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. 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

APPROVED WITH CONDITIONS

*(Instructions on page 2)

<u>C-10</u>	C-102 State of Energy, Minerals & Natur				tural				Rev	rised July, 2024			
Submit E	lectronically		OIL	CON	ISERV	AΤ	ION DIVISION	ON					
Via OCD	Permitting								Submittal				
									Type:	☐ Amended Repor	t		
							☐ As Drilled						
				W	ELL LOC	CATI	ON INFORMATIO	N					
API N	umber 30-015-5	56724	Pool Code	e 982	36	F	Pool Name WC-01	15 G-08 S	3233135I	233135D; WOLFCAMP			
Prope	rty Code 325417		Property	Name	TODD 3	36-2	5 STATE FED COM	М		Well Number 823H			
OGRID	No. 6137		Operator		N ENERG	Y PF	RODUCTION COMPA	ANY, L.P.		Ground Level 3518.7'	Elevation		
Surfac	e Owner:	□State □	Fee □Trib	al XFe	deral		Mineral Owner:		□Fee □	Γribal ⊠Federal			
						Surfa	ace Location						
UL					S Ft. from E/W	Latitude		Longitude	County				
M	36	23-S	31-E		180'	S	359' W	32.254	164	103.738891	EDDY		
					Во	otton	n Hole Location						
UL	Section	Township	Range	Lot	Ft. fron	n N/	S Ft. from E/W	Latitude		Longitude	County		
C	25	23-S	31-E		20'	N	1650' W	32.282	633	103.734704	EDDY		
Dedicat	ed Acres		ining Well	· ·		0verl	lapping Spacing Uni	` ' '	Consolid	ation Code C			
320		Infill		30-015-47	275		Y						
Order	Numbers	n/a				Well	setbacks are under	Common	Ownersh	ip: □Yes ⊠No			
					Kiel	k Off	Point (KOP)						
UL	Section	Township	Range	Lot	Ft. fron			Latitude		Longitude	County		
N	36	23-S	31-E		48' S		1652' W	32.2537079	93	-103.73479247	EDDY		
					Firs	st. Ta	ke Point (FTP)	32.2337073		-103./34/924/	EDD1		
UL	Section	Township	Range	Lot	Ft. fron			Latitude		Longitude	County		
N	36	23-S	31-E		100'	S	1650' W	32.253	943	103.734716	EDDY		
					Las	st Ta	ke Point (LTP)						
UL	Section	Township	Range	Lot	Ft. fron			Latitude		Longitude	County		
С	25	23-S	31-E		100'	N	1650' W	32.282	413	103.734704	EDDY		
					Spac	ing I	Unit Type Horizont	tal Verti	cal (Fround Floor Ele	vation:		
					Space		x				vacion.		
OPERA	TOR CERT	FICATIONS					SURVEYOR CERTIFIC	ATIONS					
I hereby	certify that the	e information cor				best	I hereby certify that the we		own on this r	alat was plotted from fie	ld notes		
		belief, and, if the ns a working inte					of actual surveys made by	me or under s		nd that the same is true	and		
		bottom hole loc contract with an o				is	correct to the best of my be	elief.		at R.	DE		
mineral i	nterest, or to a	a voluntary pooli				rder				&EK 115	DEHOLOS		
heretofore entered by the division.								A THE WEY					
		tal well, I further lessee or owner								0700	7		
interest in	n each tract (ii	n the target pool	or formation) in	n which any	part of the we	ell's	23261						
completed interval will be located or obtained a compulsory pooling order from the			the				1 70 Notice	2/2					
() audu Walson 3/31/2025							150						
Signature Date					Signature and Seal	of Profe	ssional S	urveyor ONAL	50.				
laı	uren W	atson											
Printe	ed Name					-	Certificate Number	Date of	Survey				
		atson@d	vn.com				23261	06/20	24				
Email Address					&5&01 	00/20	~4						

ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.

SURFACE HOLE LOCATION
GEODETIC COORDINATES NAD 83
NMSP EAST SURFACE LOCATION
180' FSL 359' FWL SECTION 29
EL:3518.7'
N:456706.73/E:725098.70
LAT:32.254164/LON:103.738891

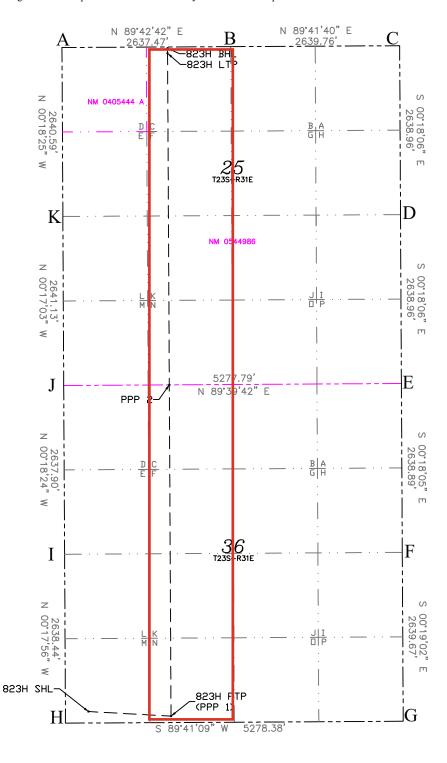
KICK_OFF_POINT CALLS: 48' FSL, 1652' FWL N;456582_E: 726392 LAT: 32.2537LON: 103.7348

FIRST TAKE POINT(PPP 1)
100' FSL 1650' FWL SECTION 36
N:456633.81/E:726389.79
LAT:32.253943/LDN:103.734716

LAST TAKE POINT 100' FNL 1650' FWL SECTION 25 N:466990.99/E:726335.72 LAT:32.282413/LON:103.734704

<u>BOTTOM HOLE LOCATION</u> 20' FNL 1650' FWL SECTION 25 N:467070.99/E:726335.29 LAT:32.282633/LON:103.734704

PPP 2 0' FSL 1650' FWL SECTION 25 N:461810.77/E:726362.77 LAT:32.268174/LON:103.734710



A=N:467082.69 B=N:467095.96 C=N:467110.04 E:724685.21 E:727322.65 E:729962.37 D=N:464471.11 729976.26 E=N:461832.19 F=N:459193.34 729990.15 E:730004.03 G=N:456553.71 E:730018.64 H=N:456524.76 I=N:459163.17 E:724726.57 E:724712.45 J=N:461801.03 K=N:464442.13 E:724699.35

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 End	ergy Productio	n Company, L.P.	OGRID:	6137		Date: _6/	26 / 2024
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 be recompleted from a s					wells pro	oposed to be dr	illed or proposed to
Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D		cipated MCF/D P	Anticipated Produced Water BBL/D
See Attached							
IV. Central Delivery Po V. Anticipated Schedul proposed to be recomple	e: Provide the		tion for each nev		vell or se		27.9(D)(1) NMAC] osed to be drilled or
proposed to be recomple	aca nom a sm	gie wen pau or con	nected to a centi	ar derivery point.			
Well Name	API	Spud Date	TD Reached Date	Completion Commencement		Initial Flow Back Date	First Production Date
See Attached							
VI. Separation Equipment: ☐ Attach a complete description of how Operator will size separation equipment to optimize gas capture. VII. Operational Practices: ☐ Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC. VIII. Best Management Practices: ☐ Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.							

NATURAL GAS MANAGEMENT PLAN Section 1 - Plan Description

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

				<u> </u>
Well Name	API	ULSTR & FOOTAGE	Anticipated Gas/Oil/Water	Central Delivery Point Name
TODD 36-25 STATE FED COM 301H	n/a	36-23S-31E, 180 FSL & 299 FWL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 302H	n/a	36-23S-31E, 180 FSL & 329 FWL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 303H	n/a	36-23S-31E, 180 FSL & 389 FWL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 1
FODD 36-25 STATE FED COM 304H	n/a	36-23S-31E, 330 FSL & 1996 FEL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 305H	n/a	36-23S-31E, 180 FSL & 645 FEL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 306H	n/a	36-23S-31E, 180 FSL & 585 FEL	(+/-) 2839mcfd/(+/-)1130bopd/(+/-)6074bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 811H	n/a	36-23S-31E, 180 FSL & 1639 FWL	(+/-) 4641mcfd/(+/-)913bopd/(+/-)3197bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 812H	n/a	36-23S-31E, 180 FSL & 1699 FWL	(+/-) 4641mcfd/(+/-)913bopd/(+/-)3197bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 813H	n/a	36-23S-31E, 180 FSL & 1736 FEL	(+/-) 4641mcfd/(+/-)913bopd/(+/-)3197bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 814H	n/a	36-23S-31E, 180 FSL & 1676 FEL	(+/-) 4641mcfd/(+/-)913bopd/(+/-)3197bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 821H	n/a	36-23S-31E, 180 FSL & 269 FWL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 822H	n/a	36-23S-31E, 180 FSL & 1669 FWL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 1
TODD 36-25 STATE FED COM 823H	n/a	36-23S-31E, 180 FSL & 359 FWL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 1
FODD 36-25 STATE FED COM 824H	n/a	36-23S-31E, 180 FSL & 1729 FWL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 1
ODD 36-25 STATE FED COM 825H	n/a	36-23S-31E, 330 FSL & 2026 FEL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 2
ODD 36-25 STATE FED COM 826H	n/a	36-23S-31E, 180 FSL & 1706 FEL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 2
FODD 36-25 STATE FED COM 827H	n/a	36-23S-31E, 180 FSL & 615 FEL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 2
TODD 36-25 STATE FED COM 828H	n/a	36-23S-31E, 180 FSL & 1646 FEL	(+/-)7600mcfd/(+/-)695bopd/(+/-)4370bwpd	TODD 36 CTB 2

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

				Completion		
				Commencement		
Well Name	API	Spud Date	TD Reached Date	Date	Initial Flow back Date	First Production Date
TODD 36-25 STATE FED COM 301H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 302H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 303H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 304H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 305H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 306H	n/a	2/6/2027	3/8/2027	7/6/2027	7/6/2027	7/6/2027
TODD 36-25 STATE FED COM 811H	n/a	9/17/2025	10/17/2025	2/14/2026	2/14/2026	2/14/2026
TODD 36-25 STATE FED COM 812H	n/a	8/29/2025	9/28/2025	1/26/2026	1/26/2026	1/26/2026
TODD 36-25 STATE FED COM 813H	n/a	8/20/2025	9/19/2025	1/17/2026	1/17/2026	1/17/2026
TODD 36-25 STATE FED COM 814H	n/a	7/31/2025	8/30/2025	12/28/2025	12/28/2025	12/28/2025
TODD 36-25 STATE FED COM 821H	n/a	8/10/2025	9/9/2025	1/7/2026	1/7/2026	1/7/2026
TODD 36-25 STATE FED COM 822H	n/a	8/10/2025	9/9/2025	1/7/2026	1/7/2026	1/7/2026
TODD 36-25 STATE FED COM 823H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025
TODD 36-25 STATE FED COM 824H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025
TODD 36-25 STATE FED COM 825H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025
TODD 36-25 STATE FED COM 826H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025
TODD 36-25 STATE FED COM 827H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025
TODD 36-25 STATE FED COM 828H	n/a	7/21/2025	8/20/2025	12/18/2025	12/18/2025	12/18/2025

^{*} Dates 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 [🗆 will 🗆 will n	ot have capacity to	gather 100	0% of the anticip	ated natural gas
production volume from the well	prior to the date of first	production.				

