Form 3160-3 FORM APPROVED OMB No. 1004-0137 (June 2015) Expires: January 31, 2018 **UNITED STATES** DEPARTMENT OF THE INTERIOR 5. Lease Serial No. BUREAU OF LAND MANAGEMENT APPLICATION FOR PERMIT TO DRILL OR REENTER 6. If Indian, Allotee or Tribe Name 7. If Unit or CA Agreement, Name and No. DRILL REENTER 1a. Type of work: 1b. Type of Well: Oil Well Gas Well Other 8. Lease Name and Well No. 1c. Type of Completion: Hydraulic Fracturing Single Zone Multiple Zone 2. Name of Operator 9. API Well No. 30-015-54971 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.\*) 11. Sec., T. R. M. or Blk. and Survey or Area At surface At proposed prod. zone 14. Distance in miles and direction from nearest town or post office\* 12. County or Parish 13. State 15. Distance from proposed\* 16. No of acres in lease 17. Spacing Unit dedicated to this well location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any) 18. Distance from proposed location\* 19. Proposed Depth 20. BLM/BIA Bond No. in file to nearest well, drilling, completed, applied for, on this lease, ft. 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. 4. Bond to cover the operations unless covered by an existing bond on file (see 2. A Drilling Plan. Item 20 above). 3. A Surface Use Plan (if the location is on National Forest System Lands, the 5. Operator certification. SUPO must be filed with the appropriate Forest Service Office). 6. Such other site specific information and/or plans as may be requested by the 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



\*(Instructions on page 2)

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

State of New Mexico Energy, Minerals & Natural Resources Department CONSERVATION DIVISION

1220 SOUTH ST. FRANCIS DR. Santa Fe, New Mexico 87505

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

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) 476-3460 Fax: (505) 476-3462

□ AMENDED REPORT

	WELL LOCATION AND	ACREAGE DEDICATION PLAT			
API Number	Pool Code	Pool Name			
30-015-54971	98220	Purple Sage;Wolfcamp			
Property Code	Prop	erty Name	Well Number		
300635	COTTON	COTTON DRAW UNIT			
OGRID No.	Oper	Elevation			
61.37	DEVON ENERGY PRO	DUCTION COMPANY, L.P.	3473.6'		

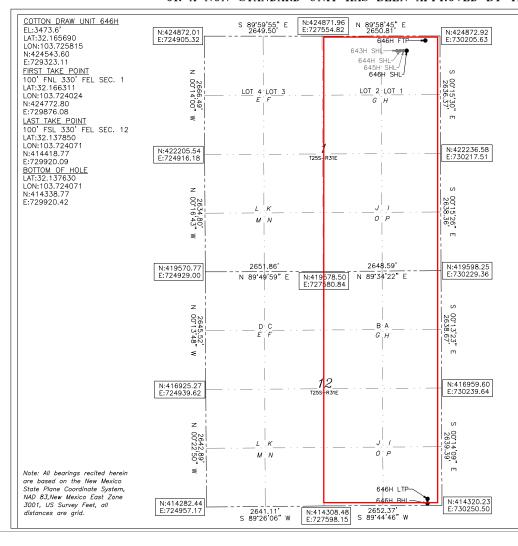
### Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
LOT 1	1	25-S	31-E		329	NORTH	884	EAST	EDDY

#### Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Р	12	25-S	31-E		20	SOUTH	330	EAST	EDDY
Dedicated Acres	s Joint o	r Infill C	onsolidation	Code Or	der No.				
640.20									

### 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



#### OPERATOR CERTIFICATION

I hereby certify that the information 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 mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

11-8-2021 Signature Date

JENNY HARMS TENNY. HARMS@DVN.COM

E-mail Address

### 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.

10/4/2021

Date of Survey



DRAWN BY: CM

Inten	t	As Dril	led											
API#														
Ope	rator Nar	me:	1			Prop	erty N	ame:						Well Number
Kick C	Off Point	(KOP)												
UL	Section	Township	Range	Lot	Feet		From N	ı/S	Feet		From	ı E/W	County	
Latitu	ıde				Longitu	ude							NAD	
Firet 7	Falsa Daisa	+ (FTD)												
UL	Section	Township	Danga	Lot	Feet		From N	ı/c	Feet			ı E/W	County	
		TOWNSHIP	Range	Lot			FIOIII	1/3	reet		FIOII	I E/ VV		
Latitu	ıde				Longitu	ude							NAD	
Last T	ake Poin	t (LTP)												
UL	Section	Township	Range	Lot	Feet	Fron	n N/S	Feet		From E/	/W	Count	у	
Latitu	ıde				Longitu	ude						NAD		
Ic +hic	wall tha	defining w	vall far th	o Hori	zontal Ci	nacina	. I Ini+2			7				
15 (1115	well the	denining w	ven ioi ti	е поп	2011tai 3	pacing	Guilte							
ا الحاد	: ممالمين	درال مالک			٦									
is this	well an	infill well?												
If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.														
API#			]											
0.50	water Na					Ducus	a mts . N							Mall Nivesbor
Ope	rator Nar	ne:				Prop	erty N	ame:						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 EN	ERGY PRODUCT	TION COMPANY, LP	OGRID: 613	37	Date:	10 / 19 / 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 Completion Initial Flow First Production Date Commencement Date Back Date 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. Wallis: 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	Central Delivery Point Name:	API	ULSTR		FOOTA	AGES			Anticipated Anticipated Gas Anticipated Produce Oil BBL/D MCF/D Water BBL/D
COTTON DRAW UNIT 631H	COTTON DRAW UNIT 1 CTB 1		1-255-31E	332	FNL	983	FWL	WC110	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 632H	COTTON DRAW UNIT 1 CTB 1	A	1-255-31E	332	FNL	1013	FWL	WCB	(+/-)6319mcfd/(+/-)886bopd/(+/-)4728bwpd
COTTON DRAW UNIT 633H	COTTON DRAW UNIT 1 CTB 1		1-255-316	332	FNL	1043	FWL	WCXY	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 634H	COTTON DRAW UNIT 1 CTB 1		1-25S-31E	482	FNL	1233	FWL	WC130	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 635H	COTTON DRAW UNIT 1 CTB 1		1-255-31E	482	FNL	1263	FWL	WC110	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 636H	COTTON DRAW UNIT 1 CTB 1		1-25S-31E	331	FNL	2594	FEL	WCB	(+/-)6319mcfd/(+/-)886bopd/(+/-)4728bwpd
COTTON DRAW UNIT 637H	COTTON DRAW UNIT 1 CTB 1		1-25S-31E	331	FNL	2564	FEL	WCXY	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 638H	COTTON DRAW UNIT 1 CTB 1		1-25S-31E	331	FNL	2534	FEL	WC130	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 639H	COTTON DRAW UNIT 1 CTB 2		1-255-318	481	FNL	2254	FEL	WC110	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 640H	COTTON DRAW UNIT 1 CTB 2		1-255-318	481	FNL	2224	FEL	WCB	(+/-)6319mcfd/(+/-)886bopd/(+/-)4728bwpd
COTTON DRAW UNIT 641H	COTTON DRAW UNIT 1 CTB 2		1-255-318	481	FNL	2194	FEL	WCXY	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 642H	COTTON DRAW UNIT 1 CTB 2		1-255-318	481	FNL	2164	FEL	WC130	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 643H	COTTON DRAW UNIT 1 CTB 2		1-255-31E	329	FNL	974	FEL	WC110	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 644H	COTTON DRAW UNIT 1 CTB 2		1-25S-31E	329	FNL	944	FEL	WCB	(+/-)6319mcfd/(+/-)886bopd/(+/-)4728bwpd
COTTON DRAW UNIT 645H	COTTON DRAW UNIT 1 CTB 2		1-25S-31E	329	FNL	914	FEL	WCXY	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd
COTTON DRAW UNIT 646H	COTTON DRAW UNIT 1 CTB 2		1-255-316	329	FNL	884	FEL	WC130	(+/-)6539mcfd/(+/-)1857bopd/(+/-)9727bwpd

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 Commencem ent Date		First Production Date
COTTON DRAW UNIT 631H	Art	10/1/2023				
COTTON DRAW UNIT 632H						
		10/1/2023				
COTTON DRAW UNIT 633H		10/1/2023				
COTTON DRAW UNIT 634H		10/1/2023				
COTTON DRAW UNIT 635H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 636H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 637H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 638H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 639H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/202
COTTON DRAW UNIT 640H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 641H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 642H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 643H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/202
COTTON DRAW UNIT 644H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	
COTTON DRAW UNIT 645H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024
COTTON DRAW UNIT 646H		10/1/2023	10/31/2023	2/28/2024	2/28/2024	2/28/2024

\*dates above are subject to change

# 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.  $\square$  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  $\square$  will  $\square$  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  $\Box$  does  $\Box$  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, aft	er 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								
_	ble to connect to a natural gas gathering system in the general area with sufficient capacity to transport one							
	ticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking							
	and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.  ox, Operator will select one of the following:							
If Operator checks this be	in, Operator with select one of the following:							
Well Shut-In.   Operator	r 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; o								
	n. $\square$ Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential							
	for the natural gas until a natural gas gathering system is available, including: power generation on lease;							
(a) (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:
Printed Name: Lindsey Miles
Title: Land Manager
E-mail Address:
Date:
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:
  - O 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
  - o 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
  - o 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.

