq. (1982) with regards to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation, and Liability Act, section 102b. A copy of any report required or requested by any Federal agency or State government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency or State government.
3. The holder agrees to indemnify the United States against any liability arising from the release of any hazardous substance or hazardous waste (as these terms are defined in the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. 9601, et seq. or the Resource Conservation and Recovery Act, 42 U.S.C. 6901, et seq.) on the Right-of-Way (unless the release or threatened release is wholly unrelated to the Right-of-Way holder's activity on the Right-of-Way), or resulting from the activity of the Right-of-Way holder on the Right-of-Way. This agreement applies without regard to whether a release is caused by the holder, its agent, or unrelated third parties.
4. There will be no clearing or blading of the right-of-way unless otherwise agreed to in writing by the Authorized Officer.
5. Power lines shall be constructed and designed in accordance to standards outlined in "Suggested Practices for Avian Protection on Power lines: The State of the Art in 2006" Edison Electric Institute, APLIC, and the California Energy Commission 2006 . The

holder shall assume the burden and expense of proving that pole designs not shown in the above publication deter raptor perching, roosting, and nesting. Such proof shall be provided by a raptor expert approved by the Authorized Officer. The BLM reserves the right to require modification or additions to all powerline structures placed on this right-of-way, should they be necessary to ensure the safety of large perching birds. Such modifications and/or additions shall be made by the holder without liability or expense to the United States.

Raptor deterrence will consist of but not limited to the following: triangle perch discouragers shall be placed on each side of the cross arms and a nonconductive perching deterrence shall be placed on all vertical poles that extend past the cross arms.

6. The holder shall minimize disturbance to existing fences and other improvements on public lands. The holder is required to promptly repair improvements to at least their former state. Functional use of these improvements will be maintained at all times. The holder will contact the owner of any improvements prior to disturbing them. When necessary to pass through a fence line, the fence shall be braced on both sides of the passageway prior to cutting the fence. No permanent gates will be allowed unless approved by the Authorized Officer.

7. The BLM serial number assigned to this authorization shall be posted in a permanent, conspicuous manner where the power line crosses roads and at all serviced facilities. Numbers will be at least two inches high and will be affixed to the pole nearest the road crossing and at the facilities served.

8. Upon cancellation, relinquishment, or expiration of this grant, the holder shall comply with those abandonment procedures as prescribed by the Authorized Officer.

9. All surface structures (poles, lines, transformers, etc.) shall be removed within 180 days of abandonment, relinquishment, or termination of use of the serviced facility or facilities or within 180 days of abandonment, relinquishment, cancellation, or expiration of this grant, whichever comes first. This will not apply where the power line extends service to an active, adjoining facility or facilities.

10. Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the Authorized Officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the Authorized Officer. An evaluation of the discovery will be made by the Authorized Officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures will be made by the Authorized Officer after consulting with the holder.

11. Special Stipulations:

- For reclamation remove poles, lines, transformer, etc. and dispose of properly.

- Fill in any holes from the poles removed.

Timing Limitation Stipulation/Condition of Approval for Lesser Prairie-Chicken:

Oil and gas activities including 3-D geophysical exploration, and drilling will not be allowed in lesser prairie-chicken habitat during the period from March 1st through June 15th annually. During that period, other activities that produce noise or involve human activity, such as the maintenance of oil and gas facilities, geophysical exploration other than 3-D operations, and pipeline, road, and well pad construction, will be allowed except between 3:00 am and 9:00 am. The 3:00 am to 9:00 am restriction will not apply to normal, around-the-clock operations, such as venting, flaring, or pumping, which do not require a human presence during this period. Additionally, no new drilling will be allowed within up to 200 meters of leks known at the time of permitting. Normal vehicle use on existing roads will not be restricted. Exhaust noise from pump jack engines must be muffled or otherwise controlled so as not to exceed 75 db measured at 30 ft. from the source of the noise.