XIII. Line Pressure. Operator \square does \square 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 (Onerator's nlar	to manage	nroduction	in resnonse	to the increase	sed line pressure

XIV. Confidentiality: \square Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information pro	vided 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 info	ormation
for which confidentiality is asserted and the basis for such assertion.	

(i)

Section 3 - Certifications <u>Effective May 25, 2021</u>

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal: 🗵 Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or ☐ Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system. If Operator checks this box, Operator will select one of the following: Well Shut-In. ☐ Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or Venting and Flaring Plan.

Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including: power generation on lease; (a) power generation for grid; **(b)** (c) compression on lease; (d) liquids removal on lease; (e) reinjection for underground storage; **(f)** reinjection for temporary storage; reinjection for enhanced oil recovery; (g) fuel cell production; and (h)

Section 4 - Notices

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

other alternative beneficial uses approved by the division.

- (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: Jeff Walla
Title: Surface Land and Regulatory 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:
 - 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
 - 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.



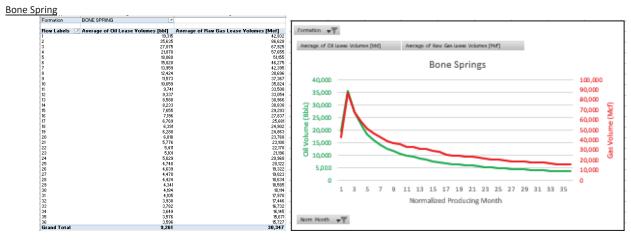
Devon Energy Production Company, L.P. 333 W. Sheridan Avenue Oklahoma City, Oklahoma 73102 Phone: (405) 228-4800

WASTE MINIMIZATION PLAN

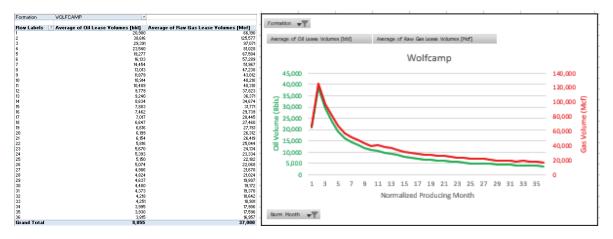
Per 89 FR 25378 - Waste Prevention, Production Subject to Royalties, and Resource Conservation, requirements:

- (1) initial oil production estimates and decline,
- (2) initial gas production estimates and decline,
- (3) certification that the operator has an executed gas sales contract to sell 100 percent of the produced oil-well gas, and
- (4) any other information demonstrating the operator's plans to avoid the waste of gas.

(1), (2) 3 year Oil and Gas decline curves: Bone Spring and Wolfcamp formation decline curves below supply Year 1, 2, 3 cumulative values for oil and gas, in range format; based on peak IP rates for oil and gas based on Devon Energy Production Company, L.P. operated wells ID post 1/2019, 10K LL norm, P90-10 ranges, annualized rates. Please refer to NGMP for table of initial oil and gas volumes.



Wolfcamp



(3) Certification (NGMP Section 3 – Certification): Operator (Devon Energy Production Company, L.P.) 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;

(4) Addl waste avoidance information: Refer to NGMP Sec. VII. Operational Practices & VIII. Best Management Practices during Maintenance

1. Geologic Formations

TVD of target	12650	Pilot hole depth	N/A
MD at TD:	23004	Deepest expected fresh water	

Basin

Dasin	Donth	Water/Mineral	
	Depth		TT 1.0
Formation	(TVD)	Bearing/Target	Hazards*
	from KB	Zone?	
Rustler	823		
Salt	1165		
Base of Salt	4217		
Delaware	4527		
Cherry Canyon	5426		
Brushy Canyon	6667		
1st Bone Spring Lime	8334		
Bone Spring 1st	9436		
Bone Spring 2nd	10020		
3rd Bone Spring Lime	10543		
Bone Spring 3rd	11294		
Wolfcamp	11730		
			_

^{*}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)
14 3/4	10 3/4	45 1/2	J-55	ВТС	0	848	0	848
9 7/8	8 5/8	32	P110HSCY	MOFXL	0	12088	0	12088
7 7/8	5 1/2	20	P110EC	DWC/IS-C+	0	23004	0	12650

[•]All casing strings will be tested in accordance with 43 CFR 3172. Must have table for contingency casing.

3. Cementing Program

Assuming no returns are established while drilling, Devon requests to pump a two stage cement job on the intermediate casing string with the first stage being pumped conventionally with the calculated top of cement at the Brushy Canyon and the second stage performed as a bradenhead squeeze with planned cement from the Brushy Canyon to surface. The final cement top will be verified by Echo-meter. Devon will include the Echo-meter verified fluid top and the volume of displacement fluid above the cement slurry in the annulus in all post-drill sundries on wells utilizing this cement program. Devon will report to the BLM the volume of fluid (limited to 1 bbls) used to flush intermediate casing valves following backside cementing procedures.

Casing	# Sks	TOC	Wt. ppg	Yld (ft3/sack)	Slurry Description
Surface	516	Surf	13.2	1.44	Lead: Class C Cement + additives
Int 1	473	Surf	13.0	2.3	2nd State: Bradenhead Squeeze - Lead: Class C Cement + additives
Int I	620	6733	13.2	1.44	Tail: Class H / C + additives
Production	117	10188	9	3.27	Lead: Class H /C + additives
Production	1431	12188	13.2	1.44	Tail: Class H / C + additives

Casing String	% Excess
Surface	50%
Intermediate 1	30%
Prod	10%

4. Pressure Control Equipment (Three String Design)

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	T	ype	✓	Tested to:
			Anı	nular	X	50% of rated working pressure
Int 1	13-5/8"	5M		d Ram	X	
Int I	13-3/0	J1V1	Pipe	Ram		5M
			Doub	le Ram	X	J1V1
			Other*			
	13-5/8"		Annul	ar (5M)	X	100% of rated working pressure
Due due ation		101/1	Blind Ram		X	10M
Production		10M	Pipe Ram			
			Double Ram		X	TUM
			Other*			
			Annul	Annular (5M)		
			Blind Ram			
			Pipe Ram			
			Double Ram			
			Other*			
N A variance is requested for	the use of a	diverter or	n the surface	casing. See	attached for s	chematic.
Y A variance is requested to a	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

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.					

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

7. Drilling Conditions

Condition	Specfiy what type and where?
BH pressure at deepest TVD	6907
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 43 CFR 3176. If Hydrogen Sulfide is encountered measured values and formations will be provided to the BLM.

L	measured va	neusured values and formations will be provided to the BEW.	
	NI I	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 next well.
- 3 The drilling rig will then batch drill the production hole sections on the wells with OBM, run/cement production casing, and install TA caps or tubing heads for completions.

NOTE: During batch operations the drilling rig will be moved from well to well however, it will not be removed 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 (43 CFR 3172, 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	1
X	Directional Plan
	Other, describe

WCDSC Permian NM

Eddy County (NAD 83 NM Eastern)
Sec 36-T23S-R31E
TODD 36-25 STATE FED COM 823H
WA022501526
Wellbore #1
Plat R0 (1650FWL) WFMP B 200

Anticollision Summary Report

27 January, 2025

TVD Reference:

MD Reference:

WCDSC Permian NM Company:

Project: Eddy County (NAD 83 NM Eastern)

Sec 36-T23S-R31E Reference Site:

Site Error: 0.00 ft

Reference Well: TODD 36-25 STATE FED COM 823H

Well Error: 0.50 ft Reference Wellbore Wellbore #1

Reference Design: Plat R0 (1650FWL) WFMP B 200 Local Co-ordinate Reference:

Well TODD 36-25 STATE FED COM 823H

GL:3518.70+26ft @ 3544.70ft

GL:3518.70+26ft @ 3544.70ft

North Reference: Grid

Minimum Curvature Survey Calculation Method:

Output errors are at 2.00 sigma EDM_5000.17 Database: Offset TVD Reference: Offset Datum

Reference Plat R0 (1650FWL) WFMP B 200

Filter type: NO GLOBAL FILTER: Using user defined selection & filtering criteria

Interpolation Method: MD Interval 100.00ft Error Model: **ISCWSA**

Depth Range: Unlimited Scan Method: Closest Approach 3D Results Limited by: Maximum centre distance of 2,493.47ft Error Surface: Pedal Curve

Warning Levels Evaluated at: 2.00 Sigma Casing Method: Not applied

Date 1/24/2025 **Survey Tool Program**

> From То

(ft) Survey (Wellbore) **Tool Name** Description (ft)

23,039.62 Plat R0 (1650FWL) WFMP B 200 (Wellbo MWD+HDGM OWSG MWD + HDGM 0.00

ummary						
Site Name Offset Well - Wellbore - Design	Reference Measured Depth (ft)	Offset Measured Depth (ft)	Dista Between Centres (ft)	nce Between Ellipses (ft)	Separation Factor	Warning
Sec 12-T23S-R31E						
Bora Bora 13-24 Fed Com 212H - Wellbore #1 - Final Su Bora Bora 13-24 Fed Com 213H - Wellbore #1 - Final Su BORA BORA 13-24 FED COM 301H - Wellbore #1 - draf BORA BORA 13-24 FED COM 301H - Wellbore #1 - svys BORA BORA 13-24 FED COM 302H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 303H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 621H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 622H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 623H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 624H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 711H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 713H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 713H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 713H - Wellbore #1 - Fina BORA BORA 13-24 FED COM 811H - Wellbore #1 - Draf BORA BORA 13-24 FED COM 811H - Wellbore #1 - svys BORA BORA 13-24 FED COM 812H - Wellbore #1 - svys	23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62 23,039.62	20,585.00 21,105.00 21,217.33 21,197.00 21,175.00 21,885.00 22,040.00 22,427.00 22,485.00 22,180.00 22,163.00 22,596.09 22,596.00 22,516.00	2,381.69 2,196.95 1,856.59 1,874.71 1,760.74 2,486.27 1,529.44 831.62 1,282.15 2,276.20 915.37 846.38 1,733.24 1,058.45 1,006.36 427.51	2,178.53 2,019.92 1,653.92 1,672.43 1,568.10 2,218.31 1,257.42 658.54 1,005.19 1,971.10 667.14 601.38 1,428.08 754.76 705.63 179.45	12.411 9.161 9.268 9.140 9.278 5.623 4.805 4.630 7.461 3.688 3.455 5.680 3.485 3.346	CC, ES, SF Alert, CC, ES, SF
BORA BORA 13-24 FED COM 813H - Wellbore #1 - Fina	23,039.62	22,573.88	1,926.99	1,610.18	6.082	CC, ES, SF
Sec 25-T23S-R31E						
Aldabra 25 Fed 3H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed 3H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 1H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 1H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 1H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 2H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 2H - Wellbore #1 - Wellbore #1 Aldabra 25 Fed Com 2H - Wellbore #1 - Wellbore #1 Todd 25 Fed 001Z SWD (Offset) - Wellbore #1 - Wellbore	22,732.73 22,800.00 18,571.20 22,730.13 22,800.00 22,558.92 22,700.00 22,900.00 21,056.19	16,698.00 16,698.00 12,013.86 16,174.00 16,174.00 14,881.14 15,012.63 15,047.00 12,618.30	950.03 952.41 1,531.32 1,587.45 1,588.99 2,297.36 2,297.80 2,304.48 322.29	813.87 815.08 1,421.21 1,380.29 1,381.33 2,157.14 2,155.61 2,160.73	6.935 13.907 7.663 7.652 16.383 16.160 16.032	CC ES SF CC ES