## **COTTON DRAW UNIT 646H**

# 1. Geologic Formations

TVD of target	12150	Pilot hole depth	N/A
MD at TD:	22485	Deepest expected fresh water	

## **Basin**

Dasin	Donalle	Water/Mineral	
	Depth		
Formation	(TVD)	Bearing/Target	Hazards*
	from KB	Zone?	
Rustler	640		
Salt	1020		
Base of Salt	4176		
Delaware	4434		
Cherry Canyon	5250		
Brushy Canyon	6662		
1st Bone Spring Lime	8304		
Bone Spring 1st	9362		
Bone Spring 2nd	9930		
3rd Bone Spring Lime	10460		
Bone Spring 3rd	11236		
Wolfcamp	11650		

<sup>\*</sup>H2S, water flows, loss of circulation, abnormal pressures, etc.

2. Casing Program (Primary Design)

		Wt				Casing	Interval	Casing	Interval
Hole Size	Csg. Size	(PPF)	Grade Conn		From (MD)	To (MD)	From (TVD)	To (TVD)	
17 1/2	13 3/8	48	H40	STC	0	665	0	665	
9 7/8	8 5/8	32	P110	TLW	0	11650	0	11650	
7 7/8	5 1/2	17	P110	ВТС	0	22485	0	12150	

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

Casing	# Sks	TOC	Wt.	Yld (ft3/sack)	Slurry Description
Surface	520	Surf	13.2	1.44	Lead: Class C Cement + additives
I., 1	447	Surf	9	3.27	Lead: Class C Cement + additives
int i	Int 1 465	4000' above	13.2	1.44	Tail: Class H / C + additives
Int 1	As Needed	Surf	13.2	1.44	Squeeze Lead: Class C Cement + additives
Intermediate	447	Surf	9	3.27	Lead: Class C Cement + additives
Squeeze	465	4000' above	13.2	1.44	Tail: Class H / C + additives
Production	117	9689	9	3.27	Lead: Class H /C + additives
	1429	11689	13.2	1.44	Tail: Class H / C + additives

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

**4. Pressure Control Equipment (Three String Design)** 

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	Ту	ype	✓	Tested to:			
				nular	X	50% of rated working pressure			
Int 1	13-58"	5M	Blind	l Ram	X				
IIIt I	13-36	3101	Pipe	Ram		5M			
			Doub	le Ram	X	3101			
			Other*						
			Annula	ar (5M)	X	100% of rated working pressure			
Dord of an	13-5/8"	403.5	Blind Ram		l Ram	X			
Production		13-5/8"	10M	TOM	13-5/8"   10M	13-5/8"   10M	Pipe	Ram	
			Doub	le Ram	X	10M			
			Other*						
			Annula	ar (5M)					
			Blind Ram Pipe Ram						
						1			
			Double Ram			1			
			Other*						
N A variance is requested for	A variance is requested for the use of a diverter on the surface casing. See attached for schematic.								
Y A variance is requested to 1	A variance is requested to run a 5 M annular on a 10M system								

5. Mud Program (Three String Design)

Section	Туре	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

<u> </u>	6				
Logging, C	Logging, Coring and Testing				
	Will run GR/CNL from TD to surface (horizontal well - vertical portion of hole). Stated logs run will be in the				
X	Completion Report and sbumitted 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.				

<b>Additional</b>	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	Specfiy what type and where?
BH pressure at deepest TVD	6634
Abnormal temperature	No

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

Hydrogren 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	H2S is present
Y	H2S 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
- 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 646H**

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 nippled 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



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

# **Drilling Plan Data Report**

03/20/2024

**APD ID:** 10400081504 Submission Date: 11/08/2021

Operator Name: DEVON ENERGY PRODUCTION COMPANY LP

Well Name: COTTON DRAW UNIT Well Number: 646H

Well Type: OIL WELL Well Work Type: Drill

Highlighted data reflects the most recent changes

**Show Final Text** 

# **Section 1 - Geologic Formations**

Formation ID	Formation Name	Elevation	True Vertical	Measured Depth	Lithologies	Mineral Resources	Producing Formatio
13111165	UNKNOWN	3471	0	Ö	OTHER : SURFACE	NONE	N
13111166	RUSTLER	2831	640	640	SANDSTONE	NONE	N
13111167	SALADO	2451	1020	1020	SALT	NONE	N
13111168	BASE OF SALT	-705	4176	4176	ANHYDRITE	NATURAL GAS, OIL	N
13111169	BELL CANYON	-963	4434	4434	SANDSTONE	NATURAL GAS, OIL	N
13111170	CHERRY CANYON	-1779	5250	5250	SANDSTONE	NATURAL GAS, OIL	N
13111171	BRUSHY CANYON	-3191	6662	6662	SANDSTONE	NATURAL GAS, OIL	N
13111178	BONE SPRING LIME	-4833	8304	8304	LIMESTONE	NATURAL GAS, OIL	N
13111172	BONE SPRING	-5891	9362	9362	SANDSTONE	NATURAL GAS, OIL	N
13111174	BONE SPRING 2ND	-6459	9930	9930	SANDSTONE	NATURAL GAS, OIL	N
13111179	BONE SPRING LIME	-6989	10460	10460	LIMESTONE	NATURAL GAS, OIL	N
13111175	BONE SPRING 3RD	-7765	11236	11236	SANDSTONE	NATURAL GAS, OIL	N
13111176	WOLFCAMP	-8179	11650	11650	SHALE	NATURAL GAS, OIL	Y
13111177	STRAWN	-10129	13600	13600	LIMESTONE	NATURAL GAS, OIL	N

# **Section 2 - Blowout Prevention**



# 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.

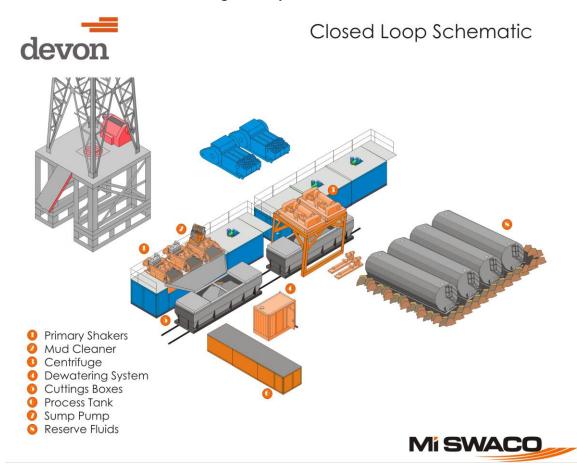
Prior to installing a closed-loop system on site, the topsoil, if present, will be stripped and stockpiled for use as the final cover or fill at the time of closure.

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.

Mud Cleaner: The Mud Cleaner cleans the fluid after it leaves the shakers. A set of hydrocyclones are sized to handle 1.25 to 1.5 times the maximum circulating rate. This ensures all the fluid is being processed to an average cut point of 25 microns. The wet discharged is dewatered on a shaker equipped with ultra fine mesh screens and generally cut at 40 microns.



Centrifuges: The centrifuges can be one or two in number depending on the well geometry or depth of well. The centrifuges are sized to maintain low gravity solids at 5% or below. They may or may not need a dewatering system to enhance the removal rates. The centrifuges can make a cut point of 8-10 microns depending on bowl speed, feed rate, solids loading and other factors.

The centrifuge system is designed to work on the active system and be flexible to process incoming fluids from other locations. This set-up is also dependant on well factors.

