

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication
 NSL NSP SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

- [D] Other: Specify _____

*-SWD
 -Devon Energy Production
 Company LK
 6137*

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[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or Does Not Apply

- [A] Working, Royalty or Overriding Royalty Interest Owners
 [B] Offset Operators, Leaseholders or Surface Owner
 [C] Application is One Which Requires Published Legal Notice
 [D] Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
 [E] For all of the above, Proof of Notification or Publication is Attached, and/or,
 [F] Waivers are Attached

*Well
 Cottonwood
 Units SWD #84
 30-015-2178
 Pool
 -SWD, Devonian
 46101*

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Linda Good
 Print or Type Name

Linda Good
 Signature

Regulatory Compliance Specialist
 Title

3/15/2016
 Date

Linda.good@dvn.com
 e-mail Address

APPLICATION FOR AUTHORIZATION TO INJECT

- I. PURPOSE: _____ Secondary Recovery _____ Pressure Maintenance _____ Disposal _____ Storage
Application qualifies for administrative approval? Yes _____ No
- II. OPERATOR: _____ Devon Energy Production Company, LP _____
ADDRESS: _____ 333 West Sheridan Avenue, Oklahoma City, Oklahoma 73102-5010 _____
CONTACT PARTY: _____ Linda Good _____ PHONE: _____ 405-552-6558 _____
- III. WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection.
Additional sheets may be attached if necessary.
- IV. Is this an expansion of an existing project? _____ Yes No
If yes, give the Division order number authorizing the project: _____
- V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
- VII. Attach data on the proposed operation, including:
1. Proposed average and maximum daily rate and volume of fluids to be injected;
 2. Whether the system is open or closed;
 3. Proposed average and maximum injection pressure;
 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,
 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
- *VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
- IX. Describe the proposed stimulation program, if any.
- *X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
- *XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
- XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
- XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.
- XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: _____ Linda Good _____ TITLE: _____ Regulatory Compliance Specialist _____
SIGNATURE: _____ *Linda Good* _____ DATE: _____ 3/15/2016 _____

E-MAIL ADDRESS: _____ linda.good@dvn.com _____

- * If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: _____ 9/5/2013 _____

III. WELL DATA

A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:

- (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
- (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
- (3) A description of the tubing to be used including its size, lining material, and setting depth.
- (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.

- (1) The name of the injection formation and, if applicable, the field or pool name.
- (2) The injection interval and whether it is perforated or open-hole.
- (3) State if the well was drilled for injection or, if not, the original purpose of the well.
- (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
- (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

Proposed Injection Well: Cotton Draw Unit SWD #84

API: 30-015-29728

APPLICATION FOR INJECTION

Form C-108 Section III

III. Well Data--On Injection Well

A. Injection Well Information

- (1) **Lease** Cotton Draw Unit
Well No #84
Location 2615' FSL & 1160' FEL
Sec,Twn,Rnge Sec 2-T25S-R31E
Cnty, State Eddy County, NM
- (2) **Casing** 18-5/8", 87.5#, K-5, BTC, @ 700'
Cmt w/1350 sx, circ cmt to surf
- 13-3/8", 68#, N-80, BTC, @ 4350'
Cmt'd w/3250 sx, circ cmt to surf
- 9-5/8", 47/53.5#, P-110-55 LTC, @ 12200'
Cmt'd w/6056, cbl 4090
- 7 5/8", 39#, P110 liner, @ 14657'
Cmt w/650 sx, tol @ 11858'
- 7", 35#, TCA-80, LTC, @ 11687'
5-1/2" x 7" X/O @ 11687'
Cmt w/400 sx, etoc @ 11256'
- 5 1/2", 20#, P110 SLX, @ 16295'
Cmt w/650 sx, tol @ 14289'
- (3) **Injection Tubing** 3-1/2" 9.3# P-110 8rd EUE IPC tubing
- (4) **Packer** 5-1/2" Baker DB Packer @ +/- 16195'

B. Other Well Information

- (1) **Injection Formation:** Paduca; Devonian, NW
Field Name: (To Be Assigned)
- (2) **Injection Interval:** 16,295 - 16,585'

(3) **Original Purpose of Wellbore:**

Oil & Gas Producer, SWD Injector

(4) **Other perforated intervals:**

Devonian: Open Hole - 16,295-16,585'

(5) **Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well if any.**

Rustler 666'; Salado 1034' (Barren); Lamar 4356 (Oil); Ramsey 4375 (Oil); Cherry Canyon 5350' (Oil); Brushy Canyon 7051 (Oil); Bone Spring 8273' (Oil); Wolfcamp 12132 (Gas); Strawn 13626' (Gas); Atoka 13757' (Gas); Morrow 14408' (Gas); Mississippian 15896' (Barren); Woodford 16202' (Barren); Devonian/Silurian 16349' (Barren)

Proposed Injection Well: Cotton Draw Unit SWD #84
API: 30-015-29728
APPLICATION FOR INJECTION
Form C-108 Section VII to XIII

VII Attach data on the proposed operation, including:

- (1) Proposed average injection rate: 5000 BWPD
Proposed maximum injection rate: 10000 BWPD
- (2) The system will be a closed system.
- (3) Proposed average injection pressure: 1629 psi
Proposed max injection pressure: 3259 psi
- (4) The injection fluid will be produced water from area wells producing from the Bone Spring and/or Delaware formations that will be injected into the Devonian/Silurian formation.
- (5) A representative water analysis is submitted for Bone Spring and Delaware formation.

VIII Geologic Injection Zone Data

The injection zone is the Devonian/Silurian formation from 16295 - 16585'. The gross injection interval is 290' thick. The Devonian formation is a Devonian aged dolomite. The average depth to fresh water is less than 800' in this area.

IX Proposed Stimulation

Based on injectivity results this interval could be stimulated with ~30,000 gals HCL.

X Log Data

Logs have been provided with previous completion report filed.

XI Fresh Water Analysis

A Fresh Water Analysis Report for the Paduca Delaware Water Well, in Sec 2-T25S-R31E located @ Lat 32.09' 56.7" Long -103.44' 51.3" has been provided.

XII Geologic / Engineering Statement

An examination of this area has determined there are no open faults or other hydrologic connection between the disposal zone and any underground drinking water.

Engineering: Devon respectfully requests permission to convert the Cotton Draw Unit #84 to a salt water disposal well. This wells average production is 120 mcf/d in gas, and 486 bbl water, currently this well has been shut in since June 6, 2013 due to the production of formation solids. It is currently completed to the Devonian and produces below a 5-1/2" liner set at 16,295' thru 4-1/2" open hole with a TD of 16,585'. The conversion would consist of removing the existing 3-1/2" production string and installing a 3-1/2" internally plastic coated injection string, with a packer set at +/-16,535'. The formation will be treated with 30,000 gals of 15% HCl acid. Current and proposed well bore diagrams attached.

Reservoir: At current production rates and high water hauling cost of \$2.80/bbl this well produces uneconomically. Devon has been told by Enterprise that due to the H2S content of the Devonian gas, our market for this and other Devonian producers will disappear within 6 months. There are 2 wells within a 1/2 mile radius, the CDU 65 and the CDU 76. The CDU 65 is an active SWD well that injects into the Delaware, and the CDU 76 which is another Devonian producer which also produces uneconomically and will lose its market at the same time, this well will be planned to be TA'd to evaluate it for up hole or conversion potential.

Geology: The Devonian is highly fractured and believed to act like an infinite reservoir in the vertical direction, therefore making it an ideal SWD candidate. This closest Devonian SWD well is the CDU 89 which is 1.2 miles from the CDU 84 and due to the vertically fractured nature of the Devonian and the distance between the two it is believed that these wells will not communicate. Beyond the CDU 76 there is one more Devonian producer in the area the, CDU 86, which is 1.4 miles from the CDU 84. But, due to the vertically fractured nature of the Devonian and the distance between the two it is not believed the two will communicate.



Derek Ohl, Geologist

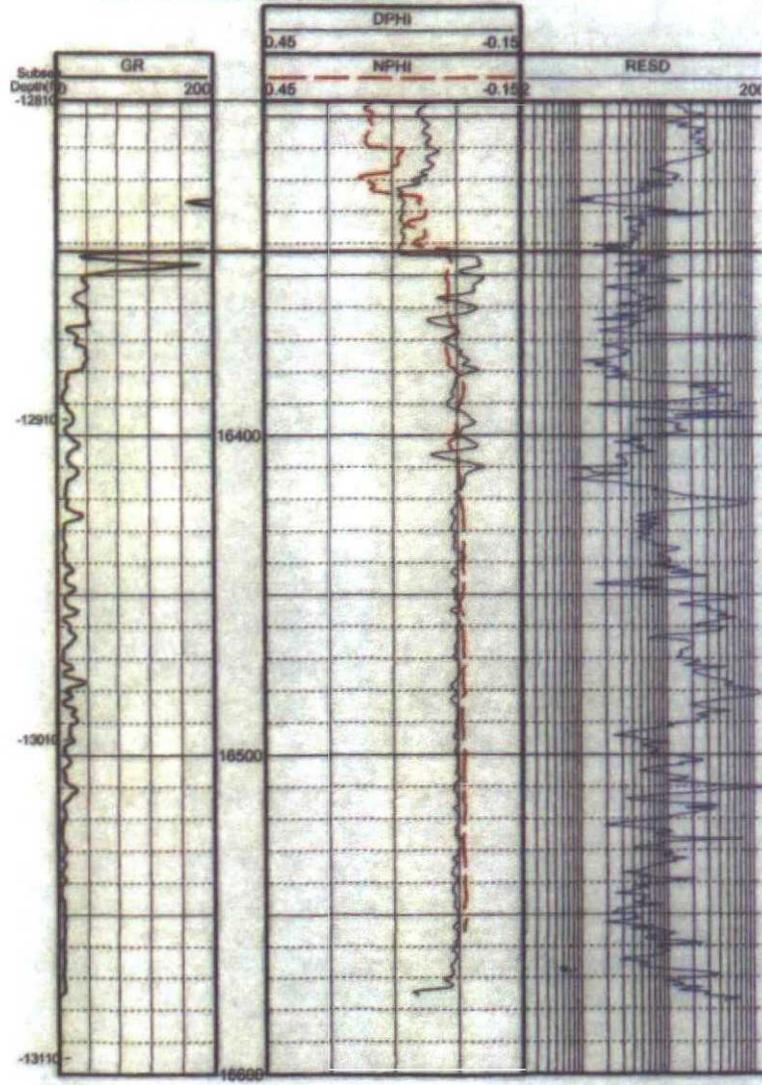
3/3/16

Date:

XIII Proof of Notice

Proof of notice to surface owner, and public legal notification are attached.

COTTON DRAW UNIT 84



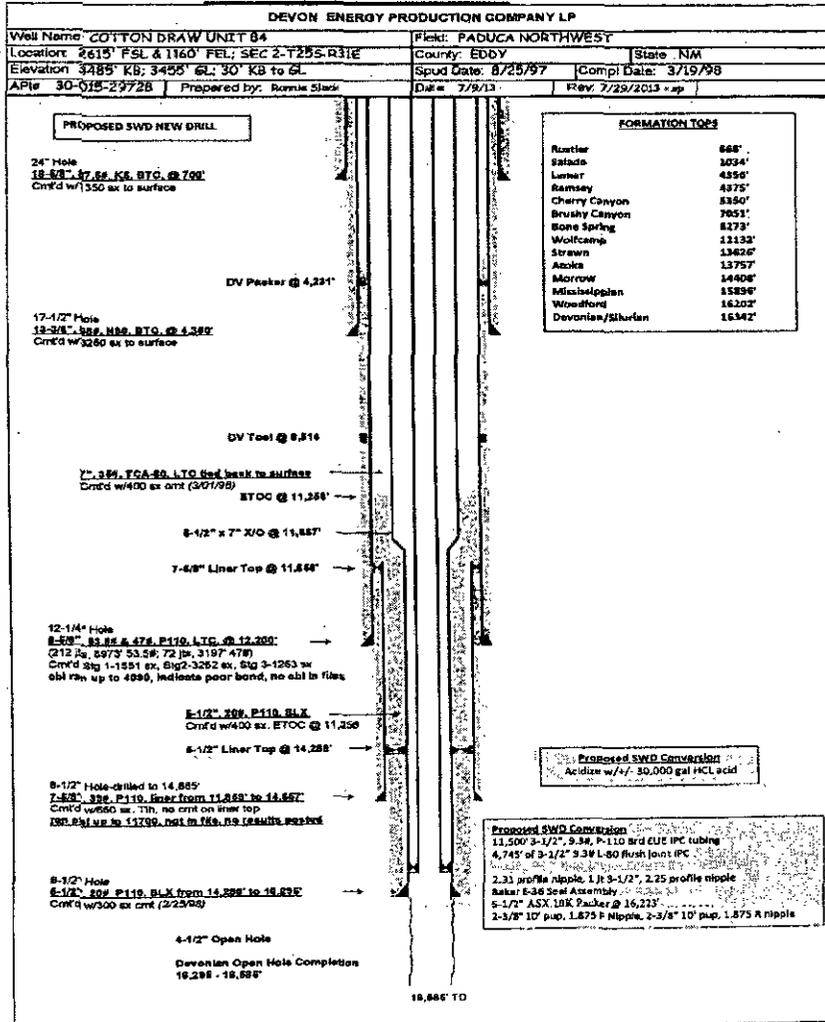
INJECTION WELL DATA SHEET

OPERATOR: Devon Energy Production Company, LP

WELL NAME & NUMBER: COTTON DRAW UNIT #84

WELL LOCATION: 2615' FSL & 1160' FEL I 2 Sec 2 T25S R31E
 FOOTAGE LOCATION UNIT LETTER SECTION TOWNSHIP RANGE

WELLBORE SCHEMATIC



WELL CONSTRUCTION DATA

Surface Casing

Hole Size: 24" Casing Size: 18-5/8, 87.5# @ 700'
 Cemented with: 1350 sx. or _____ ft³
 Top of Cement: Surface Method Determined: Circ. cement

Intermediate Casing

Hole Size: 17-1/2" Casing Size: 13-3/8", 68#, @ 4350'
 Cemented with: 3250 sx. or _____ ft³
 Top of Cement: Surface Method Determined: Circ. cement

Intermediate Casing

Hole Size: 12-1/4" Casing Size: 9-5/8", 47/53.5#, @ 12200'
 Cemented with: 6056 sx. or _____ ft³
 Top of Cement: 4090 Method Determined: Circ. CBL

Production Casing

Hole Size: 8-1/2" Casing Size: 7-5/8", 39#, @ 14657'
 Cemented with: 650 sx. or _____ ft³
 Top of Cement: TOL @ 11858' Method Determined: Calc TOC

Total Depth: 5-1/2" 20# 16295 TD @ 16585'

Injection Interval (Open Hole)

16295' to 16585'

(Perforated or Open Hole; indicate which)

INJECTION WELL DATA SHEET

Tubing Size: 3-1/2" Lining Material: IPC

Type of Packer: 5-1/2" ASX 10K Packer

Packer Setting Depth: +/- 16,223'

Other Type of Tubing/Casing Seal (if applicable): _____

Additional Data

1. Is this a new well drilled for injection? No

If no, for what purpose was the well originally drilled? Oil & Gas Producer, SWD Injector

2. Name of the Injection Formation: Paduca; Devonian, NW

3. Name of Field or Pool (if applicable): To be Assigned by NMOCD

4. Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail, i.e. sacks of cement or plug(s) used.