TVD Reference:

MD Reference:

Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

Reference Site: Sec 36-T23S-R31E

Site Error: 0.00 ft

Reference Well: TODD 36-25 STATE FED COM 823H

Well Error: 0.50 ft
Reference Wellbore #1

Reference Design: Plat R0 (1650FWL) WFMP B 200

Local Co-ordinate Reference:

Well TODD 36-25 STATE FED COM 823H

GL:3518.70+26ft @ 3544.70ft GL:3518.70+26ft @ 3544.70ft

North Reference: Grid

Survey Calculation Method: Minimum Curvature

Output errors are at 2.00 sigma

Database: EDM_5000.17

Offset TVD Reference: Offset Datum

	Reference	Offset	Dista	nce		
ite Name	Measured Depth	Measured Depth	Between Centres	Between Ellipses	Separation Factor	Warning
Offset Well - Wellbore - Design	(ft)	(ft)	(ft)	(ft)		
ec 36-T23S-R31E						
Todd 36 State 231H - Wellbore #1 - Final Surveys	6,664.44	6,532.42	110.06	58.94		Minor Risk, CC, ES, SF
Todd 36 State 335H - Wellbore #1 - Final Svys	2,034.00	2,025.73	88.89	74.79	6.303	
Todd 36 State 335H - Wellbore #1 - Final Svys	2,834.31	2,815.97	92.35	72.32		Alert, ES
Todd 36 State 335H - Wellbore #1 - Final Svys	3,200.00	3,179.42	100.43	77.67		Alert, SF
Todd 36 State 625H - Wellbore #1 - Final Svys	7,079.09	7,039.29	95.19	42.92		Minor Risk, CC
Todd 36 State 625H - Wellbore #1 - Final Svys	11,700.00	11,679.03	96.04	13.09	1.158	Major Risk, ES, SF
Todd 36 State 715H - Wellbore #1 - Flnal Svys	0.00	0.00	65.75	50.00	4.000	Al FO
Todd 36 State 715H - Wellbore #1 - Final Svys	2,100.00	2,092.58	67.67	53.06		Alert, ES
Todd 36 State 715H - Wellbore #1 - Final Svys	2,300.00 7.134.95	2,289.48 6.959.25	71.56 476.78	55.53 425.59	4.466 9.312	Alert, SF
Todd 36_25 State Fed Com 232H - Wellbore #1 - Wellbo	,	-,		425.59 425.36	9.312 9.235	
Todd 36_25 State Fed Com 232H - Wellbore #1 - Wellbo Todd 36_25 State Fed Com 232H - Wellbore #1 - Wellbo	7,200.00 7,500.00	7,026.07 7,322.09	477.01 486.43	425.36	9.235	
TODD 36-25 STATE FED COM 301H - Wellbore #1 - Pla	1,500.00	1,500.20	60.00	432.74	5.652	
TODD 36-25 STATE FED COM 301H - Wellbore #1 - Pla	1,504.45	1,500.20	60.00	49.36	5.636	
TODD 36-25 STATE FED COM 301H - Wellbore #1 - Pla	1,700.00	1,700.10	64.07	52.08	5.341	
TODD 36-25 STATE FED COM 302H - Wellbore #1 - Pla	1,500.00	1,500.10	30.00	19.38		Alert, CC, ES
TODD 36-25 STATE FED COM 302H - Wellbore #1 - Pla	1,600.00	1,600.18	31.03	19.71		Alert, SF
TODD 36-25 STATE FED COM 303H - Wellbore #1 - Pla	1,210.00	1,209.80	30.00	21.45		Alert, CC
TODD 36-25 STATE FED COM 303H - Wellbore #1 - Pla	1.300.00	1,299.30	30.42	21.23		Alert, ES, SF
TODD 36-25 STATE FED COM 304H - Wellbore #1 - Pla	7,698.64	7,562.78	1,523.07	1,468.47	27.895	
TODD 36-25 STATE FED COM 304H - Wellbore #1 - Pla	10,600.00	10,457.03	1,523.48	1,449.04	20.465	
TODD 36-25 STATE FED COM 304H - Wellbore #1 - Pla	23,039.62	21,137.68	2,175.12	1,933.88	9.016	
Todd 36-25 State Fed Com 627H - OH - OH Final Survey	12,025.20	12,030.00	1,415.45	1,335.34		CC, ES
Todd 36-25 State Fed Com 627H - OH - OH Final Survey	20,200.00	19,250.00	1,602.80	1,385.88	7.389	,
Todd 36-25 State Fed Com 627H - ST01 - ST01 Final Su	12,025.20	12,030.00	1,415.45	1,335.34	17.669	
Todd 36-25 State Fed Com 627H - ST01 - ST01 Final Su	23,000.00	22,156.00	1,586.80	1,310.70	5.747	
Todd 36-25 State Fed Com 627H - ST01 - ST01 Final Su	23,039.62	22,156.00	1,588.27	1,311.62	5.741	SF
Todd 36-25 State Fed Com 717H - Wellbore #1 - Final S	9,365.70	9,278.64	850.45	786.45	13.287	CC
Todd 36-25 State Fed Com 717H - Wellbore #1 - Final S	23,000.00	22,346.00	982.41	707.54		Alert, ES, SF
Todd 36-25 State Fed Com 718H - Wellbore #1 - Final S	15,924.95	15,274.89	2,054.36	1,930.30	16.559	
Todd 36-25 State Fed Com 718H - Wellbore #1 - Final S	23,000.00	22,322.00	2,110.12	1,806.02	6.939	ES
Todd 36-25 State Fed Com 718H - Wellbore #1 - Final S	23,039.62	22,322.00	2,111.09	1,806.45	6.930	SF
TODD 36-25 STATE FED COM 811H - Wellbore #1 - Pla	4,900.00	4,868.75	161.85	122.81	4.145	Alert, CC
TODD 36-25 STATE FED COM 811H - Wellbore #1 - Pla	4,904.45	4,872.74	161.85	122.78	4.143	Alert, ES, SF
TODD 36-25 STATE FED COM 812H - Wellbore #1 - Pla	23,039.62	22,687.06	169.95	-65.90	0.721	Collision, CC, ES, SF
TODD 36-25 STATE FED COM 813H - Wellbore #1 - Pla	23,039.62	22,781.10	1,483.40	1,169.29	4.723	Alert, CC, ES, SF
TODD 36-25 STATE FED COM 821H - Wellbore #1 - Pla	1,600.00	1,601.94	89.97	78.66	7.953	CC
TODD 36-25 STATE FED COM 821H - Wellbore #1 - Pla	1,604.45	1,606.42	89.97	78.63	7.931	ES
TODD 36-25 STATE FED COM 821H - Wellbore #1 - Pla	23,039.62	22,698.38	1,320.60	1,007.09	4.212	Alert, SF
TODD 36-25 STATE FED COM 822H - Wellbore #1 - Pla	5,679.88	5,580.53	64.08	19.64		Major Risk, CC, ES, SF
TODD 36-25 STATE FED COM 824H - Wellbore #1 - Pla	23,039.62	22,932.58	660.00	345.80		Minor Risk, CC, ES, SF
TODD 36-25 STATE FED COM 825H - Wellbore #1 - Pla	13,470.40	13,354.63	1,302.49	1,210.32	14.132	
TODD 36-25 STATE FED COM 825H - Wellbore #1 - Pla	23,039.62	22,923.84	1,317.39	1,004.76		Alert, ES, SF
TODD 36-25 STATE FED COM 826H - Wellbore #1 - Pla	12,713.18	12,421.92	1,961.61	1,873.26	22.202	
TODD 36-25 STATE FED COM 826H - Wellbore #1 - Pla	23,000.00	22,842.36	1,977.61	1,665.05	6.327	
TODD 36-25 STATE FED COM 826H - Wellbore #1 - Pla	23,039.62	22,842.36	1,978.76	1,665.56	6.318	SF

TVD Reference:

MD Reference:

North Reference:

Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

Reference Site: Sec 36-T23S-R31E

Site Error: 0.00 ft

Reference Well: TODD 36-25 STATE FED COM 823H

Well Error: 0.50 ft
Reference Wellbore #1

Reference Design: Plat R0 (1650FWL) WFMP B 200

Local Co-ordinate Reference:

rence: Well TODD 36-25 STATE FED COM 823H

GL:3518.70+26ft @ 3544.70ft GL:3518.70+26ft @ 3544.70ft

Grid

Survey Calculation Method: Minimum Curvature

Output errors are at 2.00 sigma
Database: EDM_5000.17
Offset TVD Reference: Offset Datum

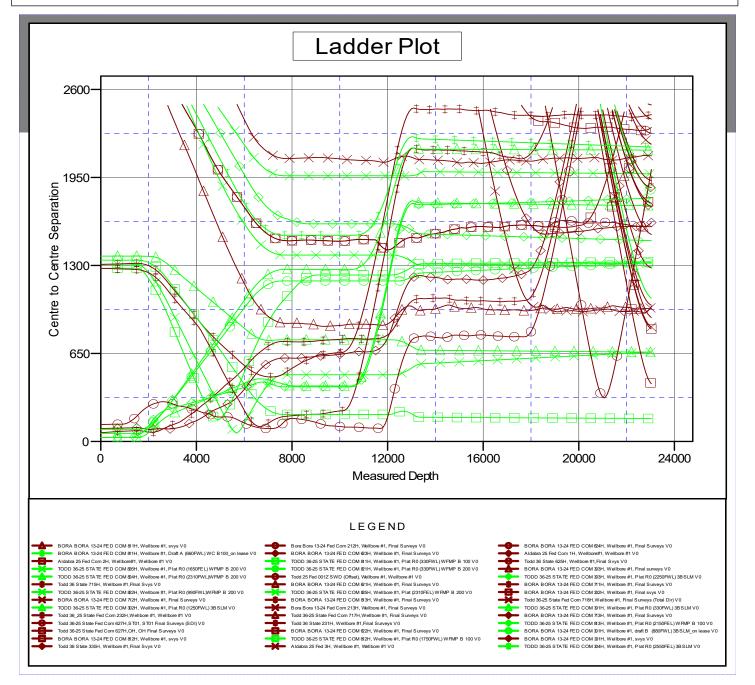
Reference Depths are relative to GL:3518.70+26ft @ 3544.70ft Cool

Offset Depths are relative to Offset Datum

Central Meridian is -104.3333333

Coordinates are relative to: TODD 36-25 STATE FED COM 823H Coordinate System is US State Plane 1983, New Mexico Eastern Zone

Grid Convergence at Surface is: 0.32°



TVD Reference:

MD Reference:

North Reference:

Output errors are at

Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

Reference Site: Sec 36-T23S-R31E

Site Error: 0.00 ft

Reference Well: TODD 36-25 STATE FED COM 823H

Well Error: 0.50 ft
Reference Wellbore #1

Reference Design: Plat R0 (1650FWL) WFMP B 200

Local Co-ordinate Reference:

Survey Calculation Method:

Well TODD 36-25 STATE FED COM 823H

GL:3518.70+26ft @ 3544.70ft GL:3518.70+26ft @ 3544.70ft

Grid

Minimum Curvature

2.00 sigma

Database: EDM_5000.17
Offset TVD Reference: Offset Datum

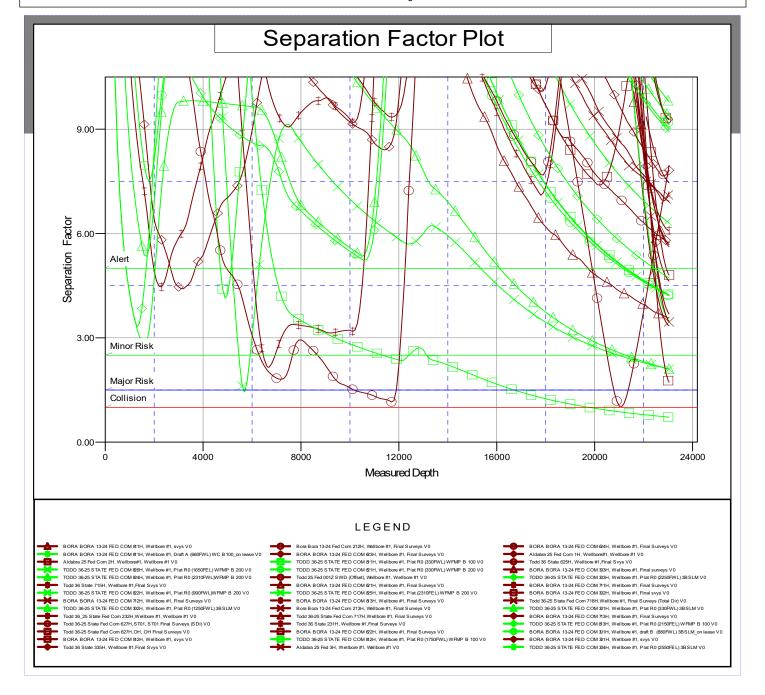
Reference Depths are relative to GL:3518.70+26ft @ 3544.70ft

Offset Depths are relative to Offset Datum

Central Meridian is -104.3333333

Coordinates are relative to: TODD 36-25 STATE FED COM 823H Coordinate System is US State Plane 1983, New Mexico Eastern Zone

Grid Convergence at Surface is: 0.32°



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.



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

Drilling Plan Data Report

03/27/2025

APD ID: 10400099603 Submission Date: 07/09/2024

Operator Name: DEVON ENERGY PRODUCTION COMPANY LP

Well Name: TODD 36-25 STATE FED COM Well Number: 823H

Well Type: OIL WELL Well Work Type: Drill

Highlighted data reflects the most recent changes

Show Final Text

Section 1 - Geologic Formations

Formation	Formation Name	Elevation	True Vertical	Measured Depth	Lithologies	Mineral Resources	Producing Formatio
15274800	UNKNOWN	3519	0	0	ALLUVIUM	NONE	N
15274806	RUSTLER	2696	823	823	SANDSTONE	NONE	N
15274801	TOP SALT	2354	1165	1165	SALT	NONE	N
15274802	BASE OF SALT	-698	4217	4217	SALT	NONE	N
15274819	BELL CANYON	-1032	4551	4551	SANDSTONE	NATURAL GAS, OIL	N
15274820	CHERRY CANYON	-1907	5426	5426	SANDSTONE	NATURAL GAS, OIL	N
15274821	BRUSHY CANYON	-3148	6667	6667	SANDSTONE	NATURAL GAS, OIL	N
15274823	BONE SPRING 1ST	-5917	9436	9436	SANDSTONE	NATURAL GAS, OIL	N
15274824	BONE SPRING 2ND	-6501	10020	10020	SANDSTONE	NATURAL GAS, OIL	N
15274833	BONE SPRING 3RD	-7024	10543	10543	LIMESTONE	NATURAL GAS, OIL	N
15274830	BONE SPRING 3RD	-7775	11294	11294	SANDSTONE	NATURAL GAS, OIL	N
15274831	WOLFCAMP	-8211	11730	11730	SHALE	NATURAL GAS, OIL	Y
15274832	STRAWN	-9956	13475	13475	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.

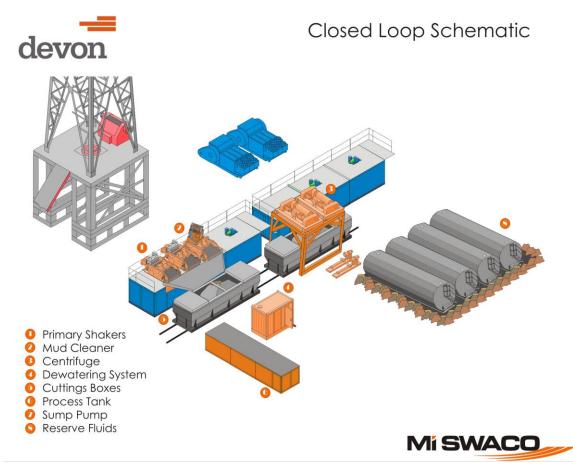
Prior to installing a closed-loop system on site, the topsoil, if present, will be stripped and stockpiled for use as the final cover or fill at the time of closure.

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

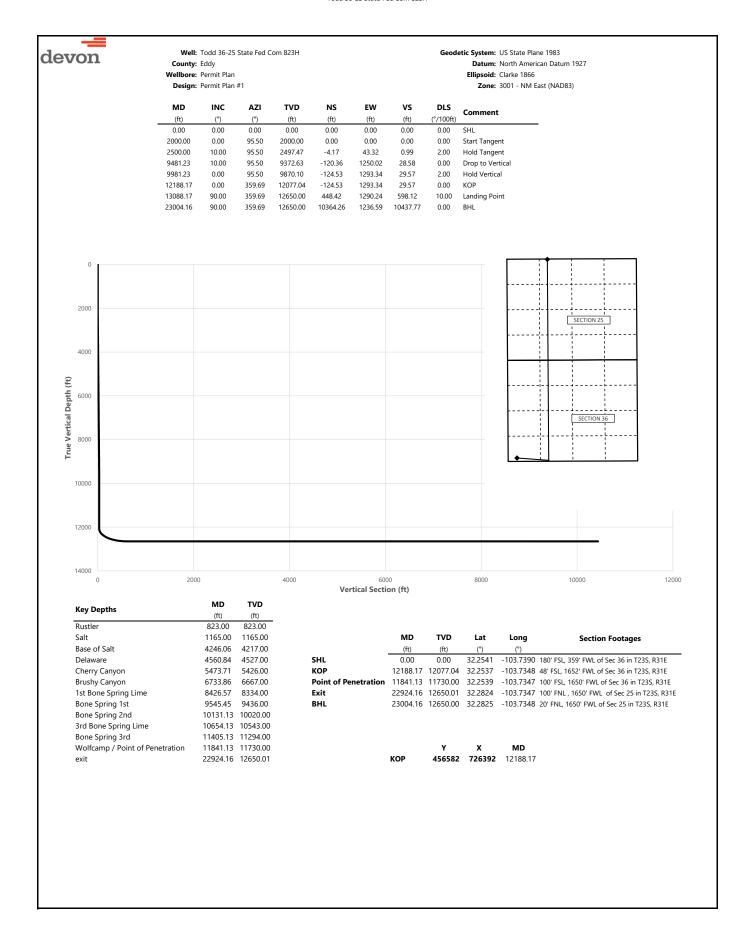
dope, or regulated chemicals are removed from soil and sent to landfills approved for these products.

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.





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	ı #1				Zone: 3001 - NM East (NAD83)				
MD	INC	AZI	TVD	NS	EW	vs	DLS	Comment			
(ft)	(°)	(°)	(ft)	(ft)	(ft)	(ft)	(°/100ft)				
0.00 100.00	0.00	0.00 95.50	0.00 100.00	0.00	0.00	0.00	0.00	SHL			
200.00	0.00	95.50	200.00	0.00	0.00	0.00	0.00				
300.00	0.00	95.50	300.00	0.00	0.00	0.00	0.00				
400.00	0.00	95.50	400.00	0.00	0.00	0.00	0.00				
500.00	0.00	95.50	500.00	0.00	0.00	0.00	0.00				
600.00	0.00	95.50	600.00	0.00	0.00	0.00	0.00				
700.00	0.00	95.50	700.00	0.00	0.00	0.00	0.00				
800.00 823.00	0.00	95.50 95.50	800.00 823.00	0.00	0.00	0.00	0.00	Rustler			
900.00	0.00	95.50	900.00	0.00	0.00	0.00	0.00	Rustiei			
1000.00	0.00	95.50	1000.00	0.00	0.00	0.00	0.00				
1100.00	0.00	95.50	1100.00	0.00	0.00	0.00	0.00				
1165.00	0.00	95.50	1165.00	0.00	0.00	0.00	0.00	Salt			
1200.00	0.00	95.50	1200.00	0.00	0.00	0.00	0.00				
1300.00	0.00	95.50	1300.00	0.00	0.00	0.00	0.00				
1400.00 1500.00	0.00	95.50 95.50	1400.00 1500.00	0.00	0.00	0.00	0.00				
1600.00	0.00	95.50	1600.00	0.00	0.00	0.00	0.00				
1700.00	0.00	95.50	1700.00	0.00	0.00	0.00	0.00				
1800.00	0.00	95.50	1800.00	0.00	0.00	0.00	0.00				
1900.00	0.00	95.50	1900.00	0.00	0.00	0.00	0.00				
2000.00	0.00	95.50	2000.00	0.00	0.00	0.00	0.00	Start Tangent			
2100.00	2.00 4.00	95.50	2099.98 2199.84	-0.17	1.74	0.04	2.00 2.00				
2200.00 2300.00	6.00	95.50 95.50	2299.45	-0.67 -1.50	6.95 15.62	0.16 0.36	2.00				
2400.00	8.00	95.50	2398.70	-2.67	27.75	0.63	2.00				
2500.00	10.00	95.50	2497.47	-4.17	43.32	0.99	2.00	Hold Tangent			
2600.00	10.00	95.50	2595.95	-5.84	60.61	1.39	0.00				
2700.00	10.00	95.50	2694.43	-7.50	77.89	1.78	0.00				
2800.00	10.00	95.50	2792.91	-9.16	95.18	2.18	0.00				
2900.00 3000.00	10.00 10.00	95.50 95.50	2891.39 2989.87	-10.83 -12.49	112.46 129.75	2.57 2.97	0.00				
3100.00	10.00	95.50	3088.35	-14.16	147.03	3.36	0.00				
3200.00	10.00	95.50	3186.83	-15.82	164.32	3.76	0.00				
3300.00	10.00	95.50	3285.31	-17.49	181.60	4.15	0.00				
3400.00	10.00	95.50	3383.79	-19.15	198.89	4.55	0.00				
3500.00	10.00	95.50	3482.27	-20.81	216.17	4.94	0.00				
3600.00 3700.00	10.00 10.00	95.50 95.50	3580.75	-22.48	233.46 250.74	5.34	0.00				
3800.00	10.00	95.50	3679.23 3777.72	-24.14 -25.81	268.03	5.73 6.13	0.00				
3900.00	10.00	95.50	3876.20	-27.47	285.31	6.52	0.00				
4000.00	10.00	95.50	3974.68	-29.14	302.60	6.92	0.00				
4100.00	10.00	95.50	4073.16	-30.80	319.88	7.31	0.00				
4200.00	10.00	95.50	4171.64	-32.46	337.16	7.71	0.00				
4246.06	10.00	95.50	4217.00	-33.23	345.13	7.89	0.00	Base of Salt			
4300.00 4400.00	10.00 10.00	95.50 95.50	4270.12 4368.60	-34.13 -35.79	354.45 371.73	8.10 8.50	0.00				
4500.00	10.00	95.50	4467.08	-33.79	389.02	8.89	0.00				
4560.84	10.00	95.50	4527.00	-38.47	399.54	9.14	0.00	Delaware			
4600.00	10.00	95.50	4565.56	-39.12	406.30	9.29	0.00				
4700.00	10.00	95.50	4664.04	-40.79	423.59	9.69	0.00				
4800.00	10.00	95.50	4762.52	-42.45	440.87	10.08	0.00				
4900.00 5000.00	10.00 10.00	95.50 95.50	4861.00 4959.48	-44.12 -45.78	458.16 475.44	10.48 10.87	0.00				
5100.00	10.00	95.50	5057.97	-47.44	492.73	11.27	0.00				
5200.00	10.00	95.50	5156.45	-49.11	510.01	11.66	0.00				
5300.00	10.00	95.50	5254.93	-50.77	527.30	12.06	0.00				
5400.00	10.00	95.50	5353.41	-52.44	544.58	12.45	0.00				
5473.71	10.00	95.50	5426.00	-53.66	557.32	12.74	0.00	Cherry Canyon			
5500.00 5600.00	10.00 10.00	95.50 95.50	5451.89 5550.37	-54.10 -55.77	561.87 579.15	12.85 13.24	0.00				
5700.00	10.00	95.50	5648.85	-55.77 -57.43	596.44	13.64	0.00				
5800.00	10.00	95.50	5747.33	-59.09	613.72	14.03	0.00				
5900.00	10.00	95.50	5845.81	-60.76	631.01	14.43	0.00				
6000.00	10.00	95.50	5944.29	-62.42	648.29	14.82	0.00				
6100.00	10.00	95.50	6042.77	-64.09	665.58	15.22	0.00				
6200.00 6300.00	10.00 10.00	95.50 95.50	6141.25 6239.73	-65.75 -67.42	682.86 700.15	15.61 16.01	0.00				
6400.00	10.00	95.50	6338.22	-67.42	717.43	16.40	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