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

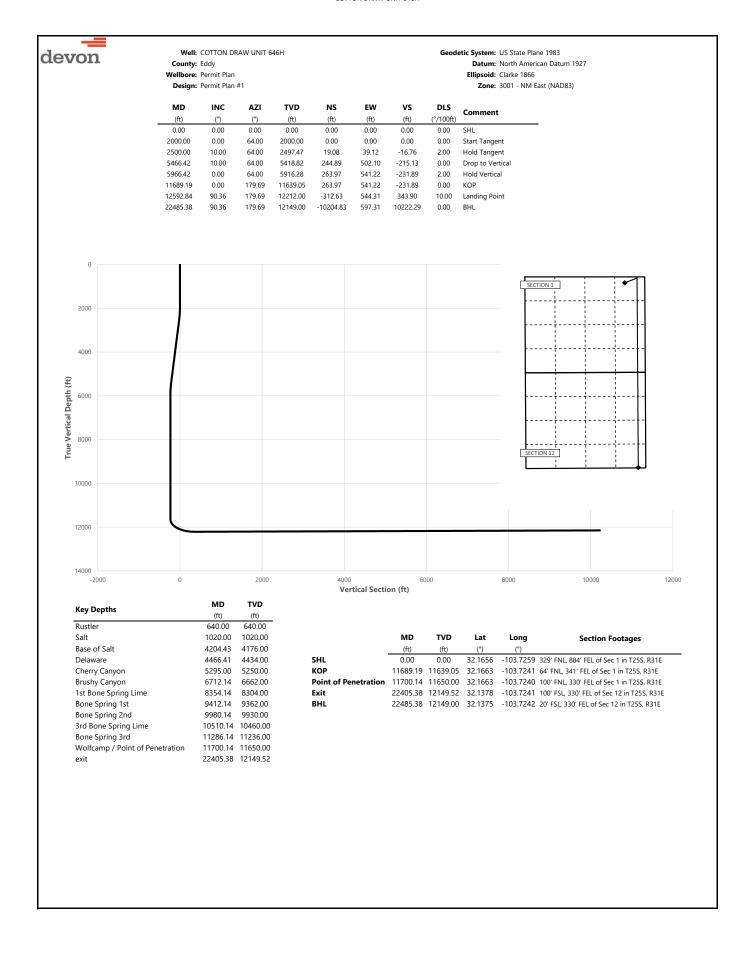
# 1. SUMMARY OF Variance:

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 nippled 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.





County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983

**Datum:** North American Datum 1927 **Ellipsoid:** Clarke 1866

Design: Permit Plan #1								<b>Zone:</b> 3001 - NM East (NAD83)		
MD	INC	AZI	TVD	NS	EW	vs	DLS			
(ft)	(°)	(°)	(ft)	(ft)	(ft)	(ft)	(°/100ft)	Comment		
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	SHL		
100.00	0.00	64.00	100.00	0.00	0.00	0.00	0.00			
200.00	0.00	64.00	200.00	0.00	0.00	0.00	0.00			
300.00	0.00	64.00	300.00	0.00	0.00	0.00	0.00			
400.00	0.00	64.00	400.00	0.00	0.00	0.00	0.00			
500.00	0.00	64.00	500.00	0.00	0.00	0.00	0.00			
600.00	0.00	64.00	600.00	0.00	0.00	0.00	0.00			
640.00	0.00	64.00	640.00	0.00	0.00	0.00	0.00	Rustler		
700.00	0.00	64.00	700.00	0.00	0.00	0.00	0.00			
800.00	0.00	64.00	800.00	0.00	0.00	0.00	0.00			
900.00	0.00	64.00	900.00	0.00	0.00	0.00	0.00			
1000.00	0.00	64.00	1000.00	0.00	0.00	0.00	0.00	Call		
1020.00	0.00	64.00	1020.00	0.00	0.00	0.00	0.00	Salt		
1100.00 1200.00	0.00	64.00 64.00	1100.00 1200.00	0.00	0.00	0.00 0.00	0.00			
1300.00	0.00	64.00	1300.00	0.00	0.00	0.00	0.00			
1400.00	0.00	64.00	1400.00	0.00	0.00	0.00	0.00			
1500.00	0.00	64.00	1500.00	0.00	0.00	0.00	0.00			
1600.00	0.00	64.00	1600.00	0.00	0.00	0.00	0.00			
1700.00	0.00	64.00	1700.00	0.00	0.00	0.00	0.00			
1800.00	0.00	64.00	1800.00	0.00	0.00	0.00	0.00			
1900.00	0.00	64.00	1900.00	0.00	0.00	0.00	0.00			
2000.00	0.00	64.00	2000.00	0.00	0.00	0.00	0.00	Start Tangent		
2100.00	2.00	64.00	2099.98	0.77	1.57	-0.67	2.00	-		
2200.00	4.00	64.00	2199.84	3.06	6.27	-2.69	2.00			
2300.00	6.00	64.00	2299.45	6.88	14.11	-6.04	2.00			
2400.00	8.00	64.00	2398.70	12.22	25.06	-10.74	2.00			
2500.00	10.00	64.00	2497.47	19.08	39.12	-16.76	2.00	Hold Tangent		
2600.00	10.00	64.00	2595.95	26.69	54.73	-23.45	0.00			
2700.00	10.00	64.00	2694.43	34.30	70.33	-30.14	0.00			
2800.00	10.00	64.00	2792.91	41.92	85.94	-36.82	0.00			
2900.00	10.00	64.00	2891.39	49.53	101.55	-43.51	0.00			
3000.00	10.00	64.00	2989.87	57.14	117.15	-50.20	0.00			
3100.00	10.00	64.00	3088.35	64.75	132.76	-56.88	0.00			
3200.00 3300.00	10.00	64.00	3186.83	72.36	148.37	-63.57	0.00			
3400.00	10.00 10.00	64.00	3285.31 3383.79	79.98	163.98	-70.26 -76.95	0.00			
3500.00	10.00	64.00 64.00	3482.27	87.59 95.20	179.58 195.19	-83.63	0.00			
3600.00	10.00	64.00	3580.75	102.81	210.80	-90.32	0.00			
3700.00	10.00	64.00	3679.23	110.43	226.41	-97.01	0.00			
3800.00	10.00	64.00	3777.72	118.04	242.01	-103.69	0.00			
3900.00	10.00	64.00	3876.20	125.65	257.62	-110.38	0.00			
4000.00	10.00	64.00	3974.68	133.26	273.23	-117.07	0.00			
4100.00	10.00	64.00	4073.16	140.87	288.84	-123.76	0.00			
4200.00	10.00	64.00	4171.64	148.49	304.44	-130.44	0.00			
4204.43	10.00	64.00	4176.00	148.82	305.13	-130.74	0.00	Base of Salt		
4300.00	10.00	64.00	4270.12	156.10	320.05	-137.13	0.00			
4400.00	10.00	64.00	4368.60	163.71	335.66	-143.82	0.00			
4466.41	10.00	64.00	4434.00	168.77	346.02	-148.26	0.00	Delaware		
4500.00	10.00	64.00	4467.08	171.32	351.27	-150.51	0.00			
4600.00	10.00	64.00	4565.56	178.94	366.87	-157.19	0.00			
4700.00	10.00	64.00	4664.04	186.55	382.48	-163.88	0.00			
4800.00	10.00	64.00	4762.52	194.16	398.09	-170.57	0.00			
4900.00	10.00	64.00	4861.00	201.77 209.39	413.69	-177.25	0.00			
5000.00 5100.00	10.00 10.00	64.00 64.00	4959.48 5057.97	209.39	429.30 444.91	-183.94 -190.63	0.00			
5200.00	10.00	64.00	5156.45	217.00	460.52	-190.63	0.00			
5295.00	10.00	64.00	5250.00	231.84	475.34	-203.67	0.00	Cherry Canyon		
5300.00	10.00	64.00	5254.93	232.22	476.12	-204.00	0.00	<i>) )</i>		
5400.00	10.00	64.00	5353.41	239.83	491.73	-210.69	0.00			
5466.42	10.00	64.00	5418.82	244.89	502.10	-215.13	0.00	Drop to Vertical		
5500.00	9.33	64.00	5451.92	247.36	507.17	-217.30	2.00	·		
5600.00	7.33	64.00	5550.86	253.71	520.18	-222.88	2.00			
5700.00	5.33	64.00	5650.25	258.54	530.09	-227.13	2.00			
5800.00	3.33	64.00	5749.96	261.85	536.87	-230.03	2.00			
5900.00	1.33	64.00	5849.87	263.63	540.52	-231.60	2.00			
5966.42	0.00	64.00	5916.28	263.97	541.22	-231.89	2.00	Hold Vertical		
6000.00	0.00	179.69	5949.86	263.97	541.22	-231.89	0.00			
6100.00	0.00	179.69	6049.86	263.97	541.22	-231.89	0.00			
6200.00	0.00	179.69	6149.86	263.97	541.22	-231.89	0.00			