This authorization is subject to your Certificate of Participation and/or Certificate of Inclusion under the New Mexico Candidate Conservation Agreement. Because it involves surface disturbing activities covered under your Certificate, your Habitat Conservation Fund Account with the Center of Excellence for Hazardous Materials Management (CEHMM) will be debited according to Exhibit B Part 2 of the Certificate of Participation.

VIII. INTERIM RECLAMATION

During the life of the development, all disturbed areas not needed for active support of production operations should undergo interim reclamation in order to minimize the environmental impacts of development on other resources and uses.

Within six (6) months of well completion, operators should work with BLM surface management specialists (Jim Amos: 575-234-5909) to devise the best strategies to reduce the size of the location. Interim reclamation should allow for remedial well operations, as well as safe and efficient removal of oil and gas.

During reclamation, the removal of caliche is important to increasing the success of revegetating the site. Removed caliche that is free of contaminants may be used for road repairs, fire walls or for building other roads and locations. In order to operate the well or complete workover operations, it may be necessary to drive, park and operate on restored interim vegetation within the previously disturbed area. Disturbing revegetated areas for production or workover operations will be allowed. If there is significant disturbance and loss of vegetation, the area will need to be revegetated. Communicate with the appropriate BLM office for any exceptions/exemptions if needed.

All disturbed areas after they have been satisfactorily prepared need to be reseeded with the seed mixture provided below.

Upon completion of interim reclamation, the operator shall submit a Sundry Notices and Reports on Wells, Subsequent Report of Reclamation (Form 3160-5).

IX. FINAL ABANDONMENT & RECLAMATION

At final abandonment, well locations, production facilities, and access roads must undergo "final" reclamation so that the character and productivity of the land are restored.

Earthwork for final reclamation must be completed within six (6) months of well plugging. All pads, pits, facility locations and roads must be reclaimed to a satisfactory revegetated, safe, and stable condition, unless an agreement is made with the landowner or BLM to keep the road and/or pad intact.

After all disturbed areas have been satisfactorily prepared, these areas need to be revegetated with the seed mixture provided below. Seeding should be accomplished by drilling on the contour whenever practical or by other approved methods. Seeding may need to be repeated until revegetation is successful, as determined by the BLM.

Operators shall contact a BLM surface protection specialist prior to surface abandonment operations for site specific objectives (Jim Amos: 575-234-5909).

Ground-level Abandoned Well Marker to avoid raptor perching: Upon the plugging and subsequent abandonment of the well, the well marker will be installed at ground level on a plate containing the pertinent information for the plugged well.

Seed Mixture for LPC Sand/Shinnery Sites

Holder shall seed all disturbed areas with the seed mixture listed below. The seed mixture shall be planted in the amounts specified in pounds of pure live seed (PLS)* per acre. There shall be no primary or secondary noxious weeds in the seed mixture. Seed will be tested and the viability testing of seed shall be done in accordance with State law(s) and within nine (9) months prior to purchase. Commercial seed shall be either certified or registered seed. The seed container shall be tagged in accordance with State law(s) and available for inspection by the Authorized Officer.

Seed will be planted using a drill equipped with a depth regulator to ensure proper depth of planting where drilling is possible. The seed mixture will be evenly and uniformly planted over the disturbed area (smaller/heavier seeds have a tendency to drop the bottom of the drill and are planted first). Holder shall take appropriate measures to ensure this does not occur. Where drilling is not possible, seed will be broadcast and the area shall be raked or chained to cover the seed. When broadcasting the seed, the pounds per acre are to be doubled. Seeding shall be repeated until a satisfactory stand is established as determined by the Authorized Officer. Evaluation of growth may not be made before completion of at least one full growing season after seeding.

