

Form 3160-3
(October 2024)

FORM APPROVED
OMB No. 1004-0137
Expires: October 31, 2027

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

1a. Type of work: <input type="checkbox"/> DRILL <input type="checkbox"/> REENTER		5. Lease Serial No.
1b. Type of Well: <input type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other		6. If Indian, Allottee or Tribe Name
1c. Type of Completion: <input type="checkbox"/> Hydraulic Fracturing <input type="checkbox"/> Single Zone <input type="checkbox"/> Multiple Zone		7. If Unit or CA Agreement, Name and No.
2. Name of Operator		8. Lease Name and Well No.
3a. Address		9. API Well No. 30-015-57751
3b. Phone No. (include area code)		10. Field and Pool, or Exploratory
4. Location of Well (Report location clearly and in accordance with any State requirements. *) At surface At proposed prod. zone		11. Sec., T. R. M. or Blk. and Survey or Area
14. Distance in miles and direction from nearest town or post office*		12. County or Parish
		13. State
15. Distance from proposed* location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any)	16. No of acres in lease	17. Spacing Unit dedicated to this well
18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft.	19. Proposed Depth	20. BLM/BIA Bond No. in file
21. Elevations (Show whether DF, KDB, RT, GL, etc.)	22. Approximate date work will start*	23. Estimated duration
24. Attachments		

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

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

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


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

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



(Continued on page 2)

*(Instructions on page 2)

C-102 Submit Electronically Via OCD Permitting		State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION						Revised July 9, 2024	
								Submittal Type:	
								<input checked="" type="checkbox"/> Initial Submittal <input type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled	
WELL LOCATION INFORMATION									
API Number 30-015-57751		Pool Code 97963			Pool Name WC-015 G-07 S203032G;WOLFCAMP				
Property Code 338800		Property Name ST HELENS 19-21 FED COM						Well Number 911H	
OGRID No. 6137		Operator Name DEVON ENERGY PRODUCTION COMPANY, L.P.					Ground Level Elevation 3320.32		
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal					Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal				
Surface Location									
UL A	Section 24	Township 20-S	Range 29-E	Lot	Ft. from N/S 244/N	Ft. from E/W 213/E	Latitude 32.5654502°	Longitude -104.0206150°	County EDDY
Bottom Hole Location									
UL A	Section 21	Township 20-S	Range 30-E	Lot	Ft. from N/S 720/N	Ft. from E/W 20/E	Latitude 32.5640704°	Longitude -103.9686310°	County EDDY
Dedicated Acres 958.70		Infill or Defining Well INFILL		Defining Well API St. Helens 19-21 Fed Com 621H		Overlapping Spacing Unit (Y/N) NO		Consolidation Code C	
Order Numbers. PENDING		Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
Kick Off Point (KOP)									
UL D	Section 19	Township 20-S	Range 30-E	Lot 1	Ft. from N/S 719/N	Ft. from E/W 100/W	Latitude 32.56404632°	Longitude -104.01960240°	County EDDY
First Take Point (FTP)									
UL D	Section 19	Township 20-S	Range 30-E	Lot 1	Ft. from N/S 720/N	Ft. from E/W 100/W	Latitude 32.5641395°	Longitude -104.0196024°	County EDDY
Last Take Point (LTP)									
UL A	Section 21	Township 20-S	Range 30-E	Lot	Ft. from N/S 720/N	Ft. from E/W 100/E	Latitude 32.5640727°	Longitude -103.9688906°	County EDDY
Unitized Area: <input type="checkbox"/> Area of Uniform Interest: <input checked="" type="checkbox"/>				Spacing Unit Type: <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical				Ground Floor Elevation:	
OPERATOR CERTIFICATIONS:					SURVEYOR NOTES:				
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division. If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.					1. BEARINGS AND COORDINATES SHOWN ARE GRID BASED ON THE NEW MEXICO STATE PLANE EAST ZONE COORDINATE SYSTEM 3001, NAD 83 (2001), BASED FROM GPS OBSERVATIONS, OCCUPYING CONTROL POINT CP FITZ BOOSTER AT N:556917.441 E:633268.606. ORTHO:3349.52. DETERMINED BY AN OPUS SOLUTION ON JUNE 5TH, 2020. UNITS REPRESENTED ON THIS PLAT ARE IN US SURVEY FEET. 2. DISTANCES DEPICTED HEREON ARE REPORTED AS GROUND DISTANCES IN US SURVEY FEET USING A COMBINED SCALE FACTOR OF 1.000237768 3. ELEVATIONS SHOWN OR LISTED ARE EXISTING GROUND ELEVATIONS UNLESS OTHERWISE NOTED. 4. KARST AREAS, 1/4 & 1/2 MILE POTASH BUFFERS, LEASE AREAS AND DRILL ISLANDS, IF SHOWN, WERE PROVIDED BY DEVON ENERGY AND NOT LOCATED ON THE GROUND AS A PART OF THIS SURVEY, LOCATIONS ARE APPROXIMATE.				
Signature: <i>Shandee Thomas</i> Date: 11/12/25 SHANDEE THOMAS					 Signature and Seal of Professional Surveyor:				
Printed Name: SHANDEE THOMAS E-mail Address: SHANDEE.THOMAS@DVN.COM									
Page: 1 of 2		Drawn By: JMA		Checked By: JEB		Date Drawn: 03/14/2025		Revision: R4	

Note: No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

ST HELENS 19-21 FED COM 911H

244' FNL - 213' FEL
SEC. 24, T20S, R29E
EL: 3320.3
 N: 569582.98
 E: 637677.03
 LAT. 32.5654502°
 LON. -104.0206150°

KOP
719' FNL - 100' FWL
SEC. 19, T20S, R30E
 N: 569107.2
 E: 637951.7
 LAT: 32.56404632°
 LON: -104.01960240°

FIRST TAKE POINT
720' FNL - 100' FWL
SEC. 19, T20S, R30E
 N: 569107.07
 E: 637990.36
 LAT. 32.5641395°
 LON. -104.0196024°

PPP 2
739' FNL - 2629' FWL
SEC. 20, T20S, R30E
 N: 569119.74
 E: 645769.70
 LAT. 32.5641088°
 LON. -103.9943513°

PPP 3
748' FNL - 0' FEL
SEC. 21, T20S, R30E
 N: 569124.05
 E: 648411.97
 LAT. 32.5640972°
 LON. -103.9857747°

PPP 4
742' FNL - 2653' FWL
SEC. 21, T20S, R30E
 N: 569128.37
 E: 651065.42
 LAT. 32.5640850°
 LON. -103.9771618°

PPP 5
731' FNL - 1324' FEL
SEC. 21, T20S, R30E
 N: 569130.52
 E: 652389.51
 LAT. 32.5640787°
 LON. -103.9728639°

LAST TAKE POINT
720' FNL - 100' FEL
SEC. 21, T20S, R30E
 N: 569132.52
 E: 653613.63
 LAT. 32.5640727°
 LON. -103.9688906°

BOTTOM HOLE LOCATION
720' FNL - 20' FEL
SEC. 21, T20S, R30E
 N: 569131.95
 E: 653693.61
 LAT. 32.5640704°
 LON. -103.9686310°

LEGEND

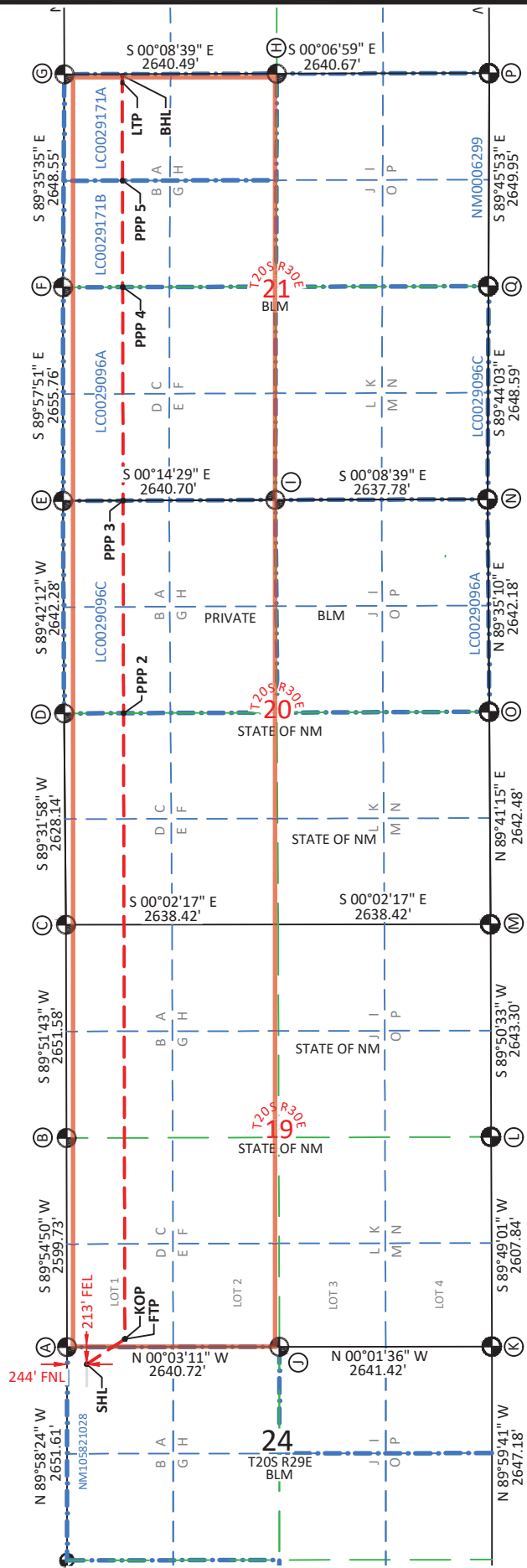
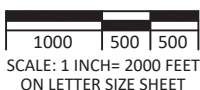
- SECTION LINE
- 1/4 SECTION LINE
- 1/16 SECTION LINE
- WELL PATH
- 1/4 MILE BUFFER
- 1/2 MILE BUFFER
- LEASE LINE
- LEASE ID NUMBER
- FOUND USGLO BRASS CAP

SECTION CORNER CALLOUTS

A	N:569826.75	E:637889.72
B	N:569830.66	E:640488.83
C	N:569837.04	E:643139.77
D	N:569858.47	E:645767.20
E	N:569872.14	E:648408.82
F	N:569870.48	E:651063.94
G	N:569851.67	E:653711.79
H	N:567211.82	E:653718.43
I	N:567232.09	E:648419.93
J	N:567186.66	E:637892.17
K	N:564545.87	E:637893.40
L	N:564554.20	E:640500.60
M	N:564561.47	E:643143.26
N	N:564575.87	E:645785.08
O	N:564594.95	E:648426.56
P	N:564582.66	E:651074.50
Q	N:564571.78	E:653723.79

SURVEYOR NOTES:

- BEARINGS AND COORDINATES SHOWN ARE GRID BASED ON THE NEW MEXICO STATE PLANE EAST ZONE COORDINATE SYSTEM 3001, NAD 83 (2001), BASED FROM GPS OBSERVATIONS, OCCUPYING CONTROL POINT CP FITZ BOOSTER AT N:556917.441 E:633268.606. ORTHO:3349.52. DETERMINED BY AN OPUS SOLUTION ON JUNE 5TH, 2020. UNITS REPRESENTED ON THIS PLAT ARE IN US SURVEY FEET.
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- KARST AREAS, 1/4 & 1/2 MILE POTASH BUFFERS, LEASE AREAS AND DRILL ISLANDS, IF SHOWN, WERE PROVIDED BY DEVON ENERGY AND NOT LOCATED ON THE GROUND AS A PART OF THIS SURVEY, LOCATIONS ARE APPROXIMATE.