County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983

**Datum:** North American Datum 1927 **Ellipsoid:** Clarke 1866

Design: Permit Plan #1							Zone: 3001 - NM East (NAD83)		
MD	INC	AZI	TVD	NS	EW	vs	DLS		
(ft)	(°)	(°)	(ft)	(ft)	(ft)	(ft)	(°/100ft)	Comment	
6300.00	0.00	179.69	6249.86	263.97	541.22	-231.89	0.00		
6400.00	0.00	179.69	6349.86	263.97	541.22	-231.89	0.00		
6500.00	0.00	179.69	6449.86	263.97	541.22	-231.89	0.00		
6600.00	0.00	179.69	6549.86	263.97	541.22	-231.89	0.00		
6700.00	0.00	179.69	6649.86	263.97	541.22	-231.89	0.00		
6712.14	0.00	179.69	6662.00	263.97	541.22	-231.89	0.00	Brushy Canyon	
6800.00	0.00	179.69	6749.86	263.97	541.22	-231.89	0.00	stastly early on	
6900.00	0.00	179.69	6849.86	263.97	541.22	-231.89	0.00		
7000.00	0.00	179.69	6949.86	263.97	541.22	-231.89	0.00		
7100.00	0.00		7049.86	263.97	541.22	-231.89	0.00		
		179.69							
7200.00	0.00	179.69	7149.86	263.97	541.22	-231.89	0.00		
7300.00	0.00	179.69	7249.86	263.97	541.22	-231.89	0.00		
7400.00	0.00	179.69	7349.86	263.97	541.22	-231.89	0.00		
7500.00	0.00	179.69	7449.86	263.97	541.22	-231.89	0.00		
7600.00	0.00	179.69	7549.86	263.97	541.22	-231.89	0.00		
7700.00	0.00	179.69	7649.86	263.97	541.22	-231.89	0.00		
7800.00	0.00	179.69	7749.86	263.97	541.22	-231.89	0.00		
7900.00	0.00	179.69	7849.86	263.97	541.22	-231.89	0.00		
8000.00	0.00	179.69	7949.86	263.97	541.22	-231.89	0.00		
8100.00	0.00	179.69	8049.86	263.97	541.22	-231.89	0.00		
8200.00	0.00	179.69	8149.86	263.97	541.22	-231.89	0.00		
8300.00	0.00	179.69	8249.86	263.97	541.22	-231.89	0.00		
8354.14	0.00	179.69	8304.00	263.97	541.22	-231.89	0.00	1st Bone Spring Lime	
8400.00	0.00	179.69	8349.86	263.97	541.22	-231.89	0.00	. 5	
8500.00	0.00	179.69	8449.86	263.97	541.22	-231.89	0.00		
8600.00	0.00	179.69	8549.86	263.97	541.22	-231.89	0.00		
8700.00	0.00	179.69	8649.86	263.97	541.22	-231.89	0.00		
8800.00	0.00	179.69	8749.86	263.97	541.22	-231.89	0.00		
8900.00	0.00	179.69	8849.86	263.97	541.22	-231.89	0.00		
9000.00	0.00	179.69	8949.86	263.97	541.22	-231.89	0.00		
		179.69	9049.86	263.97		-231.89			
9100.00	0.00				541.22		0.00		
9200.00	0.00	179.69	9149.86	263.97	541.22	-231.89	0.00		
9300.00	0.00	179.69	9249.86	263.97	541.22	-231.89	0.00		
9400.00	0.00	179.69	9349.86	263.97	541.22	-231.89	0.00		
9412.14	0.00	179.69	9362.00	263.97	541.22	-231.89	0.00	Bone Spring 1st	
9500.00	0.00	179.69	9449.86	263.97	541.22	-231.89	0.00		
9600.00	0.00	179.69	9549.86	263.97	541.22	-231.89	0.00		
9700.00	0.00	179.69	9649.86	263.97	541.22	-231.89	0.00		
9800.00	0.00	179.69	9749.86	263.97	541.22	-231.89	0.00		
9900.00	0.00	179.69	9849.86	263.97	541.22	-231.89	0.00		
9980.14	0.00	179.69	9930.00	263.97	541.22	-231.89	0.00	Bone Spring 2nd	
10000.00	0.00	179.69	9949.86	263.97	541.22	-231.89	0.00		
10100.00	0.00	179.69	10049.86	263.97	541.22	-231.89	0.00		
10200.00	0.00	179.69	10149.86	263.97	541.22	-231.89	0.00		
10300.00	0.00	179.69	10249.86	263.97	541.22	-231.89	0.00		
10400.00	0.00	179.69	10349.86	263.97	541.22	-231.89	0.00		
10500.00	0.00	179.69	10449.86	263.97	541.22	-231.89	0.00		
10510.14	0.00	179.69	10443.00	263.97	541.22	-231.89	0.00	3rd Bone Spring Lime	
10600.00	0.00	179.69	10549.86	263.97	541.22	-231.89	0.00	pgc	
10700.00	0.00	179.69	10649.86	263.97	541.22	-231.89	0.00		
10700.00	0.00	179.69	10749.86	263.97	541.22	-231.89	0.00		
10900.00		179.69							
	0.00		10849.86	263.97	541.22	-231.89	0.00		
11000.00	0.00	179.69	10949.86	263.97	541.22	-231.89	0.00		
11100.00	0.00	179.69	11049.86	263.97	541.22	-231.89	0.00		
11200.00	0.00	179.69	11149.86	263.97	541.22	-231.89	0.00		
11286.14	0.00	179.69	11236.00	263.97	541.22	-231.89	0.00	Bone Spring 3rd	
11300.00	0.00	179.69	11249.86	263.97	541.22	-231.89	0.00		
11400.00	0.00	179.69	11349.86	263.97	541.22	-231.89	0.00		
11500.00	0.00	179.69	11449.86	263.97	541.22	-231.89	0.00		
11600.00	0.00	179.69	11549.86	263.97	541.22	-231.89	0.00		
11689.19	0.00	179.69	11639.05	263.97	541.22	-231.89	0.00	KOP	
11700.00	1.08	179.69	11649.86	263.87	541.22	-231.79	10.00		
11700.14	1.09	179.69	11650.00	263.86	541.22	-231.79	10.00	Wolfcamp / Point of Penetration	
11800.00	11.08	179.69	11749.17	253.29	541.27	-221.23	10.00	•	
11900.00	21.08	179.69	11845.14	225.62	541.42	-193.60	10.00		
12000.00	31.08	179.69	11934.84	181.71	541.66	-149.75	10.00		
12100.00	41.08	179.69	12015.56	122.90	541.97	-91.02	10.00		
12200.00	51.08	179.69	12084.84	50.96	542.36	-19.18	10.00		
12300.00	61.08	179.69	12140.57	-31.92	542.80	63.58	10.00		
		179.69	12181.06	-123.21	543.29	154.75	10.00		
12400.00	71.08								