Species to be planted in pounds of pure live seed* per acre:

<u>Species</u>	<u>lb/acre</u>
Plains Bristlegrass	5lbs/A
Sand Bluestem	5lbs/A
Little Bluestem	3lbs/A
Big Bluestem	6lbs/A
Plains Coreopsis	2lbs/A
Sand Dropseed	1lbs/A

*Pounds of pure live seed:

Pounds of seed x percent purity x percent germination = pounds pure live seed

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME:	Devon Energy Production Company LP
LEASE NO.:	NMNM0012121
LOCATION:	Section 25, T.24 S., R.31 E., NMPM
COUNTY:	Eddy County, New Mexico

WELL NAME & NO.:	Cotton Draw Unit 613H
SURFACE HOLE FOOTAGE:	200'N & 165'W
BOTTOM HOLE FOOTAGE:	2620'N & 330'W

WELL NAME & NO.:	Cotton Draw Unit 614H
SURFACE HOLE FOOTAGE:	200'N & 195'W
BOTTOM HOLE FOOTAGE:	20'S & 430'W

WELL NAME & NO.:	Cotton Draw Unit 625H
SURFACE HOLE FOOTAGE:	200'N & 105'W
BOTTOM HOLE FOOTAGE:	2620'N & 890'E

WELL NAME & NO.:	Cotton Draw Unit 626H
SURFACE HOLE FOOTAGE:	200'N & 135'W
BOTTOM HOLE FOOTAGE:	2620'N & 330'E

COA

H2S	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	
Potash	<input checked="" type="checkbox"/> None	<input type="checkbox"/> Secretary	<input type="checkbox"/> R-111-P
Cave/Karst Potential	<input checked="" type="checkbox"/> Low	<input type="checkbox"/> Medium	<input type="checkbox"/> High
Cave/Karst Potential	<input type="checkbox"/> Critical		
Variance	<input type="checkbox"/> None	<input checked="" type="checkbox"/> Flex Hose	<input type="checkbox"/> Other
Wellhead	<input type="checkbox"/> Conventional	<input checked="" type="checkbox"/> Multibowl	<input type="checkbox"/> Both
Other	<input type="checkbox"/> 4 String Area	<input type="checkbox"/> Capitan Reef	<input type="checkbox"/> WIPP
Other	<input checked="" type="checkbox"/> Fluid Filled	<input checked="" type="checkbox"/> Cement Squeeze	<input type="checkbox"/> Pilot Hole
Special Requirements	<input type="checkbox"/> Water Disposal	<input type="checkbox"/> COM	<input checked="" type="checkbox"/> Unit

A. HYDROGEN SULFIDE

A Hydrogen Sulfide (H2S) Drilling Plan shall be activated 500 feet prior to drilling into the **Cotton Draw** pool. As a result, the Hydrogen Sulfide area must meet Onshore Order 6 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, please provide measured values and formations to the BLM.

B. CASING

1. The **13-3/8** inch surface casing shall be set at approximately **750 feet** (a minimum of **70 feet (Eddy County)** into the Rustler Anhydrite and above the salt) and cemented to the surface.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
 - b. Wait on cement (WOC) time for a primary cement job will be a minimum of **8 hours** or 500 pounds compressive strength, whichever is greater. (This is to include the lead cement)
 - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
 - d. If cement falls back, remedial cementing will be done prior to drilling out that string.

Intermediate casing must be kept fluid filled to meet BLM minimum collapse requirement.

2. The minimum required fill of cement behind the **8-5/8** inch intermediate casing is:
 - Cement to surface. If cement does not circulate see B.1.a, c-d above.
Cement excess is less than 25%, more cement might be required.

Operator has proposed to pump down 13-3/8" X 8-5/8" annulus. Operator must run a CBL from TD of the 8-5/8" casing to surface. Submit results to BLM.

3. The minimum required fill of cement behind the **5-1/2** inch production casing is:
 - Cement should tie-back at least **200 feet** into previous casing string. Operator shall provide method of verification.
Cement excess is less than 25%, more cement might be required.

C. PRESSURE CONTROL

1. Variance approved to use flex line from BOP to choke manifold. Manufacturer's specification to be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no hard bends).'
2. Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the surface casing. Minimum working pressure of the blowout

preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be **5000 (5M)** psi.