State of New Mexico
 Energy, Minerals and Natural Resources Department

Submit Electronically
 Via E-permitting

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

NATURAL GAS MANAGEMENT PLAN

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

Section 1 – Plan Description

Effective May 25, 2021

I. Operator: Devon Energy Production Company, L.P. **OGRID:** 6137 **Date:** 05 / 2 / 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 following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

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

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

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

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

Section 2 – Enhanced Plan

EFFECTIVE APRIL 1, 2022

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

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

IX. Anticipated Natural Gas Production:

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

X. Natural Gas Gathering System (NGGS):

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

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

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

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

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

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

Section 3 - Certifications

Effective May 25, 2021

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

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

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

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

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

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

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

Section 4 - Notices


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

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

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

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

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

Signature: 	
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:	

NATURAL GAS MANAGEMENT PLAN

Section 1 - Plan Description

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

Well Name	API	ULSTR	FOOTAGES			Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D
			19-205-30E	244	FNL			
ST HELENS 19-21 FED COM 331H			19-205-30E	244	FNL	303	FEL	(+/-)2194mcf/d/(+/-)973bopd/(+/-)2965bwpd
ST HELENS 19-21 FED COM 621H			19-205-30E	244	FNL	273	FEL	(+/-)2995mcf/d/(+/-)1245bopd/(+/-)3115bwpd
ST HELENS 19-21 FED COM 622H			19-205-30E	244	FNL	333	FEL	(+/-)2995mcf/d/(+/-)1245bopd/(+/-)3115bwpd
ST HELENS 21-19 FED COM 623H			21-205-30E	1045	FSL	84	FEL	(+/-)2995mcf/d/(+/-)1245bopd/(+/-)3115bwpd
ST HELENS 21-19 FED COM 624H			21-205-30E	1035	FSL	112	FEL	(+/-)2995mcf/d/(+/-)1245bopd/(+/-)3115bwpd
ST HELENS 21-19 FED COM 333H			21-205-30E	1054	FSL	55	FEL	(+/-)2194mcf/d/(+/-)973bopd/(+/-)2965bwpd
ST HELENS 21-19 FED COM 332H			21-205-30E	1064	FSL	27	FEL	(+/-)2194mcf/d/(+/-)973bopd/(+/-)2965bwpd
ST HELENS 21-19 FED COM 914H			21-205-30E		FSL		FEL	(+/-)6778mcf/d/(+/-)626bopd/(+/-)2539bwpd
ST HELENS 21-19 FED COM 913H			21-205-30E		FSL		FEL	(+/-)6778mcf/d/(+/-)626bopd/(+/-)2539bwpd
ST HELENS 21-19 FED COM 911H			21-205-30E		FSL		FEL	(+/-)6778mcf/d/(+/-)626bopd/(+/-)2539bwpd
ST HELENS 21-19 FED COM 912H			21-205-30E	888	FSL	2192	FEL	(+/-)6778mcf/d/(+/-)626bopd/(+/-)2539bwpd

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

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow back Date	First Production Date
ST HELENS 19-21 FED COM 331H		3/7/2025	4/6/2025	8/4/2025	8/4/2025	8/4/2025
ST HELENS 19-21 FED COM 621H		3/10/2025	4/9/2025	8/7/2025	8/7/2025	8/7/2025
ST HELENS 19-21 FED COM 622H		3/13/2025	4/12/2025	8/10/2025	8/10/2025	8/10/2025
ST HELENS 21-19 FED COM 623H		3/16/2025	4/15/2025	8/13/2025	8/13/2025	8/13/2025
ST HELENS 21-19 FED COM 624H		3/19/2025	4/18/2025	8/16/2025	8/16/2025	8/16/2025
ST HELENS 21-19 FED COM 333H		3/21/2025	4/20/2025	8/18/2025	8/18/2025	8/18/2025
ST HELENS 21-19 FED COM 332H		3/23/2025	4/22/2025	8/20/2025	8/20/2025	8/20/2025
ST HELENS 21-19 FED COM 214H		3/26/2025	4/25/2025	8/23/2025	8/23/2025	8/23/2025
ST HELENS 21-19 FED COM 213H		3/28/2025	4/27/2025	8/25/2025	8/25/2025	8/25/2025
ST HELENS 21-19 FED COM 211H		3/30/2024	4/29/2024	8/27/2024	8/27/2024	8/27/2024
ST HELENS 21-19 FED COM 212H		4/7/2025	5/7/2025	9/4/2025	9/4/2025	9/4/2025

*dates above are subject to change



VI. Separation Equipment

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



VII. Operational Practices

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

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



VIII. Best Management Practices during Maintenance

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



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

WASTE MINIMIZATION PLAN

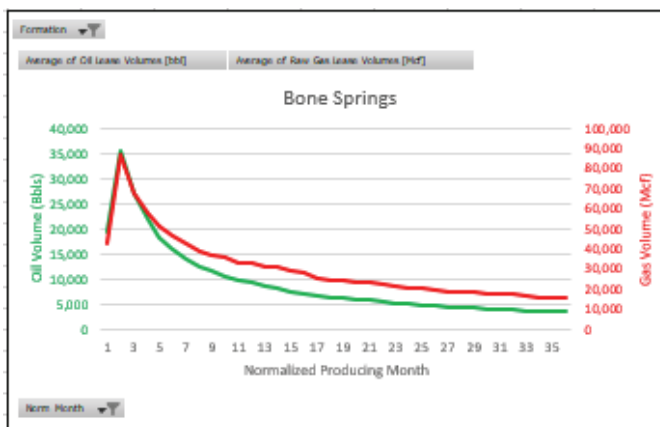
Per 89 FR 25378 - Waste Prevention, Production Subject to Royalties, and Resource Conservation, requirements:

- (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.

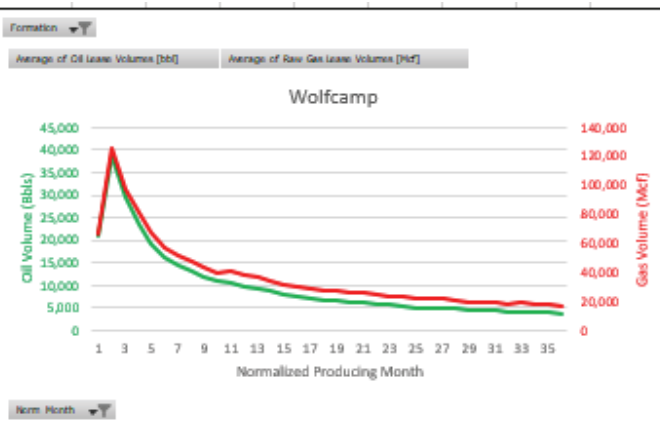
Bone Spring

Formation	BONE SPRING	
Row Labels	Average of Oil Lease Volumes [bbl]	Average of Raw Gas Lease Volumes [Mcf]
1	19,315	42,532
2	25,835	96,620
3	27,075	67,525
4	21,078	57,655
5	10,980	51,655
6	15,820	46,275
7	13,959	42,295
8	12,424	38,696
9	11,573	37,367
10	10,659	35,824
11	9,741	33,980
12	9,337	33,054
13	8,588	30,966
14	8,233	30,638
15	7,655	29,293
16	7,196	27,837
17	6,769	25,691
18	6,391	24,902
19	6,288	24,863
20	6,010	23,769
21	5,776	23,100
22	5,411	22,178
23	5,101	21,196
24	5,029	20,988
25	4,740	20,122
26	4,629	19,322
27	4,478	18,623
28	4,424	18,634
29	4,241	18,585
30	4,184	18,114
31	4,105	17,870
32	3,938	17,440
33	3,782	16,732
34	3,649	16,145
35	3,576	15,571
36	3,596	15,727
Grand Total	9,261	30,347



Wolfcamp

Formation	WOLF CAMP	
Row Labels	Average of Oil Lease Volumes [bbl]	Average of Raw Gas Lease Volumes [Mcf]
1	20,900	66,190
2	39,686	125,577
3	29,391	97,071
4	23,540	81,028
5	19,277	67,564
6	16,103	57,289
7	14,454	51,967
8	13,003	47,228
9	11,979	43,012
10	10,994	40,290
11	10,469	40,398
12	9,779	37,823
13	9,240	36,371
14	8,824	34,874
15	7,883	31,771
16	7,462	29,728
17	7,007	28,445
18	6,647	27,460
19	6,686	27,751
20	6,399	26,352
21	6,154	26,419
22	5,986	25,044
23	5,670	24,134
24	5,393	23,334
25	5,160	22,182
26	5,074	22,069
27	4,988	21,678
28	4,824	21,034
29	4,637	19,807
30	4,480	19,172
31	4,373	18,370
32	4,218	18,642
33	4,201	18,901
34	3,995	17,906
35	3,930	17,586
36	3,815	16,957
Grand Total	9,895	37,008



(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	10475	Pilot hole depth	N/A
MD at TD:	25953	Deepest expected fresh water	

Basin

Formation	Depth (TVD) from KB	Water/Mineral Bearing/Target Zone?	Hazards*
Rustler	61		
Salt	434		
Base of Salt	1660		
Capitan Reef Top	2087		
Delaware	3520		
Cherry Canyon	3734		
Brushy Canyon	4516		
1st Bone Spring Lime	6243		
Bone Spring 1st	7331		
Bone Spring 2nd	8145		
3rd Bone Spring Lime	8464		
Bone Spring 3rd	9164		
Wolfcamp	9616		

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

2. Casing Program (Primary Design)

Hole Size	Csg. Size	Wt (PPF)	Grade	Conn	Top (MD)	Bottom (MD)	Top (TVD)	Bottom (TVD)
17 1/2	13 3/8	54.5	J-55	BTC	0.0	86 MD	0	86 TVD
12 1/4	10 3/4	45.5	J-55	BTC SCC	0.0	2037 MD	0	2037 TVD
9 7/8	8 5/8	32.0	P110EC	Sprint FJ	0	3570 MD	0	3570 TVD
7 7/8	5 1/2	17.0	P110	DWC/C IS+	0	25953 MD	0	10475 TVD

- All casing strings will be tested in accordance with 43 CFR 3172. Must have table for contingency casing.
- The Rustler top will be validated via drilling parameters (i.e. reduction in ROP), and the surface casing setting depth will be revised accordingly. In addition, surface casing will be set a minimum of 25' above the top of the salt.

3. Cementing Program (Primary Design)

Casing	# Skis	TOC	Wt. (lb/gal)	Yld (ft ³ /sack)	Slurry Description
Surface	99	Surf	13.2	1.44	Lead: Class C Cement + additives
Int	114	Surf	9	3.27	Lead: Class C Cement + additives
	101	1537	13.2	1.44	Tail: Class H / C + additives
Int 1	115	Surf	9	3.27	Lead: Class C Cement + additives
	67	3070	13.2	1.44	Tail: Class H / C + additives
Int 1 Intermediate Squeeze	261	Surf	9	1.44	Squeeze Lead: Class C Cement + additives
	115	Surf	9	3.27	Lead: Class C Cement + additives
	67	3070	13.2	1.44	Tail: Class H / C + additives
Production	454	2037	9	3.27	Lead: Class H / C + additives
	2127	9883	13.2	1.44	Tail: Class H / C + additives

Assuming no returns are established while drilling, Devon requests to pump a two stage cement job on the intermediate 1 casing string with the first stage being pumped conventionally with the calculated top of cement at the Capitan Reef and the second stage performed as a bradenhead squeeze with planned cement from the Capitan Reef 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.

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

4. Pressure Control Equipment (Four String Design)

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	Type	✓	Tested to:
Int	13-5/8"	5M	Annular		n/a
			Blind Ram		800psi
			Pipe Ram		
			Double Ram		
			Other* diverter	X	
Int 1	13-5/8"	5M	Annular (5M)	X	100% of rated working pressure
			Blind Ram	X	5M
			Pipe Ram		
			Double Ram	X	
			Other*		
Production	13-5/8"	5M	Annular (5M)	X	100% of rated working pressure
			Blind Ram	X	5M
			Pipe Ram		
			Double Ram	X	
			Other*		
N	A variance is requested for the use of a diverter on the surface casing. See attached for schematic.				
N	A variance is requested to run a 5 M annular on a 10M system				

By definition, the diverter will only be used to divert flow from the well and not to shut in the well. Prior to drilling out, the diverter will be tested to 800 PSI to ensure functionality.

5. Mud Program (Four String Design)

Section	Type	Weight (ppg)
Surface	WBM	8.5-9
Intermediate	DBE / Cut Brine	10-10.5
Intermediate 1	WBM	8.5-9
Production	OBM	10-10.5

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

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

6. Logging and Testing Procedures

Logging, Coring and Testing	
X	Will run GR/CNL from TD to surface (horizontal well - vertical portion of hole). Stated logs run will be in the Completion Rpeort 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	Specify what type and where?
BH pressure at deepest TVD	5720
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.	
N	H2S is present
Y	H2S plan attached.