County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983

Datum: North American Datum 1927 Ellipsoid: Clarke 1866

	Design: Permit Plan #1						<b>Zone:</b> 3001 - NM East (NAD83)			
MD (ft)	INC (°)	<b>AZI</b> (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	<b>DLS</b> (°/100ft)	Comment		
12500.00	81.08	179.69	12205.08	-220.15	543.81	251.55	10.00			
12592.84	90.36	179.69	12212.00	-312.63	544.31	343.90	10.00	Landing Point		
12600.00	90.36	179.69	12211.95	-319.79	544.34	351.05	0.00	3		
12700.00	90.36	179.69	12211.32	-419.79	544.88	450.91	0.00			
12800.00	90.36	179.69	12210.68	-519.78	545.42	550.77	0.00			
12900.00	90.36	179.69	12210.04	-619.78	545.95	650.62	0.00			
13000.00	90.36	179.69	12209.41	-719.78	546.49	750.48	0.00			
13100.00	90.36	179.69	12208.77	-819.77	547.02	850.34	0.00			
		179.69					0.00			
13200.00	90.36		12208.13	-919.77	547.56	950.19				
13300.00	90.36	179.69	12207.50	-1019.77	548.10	1050.05	0.00			
13400.00	90.36	179.69	12206.86	-1119.76	548.63	1149.91	0.00			
13500.00	90.36	179.69	12206.22	-1219.76	549.17	1249.77	0.00			
13600.00	90.36	179.69	12205.59	-1319.76	549.70	1349.62	0.00			
13700.00	90.36	179.69		-1419.75	550.24	1449.48	0.00			
13800.00	90.36	179.69	12204.31	-1519.75	550.78	1549.34	0.00			
13900.00	90.36	179.69	12203.68	-1619.75	551.31	1649.19	0.00			
14000.00	90.36	179.69	12203.04	-1719.74	551.85	1749.05	0.00			
14100.00	90.36	179.69	12202.40	-1819.74	552.39	1848.91	0.00			
14200.00	90.36	179.69	12201.77	-1919.74	552.92	1948.76	0.00			
14300.00	90.36	179.69	12201.13	-2019.73	553.46	2048.62	0.00			
14400.00	90.36	179.69	12200.49	-2119.73	553.99	2148.48	0.00			
14500.00	90.36	179.69	12199.86	-2219.73	554.53	2248.34	0.00			
14600.00	90.36	179.69	12199.22	-2319.72	555.07	2348.19	0.00			
14700.00	90.36	179.69	12198.58	-2419.72	555.60	2448.05	0.00			
14800.00	90.36	179.69	12197.95	-2519.72	556.14	2547.91	0.00			
14900.00	90.36	179.69	12197.31	-2619.71	556.67	2647.76	0.00			
15000.00	90.36	179.69	12196.67	-2719.71	557.21	2747.62	0.00			
15100.00	90.36	179.69	12196.04	-2819.70	557.75	2847.48	0.00			
15200.00	90.36	179.69	12195.40	-2919.70	558.28	2947.33	0.00			
15300.00	90.36		12193.40	-3019.70	558.82		0.00			
		179.69				3047.19				
15400.00	90.36	179.69		-3119.69	559.35	3147.05	0.00			
15500.00	90.36	179.69	12193.49	-3219.69	559.89	3246.91	0.00			
15600.00	90.36	179.69		-3319.69	560.43	3346.76	0.00			
15700.00	90.36	179.69	12192.22	-3419.68	560.96	3446.62	0.00			
15800.00	90.36	179.69	12191.58	-3519.68	561.50	3546.48	0.00			
15900.00	90.36	179.69	12190.94	-3619.68	562.03	3646.33	0.00			
16000.00	90.36	179.69	12190.31	-3719.67	562.57	3746.19	0.00			
16100.00	90.36	179.69	12189.67	-3819.67	563.11	3846.05	0.00			
16200.00	90.36	179.69	12189.03	-3919.67	563.64	3945.90	0.00			
16300.00	90.36	179.69	12188.40	-4019.66	564.18	4045.76	0.00			
16400.00	90.36	179.69	12187.76	-4119.66	564.71	4145.62	0.00			
16500.00	90.36	179.69	12187.12	-4219.66	565.25	4245.48	0.00			
16600.00	90.36	179.69	12186.49	-4319.65	565.79	4345.33	0.00			
16700.00	90.36	179.69	12185.85	-4419.65	566.32	4445.19	0.00			
16800.00	90.36	179.69	12185.21	-4519.65	566.86	4545.05	0.00			
16900.00	90.36	179.69	12184.58	-4619.64	567.40	4644.90	0.00			
17000.00	90.36	179.69	12183.94	-4719.64	567.93	4744.76	0.00			
17100.00	90.36	179.69	12183.30	-4819.64	568.47	4844.62	0.00			
17100.00	90.36	179.69	12182.67		569.00	4944.47	0.00			
17200.00	90.36	179.69		-5019.63	569.54	5044.33	0.00			
17400.00							0.00			
	90.36	179.69		-5119.63	570.08	5144.19				
17500.00	90.36	179.69	12180.76		570.61	5244.05	0.00			
17600.00	90.36	179.69	12180.12		571.15	5343.90	0.00			
17700.00	90.36	179.69	12179.48	-5419.61	571.68	5443.76	0.00			
17800.00	90.36	179.69	12178.85	-5519.61	572.22	5543.62	0.00			
17900.00	90.36	179.69	12178.21	-5619.61	572.76	5643.47	0.00			
18000.00	90.36	179.69	12177.57	-5719.60	573.29	5743.33	0.00			
18100.00	90.36	179.69	12176.94	-5819.60	573.83	5843.19	0.00			
18200.00	90.36	179.69	12176.30	-5919.60	574.36	5943.04	0.00			
18300.00	90.36	179.69	12175.66	-6019.59	574.90	6042.90	0.00			
18400.00	90.36	179.69	12175.03	-6119.59	575.44	6142.76	0.00			
18500.00	90.36	179.69	12174.39	-6219.59	575.97	6242.62	0.00			
18600.00	90.36	179.69	12173.75	-6319.58	576.51	6342.47	0.00			
18700.00	90.36	179.69	12173.12		577.04	6442.33	0.00			
18800.00	90.36	179.69		-6519.58	577.58	6542.19	0.00			
18900.00	90.36	179.69	12171.84	-6619.57	578.12	6642.04	0.00			
19000.00	90.36	179.69	12171.04	-6719.57	578.65	6741.90	0.00			
19100.00	90.36	179.69	12171.21	-6819.57	579.19	6841.76	0.00			
19100.00	90.36	179.69	12170.57	-6919.56	579.19	6941.61	0.00			
12200.00		179.69		-7019.56	580.26	7041.47	0.00			
19300.00	90.36									



County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

Geodetic System: US State Plane 1983

**Datum:** North American Datum 1927 **Ellipsoid:** Clarke 1866

(ft) (°) (°) (ft) (ft) (ft) (ft) (°/100ft) (Comment	
19400.00 90.36 179.69 12168.66 -7119.56 580.80 7141.33 0.00	
19500.00 90.36 179.69 12168.02 -7219.55 581.33 7241.19 0.00	
19600.00 90.36 179.69 12167.38 -7319.55 581.87 7341.04 0.00	
19700.00 90.36 179.69 12166.75 -7419.55 582.40 7440.90 0.00	
19800.00 90.36 179.69 12166.11 -7519.54 582.94 7540.76 0.00	
19900.00 90.36 179.69 12165.47 -7619.54 583.48 7640.61 0.00	
20000.00 90.36 179.69 12164.84 -7719.53 584.01 7740.47 0.00	
20100.00 90.36 179.69 12164.20 -7819.53 584.55 7840.33 0.00	
20200.00 90.36 179.69 12163.56 -7919.53 585.09 7940.18 0.00	
20300.00 90.36 179.69 12162.93 -8019.52 585.62 8040.04 0.00	
20400.00 90.36 179.69 12162.29 -8119.52 586.16 8139.90 0.00	
20500.00 90.36 179.69 12161.65 -8219.52 586.69 8239.76 0.00	
20600.00 90.36 179.69 12161.02 -8319.51 587.23 8339.61 0.00	
20700.00 90.36 179.69 12160.38 -8419.51 587.77 8439.47 0.00	
20800.00 90.36 179.69 12159.74 -8519.51 588.30 8539.33 0.00	
20900.00 90.36 179.69 12159.11 -8619.50 588.84 8639.18 0.00	
21000.00 90.36 179.69 12158.47 -8719.50 589.37 8739.04 0.00	
21100.00 90.36 179.69 12157.83 -8819.50 589.91 8838.90 0.00	
21200.00 90.36 179.69 12157.20 -8919.49 590.45 8938.75 0.00	
21300.00 90.36 179.69 12156.56 -9019.49 590.98 9038.61 0.00	
21400.00 90.36 179.69 12155.92 -9119.49 591.52 9138.47 0.00	
21500.00 90.36 179.69 12155.29 -9219.48 592.05 9238.33 0.00	
21600.00 90.36 179.69 12154.65 -9319.48 592.59 9338.18 0.00	
21700.00 90.36 179.69 12154.01 -9419.48 593.13 9438.04 0.00	
21800.00 90.36 179.69 12153.38 -9519.47 593.66 9537.90 0.00	
21900.00 90.36 179.69 12152.74 -9619.47 594.20 9637.75 0.00	
22000.00 90.36 179.69 12152.10 -9719.47 594.73 9737.61 0.00	
22100.00 90.36 179.69 12151.47 -9819.46 595.27 9837.47 0.00	
22200.00 90.36 179.69 12150.83 -9919.46 595.81 9937.32 0.00	
22300.00 90.36 179.69 12150.19 -10019.46 596.34 10037.18 0.00	
22400.00 90.36 179.69 12149.56 -10119.45 596.88 10137.04 0.00	
22405.38 90.36 179.69 12149.52 -10124.83 596.91 10142.41 0.00 exit	
22485.38 90.36 179.69 12149.00 -10204.83 597.31 10222.29 0.00 BHL	

Well: COTTON DRAW UNIT 646H Geodetic System: US State Plane 1983
County: Eddy Datum: North American Datu

Wellbore: Permit Plan
Design: Permit Plan #1

Datum: North American Datum 1927 Ellipsoid: Clarke 1866 Zone: 3001 - NM East (NAD83)

INC TVD EW MD AZI NS ٧S DLS Comment (ft) (°) (°) (ft) (ft) (ft) (ft) (°/100ft)

# **Devon Energy Annular Preventer Summary**

# 1. Component and Preventer Compatibility Table

The table below, which covers the drilling and casing of the 10M MASP portion of the well, outlines the tubulars and the compatible preventers in use. This table, combined with the mud program, documents that two barriers to flow can be maintained at all times, independent of the rating of the annular preventer.

Component	OD	Preventer	RWP
Drillpipe	4.5"	Fixed lower 4.5"	10M
		Upper 4.5-7" VBR	
HWDP	4.5"	Fixed lower 4.5"	10M
		Upper 4.5-7" VBR	
Drill collars and MWD tools	4.75"	Upper 4.5-7" VBR	10M
Mud Motor	4.75"	Upper 4.5-7" VBR	10M
Production casing	5.5"	Upper 4.5-7" VBR	10M
ALL	0-13-5/8"	Annular	5M
Open-hole	-	Blind Rams	10M

6-3/4" Production hole section, 10M requirement

VBR = Variable Bore Ram. Compatible range listed in chart.