- a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
- b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
- c. Manufacturer representative shall install the test plug for the initial BOP test.
- d. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
- e. Whenever any seal subject to test pressure is broken, all the tests in OOGO2.III.A.2.i must be followed.

D. SPECIAL REQUIREMENT (S)

Unit Wells

The well sign for a unit well shall include the unit number in addition to the surface and bottom hole lease numbers. This also applies to participating area numbers. If a participating area has not been established, the operator can use the general unit designation, but will replace the unit number with the participating area number when the sign is replaced.

Commercial Well Determination

A commercial well determination shall be submitted after production has been established for at least six months.

GENERAL REQUIREMENTS

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

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

☒ Eddy County

Call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220,
(575) 361-2822

☒ Lea County

Call the Hobbs Field Station, 414 West Taylor, Hobbs NM 88240, (575)
393-3612

1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - Notify the BLM when moving in and removing the Spudder Rig.
 - Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - BOP/BOPE test to be conducted per Onshore Oil and Gas Order No. 2 as soon as 2nd Rig is rigged up on well.
2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the dog house or stairway area.
3. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well – vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

A. CASING

1. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.
2. Wait on cement (WOC) for Potash Areas: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi for all cement blends, 2) until cement has been in place at least 24 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
3. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
4. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
6. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
7. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.
8. Whenever a casing string is cemented in the R-111-P potash area, the NMOCD requirements shall be followed.

B. PRESSURE CONTROL

1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in Onshore Oil and Gas Order No. 2 and API RP 53 Sec. 17.
2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.
3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. Whenever any seal subject to test pressure is broken, all the tests in OOGO2.III.A.2.i must be followed.
 - e. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - a. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead when specified), whichever is greater. However, if the float does not

hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).

- b. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the plug. However, **no tests** shall commence until the cement has had a minimum of 24 hours setup time, except the casing pressure test can be initiated immediately after bumping the plug (only applies to single stage cement jobs).
- c. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to Onshore Order 2 with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for water basin (8 hours) or potash (24 hours) or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- d. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- e. The results of the test shall be reported to the appropriate BLM office.
- f. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- g. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- h. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per Onshore Order No. 2.