Zone: 3001 - NM East (NAD83)

MD	INC	AZI	TVD	NS	EW	VS	DLS	
(ft)			(ft)	(ft)	(ft)	(ft)	(°/100ft)	Comment
6500.00	(°) 10.00	(°) 95.50	6436.70	-70.74	734.72	16.80	0.00	
6600.00	10.00	95.50	6535.18	-70.74 -72.41	752.00	17.19	0.00	
				-72.41 -74.07	769.29			
6700.00	10.00	95.50	6633.66			17.59	0.00	Davider Canada
6733.86	10.00	95.50	6667.00	-74.64	775.14	17.72	0.00	Brushy Canyon
6800.00	10.00	95.50	6732.14	-75.74	786.57	17.98	0.00	
6900.00	10.00	95.50	6830.62	-77.40	803.86	18.38	0.00	
7000.00	10.00	95.50	6929.10	-79.07	821.14	18.77	0.00	
7100.00	10.00	95.50	7027.58	-80.73	838.43	19.17	0.00	
7200.00	10.00	95.50	7126.06	-82.39	855.71	19.57	0.00	
7300.00	10.00	95.50	7224.54	-84.06	873.00	19.96	0.00	
7400.00	10.00	95.50	7323.02	-85.72	890.28	20.36	0.00	
7500.00	10.00	95.50	7421.50	-87.39	907.57	20.75	0.00	
7600.00	10.00	95.50	7519.99	-89.05	924.85	21.15	0.00	
7700.00	10.00	95.50	7618.47	-90.72	942.14	21.54	0.00	
7800.00	10.00	95.50	7716.95	-92.38	959.42	21.94	0.00	
7900.00	10.00	95.50	7815.43	-94.04	976.70	22.33	0.00	
8000.00	10.00	95.50	7913.91	-95.71	993.99	22.73	0.00	
8100.00	10.00	95.50	8012.39	-97.37	1011.27	23.12	0.00	
8200.00	10.00	95.50	8110.87	-99.04	1028.56	23.52	0.00	
8300.00	10.00	95.50	8209.35	-100.70	1045.84	23.91	0.00	
8400.00	10.00	95.50	8307.83	-100.70	1063.13	24.31	0.00	
		95.50		-102.37			0.00	1st Rone Spring Lima
8426.57	10.00		8334.00		1067.72	24.41		1st Bone Spring Lime
8500.00	10.00	95.50	8406.31	-104.03	1080.41	24.70	0.00	
8600.00	10.00	95.50	8504.79	-105.69	1097.70	25.10	0.00	
8700.00	10.00	95.50	8603.27	-107.36	1114.98	25.49	0.00	
8800.00	10.00	95.50	8701.75	-109.02	1132.27	25.89	0.00	
8900.00	10.00	95.50	8800.24	-110.69	1149.55	26.28	0.00	
9000.00	10.00	95.50	8898.72	-112.35	1166.84	26.68	0.00	
9100.00	10.00	95.50	8997.20	-114.02	1184.12	27.07	0.00	
9200.00	10.00	95.50	9095.68	-115.68	1201.41	27.47	0.00	
9300.00	10.00	95.50	9194.16	-117.35	1218.69	27.86	0.00	
9400.00	10.00	95.50	9292.64	-119.01	1235.98	28.26	0.00	
9481.23	10.00	95.50	9372.63	-120.36	1250.02	28.58	0.00	Drop to Vertical
9500.00	9.62	95.50	9391.13	-120.67	1253.20	28.65	2.00	
9545.45	8.72	95.50	9436.00	-121.36	1260.41	28.82	2.00	Bone Spring 1st
9600.00	7.62	95.50	9489.99	-122.11	1268.13	28.99	2.00	. 3
9700.00	5.62	95.50	9589.32	-123.21	1279.61	29.26	2.00	
9800.00	3.62	95.50	9688.99	-123.99	1287.64	29.44	2.00	
9900.00	1.62	95.50	9788.88	-124.42	1292.19	29.54	2.00	
9981.23	0.00	95.50	9870.10	-124.53	1293.34	29.57	2.00	Hold Vertical
								riola vertical
10000.00	0.00	359.69	9888.87	-124.53	1293.34	29.57	0.00	
10100.00	0.00	359.69	9988.87	-124.53	1293.34	29.57	0.00	Proceeding 2nd
10131.13	0.00	359.69	10020.00	-124.53	1293.34	29.57	0.00	Bone Spring 2nd
10200.00	0.00	359.69	10088.87	-124.53	1293.34	29.57	0.00	
10300.00	0.00	359.69	10188.87	-124.53	1293.34	29.57	0.00	
10400.00	0.00	359.69	10288.87	-124.53	1293.34	29.57	0.00	
10500.00	0.00	359.69	10388.87	-124.53	1293.34	29.57	0.00	
10600.00	0.00	359.69	10488.87	-124.53	1293.34	29.57	0.00	
10654.13	0.00	359.69	10543.00	-124.53	1293.34	29.57	0.00	3rd Bone Spring Lime
10700.00	0.00	359.69	10588.87	-124.53	1293.34	29.57	0.00	
10800.00	0.00	359.69	10688.87	-124.53	1293.34	29.57	0.00	
10900.00	0.00	359.69	10788.87	-124.53	1293.34	29.57	0.00	
11000.00	0.00	359.69	10888.87	-124.53	1293.34	29.57	0.00	
11100.00	0.00	359.69	10988.87	-124.53	1293.34	29.57	0.00	
11200.00	0.00	359.69	11088.87	-124.53	1293.34	29.57	0.00	
11300.00	0.00	359.69	11188.87	-124.53	1293.34	29.57	0.00	
11400.00	0.00	359.69	11188.87	-124.53	1293.34	29.57	0.00	
11405.13	0.00	359.69	11294.00	-124.53	1293.34	29.57	0.00	Bone Spring 3rd
								bone spring sid
11500.00	0.00	359.69	11388.87	-124.53	1293.34	29.57	0.00	
11600.00	0.00	359.69	11488.87	-124.53	1293.34	29.57	0.00	
11700.00	0.00	359.69	11588.87	-124.53	1293.34	29.57	0.00	
11800.00	0.00	359.69	11688.87	-124.53	1293.34	29.57	0.00	
11841.13	0.00	359.69	11730.00	-124.53	1293.34	29.57	0.00	Wolfcamp / Point of Penetration
11900.00	0.00	359.69	11788.87	-124.53	1293.34	29.57	0.00	
12000.00	0.00	359.69	11888.87	-124.53	1293.34	29.57	0.00	
12100.00	0.00	359.69	11988.87	-124.53	1293.34	29.57	0.00	
12188.17	0.00	359.69	12077.04	-124.53	1293.34	29.57	0.00	KOP
12200.00	1.18	359.69	12088.87	-124.41	1293.34	29.69	10.00	
12300.00	11.18	359.69	12188.16	-113.66	1293.28	40.36	10.00	
	21.18	359.69	12284.08	-85.82	1293.13	67.99	10.00	
12400.00				JJ.JL	55.15	55	. 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

Zone: 3001 - NM East (NAD83)