### 2. Well Control Procedures

Well control procedures are specific to the rig equipment and the operation at the time the kick occurs. Below are the minimal high-level tasks prescribed to assure a proper shut-in while drilling, tripping, running casing, pipe out of the hole (open hole), and moving the BHA through the BOPs. The pressure at which control is swapped from the annular to another compatible ram is variable, but the operator will document in the submission their operating pressure limit. The operator may chose an operating pressure less than or equal to RWP, but in no case will it exceed the RWP of the annular preventer.

### General Procedure While Drilling

- 1. Sound alarm (alert crew)
- 2. Space out drill string
- 3. Shut down pumps (stop pumps and rotary)
- 4. Shut-in Well (uppermost applicable BOP, typically annular preventer first. HCR and choke will already be in the closed position.)
- 5. Confirm shut-in
- 6. Notify toolpusher/company representative
- 7. Read and record the following:
  - a. SIDPP and SICP
  - b. Pit gain
  - c. Time
- 8. Regroup and identify forward plan
- 9. If pressure has built or is anticipated during the kill to reach the RWP of the annular preventer, confirm spacing and swap to the upper pipe ram.

# **Devon Energy Annular Preventer Summary**

# **General Procedure While Tripping**

- 1. Sound alarm (alert crew)
- 2. Stab full opening safety valve and close
- 3. Space out drill string
- 4. Shut-in (uppermost applicable BOP, typically annular preventer first. HCR and choke will already be in the closed position.)
- 5. Confirm shut-in
- 6. Notify toolpusher/company representative
- 7. Read and record the following:
  - a. SIDPP and SICP
  - b. Pit gain
  - c. Time
- 8. Regroup and identify forward plan
- 9. If pressure has built or is anticipated during the kill to reach the RWP of the annular preventer, confirm spacing and swap to the upper pipe ram.

# General Procedure While Running Casing

- 1. Sound alarm (alert crew)
- 2. Stab crossover and full opening safety valve and close
- 3. Space out string
- 4. Shut-in (uppermost applicable BOP, typically annular preventer first. HCR and choke will already be in the closed position.)
- 5. Confirm shut-in
- 6. Notify toolpusher/company representative
- 7. Read and record the following:
  - a. SIDPP and SICP
  - b. Pit gain
  - c. Time
- 8. Regroup and identify forward plan
- 9. If pressure has built or is anticipated during the kill to reach the RWP of the annular preventer, confirm spacing and swap to compatible pipe ram.

# General Procedure With No Pipe In Hole (Open Hole)

- 1. Sound alarm (alert crew)
- 2. Shut-in with blind rams or BSR. (HCR and choke will already be in the closed position.)
- 3. Confirm shut-in
- 4. Notify toolpusher/company representative
- 5. Read and record the following:
  - a. SICP
  - b. Pit gain
  - c. Time
- 6. Regroup and identify forward plan

# **Devon Energy Annular Preventer Summary**

### General Procedures While Pulling BHA thru Stack

- 1. PRIOR to pulling last joint of drillpipe thru the stack.
  - a. Perform flowcheck, if flowing:
  - b. Sound alarm (alert crew)
  - c. Stab full opening safety valve and close
  - d. Space out drill string with tool joint just beneath the upper pipe ram.
  - e. Shut-in using upper pipe ram. (HCR and choke will already be in the closed position.)
  - f. Confirm shut-in
  - g. Notify toolpusher/company representative
  - h. Read and record the following:
    - i. SIDPP and SICP
    - ii. Pit gain
    - iii. Time
  - i. Regroup and identify forward plan
- 2. With BHA in the stack and compatible ram preventer and pipe combo immediately available.
  - a. Sound alarm (alert crew)
  - b. Stab crossover and full opening safety valve and close
  - c. Space out drill string with upset just beneath the compatible pipe ram.
  - d. Shut-in using compatible pipe ram. (HCR and choke will already be in the closed position.)
  - e. Confirm shut-in
  - f. Notify toolpusher/company representative
  - g. Read and record the following:
    - i. SIDPP and SICP
    - ii. Pit gain
    - iii. Time
  - h. Regroup and identify forward plan
- 3. With BHA in the stack and NO compatible ram preventer and pipe combo immediately available.
  - a. Sound alarm (alert crew)
  - b. If possible to pick up high enough, pull string clear of the stack and follow "Open Hole" scenario.
  - c. If impossible to pick up high enough to pull the string clear of the stack:
  - d. Stab crossover, make up one joint/stand of drillpipe, and full opening safety valve and close
  - e. Space out drill string with tooljoint just beneath the upper pipe ram.
  - f. Shut-in using upper pipe ram. (HCR and choke will already be in the closed position.)
  - g. Confirm shut-in
  - h. Notify toolpusher/company representative
  - i. Read and record the following:
    - i. SIDPP and SICP
    - ii. Pit gain
    - iii. Time
  - i. Regroup and identify forward plan

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. 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.

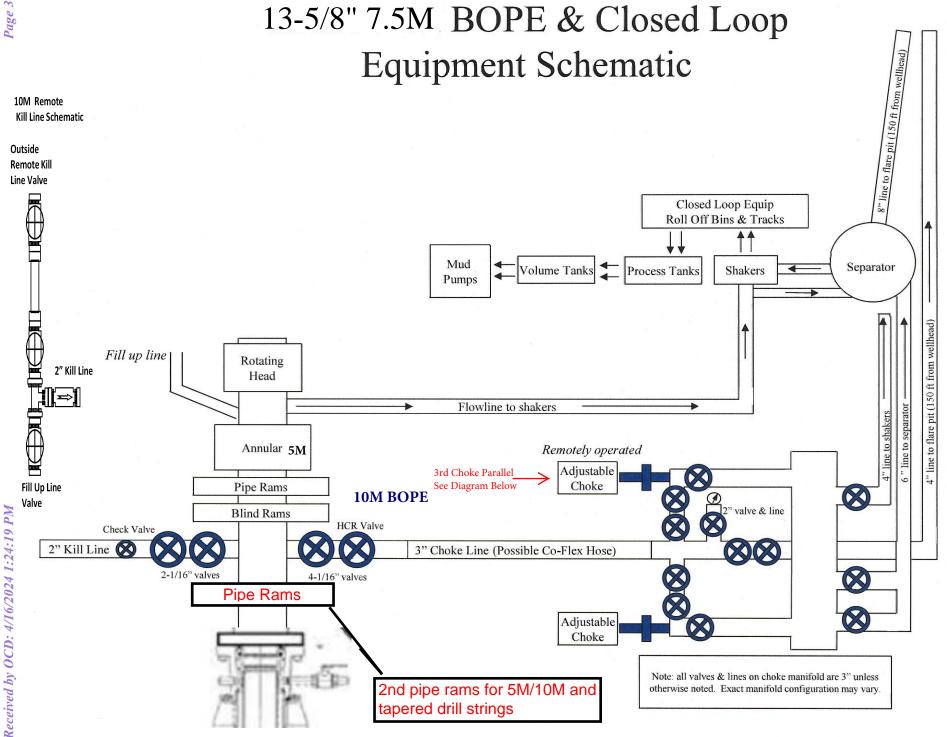
- Wellhead will be installed by wellhead representatives.
- If the welding is performed by a third party, the wellhead representative will monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
- Wellhead representative will install the test plug for the initial 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.

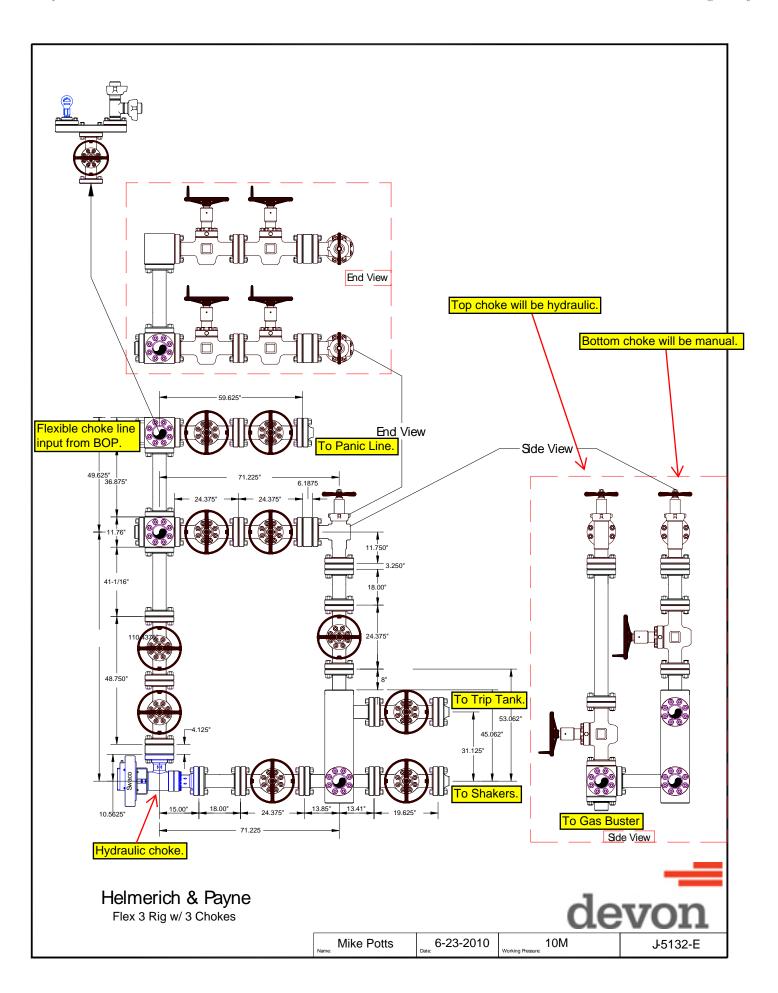
After running the surface casing, a 13-5/8" BOP/BOPE system with a minimum rating of 5M will be installed on the wellhead system and will undergo a 250 psi low pressure test followed by a 5,000 psi high pressure test. The 5,000 psi high and 250 psi low test will cover testing requirements a maximum of 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.