8. Other facets of operation

Is this a walking operation? Potentially

- 1 If operator elects, drilling rig will batch drill the surface holes and run/cement surface casing; walking the rig to next wells on the pad.
- 2 The drilling rig will then batch drill the intermediate sections and run/cement intermediate casing; the wellbore will be isolated with a blind flange and pressure gauge installed for monitoring the well before walking to the 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 nipped up and tested on the wellhead before drilling operations commences on each well.
 - a. The NMOCD will be contacted / notified 24 hours before the drilling rig moves back on to the pad with the pre-set surface casing.

Attachments

- X Directional Plan
- Other, describe

Section 2 - Blowout Preventer Testing Procedure

Variance Request

Devon Energy requests to only test BOP connection breaks after drilling out of surface casing and while skidding between wells which conforms to API Standard 53 and industry standards. The initial BOP test will follow 43 CFR 3172, and subsequent tests following a skid will only test connections that are broken. This test will at minimum include the Top Pipe Ram, HCR, Kill Line Check Valve, QDC (quick disconnect to wellhead) and BOP shell of the 10M BOPE to 5M for 10 minutes. Additional pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken. If a break to the flex hose that runs to the choke manifold is required due to repositioning from a skid, the HCR will remain open during the shell test to include that additional break. The variance only pertains to intermediate hole-sections. This variance will meet or exceed 43 CFR 3172 per the following: Devon Energy will perform a full BOP test per 43 CFR 3172 before drilling out of the intermediate casing string(s) and starting the production hole, testing the Annular during initial BOP testing to a minimum of 70% RWP and higher than MASP, and pressure testing at a 21-day interval frequency. The BLM will be contacted 4hrs prior to a BOPE test. The BLM will be notified if and when a well control event is encountered. In the event break testing is not utilized, then a full BOPE test would be conducted.

Devon Energy requests to perform offline BOP stump testing and offline BOPE testing. All pressure-containing and pressure-controlling seals will be tested either online or offline as denoted in the table below and per BLM approval during initial BOP test following test pressure requirements set forth in 43 CFR 3172. Remaining components not tested offline or on the stump will be tested within 72-hours when the BOP is connected to the wellhead. If stump testing exceeds 72-hour window prior to connecting to the wellhead, the BLM will be notified and either stump testing restarted, or the BOP being tested online. The BLM will be contacted 4hrs prior to a BOPE test. The BLM will be notified if and when a well control event is encountered. In the event stump testing is not utilized, then a full BOPE test would be conducted.

Components	Offline	Offline, BOPE	Break	Online
Upper Rams		X	X	X
Blind Rams		X		X
Lower Rams				X
Outside Kill Valve		X	X	X
Inside Kill Valve		X	X	X
Kill Line Check Valve		X	X	X
Inside Choke Valve		X	X	X
HCR		X	X	X
Kill Line	X			X
Annular		X		X
Choke Manifold Valves and Hose	X			X
Mudline (Mud Pumps, Rig Floor Valves, Kelly Hose, Mud Line)	X			X
Standpipe Valve	X			X
IBOP (Upper and Lower)	X			X

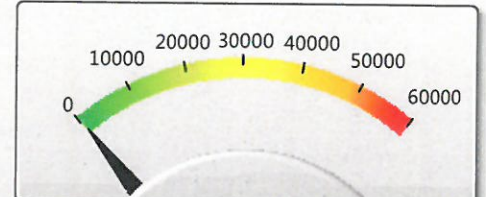
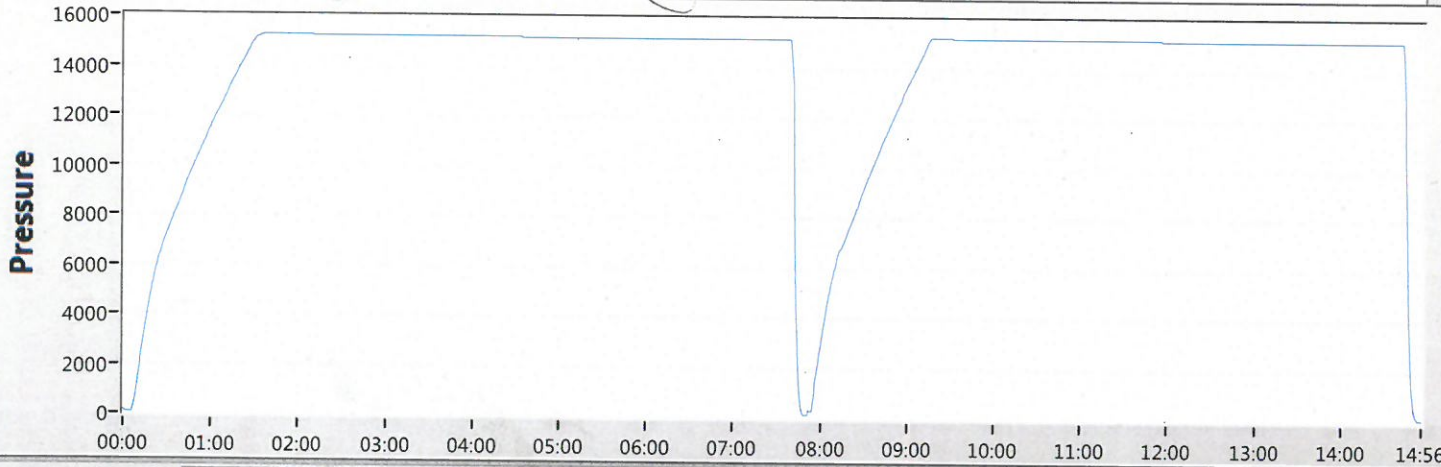
Devon requests offline BOPE testing for the following components: Upper Rams, Blind Rams, Kill Valves, Choke Valves, and Annular
 Remaining well control equipment components will either be tested offline or online, per BLM approval
 Remaining BOPE will be tested online within 72-hours form completing the offline BOPE component testing
 Notify the BLM if the online BOPE testing exceeds 72-hours
 All Full Tests not completed "Offline" or "Offline, BOPE" are required to be complete Online
 Devon requests Break testing as stated above for 5K tests, not including production hole
 Annular Preventer will be tested to minimum of 70% RWP and higher than MASP during initial BOP test
 Pressure testing is required for pressure-containing connections if the integrity of a pressure seal is broken during a break test
 Full Tests required when entering production hole

Cactus
Wellhead

2-9-17
E Bell

80.7 °F

15:49



50

Date 02-09-17

Tested By E.BELL

Transducer bay2

Transducer Serial 181504

Calibration Date 9/6/15

Job#	Part#	Serial#	Description	Test Pressure
1	TRJ0006341-0007 116966	TRJ6341-7-1	ADPT,DRLG,CW,MBU-3T,13-5/8 10M	15000
2				
3				
4				
5			TRANSDUCER CALIBRATION DUE 03/13/2017	
6				
7				
8				

Start Stop Zero Config Save Print EXIT

Offline Cementing

Variance Request

Devon Energy requests to offline cement on intermediate strings that are set in formations shallower than the Wolfcamp. Prior to commencing offline cementing operations, the well will be monitored for any abnormal pressures and confirmed to be static. A dual manifold system (equipped with chokes) for the returns will also be utilized as a redundancy. All equipment used for offline cementing will have a minimum 5M rating to match intermediate sections' 5M BOPE requirements.



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

PFAS Certification Statement

Per 19.15.7.16 NMAC , Order R-23824, Devon Energy Production Company, L.P./WPX certifies no addition of PFAS chemicals to fluids used in the completion or recompletion of the subject well.

Devon Energy **APD VARIANCE DATA**

OPERATOR NAME: Devon Energy

1. SUMMARY OF Variance:

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

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

2. Description of Operations

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



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

Drilling Plan Data Report

11/24/2025

APD ID: 10400098562

Submission Date: 05/28/2024

Highlighted data reflects the most recent changes

Operator Name: DEVON ENERGY PRODUCTION COMPANY LP

Well Name: ST HELENS 19-21 FED COM

Well Number: 911H

Well Type: OIL WELL

Well Work Type: Drill

Show Final Text

Section 1 - Geologic Formations

Formation ID	Formation Name	Elevation	True Vertical	Measured Depth	Lithologies	Mineral Resources	Producing Formatio
16803290	RUSTLER	0	61	61	SANDSTONE	NONE	N
16803291	TOP SALT	-434	434	434	SALT	NONE	N
16803292	BASE OF SALT	-1660	1660	1660	SALT	NONE	N
16803294	BELL CANYON	-3520	3520	3520	SANDSTONE	NATURAL GAS, OIL	N
16803295	CHERRY CANYON	-3734	3734	3734	SANDSTONE	NATURAL GAS, OIL	N
16803296	BRUSHY CANYON	-4516	4516	4516	SANDSTONE	NATURAL GAS, OIL	N
16803297	BONE SPRING 1ST	-6243	6243	6243	LIMESTONE	NATURAL GAS, OIL	N
16803299	BONE SPRING 1ST	-7331	7331	7331	SANDSTONE	NATURAL GAS, OIL	N
16803300	BONE SPRING 2ND	-8145	8145	8145	SANDSTONE	NATURAL GAS, OIL	N
16803301	BONE SPRING 3RD	-8464	8464	8464	LIMESTONE	NATURAL GAS, OIL	N
16803302	BONE SPRING 3RD	-9164	9164	9164	SANDSTONE	NATURAL GAS, OIL	N
16803303	WOLFCAMP	-9616	9616	9616	SHALE	NATURAL GAS, OIL	Y

Section 2 - Blowout Prevention

Pressure Rating (PSI): 5M

Rating Depth: 3570

Equipment: BOP/BOPE will be installed per 43 CFR 3172 requirements prior to drilling below intermediate 1 1 casing, a BOP/BOPE system with the above minimum rating will be installed on the wellhead system. BOP/BOPE will be tested by an independent service company per 43 CFR 3172 requirements and MASP (Maximum Anticipated Surface Pressure) calculations. If the system is upgraded, all the components installed will be functional and tested.

Requesting Variance? YES



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.

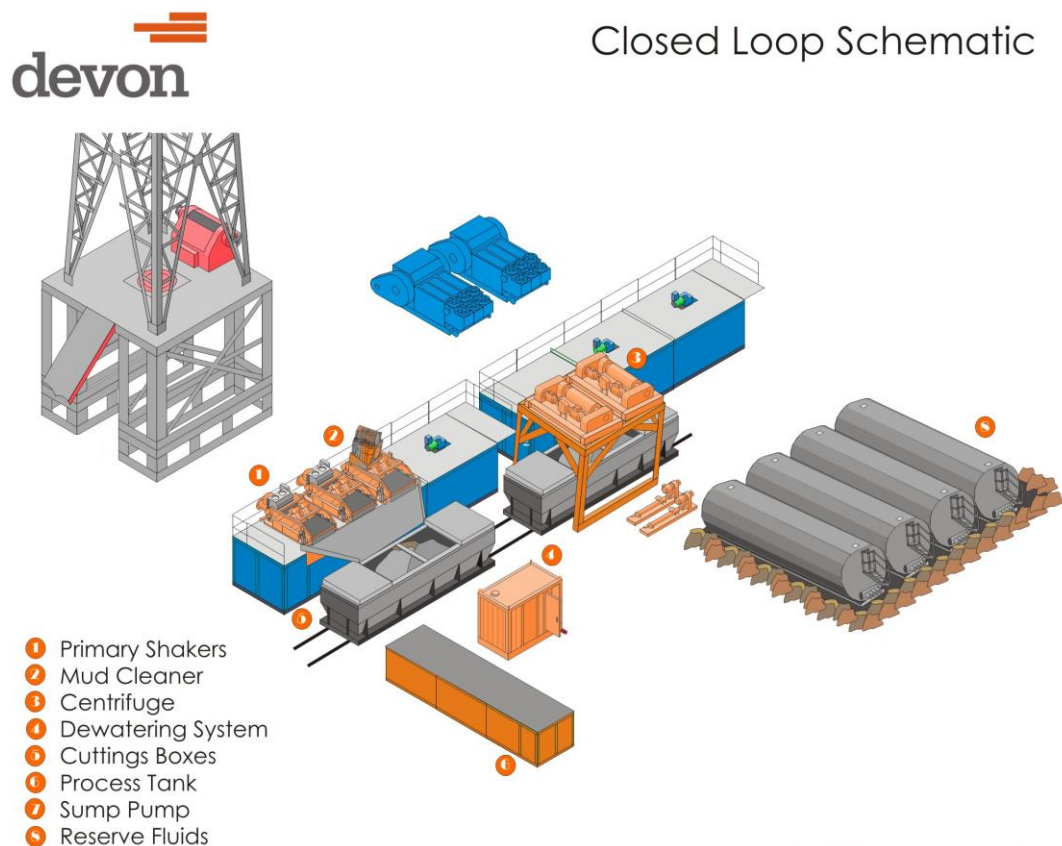
Prior to installing a closed-loop system on site, the topsoil, if present, will be stripped and stockpiled for use as the final cover or fill at the time of closure.