	Design:	Permit Plan	ı #1				Zone: 3001 - NM East (NAD83)			
MD	INC	AZI	TVD	NS	EW	VS	DLS	Comment		
(ft) 12500.00	(°) 31.18	(°) 359.69	(ft) 12373.70	(ft) -41.75	(ft) 1292.89	(ft) 111.71	(°/100ft) 10.00			
12600.00	41.18	359.69	12454.31	17.21	1292.57	170.22	10.00			
12700.00	51.18	359.69	12523.46	89.27	1292.18	241.73	10.00			
12800.00	61.18	359.69	12579.05	172.24	1291.73	324.07	10.00			
12900.00	71.18	359.69	12619.38	263.61	1291.24	414.73	10.00			
13000.00	81.18	359.69	12643.23	360.59	1290.71	510.97	10.00			
13088.17	90.00	359.69	12650.00	448.42	1290.24	598.12	10.00	Landing Point		
13100.00	90.00	359.69	12650.00	460.24	1290.18	609.85	0.00			
13200.00	90.00	359.69	12650.00	560.24	1289.63	709.08	0.00			
13300.00	90.00	359.69	12650.00	660.24	1289.09	808.31	0.00			
13400.00	90.00	359.69	12650.00	760.24	1288.55	907.54	0.00			
13500.00	90.00	359.69	12650.00	860.24	1288.01	1006.77	0.00			
13600.00	90.00	359.69	12650.00	960.24	1287.47	1106.00	0.00			
13700.00	90.00	359.69	12650.00	1060.23	1286.93	1205.23	0.00			
13800.00	90.00	359.69	12650.00	1160.23	1286.39	1304.46	0.00			
13900.00	90.00	359.69	12650.00	1260.23	1285.84	1403.69	0.00			
14000.00	90.00	359.69	12650.00	1360.23	1285.30	1502.92	0.00			
14100.00 14200.00	90.00 90.00	359.69 359.69	12650.00 12650.00	1460.23 1560.23	1284.76 1284.22	1602.15 1701.39	0.00			
14300.00	90.00	359.69	12650.00	1660.23	1283.68	1800.62	0.00			
14400.00	90.00	359.69	12650.00	1760.22	1283.14	1899.85	0.00			
14500.00	90.00	359.69	12650.00	1860.22	1282.59	1999.08	0.00			
14600.00	90.00	359.69	12650.00	1960.22	1282.05	2098.31	0.00			
14700.00	90.00	359.69	12650.00	2060.22	1281.51	2197.54	0.00			
14800.00	90.00	359.69	12650.00	2160.22	1280.97	2296.77	0.00			
14900.00	90.00	359.69	12650.00	2260.22	1280.43	2396.00	0.00			
15000.00	90.00	359.69	12650.00	2360.22	1279.89	2495.23	0.00			
15100.00	90.00	359.69	12650.00	2460.21	1279.34	2594.46	0.00			
15200.00	90.00	359.69	12650.00	2560.21	1278.80	2693.69	0.00			
15300.00	90.00	359.69	12650.00	2660.21	1278.26	2792.92	0.00			
15400.00	90.00	359.69	12650.00	2760.21	1277.72	2892.15	0.00			
15500.00	90.00	359.69	12650.00	2860.21	1277.18	2991.38	0.00			
15600.00	90.00	359.69	12650.00	2960.21	1276.64	3090.61	0.00			
15700.00 15800.00	90.00 90.00	359.69 359.69	12650.00 12650.00	3060.21 3160.20	1276.10 1275.55	3189.84 3289.07	0.00			
15900.00	90.00	359.69	12650.00	3260.20	1275.01	3388.30	0.00			
16000.00	90.00	359.69	12650.00	3360.20	1274.47	3487.53	0.00			
16100.00	90.00	359.69	12650.00	3460.20	1273.93	3586.76	0.00			
16200.00	90.00	359.69	12650.00	3560.20	1273.39	3685.99	0.00			
16300.00	90.00	359.69	12650.00	3660.20	1272.85	3785.22	0.00			
16400.00	90.00	359.69	12650.00	3760.19	1272.30	3884.45	0.00			
16500.00	90.00	359.69	12650.00	3860.19	1271.76	3983.68	0.00			
16600.00	90.00	359.69	12650.00	3960.19	1271.22	4082.91	0.00			
16700.00	90.00	359.69	12650.00	4060.19	1270.68	4182.14	0.00			
16800.00	90.00	359.69	12650.00	4160.19	1270.14	4281.37	0.00			
16900.00 17000.00	90.00	359.69	12650.00	4260.19	1269.60	4380.60	0.00			
17100.00	90.00 90.00	359.69 359.69	12650.01 12650.01	4360.19 4460.18	1269.05 1268.51	4479.83 4579.06	0.00			
17100.00	90.00	359.69	12650.01	4560.18	1268.51	4678.29	0.00			
17300.00	90.00	359.69	12650.01	4660.18	1267.43	4777.52	0.00			
17400.00	90.00	359.69	12650.01	4760.18	1266.89	4876.75	0.00			
17500.00	90.00	359.69	12650.01	4860.18	1266.35	4975.98	0.00			
17600.00	90.00	359.69	12650.01	4960.18	1265.81	5075.21	0.00			
17700.00	90.00	359.69	12650.01	5060.18	1265.26	5174.44	0.00			
17800.00	90.00	359.69	12650.01	5160.17	1264.72	5273.67	0.00			
17900.00	90.00	359.69	12650.01	5260.17	1264.18	5372.90	0.00			
18000.00	90.00	359.69	12650.01	5360.17	1263.64	5472.13	0.00			
18100.00	90.00	359.69	12650.01	5460.17	1263.10	5571.36	0.00			
18200.00	90.00	359.69	12650.01	5560.17	1262.56	5670.59	0.00			
18300.00	90.00	359.69	12650.01	5660.17 5760.17	1262.01	5769.82 5869.05	0.00			
18400.00 18500.00	90.00 90.00	359.69 359.69	12650.01 12650.01	5760.17 5860.16	1261.47 1260.93	5869.05 5968.28	0.00			
18600.00	90.00	359.69	12650.01	5960.16	1260.93	6067.51	0.00			
18700.00	90.00	359.69	12650.01	6060.16	1259.85	6166.74	0.00			
18800.00	90.00	359.69	12650.01	6160.16	1259.31	6265.97	0.00			
18900.00	90.00	359.69	12650.01	6260.16	1258.76	6365.20	0.00			
19000.00	90.00	359.69	12650.01	6360.16	1258.22	6464.43	0.00			
19100.00	90.00	359.69	12650.01	6460.16	1257.68	6563.66	0.00			
19200.00	90.00	359.69	12650.01	6560.15	1257.14	6662.89	0.00			
19300.00	90.00	359.69	12650.01	6660.15	1256.60	6762.12	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

Zone: 3001 - NM East (NAD83)

MD	INC	AZI	TVD	NS	EW	VS	DLS	Comment
(ft)	(°)	(°)	(ft)	(ft)	(ft)	(ft)	(°/100ft)	Comment
19400.00	90.00	359.69	12650.01	6760.15	1256.06	6861.35	0.00	_
19500.00	90.00	359.69	12650.01	6860.15	1255.52	6960.58	0.00	
19600.00	90.00	359.69	12650.01	6960.15	1254.97	7059.81	0.00	
19700.00	90.00	359.69	12650.01	7060.15	1254.43	7159.04	0.00	
19800.00	90.00	359.69	12650.01	7160.14	1253.89	7258.27	0.00	
19900.00	90.00	359.69	12650.01	7260.14	1253.35	7357.50	0.00	
20000.00	90.00	359.69	12650.01	7360.14	1252.81	7456.73	0.00	
20100.00	90.00	359.69	12650.01	7460.14	1252.27	7555.96	0.00	
20200.00	90.00	359.69	12650.01	7560.14	1251.72	7655.19	0.00	
20300.00	90.00	359.69	12650.01	7660.14	1251.18	7754.42	0.00	
20400.00	90.00	359.69	12650.01	7760.14	1250.64	7853.65	0.00	
20500.00	90.00	359.69	12650.01	7860.13	1250.10	7952.88	0.00	
20600.00	90.00	359.69	12650.01	7960.13	1249.56	8052.11	0.00	
20700.00	90.00	359.69	12650.01	8060.13	1249.02	8151.34	0.00	
20800.00	90.00	359.69	12650.01	8160.13	1248.47	8250.57	0.00	
20900.00	90.00	359.69	12650.01	8260.13	1247.93	8349.80	0.00	
21000.00	90.00	359.69	12650.01	8360.13	1247.39	8449.03	0.00	
21100.00	90.00	359.69	12650.01	8460.13	1246.85	8548.26	0.00	
21200.00	90.00	359.69	12650.01	8560.12	1246.31	8647.49	0.00	
21300.00	90.00	359.69	12650.01	8660.12	1245.77	8746.72	0.00	
21400.00	90.00	359.69	12650.01	8760.12	1245.23	8845.95	0.00	
21500.00	90.00	359.69	12650.01	8860.12	1244.68	8945.18	0.00	
21600.00	90.00	359.69	12650.01	8960.12	1244.14	9044.41	0.00	
21700.00	90.00	359.69	12650.01	9060.12	1243.60	9143.64	0.00	
21800.00	90.00	359.69	12650.01	9160.12	1243.06	9242.87	0.00	
21900.00	90.00	359.69	12650.01	9260.11	1242.52	9342.10	0.00	
22000.00	90.00	359.69	12650.01	9360.11	1241.98	9441.33	0.00	
22100.00	90.00	359.69	12650.01	9460.11	1241.43	9540.56	0.00	
22200.00	90.00	359.69	12650.01	9560.11	1240.89	9639.79	0.00	
22300.00	90.00	359.69	12650.01	9660.11	1240.35	9739.02	0.00	
22400.00	90.00	359.69	12650.01	9760.11	1239.81	9838.25	0.00	
22500.00	90.00	359.69	12650.01	9860.11	1239.27	9937.48	0.00	
22600.00	90.00	359.69	12650.01	9960.10	1238.73	10036.71	0.00	
22700.00	90.00	359.69	12650.01	10060.10	1238.18	10135.94	0.00	
22800.00	90.00	359.69	12650.01	10160.10	1237.64	10235.17	0.00	
22900.00	90.00	359.69	12650.01	10260.10	1237.10	10334.40	0.00	
22924.16	90.00	359.69	12650.01	10284.26	1236.97	10358.38	0.00	exit
23000.00	90.00	359.69	12650.01	10360.10	1236.56	10433.63	0.00	
23004.16	90.00	359.69	12650.00	10364.26	1236.59	10437.77	0.00	BHL

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 43 CFR 3172 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.

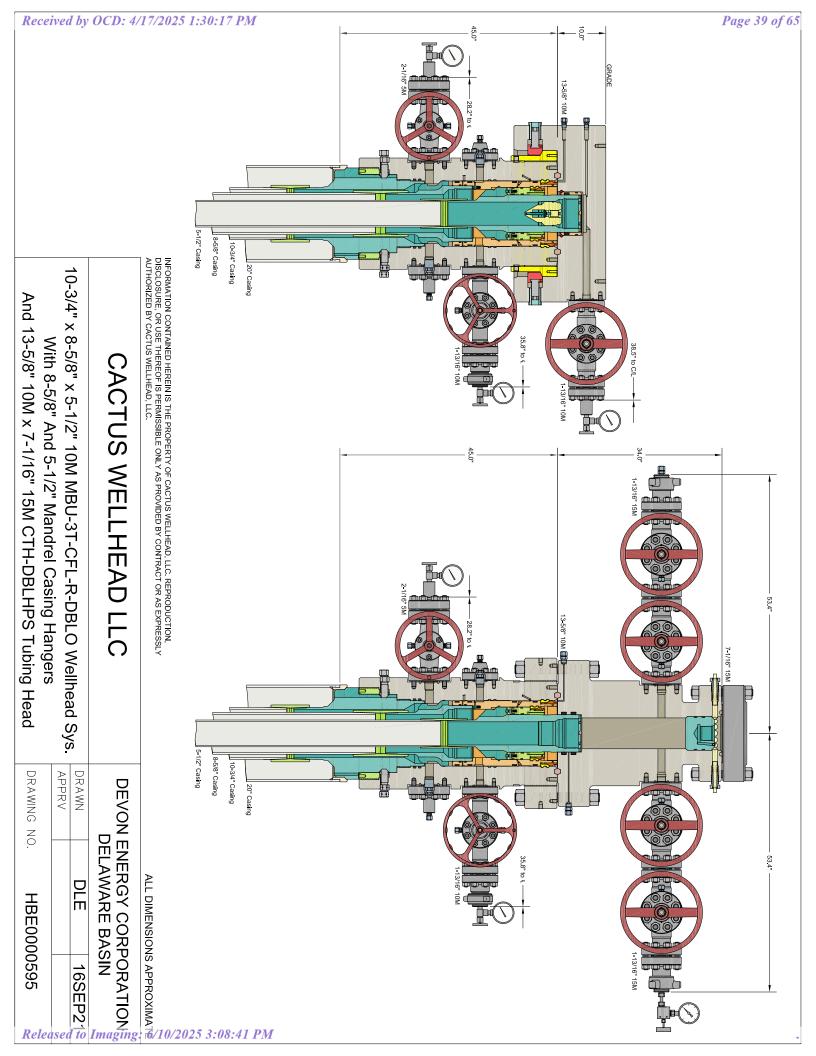
- Wellhead will be installed by wellhead representatives.
- If the welding is performed by a third party, the wellhead representative will monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
- Wellhead representative will install the test plug for the initial 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 43 CFR 3172.