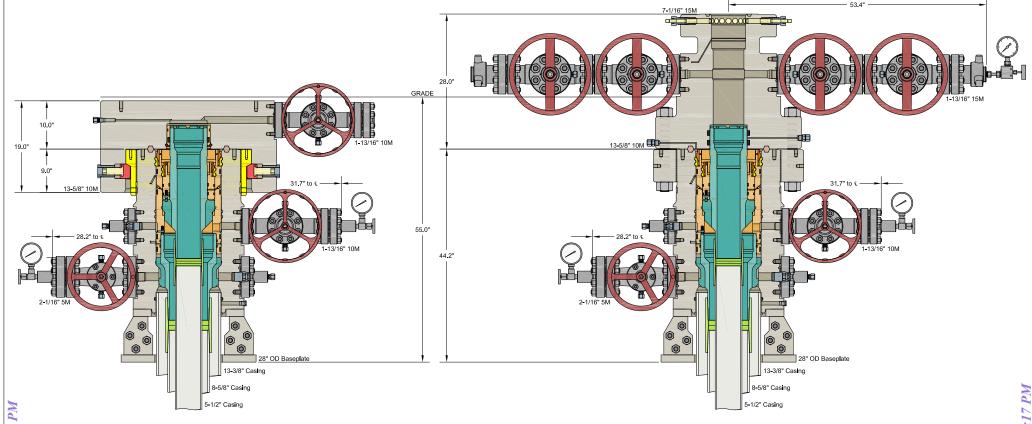
After running the intermediate casing with a mandrel hanger, the 13-5/8" BOP/BOPE system with a minimum rating of 10M will be installed and tested, with 5M annular being tested to 100% of rated working pressure.

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 10,000 psi WP.

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







INFORMATION CONTAINED HEREIN IS THE PROPERTY OF CACTUS WELLHEAD, LLC. REPRODUCTION, DISCLOSURE, OR USE THEREOF IS PERMISSIBLE ONLY AS PROVIDED BY CONTRACT OR AS EXPRESSLY AUTHORIZED BY CACTUS WELLHEAD, LLC.

# CACTUS WELLHEAD LLC

13-3/8" x 8-5/8" x 5-1/2" 5M MBU-3T Wellhead System With 8-5/8" & 5-1/2" Pin Down Rotating Mandrel Hangers And 13-5/8" 10M x 7-1/16" 15M CTH-P-DBLHPS Tubing Head

# DEVON ENERGY CORPORATION

DRAWN DLE 10MAY18
APPRV

DRAWING NO. ODE0002309

# PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

**OPERATOR'S NAME:** | **Devon Energy Production Company LP** 

LEASE NO.: NMNM0503

**LOCATION:** | Section 23, T.25 S., R.31 E., NMPM

**COUNTY:** | Eddy County, New Mexico

WELL NAME & NO.: | Cotton Draw Unit 637H

**SURFACE HOLE FOOTAGE:** 331'/N & 2564'/E **BOTTOM HOLE FOOTAGE** 20'/N & 2090'/W

**ATS/API ID:** | **ATS-22-257** 

Sundry ID: N/A

WELL NAME & NO.: | Cotton Draw Unit 638H

**SURFACE HOLE FOOTAGE:** 331'/N & 2534'/E **BOTTOM HOLE FOOTAGE** 20'/S & 2310'/W

**ATS/API ID:** | **ATS-22-258** 

Sundry ID: N/A

WELL NAME & NO.: | Cotton Draw Unit 639H

SURFACE HOLE FOOTAGE: 481'/N & 2254'/E
BOTTOM HOLE FOOTAGE 20'/S & 2310'/E

**ATS/API ID:** | **ATS-22-259** 

Sundry ID: N/A

WELL NAME & NO.: | Cotton Draw Unit 640H

**SURFACE HOLE FOOTAGE:** 481'/N & 2224'/E **BOTTOM HOLE FOOTAGE** 20'/S & 2090'/E **ATS/API ID: ATS-22-260** 

Cumdus ID. N/A

Sundry ID: | N/A

WELL NAME & NO.: | Cotton Draw Unit 642H

**SURFACE HOLE FOOTAGE:** 481'/N & 2164'/E **BOTTOM HOLE FOOTAGE** 20'/S & 1650'/E **ATS/API ID: ATS-22-262** 

Sundry ID: N/A

WELL NAME & NO.: | Cotton Draw Unit 643H

**SURFACE HOLE FOOTAGE:** 329'/N & 974'/E **BOTTOM HOLE FOOTAGE** 20'/S & 990'/E **ATS/API ID: ATS-22-263** 

Sundry ID: N/A

WELL NAME & NO.:	Cotton Draw Unit 644H
SURFACE HOLE FOOTAGE:	329'/N & 944'/E
<b>BOTTOM HOLE FOOTAGE</b>	20'/S & 770'/E
ATS/API ID:	ATS-22-264
Sundry ID:	N/A

WELL NAME & NO.: Cotton Draw Unit 646H
SURFACE HOLE FOOTAGE: 329'/N & 884'/E
BOTTOM HOLE FOOTAGE 20'/S & 330'/E
ATS/API ID: ATS-22-266
Sundry ID: N/A

COA

H2S	<b>©</b> Yes	□ No	
Potash	None	■ Secretary	<b>R</b> -111-P
Cave/Karst Potential	<b>©</b> Low	☐ Medium	□ High
Cave/Karst Potential	Critical		
Variance	None	Flex Hose	C Other
Wellhead	Conventional	Multibowl	<b>©</b> Both
Wellhead Variance	☐ Diverter		
Other	□4 String	☐ Capitan Reef	□WIPP
Other	Fluid Filled	☐ Pilot Hole	☐ Open Annulus
Cementing	▼ Cement Squeeze	☐ EchoMeter	
Special Requirements	☐ Water Disposal	□ COM	✓ Unit
Special Requirements	☐ Break Testing	□ Offline	
Variance		Cementing	

#### A. HYDROGEN SULFIDE

A Hydrogen Sulfide (H2S) Drilling Plan shall be activated 500 feet prior to drilling into the **Delaware** formation. 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 725 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 **24 hours in the Potash Area** 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.
     Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst or potash.
     Cement excess is less than 25%, more cement might be required.
  - ❖ In <u>Secretary Potash Areas</u> if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.

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

If cement does not tie-back into the previous casing shoe, a third stage remediation BH may be performed. The appropriate BLM office shall be notified.

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

- 3. The minimum required fill of cement behind the 5-1/2 inch production casing is:
  - Cement should tie-back at least 500 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.

### Option 1:

- a. 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.
- b. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the 8-5/8 inch intermediate casing shoe shall be 10,000 (10M) psi. Variance is approved to use a 5000 (5M) Annular which shall be tested to 5000 (5M) psi.

## Option 2:

Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the 13-3/8 inch surface casing. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be 10,000 (10M) psi. Variance is approved to use a 5000 (5M) Annular which shall be tested to 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)

  - ✓ Lea CountyCall the Hobbs Field Station, 414 West Taylor, Hobbs NM 88240, (575)689-5981
- 1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
  - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
  - b. When the operator proposes to set surface casing with Spudder Rig
    - Notify the BLM when moving in and removing the Spudder Rig.
    - Notify the BLM when moving in the 2<sup>nd</sup> 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.