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.



Mi SWACO

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

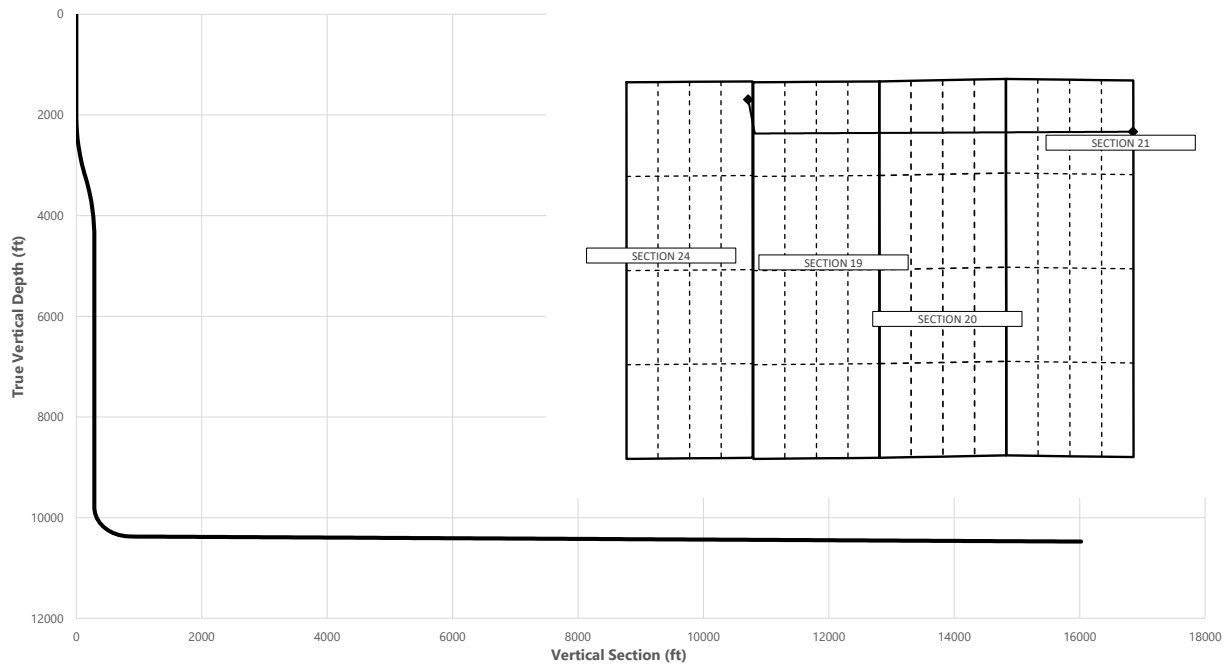
A maximum 340' X 340' caliche pad is built per well. All of the trucks and steel tanks fit on this pad. All fluid cuttings go to the steel tanks to be hauled by various trucking companies to an agency approved disposal.



Well: ST HELENS 19-21 FED COM 911H
County: Eddy
Wellbore: Permit Plan
Design: Permit Plan #1

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

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	SHL
2000.00	0.00	150.00	2000.00	0.00	0.00	0.00	0.00	Start Tangent
3250.00	25.00	150.00	3210.71	-232.45	134.20	140.70	2.00	Hold Tangent
3279.67	25.00	150.00	3237.61	-243.31	140.47	147.27	0.00	Drop to Vertical
4529.67	0.00	150.00	4448.32	-475.76	274.68	287.96	2.00	Hold Vertical
9883.41	0.00	89.91	9802.05	-475.76	274.68	287.96	0.00	KOP
10779.60	89.62	89.91	10375.00	-474.86	843.82	856.86	10.00	Landing Point
25952.71	89.62	89.91	10476.00	-451.03	16016.58	16022.93	0.00	BHL



Key Depths	MD (ft)	TVD (ft)
Rustler	61.00	61.00
Salt	434.00	434.00
Base of Salt	1660.00	1660.00
Capitan Reef Top	2087.01	2087.00
Delaware	3584.29	3520.00
Cherry Canyon	3807.74	3734.00
Brushy Canyon	4597.36	4516.00
1st Bone Spring Lime	6324.36	6243.00
Bone Spring 1st	7412.36	7331.00
Bone Spring 2nd	8226.36	8145.00
3rd Bone Spring Lime	8545.36	8464.00
Bone Spring 3rd	9245.36	9164.00
Wolfcamp / Point of Penetration	9697.36	9616.00
exit	25872.71	10475.49

	MD (ft)	TVD (ft)	Lat (°)	Long (°)	Section Footages
SHL	0.00	0.00	32.5654	-104.0207	244' FNL, 213' FEL of Sec 24 in T20S, R29E
KOP	9883.41	9802.05	32.5640	-104.0198	719' FNL, 62' FWL of Sec 19 in T20S, R30E
Point of Penetration	9697.36	9616.00	32.5641	-104.0196	720' FNL, 100' FWL of Sec 19 in T20S, R30E
Exit	25872.71	10475.49	32.5641	-103.9689	720' FNL, 100' FEL of Sec 21 in T20S, R30E
BHL	25952.71	10476.00	32.5640	-103.9687	720' FNL, 20' FEL of Sec 21 in T20S, R30E

	Y	X	MD
KOP	569107.2	637951.7	9883.41



Well: ST HELENS 19-21 FED COM 911H
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Geodetic System: US State Plane 1983
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Ellipsoid: Clarke 1866
Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	SHL
61.00	0.00	150.00	61.00	0.00	0.00	0.00	0.00	Rustler
100.00	0.00	150.00	100.00	0.00	0.00	0.00	0.00	
200.00	0.00	150.00	200.00	0.00	0.00	0.00	0.00	
300.00	0.00	150.00	300.00	0.00	0.00	0.00	0.00	
400.00	0.00	150.00	400.00	0.00	0.00	0.00	0.00	
434.00	0.00	150.00	434.00	0.00	0.00	0.00	0.00	Salt
500.00	0.00	150.00	500.00	0.00	0.00	0.00	0.00	
600.00	0.00	150.00	600.00	0.00	0.00	0.00	0.00	
700.00	0.00	150.00	700.00	0.00	0.00	0.00	0.00	
800.00	0.00	150.00	800.00	0.00	0.00	0.00	0.00	
900.00	0.00	150.00	900.00	0.00	0.00	0.00	0.00	
1000.00	0.00	150.00	1000.00	0.00	0.00	0.00	0.00	
1100.00	0.00	150.00	1100.00	0.00	0.00	0.00	0.00	
1200.00	0.00	150.00	1200.00	0.00	0.00	0.00	0.00	
1300.00	0.00	150.00	1300.00	0.00	0.00	0.00	0.00	
1400.00	0.00	150.00	1400.00	0.00	0.00	0.00	0.00	
1500.00	0.00	150.00	1500.00	0.00	0.00	0.00	0.00	
1600.00	0.00	150.00	1600.00	0.00	0.00	0.00	0.00	
1660.00	0.00	150.00	1660.00	0.00	0.00	0.00	0.00	Base of Salt
1700.00	0.00	150.00	1700.00	0.00	0.00	0.00	0.00	
1800.00	0.00	150.00	1800.00	0.00	0.00	0.00	0.00	
1900.00	0.00	150.00	1900.00	0.00	0.00	0.00	0.00	
2000.00	0.00	150.00	2000.00	0.00	0.00	0.00	0.00	Start Tangent
2087.01	1.74	150.00	2087.00	-1.14	0.66	0.69	2.00	Capitan Reef Top
2100.00	2.00	150.00	2099.98	-1.51	0.87	0.91	2.00	
2200.00	4.00	150.00	2199.84	-6.04	3.49	3.66	2.00	
2300.00	6.00	150.00	2299.45	-13.59	7.85	8.23	2.00	
2400.00	8.00	150.00	2398.70	-24.14	13.94	14.61	2.00	
2500.00	10.00	150.00	2497.47	-37.69	21.76	22.81	2.00	
2600.00	12.00	150.00	2595.62	-54.22	31.30	32.82	2.00	
2700.00	14.00	150.00	2693.06	-73.70	42.55	44.61	2.00	
2800.00	16.00	150.00	2789.64	-96.11	55.49	58.17	2.00	
2900.00	18.00	150.00	2885.27	-121.43	70.11	73.50	2.00	
3000.00	20.00	150.00	2979.82	-149.62	86.38	90.56	2.00	
3100.00	22.00	150.00	3073.17	-180.66	104.30	109.35	2.00	
3200.00	24.00	150.00	3165.21	-214.49	123.84	129.83	2.00	
3250.00	25.00	150.00	3210.71	-232.45	134.20	140.70	2.00	Hold Tangent
3279.67	25.00	150.00	3237.61	-243.31	140.47	147.27	0.00	Drop to Vertical
3300.00	24.59	150.00	3256.06	-250.69	144.74	151.74	2.00	
3400.00	22.59	150.00	3347.69	-285.35	164.75	172.72	2.00	
3500.00	20.59	150.00	3440.67	-317.22	183.15	192.01	2.00	
3584.29	18.91	150.00	3520.00	-341.89	197.39	206.94	2.00	Delaware
3600.00	18.59	150.00	3534.88	-346.26	199.91	209.58	2.00	
3700.00	16.59	150.00	3630.19	-372.44	215.03	225.43	2.00	
3800.00	14.59	150.00	3726.51	-395.72	228.47	239.52	2.00	
3807.74	14.44	150.00	3734.00	-397.40	229.44	240.53	2.00	Cherry Canyon
3900.00	12.59	150.00	3823.70	-416.07	240.22	251.83	2.00	
4000.00	10.59	150.00	3921.66	-433.47	250.27	262.37	2.00	
4100.00	8.59	150.00	4020.25	-447.90	258.60	271.10	2.00	
4200.00	6.59	150.00	4119.37	-459.35	265.20	278.03	2.00	
4300.00	4.59	150.00	4218.89	-467.79	270.08	283.14	2.00	
4400.00	2.59	150.00	4318.69	-473.22	273.21	286.42	2.00	
4500.00	0.59	150.00	4418.64	-475.62	274.60	287.88	2.00	
4529.67	0.00	150.00	4448.32	-475.76	274.68	287.96	2.00	Hold Vertical
4597.36	0.00	89.91	4516.00	-475.76	274.68	287.96	0.00	Brushy Canyon
4600.00	0.00	89.91	4518.64	-475.76	274.68	287.96	0.00	
4700.00	0.00	89.91	4618.64	-475.76	274.68	287.96	0.00	
4800.00	0.00	89.91	4718.64	-475.76	274.68	287.96	0.00	
4900.00	0.00	89.91	4818.64	-475.76	274.68	287.96	0.00	
5000.00	0.00	89.91	4918.64	-475.76	274.68	287.96	0.00	
5100.00	0.00	89.91	5018.64	-475.76	274.68	287.96	0.00	
5200.00	0.00	89.91	5118.64	-475.76	274.68	287.96	0.00	
5300.00	0.00	89.91	5218.64	-475.76	274.68	287.96	0.00	
5400.00	0.00	89.91	5318.64	-475.76	274.68	287.96	0.00	
5500.00	0.00	89.91	5418.64	-475.76	274.68	287.96	0.00	
5600.00	0.00	89.91	5518.64	-475.76	274.68	287.96	0.00	
5700.00	0.00	89.91	5618.64	-475.76	274.68	287.96	0.00	
5800.00	0.00	89.91	5718.64	-475.76	274.68	287.96	0.00	
5900.00	0.00	89.91	5818.64	-475.76	274.68	287.96	0.00	



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Zone: 3001 - NM East (NAD83)