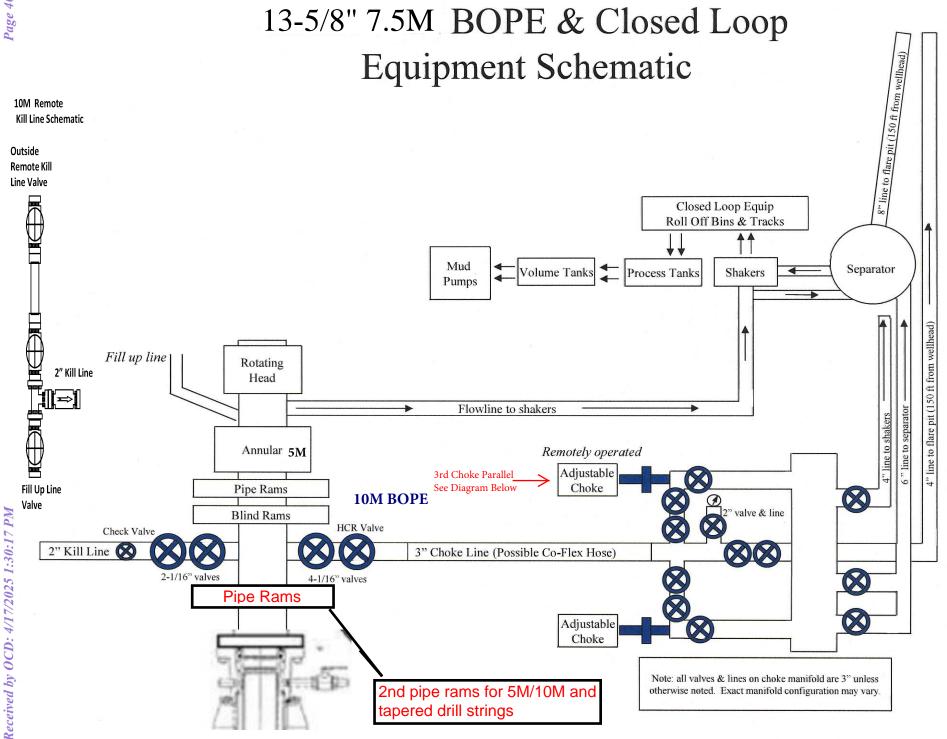
After running the surface casing, a 13-5/8" BOP/BOPE system with a minimum rating of 5M will be installed on the wellhead system and will undergo a 250 psi low pressure test followed by a 5,000 psi high pressure test. The 5,000 psi high and 250 psi low test will cover testing requirements a maximum of 30 days, as per 43 CFR 3172. If the well is not complete within 30 days of this BOP test, another full BOP test will be conducted, as per 43 CFR 3172.

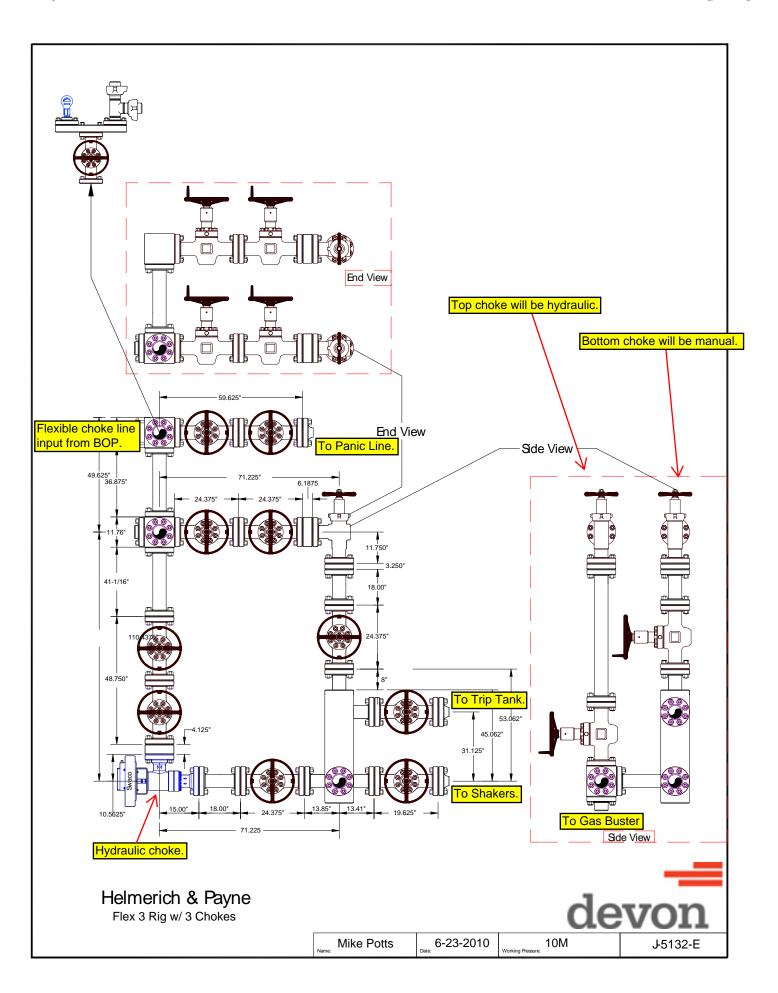
After running the intermediate casing with a mandrel hanger, the 13-5/8" BOP/BOPE system with a minimum rating of 10M will be installed and tested, with 5M annular being tested to 100% of rated working pressure.

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.







Casing Assumptions and Load Cases

Surface

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

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

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

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

Casing Assumptions and Load Cases

Intermediate

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

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

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

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

	ne Corp.	MO-FXL			MO-FXL 8	
Metal <mark>O</mark> ne		*1 Pipe Body: BMP P110HSCY MinYS125ksi		CDS#	P110HSCY	
				020"	MinYS125ksi	
		Special Drift 7.875"			SD7.875	
		Connection Data Sheet		Date	27-Nov-23	
		Geometry	<u>Imperia</u>	<u>ıl</u>	<u>S.I.</u>	
		Pipe Body				
		Grade *1	P110HSCY		P110HSCY	
		MinYS *1	125	ksi	125	ksi
		Pipe OD (D)	8 5/8	in	219.08	mm
	MO-FXL	Weight	32.00	lb/ft	47.68	kg/m
		Actual weight	31.10		46.34	kg/m
		Wall Thickness (t)	0.352	in	8.94	mm
		Pipe ID (d)	7.921	in	201.19	mm
		Pipe body cross section	9.149	in ²	5,902	mm ²
		Special Drift Dia. *1	7.875	in	200.03	mm
		-	-	-	-	-
		Connection	•			
_		Box OD (W)	8.625	in	219.08	mm
T	←	PIN ID	7.921	in	201.19	mm
		Make up Loss	3.847	in	97.71	
	Box	Box Critical Area		in ²		mm 2
	critical		5.853		3686	mm ²
area		Joint load efficiency	69	%	69	%
		Thread Taper 1 / 10 (1.2" per ft)				
	5	Number of Threads		5	TPI	
	← d	Performance		5	TPI	
ір	d D		for Pipe Body		TPI	
р		Performance Performance Properties S.M.Y.S. *1	for Pipe Body		5,087	kN
р	D	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1				kN MPa
р	Pin	Performance Performance Properties S.M.Y.S. *1	1,144	kips	5,087	
р	D	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1	1,144 8,930 4,300	kips psi psi	5,087 61.59 29.66	MPa MPa
р	Pin critical	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1 Collapse Strength *1 Note S.M.Y.S.= Specif M.I.Y.P. = Minim	1,144 8,930 4,300 ied Minimum YIE um Internal Yield	kips psi psi ELD Strei	5,087 61.59 29.66 ngth of Pipe body	MPa MPa dy
р	Pin critical	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1 Collapse Strength *1 Note S.M.Y.S.= Specif M.I.Y.P. = Minim *1: BMP P110HSCY: MinYS1	1,144 8,930 4,300 ied Minimum YIE um Internal Yield 25ksi, SD7.875,	kips psi psi ELD Streid Pressui Collapse	5,087 61.59 29.66 ngth of Pipe body	MPa MPa dy
р	Pin critical	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1 Collapse Strength *1 Note S.M.Y.S.= Specif M.I.Y.P. = Minim *1: BMP P110HSCY: MinYS1 Performance Properties	1,144 8,930 4,300 ied Minimum YIE um Internal Yield 25ksi, SD7.875, for Connectio	kips psi psi ELD Street Pressur Collapse	5,087 61.59 29.66 ngth of Pipe body e Strength 4,300	MPa MPa dy
р	Pin critical	Performance Performance Properties S.M.Y.S. *1 M.I.Y.P. *1 Collapse Strength *1 Note S.M.Y.S.= Specif M.I.Y.P. = Minim *1: BMP P110HSCY: MinYS1 Performance Properties Tensile Yield load	1,144 8,930 4,300 ied Minimum YIE um Internal Yield 25ksi, SD7.875, for Connectio 789 kips	kips psi psi ELD Streid Pressui Collapse n	5,087 61.59 29.66 ngth of Pipe body e Strength 4,30 of S.M.Y.S.)	MPa MPa dy
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Legal Notice

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Statements regarding the suitability of products for certain types of applications are based on Metal One's knowledge of typical requirements that are often placed on Metal One products in standard well configurations. Such statements are not binding statements about the suitability of products for a particular application. It is the customer's responsibility to validate that a particular product with the properties described in the product specification is suitable for use in a particular application

The products described in this Connection Data Sheet are not recommended for use in deep water offshore applications. For more information, please refer to http://www.mtlo.co.jp/mo-con/_images/top/WebsiteTerms_Active_20333287_1.pdf the contents of which are incorporated by reference into this Connection Data Sheet.

Casing Assumptions and Load Cases

Production

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

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

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

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

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME: Devon Energy Production Company LP

LOCATION: Section 36, T.23 S., R.31 E., NMPM

COUNTY: Eddy County, New Mexico

WELL NAME & NO.: Todd 36-25 State Fed Com 824H
ATS/API ID: ATS-24-2191
APD ID: 10400099608
Sundry ID: N/a

COA

H2S	Yes ▼		
Potash	Secretary •	None	
Cave/Karst Potential	Low		
Cave/Karst Potential	Critical		
Variance	None	Flex Hose	C Other
Wellhead	Conventional and Multibowl	•	
Other	□4 String □5 String	Capitan Reef None	□WIPP
Other	Pilot Hole None	☐ Open Annulus	
Cementing	Contingency Squeeze None	Echo-Meter Int 1	Primary Cement Squeeze None
Special Requirements	☐ Water Disposal/Injection	▼ COM	□ Unit
Special Requirements	☐ Batch Sundry	Waste Prevention Waste MP	
Special Requirements Variance	☐ BOPE Break Testing ☐ Offline BOPE Testing	☐ Offline Cementing	☐ Casing Clearance

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 **43 CFR part 3170 Subpart 3176** 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 10-3/4 inch surface casing shall be set at approximately 848 feet (a minimum of 70 feet (Eddy County) into the Rustler Anhydrite and above the salt when present, and below usable fresh water) and cemented to the surface. The surface hole shall be 14 3/4 inch in diameter.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
 - b. Wait on cement (WOC) time for a primary cement job will be a minimum of **8** hours or 500 pounds compressive strength, whichever is greater. (This is to include the lead cement)
 - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
 - d. If cement falls back, remedial cementing will be done prior to drilling out that string.