C. DRILLING MUD

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

D. WASTE MATERIAL AND FLUIDS

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

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



**Devon Energy Center
333 West Sheridan Avenue
Oklahoma City, Oklahoma 73102-5015**

Hydrogen Sulfide (H₂S) Contingency Plan

For

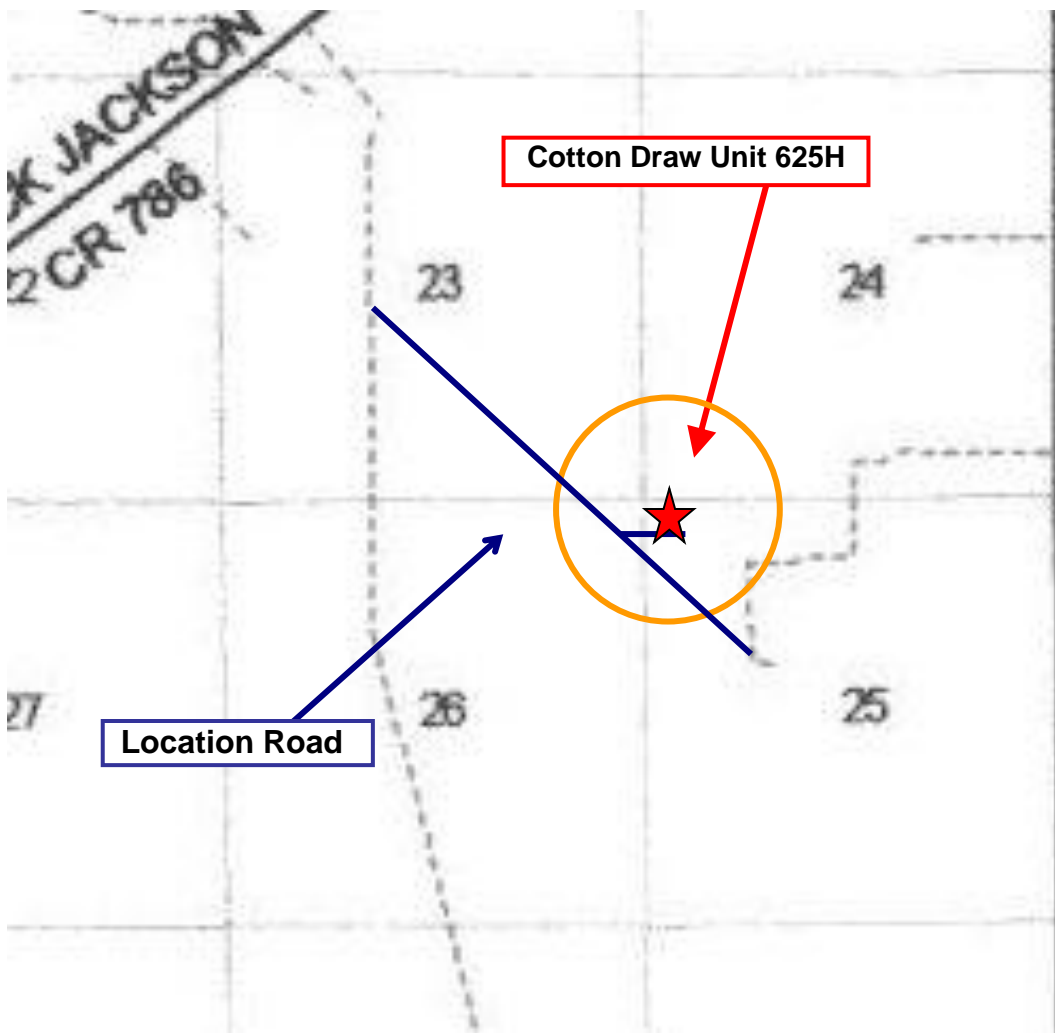
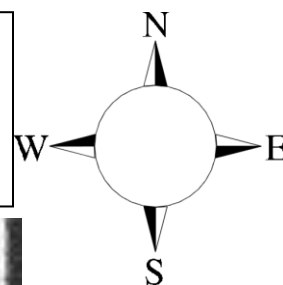
Cotton Draw Unit 625H

**Sec-25 T-24S R-31E
200' FNL & 105' FWL
LAT. = 32.1950507' N (NAD83)
LONG = 103.7397064' W**

Eddy County NM

Cotton Draw Unit 625H

This is an open drilling site. H₂S monitoring equipment and emergency response equipment will be used within 500' of zones known to contain H₂S, including warning signs, wind indicators and H₂S monitor.



Assumed 100 ppm **ROE = 3000'** (Radius of Exposure)
100 ppm H₂S concentration shall trigger activation of this plan.

Escape

Crews shall escape upwind of escaping gas in the event of an emergency release of gas. Escape can be facilitated from the location entrance road. Crews should then block the entrance to the location from the lease road so as not to allow anyone traversing into a hazardous area. The blockade should be at a safe distance outside of the ROE. There are no homes or buildings in or near the ROE.

Assumed 100 ppm ROE = 3000'

100 ppm H₂S concentration shall trigger activation of this plan.

Emergency Procedures

In the event of a release of gas containing H₂S, the first responder(s) must

- Isolate the area and prevent entry by other persons into the 100 ppm ROE.
- Evacuate any public places encompassed by the 100 ppm ROE.
- Be equipped with H₂S monitors and air packs in order to control the release.
- Use the “buddy system” to ensure no injuries occur during the response
- Take precautions to avoid personal injury during this operation.
- Contact operator and/or local officials to aid in operation. See list of phone numbers attached.
- Have received training in the
 - Detection of H₂S, and
 - Measures for protection against the gas,
 - Equipment used for protection and emergency response.