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
6000.00	0.00	89.91	5918.64	-475.76	274.68	287.96	0.00	
6100.00	0.00	89.91	6018.64	-475.76	274.68	287.96	0.00	
6200.00	0.00	89.91	6118.64	-475.76	274.68	287.96	0.00	
6300.00	0.00	89.91	6218.64	-475.76	274.68	287.96	0.00	
6324.36	0.00	89.91	6243.00	-475.76	274.68	287.96	0.00	1st Bone Spring Lime
6400.00	0.00	89.91	6318.64	-475.76	274.68	287.96	0.00	
6500.00	0.00	89.91	6418.64	-475.76	274.68	287.96	0.00	
6600.00	0.00	89.91	6518.64	-475.76	274.68	287.96	0.00	
6700.00	0.00	89.91	6618.64	-475.76	274.68	287.96	0.00	
6800.00	0.00	89.91	6718.64	-475.76	274.68	287.96	0.00	
6900.00	0.00	89.91	6818.64	-475.76	274.68	287.96	0.00	
7000.00	0.00	89.91	6918.64	-475.76	274.68	287.96	0.00	
7100.00	0.00	89.91	7018.64	-475.76	274.68	287.96	0.00	
7200.00	0.00	89.91	7118.64	-475.76	274.68	287.96	0.00	
7300.00	0.00	89.91	7218.64	-475.76	274.68	287.96	0.00	
7400.00	0.00	89.91	7318.64	-475.76	274.68	287.96	0.00	
7412.36	0.00	89.91	7331.00	-475.76	274.68	287.96	0.00	Bone Spring 1st
7500.00	0.00	89.91	7418.64	-475.76	274.68	287.96	0.00	
7600.00	0.00	89.91	7518.64	-475.76	274.68	287.96	0.00	
7700.00	0.00	89.91	7618.64	-475.76	274.68	287.96	0.00	
7800.00	0.00	89.91	7718.64	-475.76	274.68	287.96	0.00	
7900.00	0.00	89.91	7818.64	-475.76	274.68	287.96	0.00	
8000.00	0.00	89.91	7918.64	-475.76	274.68	287.96	0.00	
8100.00	0.00	89.91	8018.64	-475.76	274.68	287.96	0.00	
8200.00	0.00	89.91	8118.64	-475.76	274.68	287.96	0.00	
8226.36	0.00	89.91	8145.00	-475.76	274.68	287.96	0.00	Bone Spring 2nd
8300.00	0.00	89.91	8218.64	-475.76	274.68	287.96	0.00	
8400.00	0.00	89.91	8318.64	-475.76	274.68	287.96	0.00	
8500.00	0.00	89.91	8418.64	-475.76	274.68	287.96	0.00	
8545.36	0.00	89.91	8464.00	-475.76	274.68	287.96	0.00	3rd Bone Spring Lime
8600.00	0.00	89.91	8518.64	-475.76	274.68	287.96	0.00	
8700.00	0.00	89.91	8618.64	-475.76	274.68	287.96	0.00	
8800.00	0.00	89.91	8718.64	-475.76	274.68	287.96	0.00	
8900.00	0.00	89.91	8818.64	-475.76	274.68	287.96	0.00	
9000.00	0.00	89.91	8918.64	-475.76	274.68	287.96	0.00	
9100.00	0.00	89.91	9018.64	-475.76	274.68	287.96	0.00	
9200.00	0.00	89.91	9118.64	-475.76	274.68	287.96	0.00	
9245.36	0.00	89.91	9164.00	-475.76	274.68	287.96	0.00	Bone Spring 3rd
9300.00	0.00	89.91	9218.64	-475.76	274.68	287.96	0.00	
9400.00	0.00	89.91	9318.64	-475.76	274.68	287.96	0.00	
9500.00	0.00	89.91	9418.64	-475.76	274.68	287.96	0.00	
9600.00	0.00	89.91	9518.64	-475.76	274.68	287.96	0.00	
9697.36	0.00	89.91	9616.00	-475.76	274.68	287.96	0.00	Wolfcamp / Point of Penetration
9700.00	0.00	89.91	9618.64	-475.76	274.68	287.96	0.00	
9800.00	0.00	89.91	9718.64	-475.76	274.68	287.96	0.00	
9883.41	0.00	89.91	9802.05	-475.76	274.68	287.96	0.00	KOP
9900.00	1.66	89.91	9818.64	-475.76	274.92	288.20	10.00	
10000.00	11.66	89.91	9917.84	-475.74	286.50	299.78	10.00	
10100.00	21.66	89.91	10013.52	-475.69	315.13	328.40	10.00	
10200.00	31.66	89.91	10102.78	-475.62	359.94	373.19	10.00	
10300.00	41.66	89.91	10182.90	-475.53	419.57	432.79	10.00	
10400.00	51.66	89.91	10251.44	-475.42	492.21	505.39	10.00	
10500.00	61.66	89.91	10306.34	-475.28	575.64	588.79	10.00	
10600.00	71.66	89.91	10345.91	-475.14	667.34	680.45	10.00	
10700.00	81.66	89.91	10368.95	-474.99	764.52	777.59	10.00	
10779.60	89.62	89.91	10375.00	-474.86	843.82	856.86	10.00	Landing Point
10800.00	89.62	89.91	10375.14	-474.83	864.23	877.25	0.00	
10900.00	89.62	89.91	10375.80	-474.67	964.22	977.20	0.00	
11000.00	89.62	89.91	10376.47	-474.52	1064.22	1077.16	0.00	
11100.00	89.62	89.91	10377.13	-474.36	1164.22	1177.11	0.00	
11200.00	89.62	89.91	10377.80	-474.20	1264.22	1277.06	0.00	
11300.00	89.62	89.91	10378.46	-474.05	1364.21	1377.02	0.00	
11400.00	89.62	89.91	10379.13	-473.89	1464.21	1476.97	0.00	
11500.00	89.62	89.91	10379.80	-473.73	1564.21	1576.92	0.00	
11600.00	89.62	89.91	10380.46	-473.57	1664.21	1676.88	0.00	
11700.00	89.62	89.91	10381.13	-473.42	1764.20	1776.83	0.00	
11800.00	89.62	89.91	10381.79	-473.26	1864.20	1876.79	0.00	
11900.00	89.62	89.91	10382.46	-473.10	1964.20	1976.74	0.00	
12000.00	89.62	89.91	10383.12	-472.94	2064.20	2076.69	0.00	
12100.00	89.62	89.91	10383.79	-472.79	2164.20	2176.65	0.00	



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MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
12200.00	89.62	89.91	10384.46	-472.63	2264.19	2276.60	0.00	
12300.00	89.62	89.91	10385.12	-472.47	2364.19	2376.55	0.00	
12400.00	89.62	89.91	10385.79	-472.32	2464.19	2476.51	0.00	
12500.00	89.62	89.91	10386.45	-472.16	2564.19	2576.46	0.00	
12600.00	89.62	89.91	10387.12	-472.00	2664.18	2676.41	0.00	
12700.00	89.62	89.91	10387.79	-471.84	2764.18	2776.37	0.00	
12800.00	89.62	89.91	10388.45	-471.69	2864.18	2876.32	0.00	
12900.00	89.62	89.91	10389.12	-471.53	2964.18	2976.28	0.00	
13000.00	89.62	89.91	10389.78	-471.37	3064.17	3076.23	0.00	
13100.00	89.62	89.91	10390.45	-471.22	3164.17	3176.18	0.00	
13200.00	89.62	89.91	10391.11	-471.06	3264.17	3276.14	0.00	
13300.00	89.62	89.91	10391.78	-470.90	3364.17	3376.09	0.00	
13400.00	89.62	89.91	10392.45	-470.74	3464.16	3476.04	0.00	
13500.00	89.62	89.91	10393.11	-470.59	3564.16	3576.00	0.00	
13600.00	89.62	89.91	10393.78	-470.43	3664.16	3675.95	0.00	
13700.00	89.62	89.91	10394.44	-470.27	3764.16	3775.90	0.00	
13800.00	89.62	89.91	10395.11	-470.11	3864.16	3875.86	0.00	
13900.00	89.62	89.91	10395.77	-469.96	3964.15	3975.81	0.00	
14000.00	89.62	89.91	10396.44	-469.80	4064.15	4075.76	0.00	
14100.00	89.62	89.91	10397.11	-469.64	4164.15	4175.72	0.00	
14200.00	89.62	89.91	10397.77	-469.49	4264.15	4275.67	0.00	
14300.00	89.62	89.91	10398.44	-469.33	4364.14	4375.63	0.00	
14400.00	89.62	89.91	10399.10	-469.17	4464.14	4475.58	0.00	
14500.00	89.62	89.91	10399.77	-469.01	4564.14	4575.53	0.00	
14600.00	89.62	89.91	10400.43	-468.86	4664.14	4675.49	0.00	
14700.00	89.62	89.91	10401.10	-468.70	4764.13	4775.44	0.00	
14800.00	89.62	89.91	10401.77	-468.54	4864.13	4875.39	0.00	
14900.00	89.62	89.91	10402.43	-468.39	4964.13	4975.35	0.00	
15000.00	89.62	89.91	10403.10	-468.23	5064.13	5075.30	0.00	
15100.00	89.62	89.91	10403.76	-468.07	5164.13	5175.25	0.00	
15200.00	89.62	89.91	10404.43	-467.91	5264.12	5275.21	0.00	
15300.00	89.62	89.91	10405.10	-467.76	5364.12	5375.16	0.00	
15400.00	89.62	89.91	10405.76	-467.60	5464.12	5475.12	0.00	
15500.00	89.62	89.91	10406.43	-467.44	5564.12	5575.07	0.00	
15600.00	89.62	89.91	10407.09	-467.29	5664.11	5675.02	0.00	
15700.00	89.62	89.91	10407.76	-467.13	5764.11	5774.98	0.00	
15800.00	89.62	89.91	10408.42	-466.97	5864.11	5874.93	0.00	
15900.00	89.62	89.91	10409.09	-466.81	5964.11	5974.88	0.00	
16000.00	89.62	89.91	10409.76	-466.66	6064.10	6074.84	0.00	
16100.00	89.62	89.91	10410.42	-466.50	6164.10	6174.79	0.00	
16200.00	89.62	89.91	10411.09	-466.34	6264.10	6274.74	0.00	
16300.00	89.62	89.91	10411.75	-466.18	6364.10	6374.70	0.00	
16400.00	89.62	89.91	10412.42	-466.03	6464.09	6474.65	0.00	
16500.00	89.62	89.91	10413.08	-465.87	6564.09	6574.61	0.00	
16600.00	89.62	89.91	10413.75	-465.71	6664.09	6674.56	0.00	
16700.00	89.62	89.91	10414.42	-465.56	6764.09	6774.51	0.00	
16800.00	89.62	89.91	10415.08	-465.40	6864.09	6874.47	0.00	
16900.00	89.62	89.91	10415.75	-465.24	6964.08	6974.42	0.00	
17000.00	89.62	89.91	10416.41	-465.08	7064.08	7074.37	0.00	
17100.00	89.62	89.91	10417.08	-464.93	7164.08	7174.33	0.00	
17200.00	89.62	89.91	10417.75	-464.77	7264.08	7274.28	0.00	
17300.00	89.62	89.91	10418.41	-464.61	7364.07	7374.23	0.00	
17400.00	89.62	89.91	10419.08	-464.46	7464.07	7474.19	0.00	
17500.00	89.62	89.91	10419.74	-464.30	7564.07	7574.14	0.00	
17600.00	89.62	89.91	10420.41	-464.14	7664.07	7674.09	0.00	
17700.00	89.62	89.91	10421.07	-463.98	7764.06	7774.05	0.00	
17800.00	89.62	89.91	10421.74	-463.83	7864.06	7874.00	0.00	
17900.00	89.62	89.91	10422.41	-463.67	7964.06	7973.96	0.00	
18000.00	89.62	89.91	10423.07	-463.51	8064.06	8073.91	0.00	
18100.00	89.62	89.91	10423.74	-463.36	8164.05	8173.86	0.00	
18200.00	89.62	89.91	10424.40	-463.20	8264.05	8273.82	0.00	
18300.00	89.62	89.91	10425.07	-463.04	8364.05	8373.77	0.00	
18400.00	89.62	89.91	10425.73	-462.88	8464.05	8473.72	0.00	
18500.00	89.62	89.91	10426.40	-462.73	8564.05	8573.68	0.00	
18600.00	89.62	89.91	10427.07	-462.57	8664.04	8673.63	0.00	
18700.00	89.62	89.91	10427.73	-462.41	8764.04	8773.58	0.00	
18800.00	89.62	89.91	10428.40	-462.25	8864.04	8873.54	0.00	
18900.00	89.62	89.91	10429.06	-462.10	8964.04	8973.49	0.00	
19000.00	89.62	89.91	10429.73	-461.94	9064.03	9073.45	0.00	
19100.00	89.62	89.91	10430.40	-461.78	9164.03	9173.40	0.00	