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

2. The minimum required fill of cement behind the 8-5/8 inch intermediate casing is:

Option 1 (Single Stage):

• 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.

Option 2:

Operator has proposed to cement in two stages by conventionally cementing the first stage and performing a bradenhead squeeze on the second stage, contingent upon no returns to surface.

- a. First stage: Operator will cement with intent to reach the top of the **Brushy** Canyon at 6667'.
- b. Second stage:
 - Operator will perform bradenhead squeeze and top-out. Cement to surface. If cement does not reach surface, the appropriate BLM office shall be notified. (Squeeze 472 sxs Class C)
 Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst or potash.

Operator has proposed to pump down 10-3/4" X 8-5/8" annulus after primary cementing stage. Operator must run Echo-meter to verify Cement Slurry/Fluid top in the annulus Or operator shall run a CBL from TD of the 8-5/8" casing to surface after the second stage BH to verify TOC.

Submit results to the BLM. No displacement fluid/wash out shall be utilized at the top of the cement slurry between second stage BH and top out. Operator must run one CBL per Well Pad. Operator may conduct a negative and positive pressure test during completion to remediate sustained casing pressure.

If cement does not reach surface, the next casing string must come to surface.

Operator must use a limited flush fluid volume of 1 bbl following backside cementing procedures.

- ❖ 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.
- 3. The minimum required fill of cement behind the 5-1/2 inch production casing is:
 - Cement should tie-back **500 feet** into the previous casing and may be lower than USGS Marker Bed No. 126. Operator must run a CBL from TD of the production casing to surface to verify top of cement. Submit results to the BLM.

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 is required if washout occurs. Adjust cement volume and excess based on a fluid caliper or similar method that reflects the as-drilled size of the wellbore.

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 5000 (5M) psi.

Option 2:

Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the 10-3/4 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 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 43 CFR 3172.6(b)(9) must be followed.

D. SPECIAL REQUIREMENT (S)

Communitization Agreement

- The operator will submit a Communitization Agreement to the Santa Fe Office, 301 Dinosaur Trail Santa Fe, New Mexico 87508, at least 90 days before the anticipated date of first production from a well subject to a spacing order issued by the New Mexico Oil Conservation Division. The Communitization Agreement will include the signatures of all working interest owners in all Federal and Indian leases subject to the Communitization Agreement (i.e., operating rights owners and lessees of record), or certification that the operator has obtained the written signatures of all such owners and will make those signatures available to the BLM immediately upon request.
- The operator will submit an as-drilled survey well plat of the well completion, but are not limited to, those specified in 43 CFR part 3170 Subpart 3171

- If the operator does not comply with this condition of approval, the BLM may take enforcement actions that include, but are not limited to, those specified in 43 CFR 3163.1.
- In addition, the well sign shall include the surface and bottom hole lease numbers. When the Communitization Agreement number is known, it shall also be on the sign.

GENERAL REQUIREMENTS

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

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

☑ Eddy County

EMAIL or call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220,

BLM_NM_CFO_DrillingNotifications@BLM.GOV (575) 361-2822

- 1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - Notify the BLM when moving in and removing the Spudder Rig.
 - Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - BOP/BOPE test to be conducted per **43** CFR part **3170** Subpart **3172** 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.

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 of both lead and tail cement, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 3. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 4. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
- 5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
- 6. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
- 7. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.
- 8. Whenever a casing string is cemented in the R-111-P potash area, the NMOCD requirements shall be followed.
- B. PRESSURE CONTROL
- 1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in 43 CFR part 3170 Subpart 3172 and API STD 53 Sec. 5.3.

- 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 43 CFR 3172.6(b)(9) 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 cement), 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 cement plug. The BOPE test can be initiated after bumping the cement plug with the casing valve open. (only applies to single stage cement jobs, prior to the cement setting up.)

- c. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to 43 CFR part 3170 Subpart 3172 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 8 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 43 CFR part 3170 Subpart 3172.

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.

Long Vo (LVO) 2/21/2025



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

Hydrogen Sulfide (H₂S) Contingency Plan

For

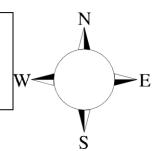
Todd 36-25 State Fed Com 823H

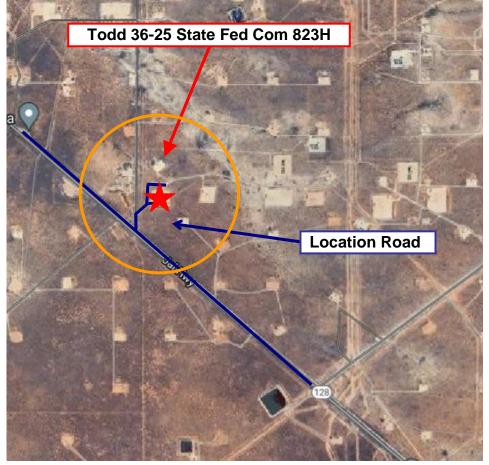
Sec-36 T-23S R-31E 180' FSL & 359' FWL LAT. = 32.254164° N (NAD83) LONG = 103.738891° W

Eddy County NM

Todd 36-25 State Fed Com 823H

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 H₂S concentration shall trigger activation of this plan.

Emergency Procedures

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

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

Ignition of Gas Source

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

Characteristics of H₂S and SO₂

Common	Chemical	Specific	Threshold	Hazardous Limit	Lethal
Name	Formula	Gravity	Limit		Concentration
Hydrogen Sulfide	H₂S	1.189 Air = 1	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO ₂	2.21 Air = 1	2 ppm	N/A	1000 ppm

Contacting Authorities

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

Hydrogen Sulfide Drilling Operation Plan

I. HYDROGEN SULFIDE (H2S) TRAINING

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

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

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

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

There will be weekly H₂S and well control drills for all personnel in each crew.

II. HYDROGEN SULFIDE TRAINING

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

1. Well Control Equipment

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

2. Protective equipment for essential personnel:

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

3. H₂S detection and monitoring equipment:

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

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

Visual warning systems:

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

4. Mud program:

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

5. Metallurgy:

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

6. Communication:

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

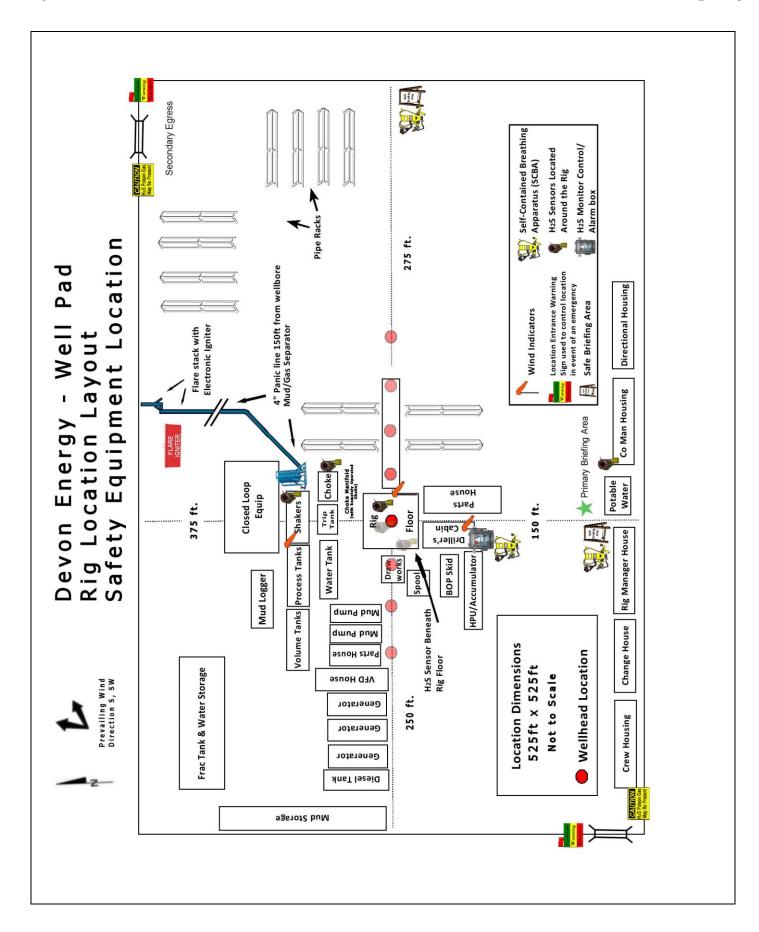
7. Well testing:

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

Devon Energy Corp. Company Call List						
Employee/Company Contact Representative	Position	Phone Number	After Hours Number			
Jonathan Fisher (North)	Drilling Manager	832-967-7912				
Jason Hildebrand (South)	Drilling Manager	405-552-6514				
Rich Downey	Drilling VP	405-228-2415				
Josh Harvey	EHS Manager	405-228-2440	918-500-5536			
Laura Wright	EHS Supervisor	405-552-5334	832-969-8145			
Robert Glover	EHS Professional	575-703-5712	575-703-5712			
Lane Frank	Lead EHS	580-579-7052	580-579-7052			
Rickey Porter	Lead EHS	903-720-8315	903-720-8315			
Ronnie Handy	Lead EHS	918-839-2046	918-839-2046			
Brock Vise	Lead EHS	918-413-3291	918-413-3291			

Agency	Call List	
<u>Lea</u>	Hobbs	
County	Lea County Communication 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 Emergency Planning Committee)	393-2870
	NMOCD	393-6161
	US Bureau of Land Management (Closed)	393-0002
Eddy	Carlsbad	
County	State Police	885-3137
(575)	City Police	885-2111
	Sheriff's Office	887-7551
	Ambulance	911
	Fire Department	885-3125
	LEPC (Local Emergency Planning Committee)	887-3798
	US Bureau of Land Management	234-5972
	NM Emergency Response Commission (Santa Fe)	(505) 476-9600
	24 HR	(505) 827-9126
	National Emergency Response Center	(800) 424-8802
	National Pollution Control Center: Direct	(703) 872-6000
	For Oil Spills	(800) 280-7118
	Emergency Services	()
	Wild Well Control	(281) 784-4700
	Cudd Pressure Control (915) 699-0139	(915) 563-3356
	Halliburton	(575) 746-2757
	B. J. Services	(575) 746-3569
Give	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
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Prepared in conjunction with Dave Small



Sante Fe Main Office Phone: (505) 476-3441

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

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

CONDITIONS

Action 453217

CONDITIONS

Operator:	OGRID:	
DEVON ENERGY PRODUCTION COMPANY, LP	6137	
333 West Sheridan Ave.	Action Number:	
Oklahoma City, OK 73102	453217	
	Action Type:	
	[C-101] BLM - Federal/Indian Land Lease (Form 3160-3)	

CONDITIONS

Created By	Condition	Condition Date
wsalter	Cement is required to circulate on both surface and intermediate1 strings of casing.	4/17/2025
wsalter	If cement does not circulate on any string, a Cement Bond Log (CBL) is required for that string of casing.	4/17/2025
ward.rikala	Notify the OCD 24 hours prior to casing & cement.	6/10/2025
ward.rikala	File As Drilled C-102 and a directional Survey with C-104 completion packet.	6/10/2025
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.	6/10/2025
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.	6/10/2025