Devonian: Open Hole – 16,295-16,585'

5. Give the name and depths of any oil or gas zones underlying or overlying the proposed injection zone in this area:

Rustler 666'; Salado 1034' (Barren); Lamar 4356 (Oil); Ramsey 4375 (Oil); Cherry Canyon 5350' (Oil); Brushy Canyon 7051 (Oil); Bone Spring 8273' (Oil); Wolfcamp 12132 (Gas); Strawn 13626' (Gas); Atoka 13757' (Gas); Morrow 14408' (Gas); Mississippian 15896' (Barren); Woodford 16202' (Barren); Devonian/Silurian 16349' (Barren)

Proposed Injection Well: Cotton Draw Unit SWD #84

API: 30-015-29728

APPLICATION FOR INJECTION:

Form C-108 Section III

III. Well Data--On Injection Well

A. Injection Well Information

- (1) Lease Cotton Draw Unit
Well No #84
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Sec,Twn,Rnge Sec 2-T25S-R31E
Cnty, State Eddy County, NM
- (2) Casing 18-5/8", 87.5#, K-5, BTC, @ 700'
Cmt w/1350 sx, circ cmt to surf
- 13-3/8", 68#, N-80, BTC, @ 4350'
Cmt'd w/3250 sx, circ cmt to surf
- 9-5/8", 47/53.5#, P-110-55 LTC, @ 12200'
Cmt'd w/6056, cbl 4090
- 7 5/8", 39#, P110 liner, @ 14657'
Cmt w/650 sx, tol @ 11858'
- 7", 35#, TCA-80, LTC, @ 11687'
5-1/2" x 7" X/O @ 11687'
Cmt w/400 sx, etoc @ 11256'
- 5 1/2", 20#, P110 SLX, @ 16295'
Cmt w/650 sx, tol @ 14289'
- (3) Injection Tubing 3-1/2" 9.3# P-110 8rd EUE IPC tubing
- (4) Packer 5-1/2" ASX 10K Packer @ +/- 16,223'

B. Other Well Information

- (1) Injection Formation: Paduca; Devonian, NW
Field Name: (To Be Assigned)
- (2) Injection Interval: 16,295 - 16,585'

(3) Original Purpose of Wellbore:

Oil & Gas Producer, SWD Injector

(4) Other perforated intervals:

Devonian: Open Hole - 16,295-16,585'

(5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well if any.

Rustler 666'; Salado 1034' (Barren); Lamar 4356 (Oil); Ramsey 4375 (Oil); Cherry Canyon 5350' (Oil); Brushy Canyon 7051 (Oil); Bone Spring 8273' (Oil); Wolfcamp 12132 (Gas); Strawn 13626' (Gas); Atoka 13757' (Gas); Morrow 14408' (Gas); Mississippian 15896' (Barren); Woodford 16202' (Barren); Devonian/Silurian 16349' (Barren)



COTTON DRAW UNIT
221H

COTTON DRAW UNIT
220H

COTTON DRAW UNIT
219H

COTTON DRAW UNIT
137H

COTTON DRAW UNIT
202H

COTTON DRAW UNIT
136H

25S 31E

COTTON DRAW UNIT
65

2

SAD CL

COTTON DRAW UNIT
84

1/2 MILE

COTTON DRAW UNIT
76

Approved
DEV
TA

COTTON DRAW UNIT
160H

devon

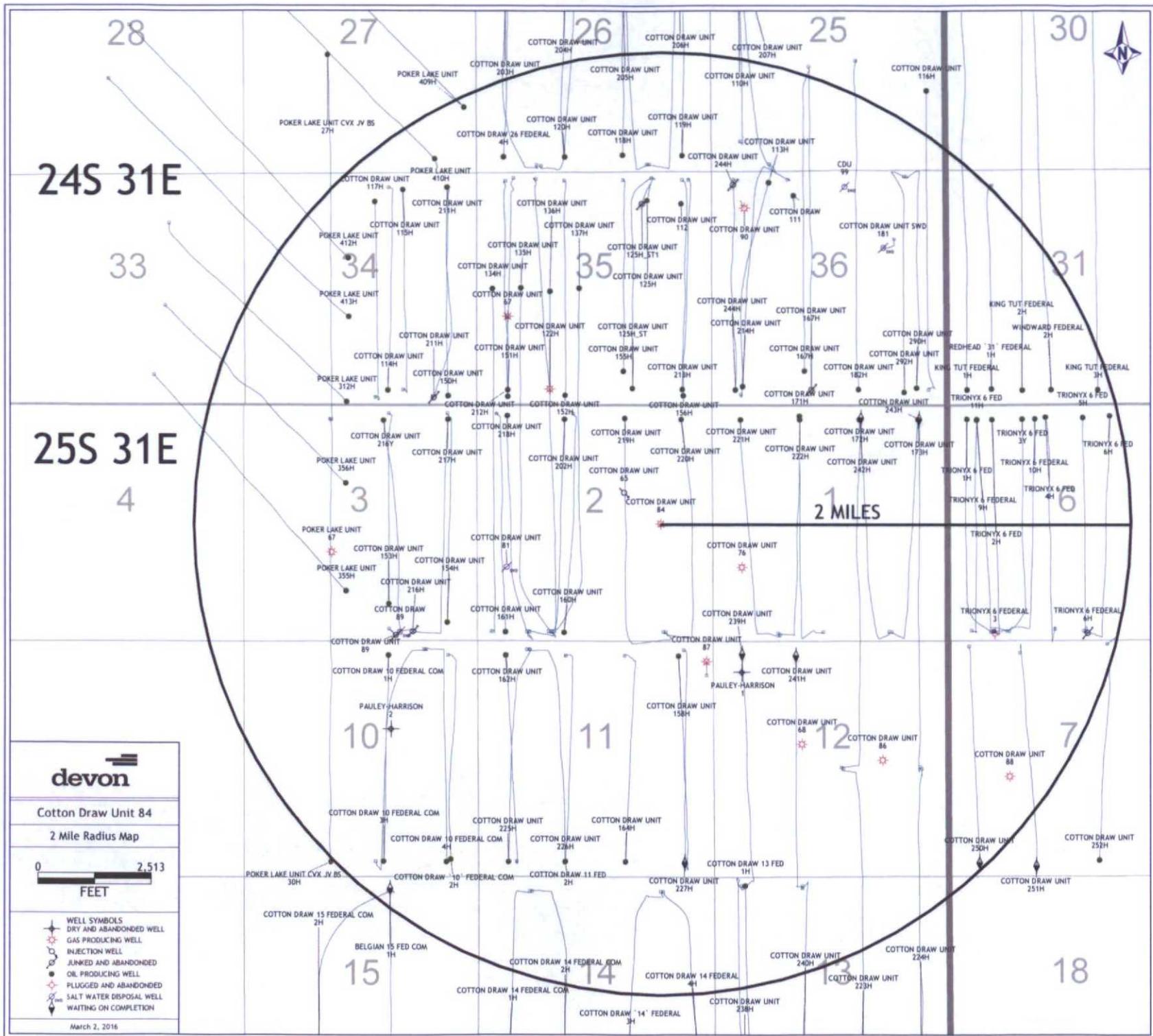
Cotton Draw Unit 84

1/2 Mile Radius Map



- WELL SYMBOLS
- ☆ GAS PRODUCING WELL
- INJECTION WELL
- OIL PRODUCING WELL

March 2, 2016



C108 ITEM VI--Well Tabulation in 1/2 Mile Review Area

Devon Energy Production Company, LP

Proposed Inj Well: COTTON DRAW UNIT SWD #84

Proposed Formation: DEVONIAN

Proposed Interval: 16295' - 16585'

Operator	Well Name	API NO	County	Surf Location	Sec.	Twn.	Rnge	Type	Status	Spud Date	Comp Date	TD	PBTD	Comp Zone	Comp Interval-Ft	Casing Program	Cement / TOC
Devon Energy Prod Co LP	Cotton Draw 65	30-015-10843	Eddy	1980' FNL 1980' FEL	2	25S	31E	Inj	Active	7/8/1966	6/3/1967	19546	8180	Delaware Wolfcamp Morrow Devonian	5326-5714' (swd inj int) 12785-12851' (squeezed off) 14606-14625' CIBP @ 146444' 20", 94# @ 600' 14787-14835' CIBP @ 15050' 13-3/8", 54.5# @ 4365' 16250-19546' (Open Hole) 10-3/4", 60.7# @ 12570' (See wellbore schematics) 8-5/8" liner, 48, @ 16250'	1300 sx / surface 4300 sx / surface 4450 sx / 3555 ts 2350 sx / 11553 tol	
Devon Energy Prod Co LP	Cotton Draw Unit 76	30-015-29252	Eddy	1680' FSL 1660' FWL	1	25S	31E	Gas	Active	10/27/1996	5/1/1997	16623	16623	Devonian	16400-16623'	18-5/8", 87.5# @ 700' 13-3/8", 68# @ 4578' 9-5/8", 53.5# @ 12033' 7", 35# @ 11552' 7-5/8" liner, 39# @ 14698 5-1/2", 20# @ 16400	1350 sx / surface 3300 sx / surface 4250 sx / surface 700 sx / 11656 tol 240 sx / 11091 toc
Devon Energy Prod Co LP	Cotton Draw Unit 84	30-015-29728	Eddy	2615' FSL 1160' FEL	2	25S	31E	Gas	Active	8/25/1997	3/19/1998	16585	16585	Devonian	16295-16585'	18-5/8", 87.5# @ 700' 13-3/8", 68# @ 4350' 9-5/8", 53.5/47# @ 12200' 7", 35# @ 11667' 7-5/8", 39# @ 14657' 5-1/2", 20# @ 16295'	1350 sx / surface 3250 sx / surface 6056 sx / 4090 cbl 400 sx / etoc 11256 650 sx / 11858 tol 300 sx / 14289 tol
Devon Energy Prod Co LP	Cotton Draw Unit 219H	30-015-41363	Eddy	200' FSL 1110' FEL	2	25S	31E	Oil	Active	9/4/2013	1/23/2014	15280	15238	Bone Spring	10685-15212'	13-3/8", 48# @ 880' 5/8", 40# @ 4200' 1/2", 17# @ 15280'	9- 940 sx / surface 5- 1235 sx / surface 3640 sx / TOC @ 4476
Devon Energy Prod Co LP	Cotton Draw Unit 220H	30-015-41364	Eddy	200' FSL 1060' FEL	2	25S	31E	Oil	Active	10/23/2013	1/24/2014	14975	14924	Bone Spring	10555-14912'	13-3/8", 48# @ 903' 5/8", 40# @ 4225' 1/2", 17# @ 14975'	9- 945 sx / surface 5- 11503 sx / TOC @ 662' 3045 sx / TOC @ 3920

**Cotton Draw Unit 84
C108 Application for Injection
Injection Water Analysis
Delaware Formation
Devon Energy Production Co LP**

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33521.1
Region:	PERMIAN BASIN	Account Manager:	GENE ROGERS (575) 910-1022
Area:	ARTESIA, NM	Sample #:	633542
Lease/Platform:	NEW MEXICO COM UNIT	Analysis ID #:	125781
Entity (or well #):	3	Analysis Cost:	\$90.00
Formation:	UNKNOWN		
Sample Point:	WELLHEAD		

Summary		Analysis of Sample 633542 @ 75 F					
Sampling Date:	10/19/12	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date:	10/31/12	Chloride:	143232.0	4040.05	Sodium:	67508.7	2936.46
Analyst:	SANDRA GOMEZ	Bicarbonate:	73.2	1.2	Magnesium:	3523.0	289.82
TDS (mg/l or g/m3):	232774.2	Carbonate:	0.0	0.	Calcium:	15857.0	791.27
Density (g/cm3, tonne/m3):	1.16	Sulfate:	887.0	18.47	Strontium:	440.0	10.04
Anion/Cation Ratio:	1	Phosphate:			Barium:	0.1	0.
Carbon Dioxide:	240 PPM	Borate:			Iron:	8.0	0.29
Oxygen:		Silicate:			Potassium:	1245.0	31.84
Comments:		Hydrogen Sulfide:		0 PPM	Aluminum:		
		pH at time of sampling:		7.07	Chromium:		
		pH at time of analysis:			Copper:		
		pH used in Calculation:		7.07	Lead:		
					Manganese:	0.200	0.01
					Nickel:		