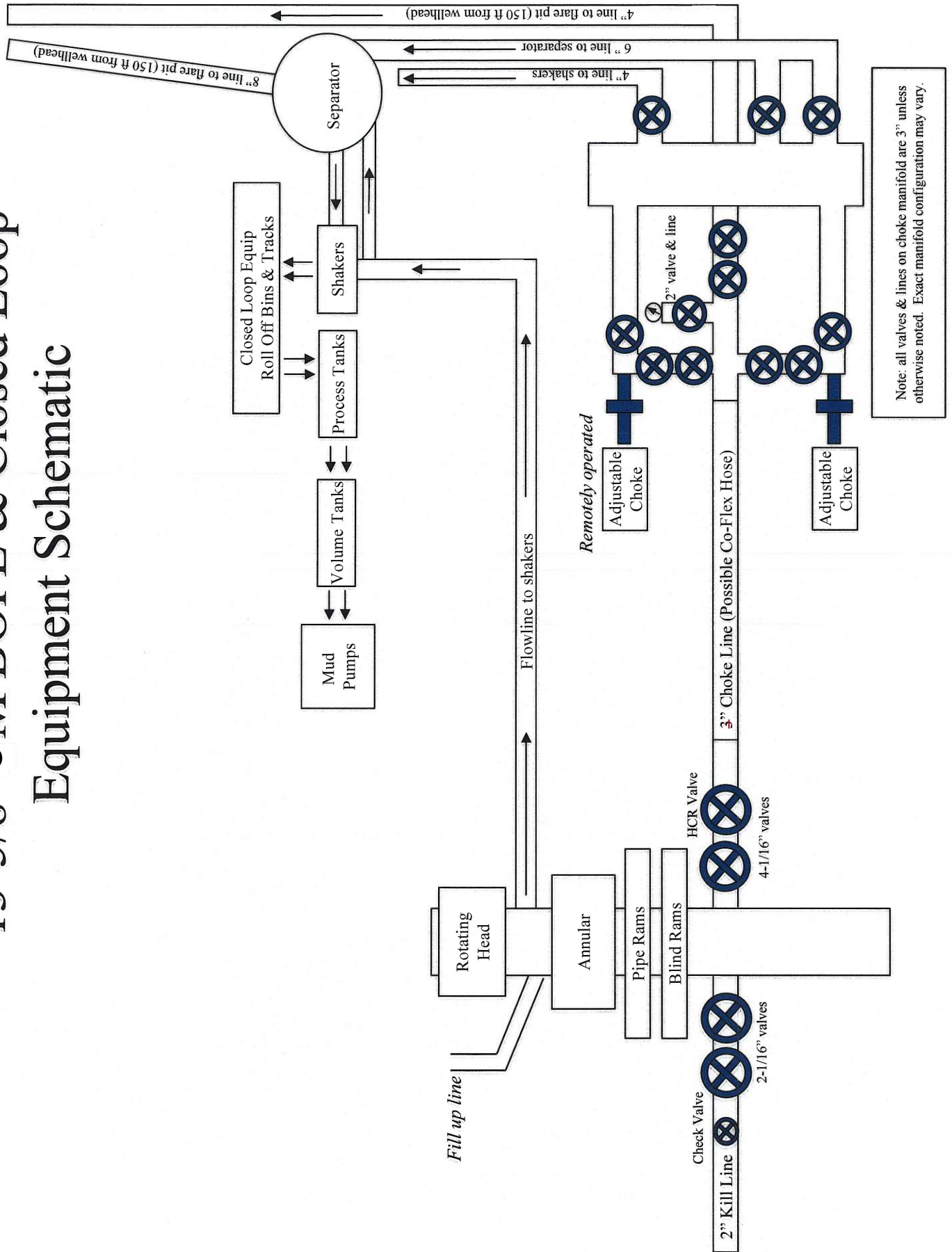


Well: ST HELENS 19-21 FED COM 911H
 County: Eddy
 Wellbore: Permit Plan
 Design: Permit Plan #1

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

MD (ft)	INC (°)	AZI (°)	TVD (ft)	NS (ft)	EW (ft)	VS (ft)	DLS (°/100ft)	Comment
19200.00	89.62	89.91	10431.06	-461.63	9264.03	9273.35	0.00	
19300.00	89.62	89.91	10431.73	-461.47	9364.03	9373.31	0.00	
19400.00	89.62	89.91	10432.39	-461.31	9464.02	9473.26	0.00	
19500.00	89.62	89.91	10433.06	-461.15	9564.02	9573.21	0.00	
19600.00	89.62	89.91	10433.72	-461.00	9664.02	9673.17	0.00	
19700.00	89.62	89.91	10434.39	-460.84	9764.02	9773.12	0.00	
19800.00	89.62	89.91	10435.06	-460.68	9864.02	9873.07	0.00	
19900.00	89.62	89.91	10435.72	-460.53	9964.01	9973.03	0.00	
20000.00	89.62	89.91	10436.39	-460.37	10064.01	10072.98	0.00	
20100.00	89.62	89.91	10437.05	-460.21	10164.01	10172.93	0.00	
20200.00	89.62	89.91	10437.72	-460.05	10264.01	10272.89	0.00	
20300.00	89.62	89.91	10438.38	-459.90	10364.00	10372.84	0.00	
20400.00	89.62	89.91	10439.05	-459.74	10464.00	10472.80	0.00	
20500.00	89.62	89.91	10439.72	-459.58	10564.00	10572.75	0.00	
20600.00	89.62	89.91	10440.38	-459.42	10664.00	10672.70	0.00	
20700.00	89.62	89.91	10441.05	-459.27	10763.99	10772.66	0.00	
20800.00	89.62	89.91	10441.71	-459.11	10863.99	10872.61	0.00	
20900.00	89.62	89.91	10442.38	-458.95	10963.99	10972.56	0.00	
21000.00	89.62	89.91	10443.05	-458.80	11063.99	11072.52	0.00	
21100.00	89.62	89.91	10443.71	-458.64	11163.98	11172.47	0.00	
21200.00	89.62	89.91	10444.38	-458.48	11263.98	11272.42	0.00	
21300.00	89.62	89.91	10445.04	-458.32	11363.98	11372.38	0.00	
21400.00	89.62	89.91	10445.71	-458.17	11463.98	11472.33	0.00	
21500.00	89.62	89.91	10446.37	-458.01	11563.98	11572.29	0.00	
21600.00	89.62	89.91	10447.04	-457.85	11663.97	11672.24	0.00	
21700.00	89.62	89.91	10447.71	-457.70	11763.97	11772.19	0.00	
21800.00	89.62	89.91	10448.37	-457.54	11863.97	11872.15	0.00	
21900.00	89.62	89.91	10449.04	-457.38	11963.97	11972.10	0.00	
22000.00	89.62	89.91	10449.70	-457.22	12063.96	12072.05	0.00	
22100.00	89.62	89.91	10450.37	-457.07	12163.96	12172.01	0.00	
22200.00	89.62	89.91	10451.03	-456.91	12263.96	12271.96	0.00	
22300.00	89.62	89.91	10451.70	-456.75	12363.96	12371.91	0.00	
22400.00	89.62	89.91	10452.37	-456.60	12463.95	12471.87	0.00	
22500.00	89.62	89.91	10453.03	-456.44	12563.95	12571.82	0.00	
22600.00	89.62	89.91	10453.70	-456.28	12663.95	12671.78	0.00	
22700.00	89.62	89.91	10454.36	-456.12	12763.95	12771.73	0.00	
22800.00	89.62	89.91	10455.03	-455.97	12863.94	12871.68	0.00	
22900.00	89.62	89.91	10455.69	-455.81	12963.94	12971.64	0.00	
23000.00	89.62	89.91	10456.36	-455.65	13063.94	13071.59	0.00	
23100.00	89.62	89.91	10457.03	-455.49	13163.94	13171.54	0.00	
23200.00	89.62	89.91	10457.69	-455.34	13263.94	13271.50	0.00	
23300.00	89.62	89.91	10458.36	-455.18	13363.93	13371.45	0.00	
23400.00	89.62	89.91	10459.02	-455.02	13463.93	13471.40	0.00	
23500.00	89.62	89.91	10459.69	-454.87	13563.93	13571.36	0.00	
23600.00	89.62	89.91	10460.36	-454.71	13663.93	13671.31	0.00	
23700.00	89.62	89.91	10461.02	-454.55	13763.92	13771.26	0.00	
23800.00	89.62	89.91	10461.69	-454.39	13863.92	13871.22	0.00	
23900.00	89.62	89.91	10462.35	-454.24	13963.92	13971.17	0.00	
24000.00	89.62	89.91	10463.02	-454.08	14063.92	14071.13	0.00	
24100.00	89.62	89.91	10463.68	-453.92	14163.91	14171.08	0.00	
24200.00	89.62	89.91	10464.35	-453.77	14263.91	14271.03	0.00	
24300.00	89.62	89.91	10465.02	-453.61	14363.91	14370.99	0.00	
24400.00	89.62	89.91	10465.68	-453.45	14463.91	14470.94	0.00	
24500.00	89.62	89.91	10466.35	-453.29	14563.91	14570.89	0.00	
24600.00	89.62	89.91	10467.01	-453.14	14663.90	14670.85	0.00	
24700.00	89.62	89.91	10467.68	-452.98	14763.90	14770.80	0.00	
24800.00	89.62	89.91	10468.34	-452.82	14863.90	14870.75	0.00	
24900.00	89.62	89.91	10469.01	-452.66	14963.90	14970.71	0.00	
25000.00	89.62	89.91	10469.68	-452.51	15063.89	15070.66	0.00	
25100.00	89.62	89.91	10470.34	-452.35	15163.89	15170.62	0.00	
25200.00	89.62	89.91	10471.01	-452.19	15263.89	15270.57	0.00	
25300.00	89.62	89.91	10471.67	-452.04	15363.89	15370.52	0.00	
25400.00	89.62	89.91	10472.34	-451.88	15463.88	15470.48	0.00	
25500.00	89.62	89.91	10473.01	-451.72	15563.88	15570.43	0.00	
25600.00	89.62	89.91	10473.67	-451.56	15663.88	15670.38	0.00	
25700.00	89.62	89.91	10474.34	-451.41	15763.88	15770.34	0.00	
25800.00	89.62	89.91	10475.00	-451.25	15863.87	15870.29	0.00	
25872.71	89.62	89.91	10475.49	-451.14	15936.58	15942.97	0.00	exit
25900.00	89.62	89.91	10475.67	-451.09	15963.87	15970.24	0.00	
25952.71	89.62	89.91	10476.00	-451.03	16016.58	16022.93	0.00	BHL