Page 6 of 10

#### 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 intergrity 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 intergrity 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

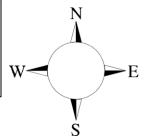
**Cotton Draw Unit 646H** 

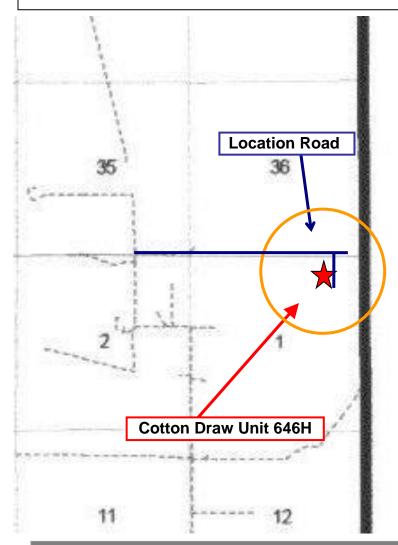
Sec-1 T-25S R-31E 329 FNL & 884' FEL LAT. = 32.165690 N (NAD83) LONG = 103.725815 W

**Eddy County NM** 

# **Cotton Draw Unit 646H**

This is an open drilling site.  $H_2S$  monitoring equipment and emergency response equipment will be used within 500' of zones known to contain  $H_2S$ , including warning signs, wind indicators and  $H_2S$  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 H<sub>2</sub>S concentration shall trigger activation of this plan.

### **Emergency Procedures**

In the event of a release of gas containing H<sub>2</sub>S, 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 H<sub>2</sub>S 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 (SO<sub>2</sub>). 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 H<sub>2</sub>S and SO<sub>2</sub>

Common	Chemical	Specific	Threshold	Hanardaya Limit	Lethal
Name	Formula	Gravity	Limit	Hazardous Limit	Concentration
Hydrogen Sulfide	H <sub>2</sub> S	1.189 Air = 1	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO <sub>2</sub>	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 (H<sub>2</sub>S)
- 2. The proper use and maintenance of personal protective equipment and life support systems.
- 3. The proper use of H<sub>2</sub>S 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 H<sub>2</sub>S 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 H<sub>2</sub>S Drilling Operations Plan.

There will be weekly H<sub>2</sub>S and well control drills for all personnel in each crew.

#### II. HYDROGEN SULFIDE TRAINING

Note: All  $H_2S$  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  $H_2S$ .

## 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.

Fire extinguishers are located at various locations around the rig. First Aid supplies are located in the top doghouse and the rig manger's office.

#### 3. H<sub>2</sub>S detection and monitoring equipment:

Portable H<sub>2</sub>S monitors positioned on location for best coverage and response. These units have warning lights which activate when H<sub>2</sub>S 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

### 4. 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.

## 5. Mud program:

The mud program has been designed to minimize the volume of H<sub>2</sub>S circulated to surface. Proper mud weight, safe drilling practices and the use of H<sub>2</sub>S scavengers will minimize hazards when penetrating H<sub>2</sub>S bearing zones.

## 6. Metallurgy:

All drill strings, casings, tubing, wellhead, blowout preventer, drilling spool, kill lines, choke manifold lines, and valves shall be H<sub>2</sub>S trim.

All elastomers used for packing and seals shall be H<sub>2</sub>S trim.

#### 7. Communication:

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

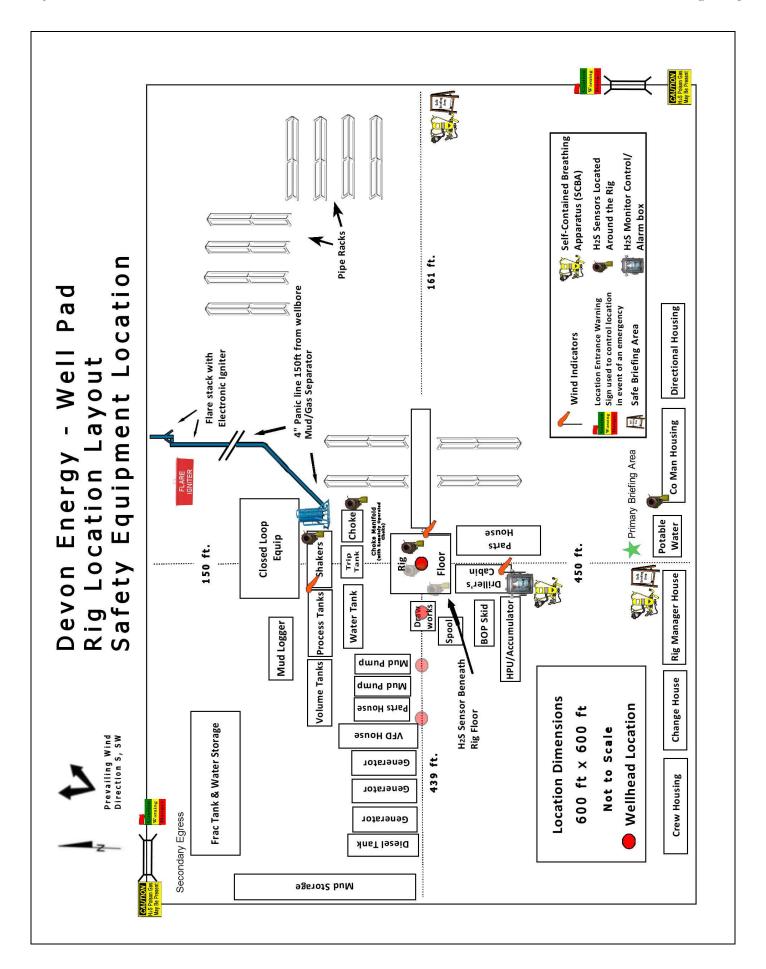
#### 8. Well testing:

- 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 H<sub>2</sub>S environment will use the closed chamber method of testing.
- **b.** There will be no drill stem testing.

Devon En	ergy Corp. Company C	all List			
	ee/Company Contact epresentative	Position	Phone Number	After Hours Number	
	Fisher (North)	Drilling Manager	832-967-7912		
Jason Hildebrand (South)		Drilling Manager			
Rich Dowr	ney	Drilling VP	405-228-2415		
Josh Harv	ey	EHS Manger	405-228-2440	918-500-5536	
Laura Wrig	ght	EHS Supervisor	405-552-5334	832-969-8145	
Robert Glo		EHS Professiona	al 575-703-5712	575-703-5712	
Lane Fran		Lead EHS	580-579-7052	580-579-7052	
Rickey Po		Lead EHS	903-720-8315	903-720-8315	
Brock Vise	9	Lead EHS	918-413-3291	918-413-3291	
Agency	Call List	<u> </u>			
rigency					
<u>Lea</u>	Hobbs				
County	Lea County Communic	ation Authority		397-9265	
<u>(575)</u>	State Police			885-3138	
	City Police	397-9265			
	Sheriff's Office			396-3611	
	Ambulance	911			
	Fire Department	397-9308			
	LEPC (Local Emergence	393-2870			
	NMOCD	393-6161			
	US Bureau of Land Management (Hobbs Office Closed) 393				
Eddy	Carlsbad				
County	State Police			885-3137	
<u>(575)</u>	City Police	885-2111			
	Sheriff's Office	887-7551			
	Ambulance	911			
	Fire Department	885-3125			
	LEPC (Local Emergend	887-3798			
	US Bureau of Land Ma	(575)-706-1920			
		(575)-234-5909			
	NM Emergency Response Commission (Santa Fe)			(505) 476-9600	
	24 HR			(505) 827-9126	
	National Emergency Ro	(800) 424-8802			
	National Pollution Cont	(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	Native Air – Emergency Helicopter – Hobbs	(575) 347-9836
GPS	For Air Ambulance - Eddy County Dispatch	(575)-616-7155
position:	For Air Ambulance - Lea County (LCCA)	(575)-397-9265
	Poison Control (24/7)	(800) 222-1222
	Oil & Gas Pipeline 24 Hour Service	(800) 364-4366
	NOAA – Website - www.nhc.noaa.gov	
	National Pollution Control Center	202-795-6958
	NPCC – Oil Spills	800-280-7118
	BNSF Railroad Resource Operations	800-832-5452
	NM OSHA – Santa Fe	505-222-9595
	NM OSHA (Reporting)	877-610-6742
		505-476-8700

Prepared in conjunction with Dave Small



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

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 334012

#### **CONDITIONS**

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	334012
	Action Type:
	[C-101] BLM - Federal/Indian Land Lease (Form 3160-3)

#### CONDITIONS

Created By	Condition	Condition Date
ward.rikala	Notify OCD 24 hours prior to casing & cement	4/29/2024
ward.rikala	Will require a File As Drilled C-102 and a Directional Survey with the C-104	4/29/2024
ward.rikala	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	4/29/2024
ward.rikala	Cement is required to circulate on both surface and intermediate1 strings of casing	4/29/2024
ward.rikala	If cement does not circulate on any string, a CBL is required for that string of casing	4/29/2024
ward.rikala	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	4/29/2024