Ignition of Gas Source

Should control of the well be considered lost and ignition considered, take care to protect against exposure to Sulfur Dioxide (SO₂). Intentional ignition must be coordinated with the NMOCD and local officials. Additionally the NM State Police may become involved. NM State Police shall be the Incident Command on scene of any major release. Take care to protect downwind whenever there is an ignition of the gas

Characteristics of H₂S and SO₂

Common Name	Chemical Formula	Specific Gravity	Threshold Limit	Hazardous Limit	Lethal Concentration
Hydrogen Sulfide	H ₂ S	1.189 Air = 1	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO ₂	2.21 Air = 1	2 ppm	N/A	1000 ppm

Contacting Authorities

Devon Energy Corp. personnel must liaison with local and state agencies to ensure a proper response to a major release. Additionally, the OCD must be notified of the release as soon as possible but no later than 4 hours. Agencies will ask for information such as type and volume of release, wind direction, location of release, etc. Be prepared with all information available. The following call list of essential and potential responders has been prepared for use during a release. Devon Energy Corp. Company response must be in coordination with the State of New Mexico's 'Hazardous Materials Emergency Response Plan' (HMER)

Hydrogen Sulfide Drilling Operation Plan

I. HYDROGEN SULFIDE (H₂S) TRAINING

All personnel, whether regularly assigned, contracted, or employed on an unscheduled basis, will receive training from a qualified instructor in the following areas prior to commencing drilling operations on this well:

1. The hazards and characteristics of hydrogen sulfide (H₂S)
2. The proper use and maintenance of personal protective equipment and life support systems.
3. The proper use of H₂S detectors, alarms, warning systems, briefing areas, evacuation procedures, and prevailing winds.
4. The proper techniques for first aid and rescue procedures.

In addition, supervisory personnel will be trained in the following areas:

1. The effects of H₂S metal components. If high tensile tubulars are to be used, personnel will be trained in their special maintenance requirements.
2. Corrective action and shut-in procedures when drilling or reworking a well and blowout prevention and well control procedures.
3. The contents and requirements of the H₂S Drilling Operations Plan and Public Protection Plan.

There will be an initial training session just prior to encountering a known or probable H₂S zone (within 3 days or 500 feet) and weekly H₂S and well control drills for all personnel in each crew. The initial training session shall include a review of the site specific H₂S Drilling Operations Plan and the Public Protection Plan.

II. HYDROGEN SULFIDE TRAINING

Note: All H₂S safety equipment and systems will be installed, tested, and operational when drilling reaches a depth of 500 feet above, or three days prior to penetrating the first zone containing or reasonably expected to contain H₂S.

1. Well Control Equipment

- A. Flare line
- B. Choke manifold – Remotely Operated
- C. Blind rams and pipe rams to accommodate all pipe sizes with properly sized closing unit
- D. Auxiliary equipment may include if applicable: annular preventer and rotating head.
- E. Mud/Gas Separator

2. Protective equipment for essential personnel:

30-minute SCBA units located at briefing areas, as indicated on well site diagram, with escape units available in the top doghouse. As it may be difficult to communicate audibly while wearing these units, hand signals shall be utilized.

3. H₂S detection and monitoring equipment:

Portable H₂S monitors positioned on location for best coverage and response. These units have warning lights which activate when H₂S levels reach 10 ppm and audible sirens which activate at 15 ppm. Sensor locations:

- Bell nipple
- Possum Belly/Shale shaker
- Rig floor
- Choke manifold
- Cellar

Visual warning systems:

- A. Wind direction indicators as shown on well site diagram
- B. Caution/ Danger signs shall be posted on roads providing direct access to locations. Signs will be painted a high visibility yellow with black lettering of sufficient size to be reasonable distance from the immediate location. Bilingual signs will be used when appropriate.

4. Mud program:

The mud program has been designed to minimize the volume of H₂S circulated to surface. Proper mud weight, safe drilling practices and the use of H₂S scavengers will minimize hazards when penetrating H₂S bearing zones.

5. Metallurgy:

- A. All drill strings, casings, tubing, wellhead, blowout preventer, drilling spool, kill lines, choke manifold lines, and valves shall be H₂S trim.
- B. All elastomers used for packing and seals shall be H₂S trim.