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
80	0	0.83	4.20	0.00	3.08	0.04	33.62	0.05	21.57	-0.49	0.00	0.04
100	0	0.83	4.76	-0.07	0.00	0.03	27.18	0.03	12.89	-0.69	0.00	0.05
120	0	0.83	5.32	-0.13	0.00	0.05	41.47	0.02	9.53	-0.86	0.00	0.07
140	0	0.84	5.88	-0.18	0.00	0.09	71.16	0.03	10.65	-1.01	0.00	0.09

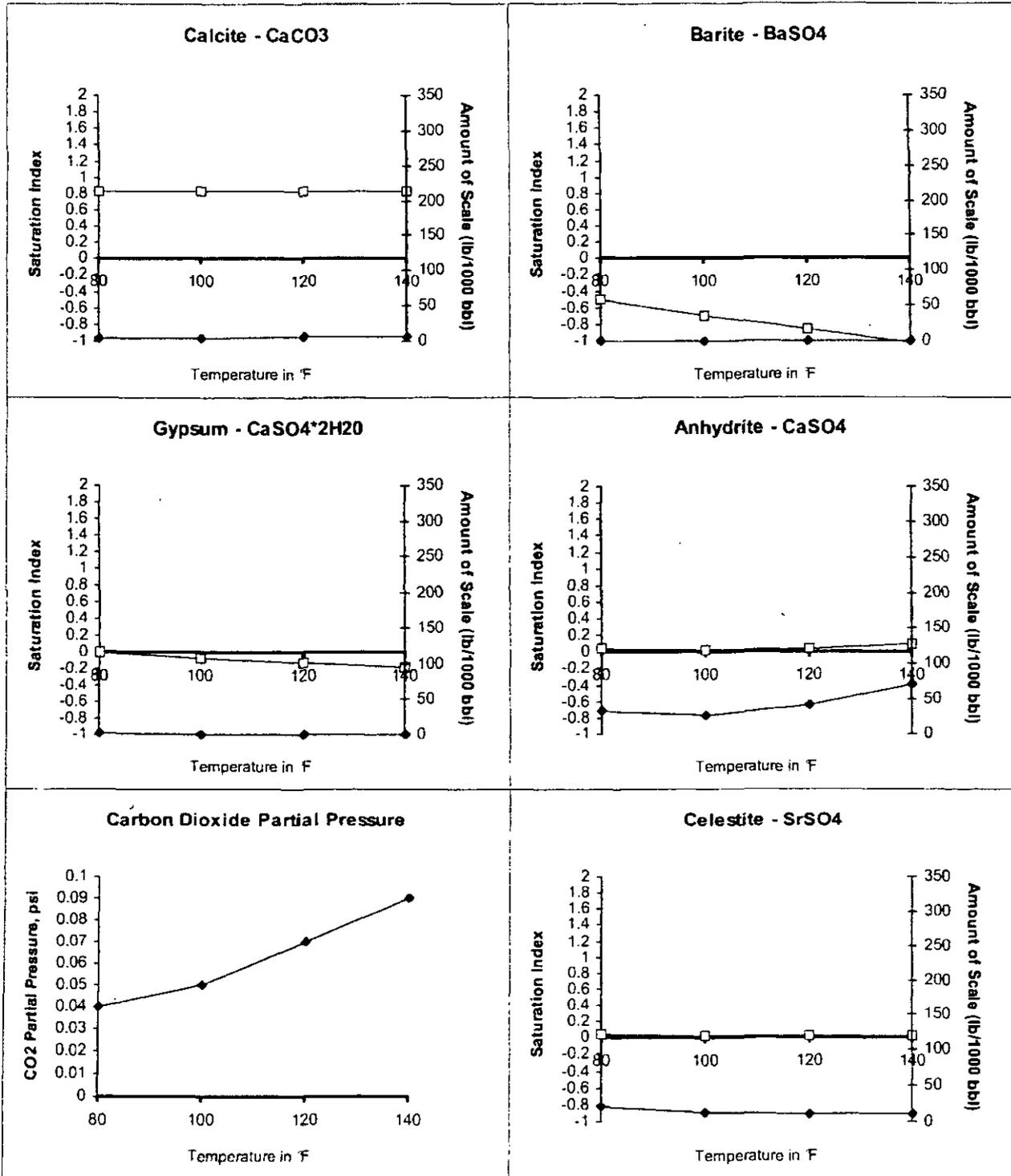
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO₂ pressure is actually the calculated CO₂ fugacity. It is usually nearly the same as the CO₂ partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633542 @ 75 °F for DEVON ENERGY CORPORATION, 10/31/12



**Cotton Draw Unit 84
C108 Application for Injection
Injection Water Analysis
Bone Spring Formation
Devon Energy Production Co LP**

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33521.1
Region:	PERMIAN BASIN	Account Manager:	GENE ROGERS (575) 910-1022
Area:	ARTESIA, NM	Sample #:	633540
Lease/Platform:	CAPELLA UNIT	Analysis ID #:	125780
Entity (or well #):	1	Analysis Cost:	\$90.00
Formation:	UNKNOWN		
Sample Point:	WELLHEAD		

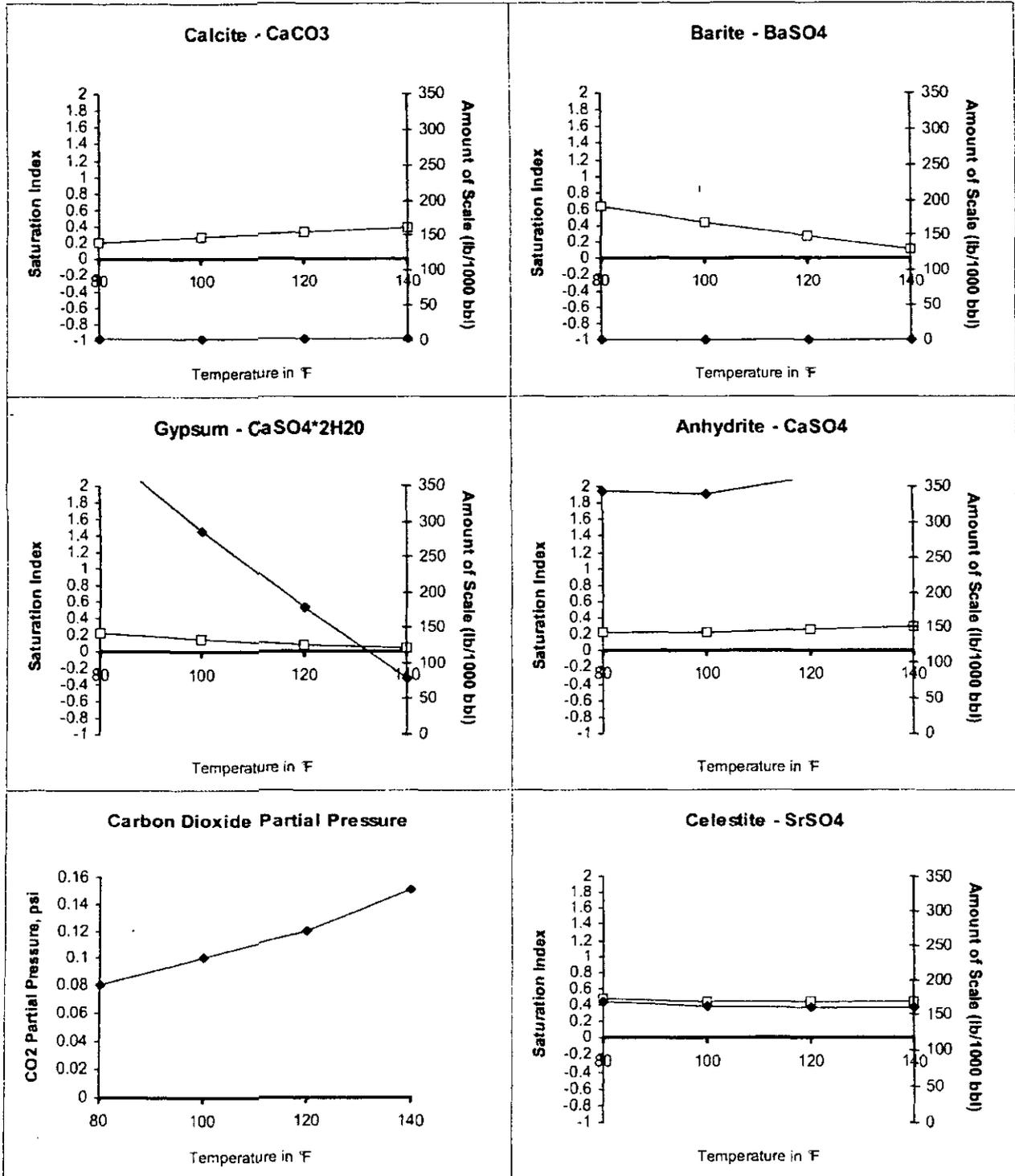
Summary		Analysis of Sample 633540 @ 75 F					
Sampling Date:	10/19/12	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date:	10/31/12	Chloride:	120450.0	3397.46	Sodium:	62153.2	2703.51
Analyst:	SANDRA GOMEZ	Bicarbonate:	61.0	1.	Magnesium:	1705.0	140.26
TDS (mg/l or g/m3):	199313.2	Carbonate:	0.0	0.	Calcium:	10875.0	542.66
Density (g/cm3, tonne/m3):	1.142	Sulfate:	1966.0	40.93	Strontium:	431.0	9.84
Anion/Cation Ratio:	1	Phosphate:			Barium:	0.5	0.01
		Borate:			Iron:	33.0	1.19
		Silicate:			Potassium:	1637.0	41.86
Carbon Dioxide:	250 PPM	Hydrogen Sulfide:		0 PPM	Aluminum:		
Oxygen:		pH at time of sampling:		6.69	Chromium:		
Comments:		pH at time of analysis:			Copper:		
		pH used in Calculation:		6.69	Lead:		
					Manganese:	1.500	0.05
					Nickel:		

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
F	psi											psi
80	0	0.21	1.16	0.21	402.17	0.23	344.60	0.47	167.23	0.63	0.29	0.08
100	0	0.27	1.74	0.14	287.31	0.23	339.39	0.44	161.74	0.44	0.29	0.1
120	0	0.33	2.03	0.08	177.94	0.25	363.40	0.43	159.42	0.27	0.00	0.12
140	0	0.38	2.60	0.03	77.54	0.29	409.12	0.43	159.42	0.12	0.00	0.15

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.
 Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.
 Note 3: The reported CO₂ pressure is actually the calculated CO₂ fugacity. It is usually nearly the same as the CO₂ partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633540 @ 75 °F for DEVON ENERGY CORPORATION, 10/31/12



**Cotton Draw Unit 84
C108 Application for Injection
Injection Water Analysis
Delaware Formation
Devon Energy Production Co LP**

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33521.1
Region:	PERMIAN BASIN	Account Manager:	GENE ROGERS (575) 910-1022
Area:	ARTESIA, NM	Sample #:	633541
Lease/Platform:	BROWN BEAR	Analysis ID #:	125782
Entity (or well #):	1	Analysis Cost:	\$90.00
Formation:	UNKNOWN		
Sample Point:	WELLHEAD		

Summary		Analysis of Sample 633541 @ 75 F					
Sampling Date:	10/19/12	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date:	10/31/12	Chloride:	52707.0	1486.67	Sodium:	23678.3	1029.95
Analyst:	SANDRA GOMEZ	Bicarbonate:	109.8	1.8	Magnesium:	1474.0	121.26
TDS (mg/l or g/m3):	85195.9	Carbonate:	0.0	0.0	Calcium:	6421.0	320.41
Density (g/cm3, tonne/m3):	1.061	Sulfate:	77.0	1.6	Strontium:	161.0	3.67
Anion/Cation Ratio:	1	Phosphate:			Barium:	0.3	0.0
		Borate:			Iron:	23.0	0.83
Carbon Dioxide:	130 PPM	Silicate:			Potassium:	542.0	13.86
Oxygen:		Hydrogen Sulfide:		0 PPM	Aluminum:		
Comments:		pH at time of sampling:		6.73	Chromium:		
		pH at time of analysis:			Copper:		
		pH used in Calculation:		6.73	Lead:		
					Manganese:	2.500	0.09
					Nickel:		

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
80	0	0.21	2.90	-1.27	0.00	-1.30	0.00	-1.08	0.00	-0.71	0.00	0.15
100	0	0.29	4.19	-1.31	0.00	-1.28	0.00	-1.09	0.00	-0.88	0.00	0.19
120	0	0.38	5.80	-1.34	0.00	-1.22	0.00	-1.08	0.00	-1.03	0.00	0.24
140	0	0.47	7.41	-1.35	0.00	-1.15	0.00	-1.07	0.00	-1.16	0.00	0.29