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



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

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

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

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

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

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

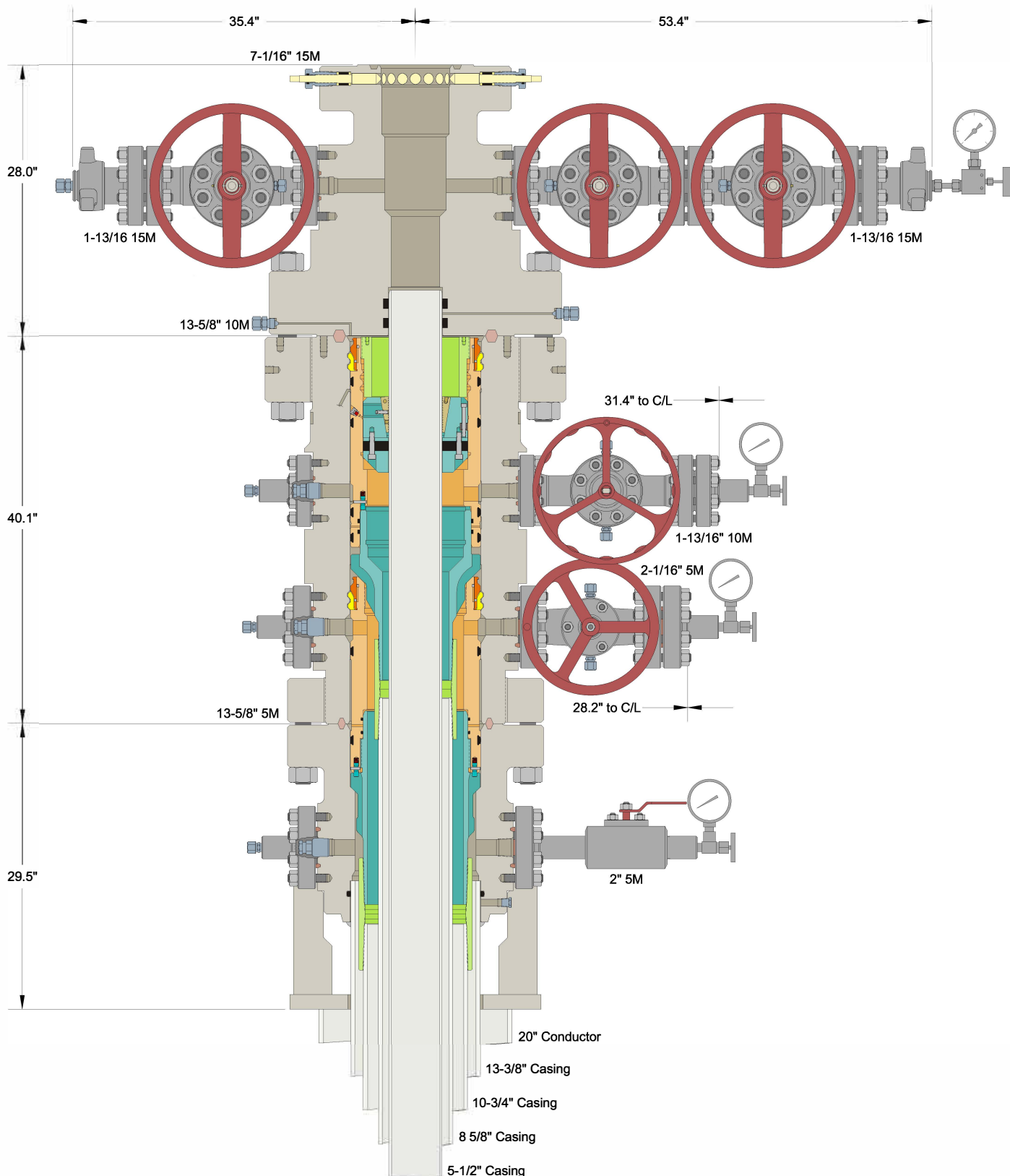
- Wellhead will be installed by wellhead representatives.
- If the welding is performed by a third party, the wellhead representative will monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
- Wellhead representative will install the test plug for the initial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

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

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

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

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



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ALL DIMENSIONS APPROXIMATE

CACTUS WELLHEAD LLC

DEVON ENERGY CORPORATION
DELAWARE BASIN

20" x 13-3/8" x 10-3/4" x 8-5/8" x 5-1/2" MBU-4T-SOW Wellhead
With 13-5/8" 10M x 7-1/16" 15M CTH-DBLHPS Tubing Head,
10-3/4" & 8-5/8" Mandrel Hangers And 5-1/2" Slip Casing Hanger

DRAWN	DLE	09AUG19
APPRV		
DRAWING NO.	HBE0000156	

Section 2 - Blowout Preventer Testing Procedure

Variance Request

Devon Energy requests to only test BOP connection breaks after drilling out of surface casing and while skidding between wells which conforms to API Standard 53 and industry standards. The initial BOP test will follow 43 CFR 3172, and subsequent tests following a skid will only test connections that are broken. This test will at minimum include the Top Pipe Ram, HCR, Kill Line Check Valve, QDC (quick disconnect to wellhead) and BOP shell of the 10M BOPE to 5M for 10 minutes. Additional pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken. If a break to the flex hose that runs to the choke manifold is required due to repositioning from a skid, the HCR will remain open during the shell test to include that additional break. The variance only pertains to intermediate hole-sections. This variance will meet or exceed 43 CFR 3172 per the following: Devon Energy will perform a full BOP test per 43 CFR 3172 before drilling out of the intermediate casing string(s) and starting the production hole, testing the Annular during initial BOP testing to a minimum of 70% RWP and higher than MASP, and pressure testing at a 21-day interval frequency. The BLM will be contacted 4hrs prior to a BOPE test. The BLM will be notified if and when a well control event is encountered. In the event break testing is not utilized, then a full BOPE test would be conducted.

Devon Energy requests to perform offline BOP stump testing and offline BOPE testing. All pressure-containing and pressure-controlling seals will be tested either online or offline as denoted in the table below and per BLM approval during initial BOP test following test pressure requirements set forth in 43 CFR 3172. Remaining components not tested offline or on the stump will be tested within 72-hours when the BOP is connected to the wellhead. If stump testing exceeds 72-hour window prior to connecting to the wellhead, the BLM will be notified and either stump testing restarted, or the BOP being tested online. The BLM will be contacted 4hrs prior to a BOPE test. The BLM will be notified if and when a well control event is encountered. In the event stump testing is not utilized, then a full BOPE test would be conducted.

Components	Offline	Offline, BOPE	Break	Online
Upper Rams		X	X	X
Blind Rams		X		X
Lower Rams				X
Outside Kill Valve		X	X	X
Inside Kill Valve		X	X	X
Kill Line Check Valve		X	X	X
Inside Choke Valve		X	X	X
HCR		X	X	X
Kill Line	X			X
Annular		X		X
Choke Manifold Valves and Hose	X			X
Mudline (Mud Pumps, Rig Floor Valves, Kelly Hose, Mud Line)	X			X
Standpipe Valve	X			X
IBOP (Upper and Lower)	X			X

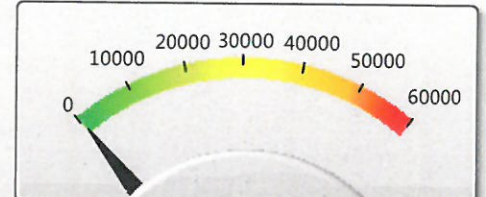
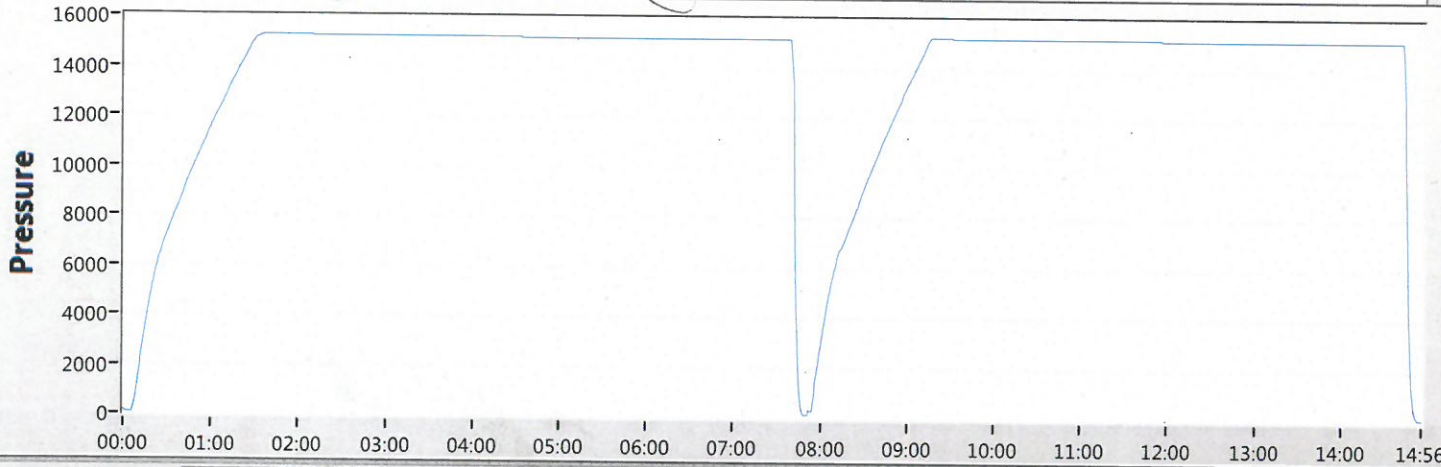
Devon requests offline BOPE testing for the following components: Upper Rams, Blind Rams, Kill Valves, Choke Valves, and Annular
 Remaining well control equipment components will either be tested offline or online, per BLM approval
 Remaining BOPE will be tested online within 72-hours form completing the offline BOPE component testing
 Notify the BLM if the online BOPE testing exceeds 72-hours
 All Full Tests not completed "Offline" or "Offline, BOPE" are required to be complete Online
 Devon requests Break testing as stated above for 5K tests, not including production hole
 Annular Preventer will be tested to minimum of 70% RWP and higher than MASP during initial BOP test
 Pressure testing is required for pressure-containing connections if the integrity of a pressure seal is broken during a break test
 Full Tests required when entering production hole

Cactus
Wellhead

2-9-17
E Bell

80.7 °F

15:49



50

Date 02-09-17

Tested By E.BELL

Transducer bay2

Transducer Serial 181504

Calibration Date 9/6/15

Job#	Part#	Serial#	Description	Test Pressure
1	TRJ0006341-0007 116966	TRJ6341-7-1	ADPT,DRLG,CW,MBU-3T,13-5/8 10M	15000
2				
3				
4				
5			TRANSDUCER CALIBRATION DUE 03/13/2017	
6				
7				
8				

Start Stop Zero Config Save Print EXIT

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME:	Devon Energy Production Company LP
LOCATION:	Section 24, T.20 S., R.29 E., NMPM
COUNTY:	Eddy County, New Mexico

WELL NAME & NO.:	St Helens 19-21 Fed Com 621H
ATS/API ID:	ATS-24-1604
APD ID:	10400098520
Sundry ID:	N/a

WELL NAME & NO.:	St Helens 19-21 Fed Com 622H
ATS/API ID:	ATS-24-1605
APD ID:	10400098521
Sundry ID:	N/a

WELL NAME & NO.:	St Helens 19-21 Fed Com 911H
ATS/API ID:	ATS-24-1630
APD ID:	10400098562
Sundry ID:	N/a

COA

H2S	No		
Potash	Secretary	None	
Cave/Karst Potential	High		
Cave/Karst Potential	<input type="checkbox"/> Critical		
Variance	<input checked="" type="checkbox"/> None	<input checked="" type="checkbox"/> Flex Hose	<input checked="" type="checkbox"/> Other
Wellhead	Diverter		
Other	<input checked="" type="checkbox"/> 4 String <input type="checkbox"/> 5 String	Capitan Reef Int 2	<input type="checkbox"/> WIPP
Other	Pilot Hole None	<input type="checkbox"/> Open Annulus	
Cementing	Contingency Squeeze None	Echo-Meter Int 2	Primary Cement Squeeze None
Special Requirements	<input type="checkbox"/> Water Disposal/Injection	<input checked="" type="checkbox"/> COM	<input type="checkbox"/> Unit
Special Requirements	<input type="checkbox"/> Batch Sundry	Waste Prevention None	
Special Requirements Variance	<input checked="" type="checkbox"/> BOPE Break Testing <input type="checkbox"/> Offline BOPE Testing	<input checked="" type="checkbox"/> Offline Cementing	<input type="checkbox"/> Casing Clearance

A. HYDROGEN SULFIDE

Hydrogen Sulfide (H₂S) monitors shall be installed prior to drilling out the surface shoe. If H₂S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet **43 CFR part 3170 Subpart 3176**, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

B. CASING

1. The **13-3/8** inch surface casing shall be set at approximately **350 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 **17 1/2** 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.

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.

2. The minimum required fill of cement behind the **10-3/4** inch intermediate casing is:
 - Cement to surface. If cement does not circulate see B.1.a, c-d above. **Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst, potash or capitan reef.**
3. The minimum required fill of cement behind the **8-5/8** inch intermediate casing is:

Option 1 (Single Stage):

- Cement should tie-back at least **50 feet** on top of Capitan Reef top **or 500 feet** into the previous casing, whichever is greater 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. 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, potash or capitan reef.

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 **Capitan Reef at 2087'**.
- b. Second stage:
 - Operator will perform bradenhead squeeze from the top of **Capitan Reef** to at least **50 feet** on top of the Capitan Reef top **or 500 feet** into the previous casing, whichever is greater and may be lower than USGS Marker Bed No. 126. If cement does not meet the minimum tie-back requirement, the appropriate BLM office shall be notified. **(Squeeze 261 sxs Class)**
Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst, potash or capitan reef.

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. Operator must run one CBL per Well Pad. Operator may conduct a negative and positive pressure test during completion to remediate sustained casing pressure.