6. Communication:

- A. Company personnel have/use cellular telephones in the field.
- B. Land line (telephone) communications at Office

7. Well testing:

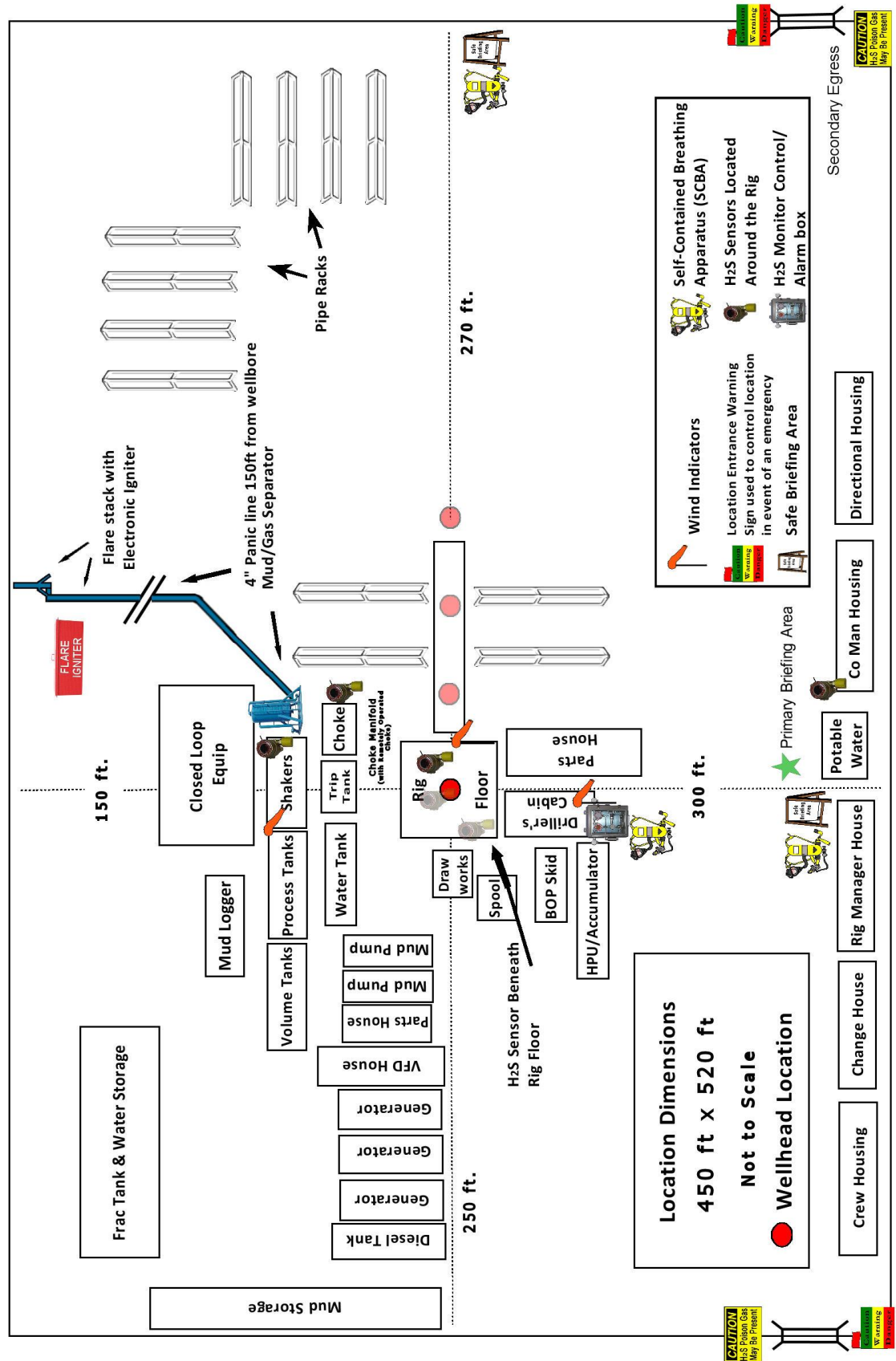
- A. Drill stem testing will be performed with a minimum number of personnel in the immediate vicinity, which are necessary to safety and adequately conduct the test. The drill stem testing will be conducted during daylight hours and formation fluids will not be flowed to the surface. All drill-stem-testing operations conducted in an H₂S environment will use the closed chamber method of testing.
- B. There will be no drill stem testing.