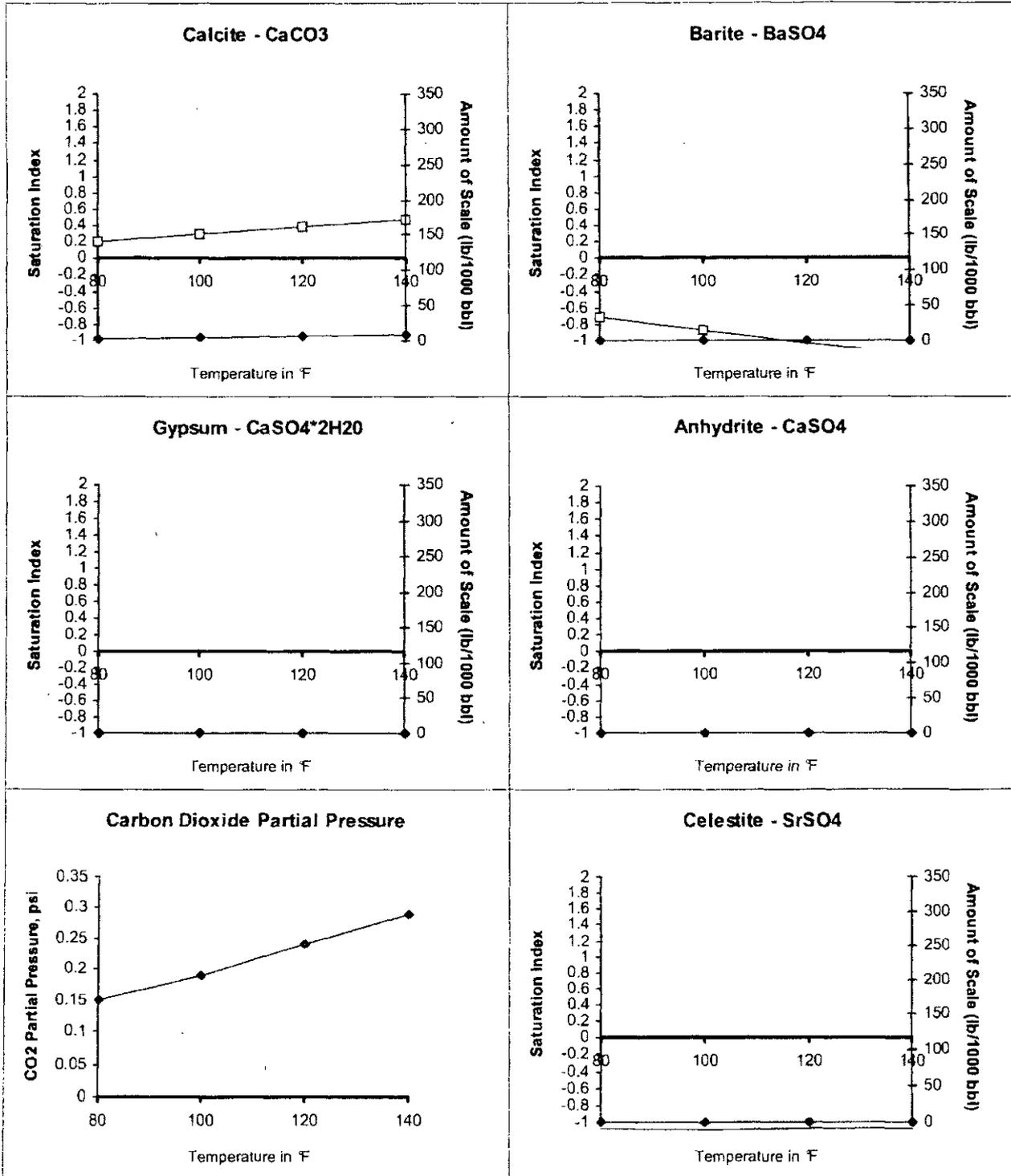
Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO₂ pressure is actually the calculated CO₂ fugacity. It is usually nearly the same as the CO₂ partial pressure.

Scale Predictions from Baker Petrolite

Analysis of Sample 633541 @ 75 F for DEVON ENERGY CORPORATION, 10/31/12



Fresh Water Analysis Report
Paduca Delaware Water Well
SEC 2-T25S-R31E
Lat 32.09° 56.7" Long -103.44° 51.3"

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33521:1
Region:	PERMIAN BASIN	Account Manager:	GENE ROGERS (575) 910-1022
Area:	ARTESIA, NM	Sample #:	575022
Lease/Platform:	PADUCA LEASE	Analysis ID #:	113161
Entity (or well #):	FRESH WATER	Analysis Cost:	\$90.00
Formation:	UNKNOWN		
Sample Point:	WELLHEAD		

Summary		Analysis of Sample 575022 @ 75 F					
Sampling Date:	10/06/11	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date:	10/10/11	Chloride:	328.0	9.25	Sodium:	452.1	19.66
Analyst:	SANDRA GOMEZ	Bicarbonate:	24.4	0.4	Magnesium:	120.0	9.87
TDS (mg/l or g/m3):	3720.6	Carbonate:	0.0	0.	Calcium:	531.0	26.5
Density (g/cm3, tonne/m3):	1.004	Sulfate:	2248.0	46.8	Strontium:	7.0	0.16
Anion/Cation Ratio:	1.0000004	Phosphate:			Barium:	0.1	0.
		Borate:			Iron:	0.5	0.02
		Silicate:			Potassium:	9.5	0.24
Carbon Dioxide:	20 PPM	Hydrogen Sulfide:		0	Aluminum:		
Oxygen:		pH at time of sampling:		7	Chromium:		
Comments:		pH at time of analysis:			Copper:		
		pH used in Calculation:		7	Lead:		
					Manganese:	0.025	0.
					Nickel:		

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
80	0	-0.64	0.00	-0.03	0.00	-0.10	0.00	-0.26	0.00	1.06	0.00	0.03
100	0	-0.72	0.00	-0.04	0.00	-0.04	0.00	-0.26	0.00	0.90	0.00	0.04
120	0	-0.59	0.00	-0.03	0.00	0.04	55.87	-0.24	0.00	0.78	0.00	0.05
140	0	-0.45	0.00	-0.01	0.00	0.15	173.21	-0.21	0.00	0.68	0.00	0.06

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.

Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.

Note 3: The reported CO₂ pressure is actually the calculated CO₂ fugacity. It is usually nearly the same as the CO₂ partial pressure.

Injection Water Analysis Report
Mad Dog 15 #1
SEC 15-T23S-R34E
(Devonian Formation Water)

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33517
Region:	PERMIAN BASIN	Account Manager:	FRANK GARDNER (575) 390-5194
Area:	JAL, NM	Sample #:	481511
Lease/Platform:	MAD DOG '15' LEASE	Analysis ID #:	102920
Entity (or well #):	1	Analysis Cost:	\$90.00
Formation:	DEVONIAN		
Sample Point:	WELLHEAD		

Summary		Analysis of Sample 481511 @ 75 F					
Sampling Date:	08/24/10	Anions	mg/l	meq/l	Cations	mg/l	meq/l
Analysis Date:	09/13/10	Chloride:	40711.0	1148.31	Sodium:	24262.3	1055.35
Analyst:	LEAH DURAN	Bicarbonate:	366.0	6.	Magnesium:	298.0	24.51
TDS (mg/l or g/m3):	69356	Carbonate:	0.0	0.	Calcium:	1833.0	91.47
Density (g/cm3, tonne/m3):	1.051	Sulfate:	1404.0	29.23	Strontium:	55.0	1.26
Anion/Cation Ratio:	1	Phosphate:			Barium:	1.0	0.01
		Borate:			Iron:	4.5	0.16
		Silicate:			Potassium:	421.0	10.77
Carbon Dioxide:	20 PPM	Hydrogen Sulfide:		153 PPM	Aluminum:		
Oxygen:	N/A	pH at time of sampling:		8.4	Chromium:		
Comments:		pH at time of analysis:			Copper:		
		pH used in Calculation:		8.4	Lead:		
					Manganese:	0.200	0.01
					Nickel:		

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
80	0	1.80	51.07	-0.42	0.00	-0.46	0.00	-0.15	0.00	1.22	0.65	0.01
100	0	1.70	54.67	-0.46	0.00	-0.43	0.00	-0.16	0.00	1.04	0.65	0.02
120	0	1.62	58.60	-0.49	0.00	-0.38	0.00	-0.16	0.00	0.89	0.65	0.05
140	0	1.56	62.86	-0.51	0.00	-0.31	0.00	-0.15	0.00	0.76	0.33	0.08

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.
Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.
Note 3: The reported CO2 pressure is actually the calculated CO2 fugacity. It is usually nearly the same as the CO2 partial pressure.

WATER ANALYSIS
Bone Spring Formation
Chimayo 16 ST #1

North Permian Basin Region
P.O. Box 740
Sundown, TX 79372-0740
(806) 229-8121
Lab Team Leader - Sheila Hernandez
(432) 495-7240

Water Analysis Report by Baker Petrolite

Company:	DEVON ENERGY CORPORATION	Sales RDT:	33521.1
Region:	PERMIAN BASIN	Account Manager:	GENE ROGERS (575) 910-1022
Area:	ARTESIA, NM	Sample #:	492168
Lease/Platform:	CHIMAYO UNIT	Analysis ID #:	100662
Entity (or well #):	16-1	Analysis Cost:	\$90.00
Formation:	Bone Spring		
Sample Point:	HEATER DUMP		

Summary		Analysis of Sample 492168 @ 75 F											
		Anions		mg/l		meq/l		Cations		mg/l		meq/l	
Sampling Date:	05/12/10	Chloride:	142827.0	4028.63	Sodium:	76546.4	3329.58						
Analysis Date:	05/18/10	Bicarbonate:	73.0	1.2	Magnesium:	1589.0	130.72						
Analyst:	STACEY SMITH	Carbonate:	0.0	0.	Calcium:	10332.0	515.57						
TDS (mg/l or g/m3):	235300.4	Sulfate:	1021.0	21.26	Strontium:	1192.0	27.21						
Density (g/cm3, tonne/m3):	1.157	Phosphate:			Barium:	2.5	0.04						
Anion/Cation Ratio:	1	Borate:			Iron:	379.0	13.7						
		Silicate:			Potassium:	1334.0	34.12						
Carbon Dioxide:	1400 PPM	Hydrogen Sulfide:		17 PPM	Aluminum:								
Oxygen:		pH at time of sampling:		6.5	Chromium:								
Comments:		pH at time of analysis:			Copper:								
		pH used in Calculation:		6.5	Lead:								
					Manganese:	4.500	0.16						
					Nickel:								

Conditions		Values Calculated at the Given Conditions - Amounts of Scale in lb/1000 bbl										
Temp	Gauge Press.	Calcite CaCO ₃		Gypsum CaSO ₄ ·2H ₂ O		Anhydrite CaSO ₄		Celestite SrSO ₄		Barite BaSO ₄		CO ₂ Press
		Index	Amount	Index	Amount	Index	Amount	Index	Amount	Index	Amount	
80	0	0.18	1.40	-0.08	0.00	-0.03	0.00	0.58	321.11	1.00	1.12	0.14
100	0	0.24	1.95	-0.16	0.00	-0.05	0.00	0.55	310.50	0.80	1.12	0.18
120	0	0.30	2.51	-0.23	0.00	-0.04	0.00	0.54	304.91	0.62	1.12	0.21
140	0	0.35	3.35	-0.29	0.00	-0.01	0.00	0.53	303.52	0.47	0.84	0.25

Note 1: When assessing the severity of the scale problem, both the saturation index (SI) and amount of scale must be considered.
Note 2: Precipitation of each scale is considered separately. Total scale will be less than the sum of the amounts of the five scales.
Note 3: The reported CO₂ pressure is actually the calculated CO₂ fugacity. It is usually nearly the same as the CO₂ partial pressure.

MAR-08-2004 MON 03:00 PM
08 Mar 04 07:14

WATER ANALYSIS
Delaware Formation
Apache 25 Fed 6

3821

P. 03

P. 3

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M
S

Laboratory Services, Inc.
4018 Fiesta Drive
Hobbs, New Mexico 88240
Telephone: (505) 397-3713