- ❖ In High Cave/Karst Areas if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.
- ❖ In Secretary Potash Areas if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.
- ❖ In Capitan Reef Areas if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.
- ❖ **Special Capitan Reef requirements.** If lost circulation (50% or greater) occurs below the Base of the Salt, the operator shall do the following:

4. 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, potash or capitan reef. 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 tested to **800 psi**. A Diverter system is approved as a variance to drill the **10-3/4 inch** intermediate casing section in a **12 1/4 inch** hole.
- b. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the **10-3/4 inch** intermediate casing shoe shall be **3000 (3M) psi**. **Annular which shall be tested to 2100 (70% Working Pressure) psi.**
- c. 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:

- a. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be tested to **800 psi**. A Diverter system is approved as a variance to drill the **10-3/4 inch** intermediate casing section in a **12 1/4 inch** hole.
- b. Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the **10-3/4 inch** intermediate casing. Minimum working pressure of the blowout preventer (BOP) and related

equipment (BOPE) required for drilling below the intermediate 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.

BOPE Break Testing Variance (Approved)

- BOPE Break Testing is ONLY permitted for 5M BOPE or less. **(Annular preventer must be tested to a minimum of 70% of BOPE working pressure and shall be higher than the MASP)**
- BOPE Break Testing is NOT permitted to drilling the production hole section.
- Variance only pertains to the intermediate hole-sections and no deeper than the Bone Springs formation.
- While in transfer between wells, the BOPE shall be secured by the hydraulic carrier or cradle.
- Any well control event while drilling require notification to the BLM Petroleum

Engineer (575-706-2779) prior to the commencement of any BOPE Break Testing operations.

- A full BOPE test is required prior to drilling the first deep intermediate hole section. If any subsequent hole interval is deeper than the first, a full BOPE test will be required. (200' TVD tolerance between intermediate shoes is allowable).
- The BLM is to be contacted (575-361-2822 Eddy County) 4 hours prior to BOPE tests.
- As a minimum, a full BOPE test shall be performed at 21-day intervals.
- In the event any repairs or replacement of the BOPE is required, the BOPE shall test as per 43 CFR part 3170 Subpart 3172.
- If in the event break testing is not utilized, then a full BOPE test would be conducted.

Offline Cementing

Operator has been (Approved) to pump the proposed cement program offline in the **Intermediate(s) interval**.

Offline cementing should commence within 24 hours of landing the casing for the interval.

Notify the BLM 4hrs prior to cementing offline at **Eddy County: 575-361-2822**.

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) 2/14/2025



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

Hydrogen Sulfide (H₂S) Contingency Plan

For

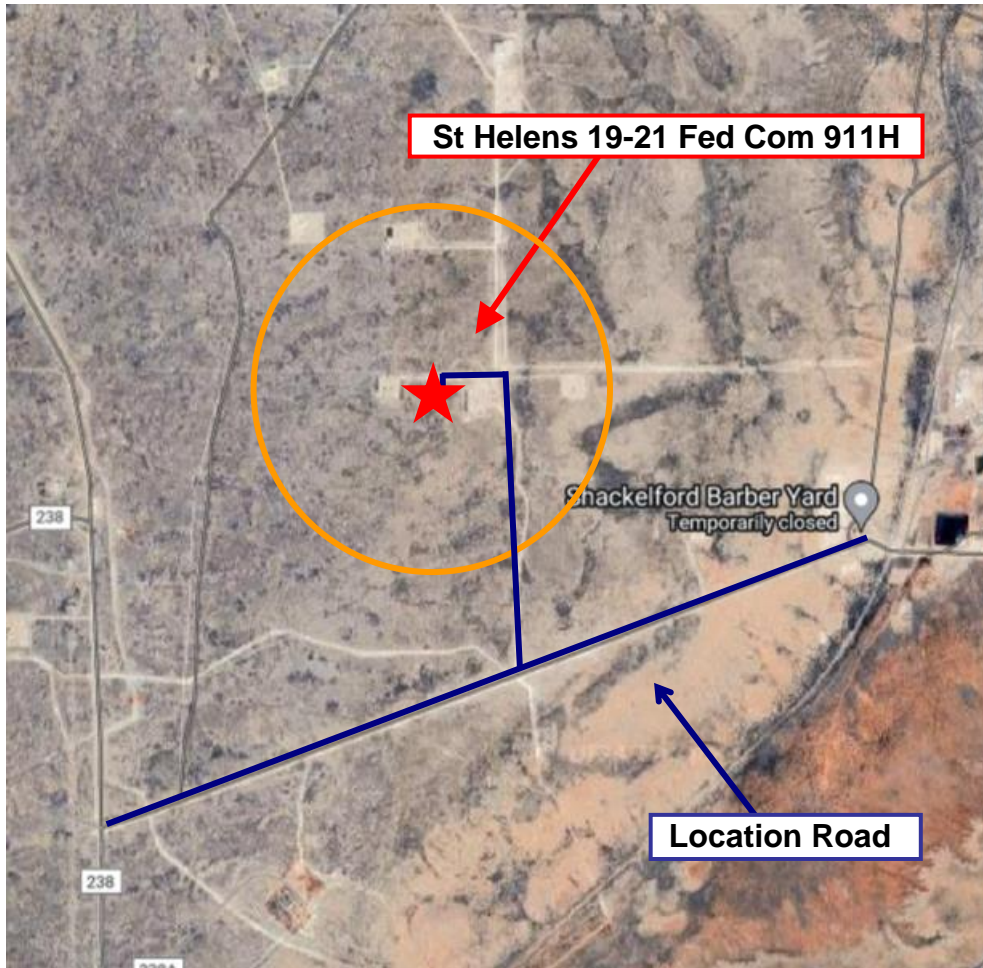
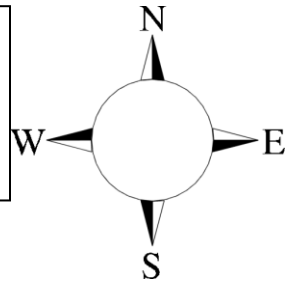
St Helens 19-21 Fed Com 911H

**Sec-24 T-20S R-29E
244' FNL & 213' FEL
LAT. = 32.5654502° N (NAD83)
LONG = 104.0206150° W**

Eddy County NM

St Helens 19-21 Fed Com 911H

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



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

Escape

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

Assumed 100 ppm ROE = 3000'
100 ppm H₂S concentration shall trigger activation of this plan.

Emergency Procedures

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

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

Ignition of Gas Source

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

Characteristics of H₂S and SO₂

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

Contacting Authorities

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

Hydrogen Sulfide Drilling Operation Plan

I. HYDROGEN SULFIDE (H₂S) TRAINING

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

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

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

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

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:

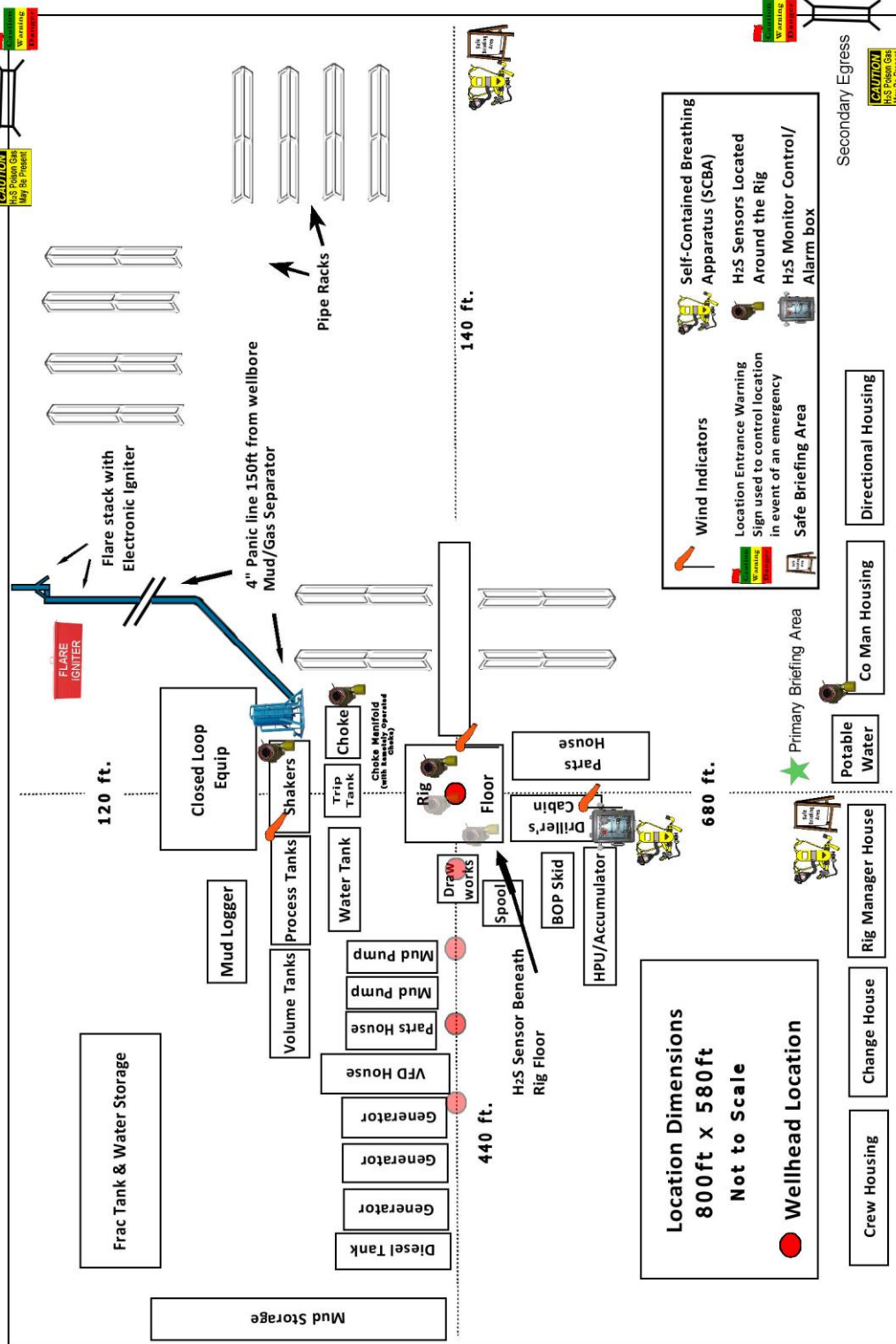
- A. Drill stem testing will be performed with a minimum number of personnel in the immediate vicinity, which are necessary to safety and adequately conduct the test. The drill stem testing will be conducted during daylight hours and formation fluids will not be flowed to the surface. All drill-stem-testing 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			
Lea County (575)	Hobbs		
	Lea County Communication Authority	397-9265	
	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 County (575)	Carlsbad		
	State Police	885-3137	
	City Police	885-2111	
	Sheriff's Office	887-7551	
	Ambulance	911	
	Fire Department	885-3125	
	LEPC (Local Emergency Planning Committee)	887-3798	
	US Bureau of Land Management	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 GPS position:	Native Air – Emergency Helicopter – Hobbs	(575) 347-9836
		For Air Ambulance - Eddy County Dispatch	(575)-616-7155
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	

Prepared in conjunction with
 Dave Small  SHARP
 communications and consulting

Devon Energy - Well Pad Rig Location Layout Safety Equipment Location



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

ACKNOWLEDGMENTS

Action 534711

ACKNOWLEDGMENTS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 534711
	Action Type: [C-101] BLM - Federal/Indian Land Lease (Form 3160-3)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I hereby certify that no additives containing PFAS chemicals will be added to the completion or recompletion of this well.
-------------------------------------	--

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 534711

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 534711
	Action Type: [C-101] BLM - Federal/Indian Land Lease (Form 3160-3)

CONDITIONS

Created By	Condition	Condition Date
tshandee	Cement is required to circulate on both surface and intermediate1 strings of casing.	12/15/2025
tshandee	If cement does not circulate on any string, a Cement Bond Log (CBL) is required for that string of casing.	12/15/2025
ward.rikala	Notify the OCD 24 hours prior to casing & cement.	1/29/2026
ward.rikala	File As Drilled C-102 and a directional Survey with C-104 completion packet.	1/29/2026
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.	1/29/2026
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.	1/29/2026
ward.rikala	This well is within the Capitan Reef. The first intermediate casing string shall be sat and cemented back to surface immediately above the Capitan Reef. The second intermediate string shall be set and cemented back to surface immediately below the base of the Capitan Reef.	1/29/2026