<u>Devon Energy Corp. Company Call List</u>		
Drilling Supervisor – Basin – Mark Kramer		405-823-4796
EHS Professional – Laura Wright		405-439-8129
<u>Agency Call List</u>		
<u>Lea County (575)</u>	Hobbs	
	Lea County Communication Authority	393-3981
	State Police	392-5588
	City Police	397-9265
	Sheriff's Office	393-2515
	Ambulance	911
	Fire Department	397-9308
	LEPC (Local Emergency Planning Committee)	393-2870
	NMOCD	393-6161
	US Bureau of Land Management	393-3612
<u>Eddy County (575)</u>	Carlsbad	
	State Police	885-3137
	City Police	885-2111
	Sheriff's Office	887-7551
	Ambulance	911
	Fire Department	885-3125
	LEPC (Local Emergency Planning Committee)	887-3798
	US Bureau of Land Management	887-6544
	NM Emergency Response Commission (Santa Fe)	(505) 476-9600
	24 HR	(505) 827-9126
	National Emergency Response Center	(800) 424-8802
	National Pollution Control Center: Direct	(703) 872-6000
	For Oil Spills	(800) 280-7118
	Emergency Services	
	Wild Well Control	(281) 784-4700
	Cudd Pressure Control	(915) 699-0139 (915) 563-3356
	Halliburton	(575) 746-2757
	B. J. Services	(575) 746-3569
	Give GPS position:	
	Native Air – Emergency Helicopter – Hobbs (TX & NM)	(800) 642-7828
	Flight For Life - Lubbock, TX	(806) 743-9911
	Aerocare - Lubbock, TX	(806) 747-8923
	Med Flight Air Amb - Albuquerque, NM	(575) 842-4433
	Lifeguard Air Med Svc. Albuquerque, NM	(800) 222-1222
	Poison Control (24/7)	(575) 272-3115
	Oil & Gas Pipeline 24 Hour Service	(800) 364-4366
	NOAA – Website - www.nhc.noaa.gov	

Prepared in conjunction with
Dave Small



Devon Energy - Well Pad Rig Location Layout Safety Equipment Location



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:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

COMMENTS

Action 32134

COMMENTS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 32134
	Action Type: [C-101] BLM - Federal/Indian Land Lease (Form 3160-3)

COMMENTS

Created By	Comment	Comment Date
kpickford	KP GEO Review 6/16/2021	6/16/2021

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:(575) 748-1283 Fax:(575) 748-9720

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1000 Rio Brazos Rd., Aztec, NM 87410
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1220 S. St Francis Dr., Santa Fe, NM 87505
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State of New Mexico
Energy, Minerals and Natural Resources
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CONDITIONS

Action 32134

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Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 32134
	Action Type: [C-101] BLM - Federal/Indian Land Lease (Form 3160-3)

CONDITIONS

Created By	Condition	Condition Date
kpickford	Will require a administrative order for non-standard location prior to placing the well on production	6/16/2021
kpickford	Notify OCD 24 hours prior to casing & cement	6/16/2021
kpickford	Will require a File As Drilled C-102 and a Directional Survey with the C-104	6/16/2021
kpickford	Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the operator shall drill without interruption through the fresh water zone or zones and shall immediately set in cement the water protection string	6/16/2021
kpickford	Cement is required to circulate on both surface and intermediate1 strings of casing	6/16/2021
kpickford	Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the oil or diesel. This includes synthetic oils. Oil based mud, drilling fluids and solids must be contained in a steel closed loop system	6/16/2021