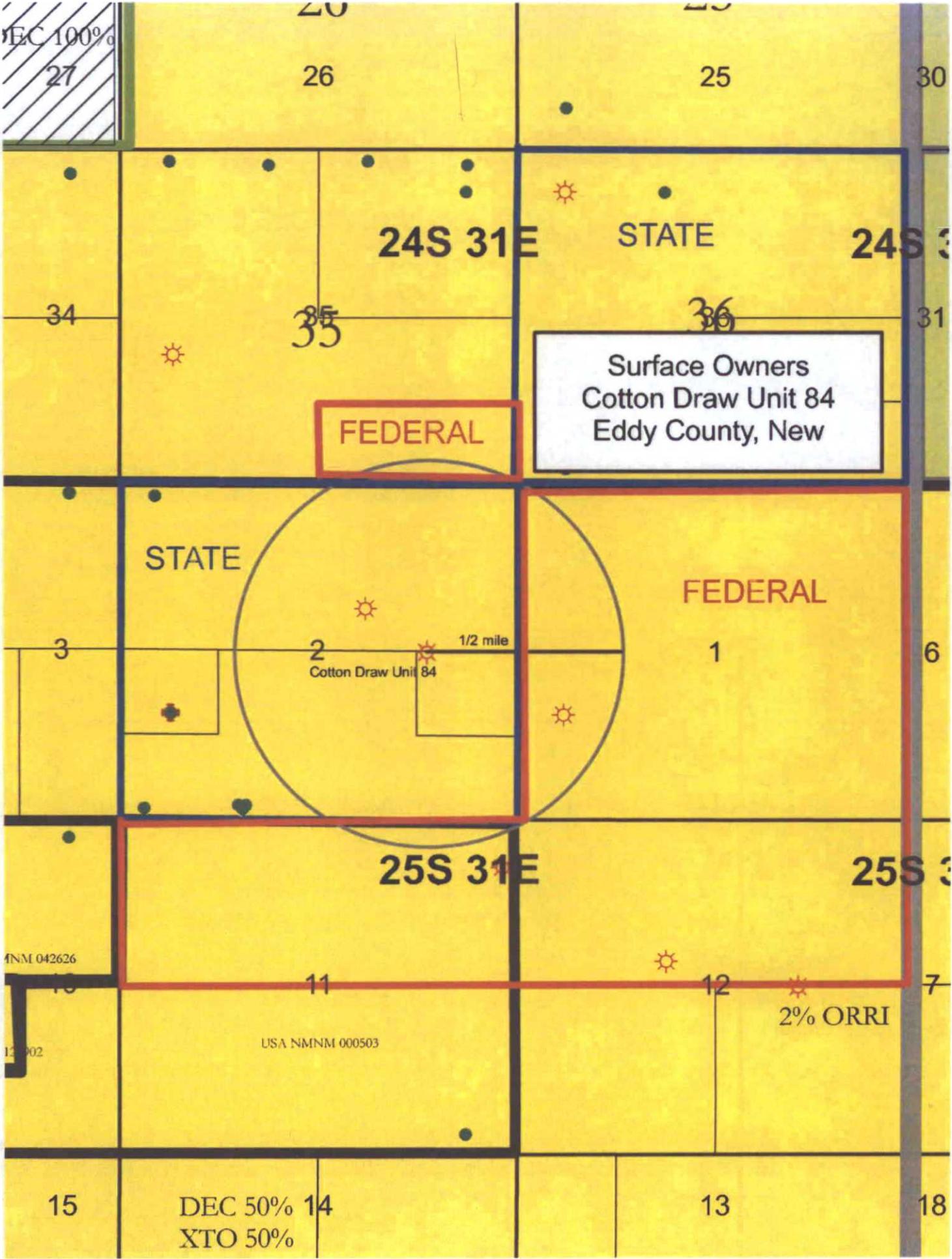
Water Analysis

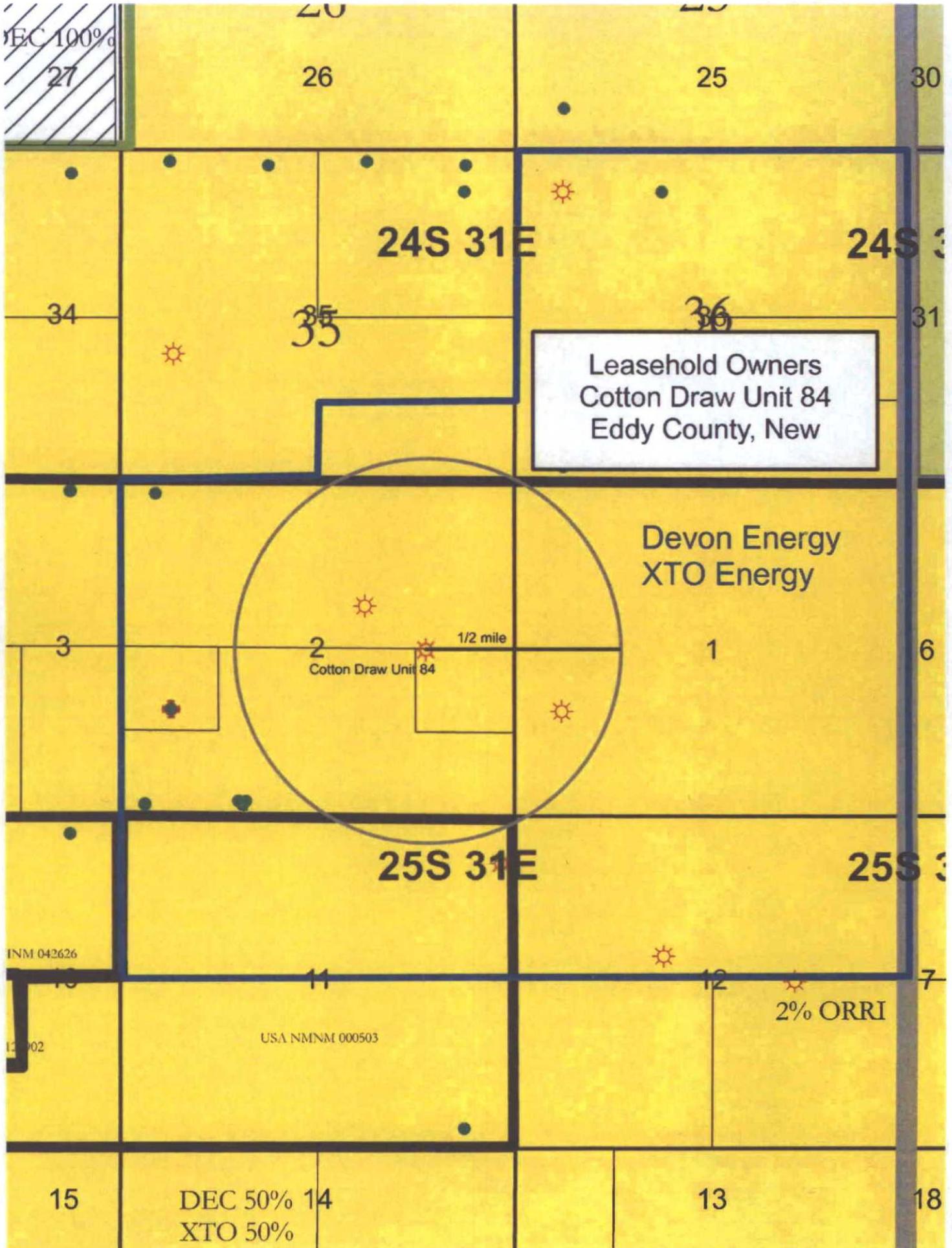
COMPANY	Devon Energy	
SAMPLE	Apache 25-6	
SAMPLED BY		
DATE TAKEN		
REMARKS		
Barium as Ba	0	
Carbonate alkalinity PPM	0	
Bicarbonate alkalinity PPM	80	
pH at Lab	6.05	
Specific Gravity @ 60°F	1.195	
Magnesium as Mg	59,566	
Total Hardness as CaCO ₃	103,700	
Chlorides as Cl	192,032	
Sulfate as SO ₄	200	
Iron as Fe	33	
Potassium	85	
Hydrogen Sulfide	0	
AW	0.046	6 23° C
Total Dissolved Solids	295,500	
Calcium as Ca	43,134	
Nitrate	35	

Results reported as Parts per Million unless stated

Langelier Saturation Index 0.65

Analysis by: Vickie Blagg
Date: 3/5/04





Leasehold Ownership
½ mile Cotton Draw Unit 84

24S-31E Section 35: S/2 SE/4

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	
810 Houston Street	
Fort Worth, Texas 76102-6298	<u>.500000</u>

Total: 1.000000

24S-31E Section 36: All

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	<u>.500000</u>

Total: 1.000000

25S-31E Section 1: All

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	<u>.500000</u>

Total: 1.000000

25S-31E Section 2: All

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	<u>.500000</u>

Total: 1.000000

25S-31E Section 11: N/2

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	<u>.500000</u>

Total: 1.000000

25S-31E Section 12: N/2

Devon Energy Production Company, L.P.	.500000
XTO Energy, Inc.	<u>.500000</u>

Total: 1.000000

Section XIV--Proof of Notice to Surface Land Owner
Devon Energy Prod Co LP
C108 Application For Injection
Proposed Well: Cotton Draw Unit SWD #84

Proof of Notice to Surface Land Owner of well location site.

Certified receipt No. 9214 8901 5271 8100 1166 39

New Mexico State Land Office
Attn: Donald Martinez – Surface Division
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

A copy of this application has been mailed to the above surface land owner by certified mail, pertaining to Devon Energy's application for salt water disposal in the Cotton Draw Unit 84.

Date Mailed: 3/15/2016

Signature: Linda Good

Date: 3/15/2016

Linda Good, Regulatory Compliance Specialist
Devon Energy Production Co., L.P.
333 West Sheridan Avenue
Oklahoma City, OK 73102

Section XIV--Proof of Notice to Leasehold Operators
Devon Energy Prod Co LP
C108 Application For Injection
Proposed Well: Cotton Draw Unit 84

Proof of Notice to Leasehold Operators within 1/2 mile of Cotton Draw Unit 76

Certified receipt No. 9214 8901 5271 8100 1166 22

XTO Energy, Inc
810 Houston Street
Fort Worth, Texas 76102-6298

A copy of this application has been mailed to the above leasehold operators by certified mail, pertaining to Devon Energy's application for salt water disposal in the Cotton Draw Unit SWD #84.

Date Mailed: 3/15/2016

Signature: Linda Good

Date: 3/15/2016

Linda Good, Regulatory Compliance Specialist
Devon Energy Production Co., L.P.
333 West Sheridan Avenue
Oklahoma City, OK 73102

March 3, 2016

Legal Notice

Devon Energy Production Company, LP, 333 West Sheridan Avenue, Oklahoma City, OK 73102-8260 has filed form C-108 (Application for Authorization to Inject) with the New Mexico Oil Conservation Division seeking administrative approval for an injection well. The existing well, the Cotton Draw Unit 84 is located at 2615' FSL & 1160' FEL, Section 2, Township 25 South, Range 31 East, in Eddy County, New Mexico. Disposal water will be sourced from area wells producing from the Bone Spring and/or Delaware formations. The disposal water will be injected into the Devonian formation at a depth of 16,295' to 16,585', open hole, at a maximum surface pressure of 3259 psi and a maximum rate of 10,000 BWPD. Any interested party who has an objection to this must give notice in writing to the Oil Conservation Division, 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505, within (15) days of this notice. Any interested party with questions or comments may contact Josh Bruening at Devon Energy Corporation, 333 West Sheridan Avenue, Oklahoma City, OK 73102-8260, or call (405) 552-7882.

Affidavit of Publication

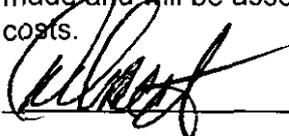
State of New Mexico,
County of Eddy, ss.

Rynni Henderson, being first duly sworn, on oath says:

That she is the Publisher of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the State wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

March 3 2016

That the cost of publication is **\$73.49** and that payment thereof has been made and will be assessed as court costs.

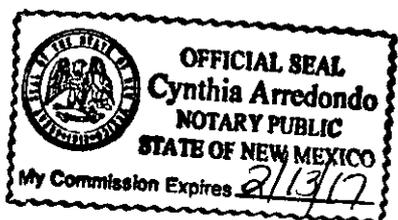


Subscribed and sworn to before me this 9 day of March,

2016


My commission Expires
2/13/17

Notary Public





Devon Energy Corporation
333 W. Sheridan Avenue
Oklahoma City, OK 73102

405-552-6558
Linda.good@dvn.com

March 15, 2016

Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

RE: Form C-108, Application for Authorization to Inject
Cotton Draw Unit SWD #84; API 30-015-29728
Eddy County, NM
Section 2, T25S, R31E

Dear Santa Fe Oil Conservation Division:

Please find attached Devon Energy Production Company, L.P.'s Form C-108 Application for Authorization to Inject. Devon's application proposes to convert the Cotton Draw Unit SWD #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail. A copy of this application has been filed with the OCD-Artesia office.

If you have any questions or concerns, please contact Josh Bruening at (405) 552-7882 or myself at (405) 552-6558.

Sincerely,

A handwritten signature in black ink that reads "Linda Good". The signature is written in a cursive, flowing style.

Linda Good
Regulatory Compliance Specialist

Enclosure



Devon Energy Corporation
333 W. Sheridan Avenue
Oklahoma City, OK 73102

405-552-6558
linda.good@devon.com

March 15, 2016

New Mexico State Land Office
Surface Division
Attn: Donald Martinez
310 Old Santa Fe Trail
Santa Fe, New Mexico 87501

RE: Form C-108, Application for Authorization to Inject
Cotton Draw Unit SWD #84; API 30-015-29728
Eddy County, NM
Section 2, T25S, R31E

Dear New Mexico State Land Office:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject. Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail. A copy of this application has been filed with the OCD-Artesia office.

If you have any questions or concerns, please contact Josh Bruening at (405) 552-7882 or myself at (405) 552-6558.

Sincerely,

A handwritten signature in cursive script that reads "Linda Good".

Linda Good
Regulatory Compliance Specialist

Enclosure



March 15, 2016

Oil Conservation Division
811 S. First Street
Artesia, New Mexico 88210

RE: Form C-108, Application for Authorization to Inject
Cotton Draw Unit SWD #84; API 30-015-29728
Eddy County, NM
Section 2, T25S, R31E

Dear Conservation Division – Artesia District Office:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject. The original application has been filed with the Oil Conservation Division-Santa Fe Office.

Devon's application proposes to convert the Cotton Draw Unit SWD #84 to salt water disposal in the Devonian formation.

The surface land owner and operators with leasehold ownership have been notified with Devon's application to inject via certified mail.

If you have any questions or concerns, please contact Josh Bruening at (405) 552-7882 or myself at (405) 552-6558.

Sincerely,

A handwritten signature in cursive script that reads "Linda Good".

Linda Good
Regulatory Compliance Specialist

Enclosure



Devon Energy Corporation
333 W. Sheridan Avenue
Oklahoma City, OK 73102

405-552-6558
Linda.good@dvn.com

March 15, 2016

XTO Energy, Inc.
810 Houston Street
Ft. Worth, Texas 76102-6298

RE: Form C-108, Application for Authorization to Inject
Cotton Draw Unit SWD #84; API 30-015-29728
Eddy County, NM
Section 2, T25S, R31E

Dear XTO Energy, Inc.:

Please find attached Devon Energy Production Company, LP's Form C-108, Application for Authorization to Inject.

Devon's application proposes to convert the Cotton Draw Unit #84 to salt water disposal in the Devonian formation.

As a requirement of the New Mexico Oil Conservation Division, we are notifying you because you have been identified as having leasehold ownership within the ½ mile review area around the Cotton Draw Unit #84 well. Any objections must be submitted in writing to NMOCD, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. Objections must be received within (15) days of receipt of this letter.

If you have any questions or concerns, please contact Josh Bruening at (405) 552-7882 or myself at (405) 552-6558.

Sincerely,

A handwritten signature in cursive script that reads "Linda Good".

Linda Good
Regulatory Compliance Specialist

Enclosure

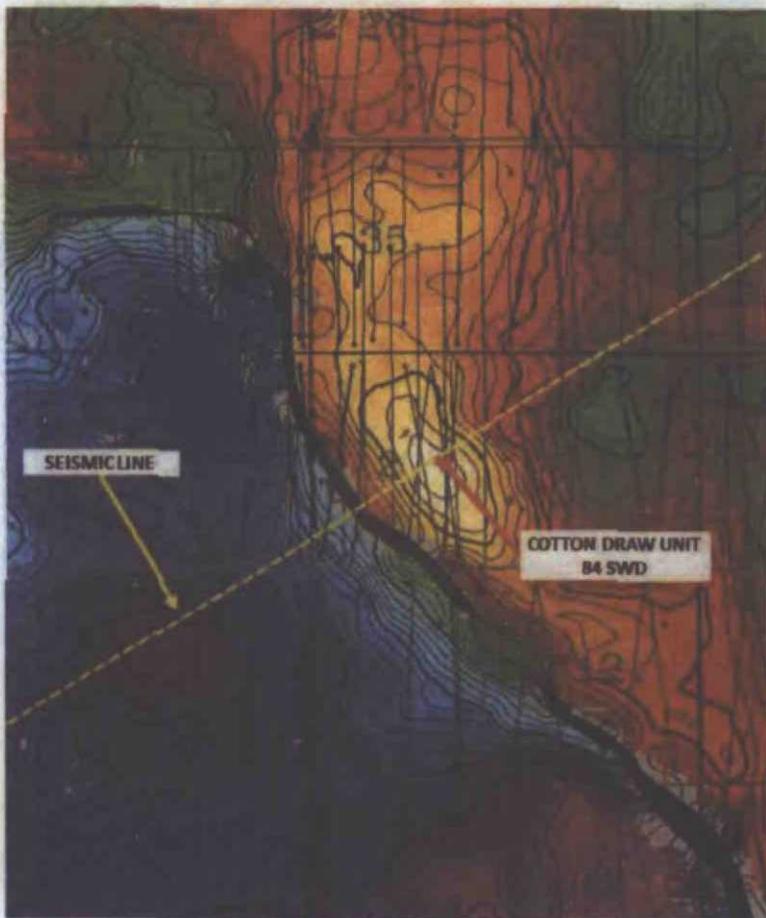


SLO/Devon states depletion - SLO & Devon negotiated settlement Oct 8th
C-108 Review Checklist: Received 08/08/13 Add. Request: 09/10/13 Reply Date: Suspended: [Ver 10]
 PERMIT TYPE: WFX/PMX/SWD Number: 1447 Permit Date: 10/25/13 Legacy Permits/Orders: NA

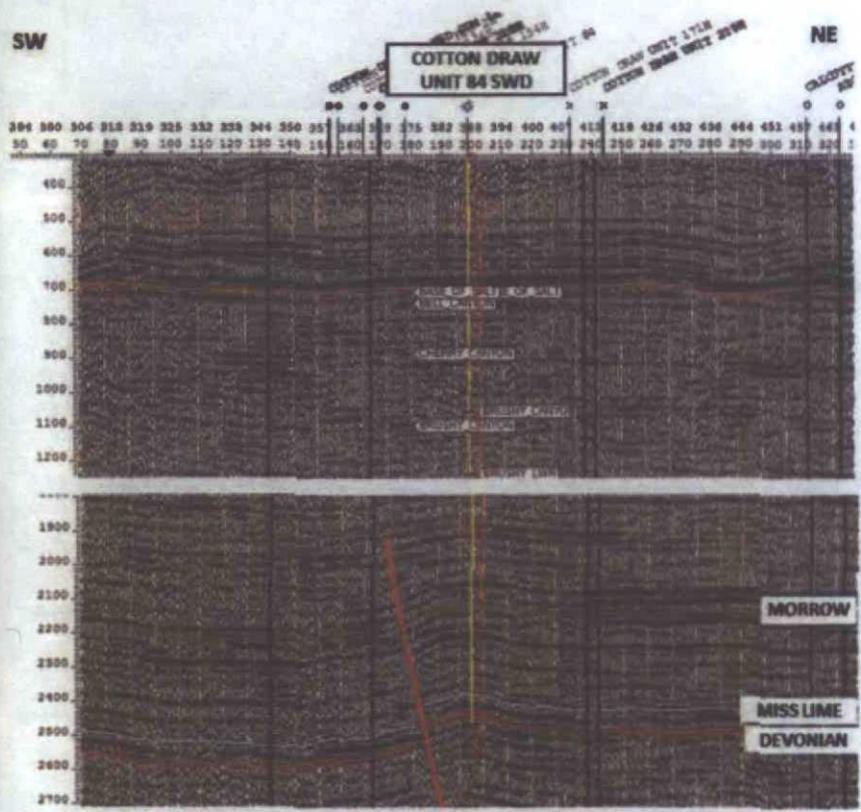
Well No. 84 Well Name(s): Cotton Draw Unit (CDU)
 API: 30-0 15-24728 Spud Date: 08/25/97 New or Old: N (UIC Class II Primacy 03/07/1982)
 Footages 2615 FSL/1160 FEL Lot Unit I Sec 2 Tsp 255 Rge 31E County Eddy
 General Location: Cotton Draw/south of pump/ near TX border Pool: Paduca, NW; Devonian Pool No.: 91615
 Operator: Devon Energy Production Company LP OGRID: 6137 Contact: Stephanie Porter
 COMPLIANCE RULE 5.9: Inactive Wells: 5 Total Wells: 1819 Fincl Assur: Yes Compl. Order? No IS 5.9 OK? Yes
 Well File Reviewed Current Status: Former producer in Devonian 11/04/97
 Well Diagrams: NEW: Proposed RE-ENTER: Before Conv. After Conv. Are Elogs in Imaging?: Multiple/only for open hole portion CDU 2020' to 12,139'
 Planned Rehab Work to Well: No changes to well construction / acidize / add tubing / packer system

Well Construction Details:	Sizes (in) Borehole / Pipe	Setting Depths (ft)	Cement Sx or Cf	Cement Top and Determination Method
Planned ___ or Existing ___ Conductor	—	—	—	—
Planned ___ or Existing <input checked="" type="checkbox"/> Surface	24 / 18 5/8	0 to 700	1350	Cr. to surface
Planned ___ or Existing <input checked="" type="checkbox"/> Intern/Prod	17 1/2 / 13 3/8	0 to 4350	3250	Cr. to surface
Planned ___ or Existing <input checked="" type="checkbox"/> Prod/Intern	12 1/4 / 9 5/8	0 to 12200	6056 / 3250	CDU - 4090'
Planned ___ or Existing <input checked="" type="checkbox"/> (Liner) Prop	8 1/2 / 7 3/8	11858 - 14057	600	TOL - Calculated
Planned ___ or Existing <input checked="" type="checkbox"/> OH / PERF	6 1/2 / 5 1/2	14284 - 16295	300	CDU - 4090'
Planned ___ or Existing <input checked="" type="checkbox"/> OH / PERF	4 1/2 / 5 1/8	16295 - 16585	290'	Completion/Operation Details:
Injection Stratigraphic Units:	Depths (ft)	Injection or Confining Units	Tops?	Drilled TD <u>16585</u> PBSD <u>NA</u>
Adjacent Unit: <input checked="" type="checkbox"/> Litho <input type="checkbox"/> Struct. <input type="checkbox"/> Por.		Morrow	14408	NEW TD <u>NA</u> NEW PBSD <u>NA</u>
Confining Unit: <input checked="" type="checkbox"/> Litho <input type="checkbox"/> Struct. <input type="checkbox"/> Por.		Mississippian	15896	NEW Open Hole <u>NA</u> or NEW Perfs <u>NA</u>
Proposed Inj Interval TOP:	16295	Woodford fm	16202	Tubing Size <u>3/2</u> in. Inter Coated? <u>Yes</u>
Proposed Inj Interval BOTTOM:	16585	Devonian fm	16342	Proposed Packer Depth <u>16180</u> ft
Confining Unit: Litho. Struct. Por.	NA	Silurian / Foraker (incl. mid)		Packer Depth <u>16195</u> (100-ft limit)
Adjacent Unit: Litho. Struct. Por.	—	Montana	—	Proposed Max. Surface Press. <u>3259</u> psi
AOR: Hydrologic and Geologic Information				Admin. Inj. Press. <u>3259</u> (0.2 psi per ft)
POTASH: R-111-P <input type="checkbox"/> Noticed? <u>NA</u> BLM Sec Ord <u>NA</u> WIPP <u>NA</u> Noticed? <u>NA</u> SALADO: T: <u>1037</u> B: <u>4356</u> CLIFF HOUSE <u>NA</u>	FRESH WATER: Formation <u>Pecos Basin</u> Max Depth <u>300</u> Wells? <u>2</u> FW Analysis <u>Hydrologic Affirm</u> By Qualified Person <input checked="" type="checkbox"/>			
Disposal Fluid: Formation Source(s) <u>Delaware fm / CDU</u> Alluvial <u>to 605' FE</u> Analysis? <u>Yes</u> On Lease <input type="checkbox"/> Operator Only <input checked="" type="checkbox"/> or Commercial <input type="checkbox"/>	Disposal Interval: Injection Rate (Avg/Max BWPD): <u>500/1000</u> Protectable Waters: <u>NO</u> CAPITAN REEF: thru <input type="checkbox"/> adj <input type="checkbox"/> NA <input checked="" type="checkbox"/>			
H/C Potential: Producing Interval? <u>Yes - see note</u> Formerly Producing? <u>Yes</u> Method: E Log / Mudlog/DST/Deplete / (Other) <u>see e-mails</u>	AOR Wells: 1/2-M Radius Map? <u>Yes</u> Well List? <u>Yes</u> Total No. Wells Penetrating Interval: <u>2</u> Horizontals? <u>0</u>			
Penetrating Wells: No. Active Wells <u>2</u> Num Repairs? <u>0</u> on which well(s)? <u>One well injection / sud into Delaware GP</u> Diagrams? <u>NA - see file</u>	Penetrating Wells: No. P&A Wells <u>0</u> Num Repairs? <u>0</u> on which well(s)? <u> </u> Diagrams? <u>NA</u>			
NOTICE: Newspaper Date <u>07/18/13</u> Mineral Owner <u>SLO</u> Surface Owner <u>SLO</u> N. Date <u>8/13/13</u>				
RULE 26.7(A): Identified Tracts? <u>Yes</u> Affected Persons: <u>XTO Energy [Unit with Devon]</u> N. Date <u>8/13/13</u>				

Permit Conditions: Issues: CDU not available on file.
 Add Permit Cond: None identified - except restate 100-ft packer (max depth of 16195')
 On a separate document for remaining in...



MISS LIME TIME STRUCTURE MAP
C.I. = 4 MSEC = 25 FT.



SOUTHWEST-NORTHEAST TRENDING 3D SEISMIC LINE
OVER THE COTTON DRAW UNIT 84 SWD

Good, Linda

From: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Sent: Thursday, March 03, 2016 8:41 AM
To: Good, Linda
Cc: Jones, William V, EMNRD
Subject: FW: Cotton Draw Unit SWD #84 - C-108 Expiration (30-015-29728)

Linda:

FYI regarding your re-application for this well. This will be attached to your application as part of the record. PRG

Phillip R. Goetze, PG
Engineering and Geological Services Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
Direct: 505.476.3466
e-mail: phillip.goetze@state.nm.us



From: Holm, Anchor [mailto:aholm@slo.state.nm.us]
Sent: Thursday, March 03, 2016 7:32 AM
To: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Cc: Martin, Ed <emartin@slo.state.nm.us>; Khalsa, Niranjana K. <nkhalsa@slo.state.nm.us>
Subject: RE: Cotton Draw Unit SWD #84 - C-108 Expiration (30-015-29728)

Phil,

The SLO has received the compensatory royalty payment on September 14, 2014, and has agreed to withdraw our objection to this SWD conversion of the Cotton Draw Unit #84 gas well. This reapplication will likely not be further contested by the SLO assuming that no significant changes are made in the new proposed conversion and injection interval.

Anchor E. Holm
Geoscientist/Petroleum Engineering Specialist
Oil Gas & Minerals Division
505.827.5759
New Mexico State Land Office
310 Old Santa Fe Trail
P.O. Box 1148
Santa Fe, NM 87504-1148
aholm@slo.state.nm.us



.....
CONFIDENTIALITY NOTICE - This e-mail transmission, including all documents, files, or previous e-mail messages attached hereto, may contain confidential and/or legally privileged information. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution, or use of any of the information contained in and/or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender and delete the original transmission and its attachments without reading or saving in any manner. Thank you.

From: Goetze, Phillip, EMNRD [<mailto:Phillip.Goetze@state.nm.us>]
Sent: Tuesday, March 01, 2016 1:17 PM
To: Holm, Anchor <aholm@slo.state.nm.us>
Subject: FW: Cotton Draw Unit SWD #84 - C-108 Expiration (30-015-29728)

Anchor:

A notice of coming application. The SLO protested this well, but resolved its protest with Devon. Devon let this lapse without providing an extension letter. There would be no changes to the application, only the application to renew the order. PRG

Phillip R. Goetze, PG
Engineering and Geological Services Bureau
Oil Conservation Division
New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
Direct: 505.476.3466
e-mail: phillip.goetze@state.nm.us



From: Goetze, Phillip, EMNRD
Sent: Tuesday, March 01, 2016 12:28 PM
To: 'Good, Linda' <Linda.Good@dvn.com>
Cc: McMillan, Michael, EMNRD <Michael.McMillan@state.nm.us>; Jones, William V, EMNRD <WilliamV.Jones@state.nm.us>; Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>
Subject: RE: Cotton Draw Unit SWD #84 - C-108 Expiration (30-015-29728)

Linda:

Yes, SWD-1447 has expired or terminated. Any petition to extend this order had to be submitted prior to the two-year anniversary date, 10/25/2015. A new C-108 would be required to have a new SWD order issue for this well. PRG

Phillip R. Goetze, PG
Engineering and Geological Services Bureau
Oil Conservation Division

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505
Direct: 505.476.3466
e-mail: phillip.goetze@state.nm.us



From: Good, Linda [<mailto:Linda.Good@dvn.com>]
Sent: Tuesday, March 01, 2016 5:56 AM
To: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Subject: Cotton Draw Unit SWD #84 - C-108 Expiration (30-015-29728)

Hi Phillip,

The Cotton Draw Unit SWD #84 C-108 expired on 10/25/2015. Is it too late to file an extension or do I need to re-submit the C-108 application? Administrative Order SWD-1447.

Thank you,

Linda Good
Regulatory Compliance Specialist
Devon Energy Corporation
Devon Energy Center-Tower - OKDEC 18.532
333 West Sheridan Avenue Oklahoma City OK 73102-5015
405-552-6558
linda.good@dvn.com



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30-015-10843

DEVON ENERGY PRODUCTION COMPANY LP

Well Name: COTTON DRAW UNIT 65		Field: PADUCA	
Location: 1980' FNL & 1980' FEL; SEC 2-T255-R31E		County: EDDY	State: NM
Elevation: 3476' KB; 3455' GL; 21' KB to GL		Spud Date: 7/8/66	Compl Date:
API#: 30-015-10843	Prepared by: Ronnie Slack	Date: 3/21/14	Rev:

PLUGGED & ABANDONED
3/21/14

Converted to SWD 3/98
Administrative Order SWD-699

36" Hole
20", H40, 94#, @ 600'
Cmt'd w/ 1300 sx surface

10-3/4" TOC-3555' T/S

dv @ 4308

17-1/2" hole
13-3/8", J55, 54.5#, @ 4365'
Cmt'd w/ 4300 sx. Cmt did not circ.

Cherry Canyon SWD 5326-5714 (3/98)

dv @ 7478

8-5/8", P110, 40#, liner from 11553' to surface'
Cmt'd w/1230 sx. TOC @ 65', T/S (3/67)

8-5/8" Liner hanger @ 11,553

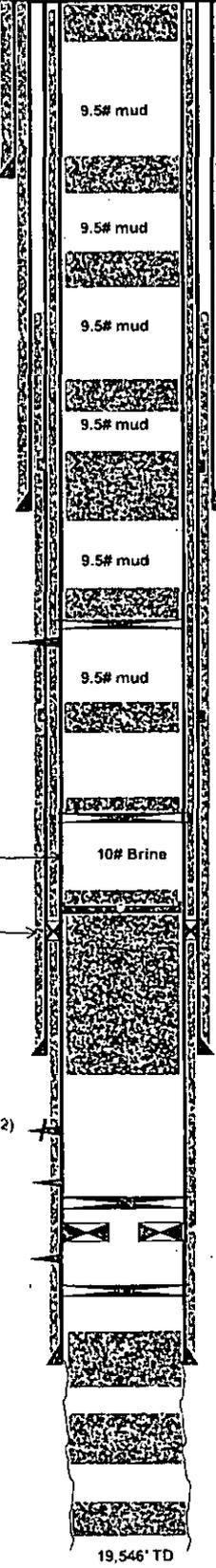
12-1/4" hole
10-3/4", 60.7#, P110, @ 12,570'
Cmt w/4450 sx cmt total. TOC @ 3555' temp survey

Wolfcamp 12785-12851 (6/67) sqzd w/150 sx (7/72)

Morrow 14606-14625 (3/92)

Morrow 14787-14835 (6/67)

9-1/2" hole
8-5/8", P110, 48#, liner from 11553' to 16250'
Cmt'd w/1350 sx, sqzd liner top w/1000 sx
Tied back liner from 11553' to surface



1. Spot 30 sx cmt from 129' to surf. Top off w/5 sx. (3/17/14)
2. Cut wellhead off, set dry hole marker. (3/21/14)

Spot 50 sx cmt @ 490' - 650'. (3/14/14)

Spot 50 sx cmt @ 790' - 950'. (3/14/14)
(Top of Salt @ 950')

Spot 70 sx cmt @ 3,910' - 4,165' (3/14/14) (Base of Salt @ 4,115')

Spot 45 sx cmt @ 4,256' - 4,438'. Tagged. (3/13/14) (Top of Delaware @ 4,370')

Set CIBP @ 5,300'. Spot 30 sx cmt @ 5,192'-5,300'

Spot 30 sx @ 7,395' - 7,516' (3/12/14)

20 sx cmt. 8180' pbd (3/98)
CIBP @ 8250 (3/98)

15 sx on top of retainer. 11439' pbd (1/95)
Cement retainer 11491.
985 sx below retainer

CIBP @ 14644' (3/92)

Model D 14700 (6/67)

CIBP 15050 (6/67)

Cement 16070 - 16780 (6/67)

Cement 17070 - 17220 (6/67)

Cement 18630 - 18800 (6/67)

19,546' TD

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OCD Artesia

FORM APPROVED
OMB No. 1004-0137
Expires: July 31, 2010

SUNDRY NOTICES AND REPORTS ON WELLS
Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.

5. Lease Serial No.
NMNM0503

6. If Indian, Allottee or Tribe Name

SUBMIT IN TRIPLICATE - Other instructions on page 2.

1. Type of Well

Oil Well Gas Well Other

7. If Unit of CA/Agreement, Name and/or No.
891005247E

8. Well Name and No.
COTTON DRAW UNIT 76

2. Name of Operator
DEVON ENERGY PRODUCTION COMPANY, LP

9. API Well No.
30-015-29252

3a. Address
333 West Sheridan Avenue, Oklahoma City, OK 73102-5015

3b. Phone No. (include area code)
405-552-4615

10. Field and Pool or Exploratory Area
PADUCA

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)
Sec 1 T25S R31E 1650 FSL 680 FWL

11. Country or Parish, State
EDDY, NM

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

TYPE OF SUBMISSION	TYPE OF ACTION				
<input type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off	
<input checked="" type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity	
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other Cancel P&A ops, request TA status for SWD evaluation.	
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon		
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal		

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

- 9/30/15-Prep location for P&A ops.
- 10/1-10/8/15: Conduct flow down kill ops. Lost 16,340' of EL tools in hole with intent to set a W/L plug in Model D packer @ 16,310'.
- 10/9-10/20/15: MIRU P&A rig. Fished out all EL wire, tools, and 2-7/8" production tubing with seal assembly from packer @ 16,310'.
- 10/23/15: Set plastic coated RBP @ 16,305'. Set 2nd plastic coated RBP @ 16,257'.
- 10/24/15: Load hole. Test casing to 514 psi for 30 min. Lost 14 psi. Did not chart. Prepare to test casing again & chart.
- 10/26/15: RU chart recorder. Test casing to 525 psi for 30 minutes. Lost 5 psi. Original MIT chart delivered to Jim Amos.
- 10/27/15: Run casing inspection logs.

Wellbore is temporarily abandoned.

Request that well be approved for a 12 month TA Status to remove from the inactive list. Devon will evaluate well for swd, file C-108 application for swd disposal, and convert well to swd.

NM OIL CONSERVATION

ARTESIA DISTRICT

Current wellbore schemat and MIT chart attached.

DEC 18 2015

APPROVED FOR 12 MONTH PERIOD
ENDING 10-26-16

RECEIVED

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

Name (Printed/Typed)
Ronnie Slack

Title Production Technologist

Signature

Ronnie Slack

Date

10-28-15

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved by

James A. Pans

Title SPET

Date 12-10-15

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

Office CFO

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.

DEVON ENERGY PRODUCTION COMPANY LP

Well Name: COTTON DRAW UNIT 76		Field: PADUCA NORTHWEST	
Location: 1650' FSL & 660' FWL; SEC 1-T255-R31E		County: EDDY	State: NM
Elevation: KB: 3457' GL: KB to GL		Spud Date: 10/27/96	Compl Date: 5/1/97
API#: 30-015-29252	Prepared by: Ronnie Slack	Date: 10/26/15	Rev:

CURRENT WELLBORE
CANCEL P&A
REQUEST TA TO EVAL FOR SWD

24" Hole
18-5/8" 87.5# J55 BTC @ 700'
Cmt'd w/1350 sx, circ 363 sx to surface

17-1/2" Hole
13-3/8" 68# N80 BTC @ 4,578'
Cmt'd w/3300 sx, circ 500 sx to surf

DV tool @ 8518.

7" 35# L80 LTC from 11,552' to surface
5-1/2" X 7" X/O @ 11,552'

7-5/8" Liner top @ 11,655'

12-1/4" Hole
9-5/8" 53.5# & 47# P110 LTC @ 12,033'
Cmt'd 1st stg w/1451 sx, 2nd stg w/2802 sx
45 Jts (2069' 53.5#)
66 Jts (2988' 47# P110)
153 Jts (6969, 47#, LTC)

8-1/2" Hole
7-5/8" liner from 11,656' to 14,698'
Cmt'd w/700 sx. 2/28/97-Liner top sqzd w/300 sx.

6-1/2" Hole
5-1/2" 20# P110 SLX & HCL-80 @ 16,400'
Cmt'd w/340 sx. Est TOC @ 11,091'

4-5/8" Open Hole
Devonian Open Hole Completion

Plastic coated RBP @ 16,257' (10/23/15)
Plastic coated RBP @ 16,305' (10/23/15)
Baker Model D Packer @ 16,310' (4/26/97)
2-3/8 x 10' pup
R Nipple w/1.875 no go
w/ re-entry guide

16,560' TD

McMillan, Michael, EMNRD

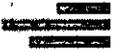
From: Good, Linda <Linda.Good@dvn.com>
Sent: Monday, March 21, 2016 6:12 AM
To: McMillan, Michael, EMNRD
Subject: RE: Cotton Draw SWD Well No. 84

Good morning Michael,

Yes the Order expired in October 2015, so we submitted a new application. The wellbore schematic is current and proposed. Please let me know if you need anything else.

Thank you,

Linda Good
Regulatory Compliance Specialist
Devon Energy Corporation
Devon Energy Center-Tower - OKDEC 18.532
333 West Sheridan Avenue Oklahoma City OK 73102-5015
405-552-6558
linda.good@dvn.com



devon

From: McMillan, Michael, EMNRD [mailto:Michael.McMillan@state.nm.us]
Sent: Friday, March 18, 2016 1:51 PM
To: Good, Linda <Linda.Good@dvn.com>
Subject: Cotton Draw SWD Well No. 84

Linda:

I am looking at the Cotton Draw SWD Well No. 84, and I have some questions.

The Cotton Draw SWD Well No. 84 was an approved SWD by Administrative Order SWD 1447.

Did Devon do a work over on the well, but did not start injecting within 2 years? So, is the wellbore diagram in the application, the current well status? If not you will need a current wellbore diagram.

Thank You

Michael A. McMillan

Engineering and Geological Services Bureau, Oil Conservation Division
1220 South St. Francis Dr., Santa Fe NM 87505
O: 505.476.3448 F. 505.476.3462
Michael.mcmillan@state.nm.us



SLO/Devon states depletion - SLO & Devon negotiated settlement Oct 8th
C-108 Review Checklist: Received 08/08/13 Add. Request: 09/10/13 Reply Date: Suspended: [Ver 10]

PERMIT TYPE: WFX / PMX / SWD Number: 1447 Permit Date: 10/25/13 Legacy Permits/Orders: NA

Well No. 84 Well Name(s): Cotton Draw Unit (CDU)

API: 30-0 15-29728 Spud Date: 08/25/97 New or Old: N (UIC Class II Primacy 03/07/1982)

Footages 2615 FSL / 1160 FEL Lot Unit I Sec 2 Tsp 25S Rge 31E County Eddy

General Location: Cotton Draw / south of pump / near TX border Pool: Paduca, NW; Devonian Pool No.: 91615

Operator: Devon Energy Production Company LP OGRID: 6137 Contact: Stephanie Porter

COMPLIANCE RULE 5.9: Inactive Wells: 5 Total Wells: 1819 Fincl Assur: Yes Compl. Order? No IS 5.9 OK? Yes

Well File Reviewed Current Status: Former producer in Devonian 11/04/97

Well Diagrams: NEW: Proposed RE-ENTER: Before Conv. After Conv. Are Elogs in Imaging?: Multiple/only for CO2 open hole portions / 4090' to 12,139'

Planned Rehab Work to Well: No changes to well construction / acidize / add tubing / packer system

Well Construction Details:	Sizes (in) Borehole / Pipe	Setting Depths (ft)	Cement Sx or Cf	Cement Top and Determination Method
Planned ___ or Existing ___ Conductor	—	—	—	—
Planned ___ or Existing <input checked="" type="checkbox"/> Surface	24 / 18 5/8	0 to 700	1350	Cr. to surface
Planned ___ or Existing <input checked="" type="checkbox"/> Intern Prod	17 1/2 / 13 3/8	0 to 4350	3259	Cr. to surface
Planned ___ or Existing <input checked="" type="checkbox"/> Prod/Intern	12 1/4 / 9 5/8	0 to 12200	6056 / 3259	CBL - 4890'
Planned ___ or Existing <input checked="" type="checkbox"/> Liner Prod	8 1/2 / 7 3/8	11858 - 14637	6056	TOL - calculated
Planned ___ or Existing <input checked="" type="checkbox"/> OH / PERF	6 1/2 / 5 1/2	14289 - 16295	300	—
	4 1/2 / 5 7/8	16295 - 16585	Inj Length 290'	Completion/Operation Details:
Injection Stratigraphic Units:	Depths (ft)	Injection or Confining Units	Tops?	Drilled TD <u>16585</u> PBDT <u>NA</u>
Adjacent Unit: <input checked="" type="checkbox"/> Litho <input type="checkbox"/> Struc. <input type="checkbox"/> Por.		Morrow	14408	NEW TD <u>NA</u> NEW PBDT <u>NA</u>
Confining Unit: <input checked="" type="checkbox"/> Litho <input type="checkbox"/> Struc. <input type="checkbox"/> Por.		Mississippian	15896	NEW Open Hole <u>NA</u> or NEW Perfs <u>NA</u>
Proposed Inj Interval TOP:	16295	Woodford fm	16202	Tubing Size <u>3 1/2</u> in. later Coated? <u>Yes</u>
Proposed Inj Interval BOTTOM:	16585	Devonian fm	16342	Proposed Packer Depth <u>16180</u> ft
Confining Unit: Litho. Struc. Por.	NA	Silurian / Forsham (included)		Packer Depth <u>16195</u> (100-ft limit)
Adjacent Unit: Litho. Struc. Por.		Montoya		Proposed Max. Surface Press. <u>3259</u> psi
AOR: Hydrologic and Geologic Information				
POTASH: R-111-P <input type="checkbox"/> Noticed? <u>NA</u> BLM Sec Ord <u>NA</u> WIPP <u>NA</u> Noticed? <u>NA</u> SALADO: T: <u>1037</u> B: <u>4356</u> CLIFF HOUSE <u>NA</u>				
FRESH WATER: Formation <u>Pecos Basin</u> Max Depth <u>300</u> Wells? <u>1</u> FW Analysis <u>HYDROLOGIC AFFIRM By Qualified Person</u> <input checked="" type="checkbox"/>				
Disposal Fluid: Formation Source(s) <u>Delaware fm / CDU</u> Analysis? <u>Yes</u> On Lease <input type="checkbox"/> Operator Only <input checked="" type="checkbox"/> or Commercial <input type="checkbox"/>				
Disposal Interval: Injection Rate (Avg/Max BWPD): <u>5000/10000</u> Protectable Waters: <u>NO</u> CAPITAN REEF: thru <input type="checkbox"/> adj <input type="checkbox"/> NA <input checked="" type="checkbox"/>				
H/C Potential: Producing Interval? <u>Yes - see note</u> Formerly Producing? <u>Yes</u> Method: E Log / Mudlog / DST / Depleted <input checked="" type="checkbox"/> Other <input type="checkbox"/> <u>see e-mails</u>				
AOR Wells: 1/2-M Radius Map? <u>Yes</u> Well List? <u>Yes</u> Total No. Wells Penetrating Interval: <u>2</u> Horizontals? <u>0</u>				
Penetrating Wells: No. Active Wells <u>2</u> Num Repairs? <u>0</u> on which well(s)? <u>One well injection / sub</u> Diagrams? <u>NA - on file</u>				
Penetrating Wells: No. P&A Wells <u>0</u> Num Repairs? <u>0</u> on which well(s)? <u>into Delaware GP</u> Diagrams? <u>NA</u>				
NOTICE: Newspaper Date <u>07/18/13</u> Mineral Owner <u>SLO</u> Surface Owner <u>SLO</u> N. Date <u>8/13/13</u>				
RULE 26.7(A): Identified Tracts? <u>Yes</u> Affected Persons: <u>XTO Energy [Unit with Devon]</u> N. Date <u>8/13/13</u>				

Permit Conditions: Issues: CBL not available on file.
 Add Permit Cond: None identified - except restate 100-ft packer (max depth of 16195) disc.
 AOR completed on 10/18/13 for American in...

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

David Martin
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Balley, Division Director
Oil Conservation Division



Administrative Order SWD-1447
October 25, 2013

ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION

Pursuant to the provisions of 19.15.26.8B, NMAC, Devon Energy Production Company, LP (the "operator") seeks an administrative order for its Cotton Draw Unit SWD Well No. 84 with a location of 2615 feet from the South line and 1160 feet from the East line, Unit letter I of Section 2, Township 25 South, Range 31 East, NMPM, Eddy County, New Mexico, for produced water disposal purposes.

THE DIVISION DIRECTOR FINDS THAT:

The application has been duly filed under the provisions of 19.15.26.8B, NMAC and satisfactory information has been provided that affected parties as defined in said rule have been notified. One objection from the New Mexico State Land Office was received within the prescribed waiting period, but the applicant, Devon Energy Production Company, LP, satisfied this protest through a negotiated settlement with the State Land Office. The applicant has presented satisfactory evidence that all requirements prescribed in 19.15.26.8 NMAC have been met and the operator is in compliance with 19.15.5.9 NMAC.

IT IS THEREFORE ORDERED THAT:

Devon Energy Production Company, LP (OGRID 6137), is hereby authorized to utilize its Cotton Draw Unit SWD Well No. 84 (API 30-015-29728) with a location of 2615 feet from the South line and 1160 feet from the East line, Unit letter I of Section 2, Township 25 South, Range 31 East, NMPM, Eddy County, for disposal of oil field produced water (UIC Class II only) into Devonian formations and the upper Fusselman formation through open hole from approximately 16295 feet to 16585 feet. Injection will occur through internally-coated tubing and a packer set within 100 feet of the permitted interval **at a depth no shallower than 16195 feet.**

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the disposed water enters only the approved disposal interval and is not permitted to escape to other formations or onto the surface. This includes the well construction proposed and described in the application.

After installing tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine

leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The well shall pass an initial mechanical integrity test ("MIT") prior to initially commencing disposal and prior to resuming disposal each time the disposal packer is unseated. All MIT testing procedures and schedules shall follow the requirements in Division Rule 19.15.26.11A. NMAC. The Division Director retains the right to require at any time wireline verification of completion and packer setting depths in this well.

The wellhead injection pressure on the well shall be limited to **no more than 3259 psig**. In addition, the disposal well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface tubing pressure to the maximum allowable pressure for this well.

The Director of the Division may authorize an increase in tubing pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the disposed fluid from the target formation. Such proper showing shall be demonstrated by sufficient evidence including but not limited to an acceptable Step-Rate Test.

The operator shall notify the supervisor of the Division's district II office of the date and time of the installation of disposal equipment and of any MIT test so that the same may be inspected and witnessed. The operator shall provide written notice of the date of commencement of disposal to the Division's district office. The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Division Rules 19.15.26.13 and 19.15.7.24 NMAC.

Without limitation on the duties of the operator as provided in Division Rules 19.15.29 and 19.15.30 NMAC, or otherwise, the operator shall immediately notify the Division's district II office of any failure of the tubing, casing or packer in the well, or of any leakage or release of water, oil or gas from around any produced or plugged and abandoned well in the area, and shall take such measures as may be timely and necessary to correct such failure or leakage.

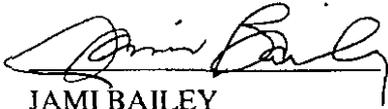
The injection authority granted under this order is not transferable except upon division approval. The Division may require the operator to demonstrate mechanical integrity of any injection well that will be transferred prior to approving transfer of authority to inject.

The Division may revoke this injection permit after notice and hearing if the operator is in violation of 19.15.5.9 NMAC.

The disposal authority granted herein shall terminate two (2) years after the effective date of this order if the operator has not commenced injection operations into the subject well. One year after the last date of reported disposal into this well, the Division shall consider the well abandoned, and the authority to dispose will terminate *ipso facto*. The Division, upon written request mailed by the operator prior to the termination date, may grant an extension thereof for good cause.

Compliance with this order does not relieve the operator of the obligation to comply with other applicable federal, state or local laws or rules, or to exercise due care for the protection of fresh water, public health and safety and the environment.

Jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh or protectable waters or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the disposal authority granted herein.



JAMI BAILEY
Director

JB/prg

cc: Oil Conservation Division – Artesia District Office
State Land Office – Oil, Gas, and Minerals Division



C-108 Review Checklist: Received 3/16 Add. Request: _____ Reply Date: _____ Suspended: _____ (Ver 154)

ORDER TYPE: WFX / PMX / SWD Number: _____ Order Date: _____ Legacy Permits/Orders: SWD 1447

Well No. 84 Well Name(s): COTTON DRAW 44.1

Issued
October 25, 2016

API: 30-0 15-29728 Spud Date: 8/27/1997 New or Old: N (UIC Class II Primacy 03/07/1982)

Footages 2615 FSL
1160 FEL Lot _____ or Unit I Sec 2 Tsp 255 Rge 31E County Eddy

General Location: 2 1/2 mile SW WIPP Pool: SWD, Devonian Pool No.: 9401

BLM 100K Map: JAI Operator: Devon Energy Production LP OGRID: 637 Contact: Linda Good

COMPLIANCE RULE 5.9: Total Wells: 1547 Inactive: 10 Fincl Assur: 6 Compl. Order: NA IS 5.9 OK? Y Date: 4-01-2016 (April Fool's day)

WELL FILE REVIEWED Current Status: Proposed injection -> see comment

WELL DIAGRAMS: NEW: Proposed or RE-ENTER: Before Conv. After Conv. Logs in Imaging: Y

Planned Rehab Work to Well: _____

Well Construction Details	Sizes (in) Borehole / Pipe	Setting Depths (ft)	Cement Sx or Cf	Cement Top and Determination Method
Planned ___ or Existing ___ Surface	<u>24/185/8</u>	<u>700</u>	<u>1350</u>	<u>SURFACE</u>
Planned ___ or Existing ___ Interm/Prod	<u>17 1/2/13 3/8</u>	<u>4360</u>	<u>3250</u>	<u>SURFACE</u>
Planned ___ or Existing ___ Interm/Prod	<u>12 1/4/9 5/8</u>	<u>12200</u>	<u>6056</u>	<u>4090' CBL</u>
Planned ___ or Existing ___ Prod/Liner	<u>8 1/2/7 5/8</u>	<u>14657</u>	<u>650</u>	<u>11854' CALCULATED</u>
Planned ___ or Existing ___ Liner				
Planned ___ or Existing ___ <u>OH</u> PERF	<u>16295/16585</u>			
			<u>Inj. Length</u>	
			<u>290'</u>	
Completion/Operation Details:				
Injection Lithostratigraphic Units:		Depths (ft)	Injection or Confining Units	Top
Adjacent Unit: Litho. Struc. Por.			<u>ms</u>	<u>16292'</u>
Confining Unit: Litho. Struc. Por.			<u>ms</u>	<u>15894'</u>
Proposed Inj Interval TOP:	<u>16295</u>			
Proposed Inj Interval BOTTOM:	<u>16585</u>			
Confining Unit: Litho. Struc. Por.				
Adjacent Unit: Litho. Struc. Por.				
Drilled TD	<u>16586</u>		PBTD	
NEW TD			NEW PBTD	
NEW Open Hole	<input checked="" type="checkbox"/>		NEW Perfs	<input type="checkbox"/>
Tubing Size	<u>5 1/2</u>		Inter Coated?	<u>Y</u>
Proposed Packer Depth	<u>1480</u>		ft	
Min. Packer Depth	<u>1660</u>		(100-ft limit)	<u>16145</u>
Proposed Max. Surface Press.	<u>3259</u>		psi	
Admin. Inj. Press.	<u>3259</u>		(0.2 psi per ft)	

AOR: Hydrologic and Geologic Information

POTASH: R-111-P NA Noticed? _____ BLM Sec Ord WIPP Noticed? _____ Salt/Salado T: NA B: 4350 NW: Cliff House fm

FRESH WATER: Aquifer Quaternary Max Depth 450 HYDRO AFFIRM STATEMENT By Qualified Person

NMOSE Basin: CANLSBAD CAPITAN REEF: thru adj NA No. Wells within 1-Mile Radius? _____ FW Analysis _____

Disposal Fluid: Formation Source(s) Bonespine Analysis? Y On Lease Operator Only Commercial

Disposal Int: Inject Rate (Avg/Max BWPD): 10K-20K MAX Protectable Waters? NO Source: _____ System: Closed or Open

HC Potential: Producing Interval? Y Formerly Producing? _____ Method: Logs/DST/P&A/Other _____ 2-Mile Radius Pool Map

AOR Wells: 1/2-M Radius Map? Y Well List? Y Total No. Wells Penetrating Interval: 2 Horizontals? _____

Penetrating Wells: No. Active Wells 2 Num Repairs? _____ on which well(s)? _____ Diagrams? _____

Penetrating Wells: No. P&A Wells 0 Num Repairs? _____ on which well(s)? _____ Diagrams? _____

NOTICE: Newspaper Date March 3, 2016 Mineral Owner NMSLO Surface Owner NMSLO N. Date 3/15/2016

RULE 26.7(A): Identified Tracts? Y Affected Persons: XTO, N. Date 3/15/2016

Order Conditions: Issues: _____

Add Order Cond: Operator had approval for SWD, drilled equipped well but did not begin injection within 2 years. This is a new application. Packer not used. 100' 10" perf, ~~16295~~ well (16585') -> 16145' as stated in Admin Order 5601447. Made deal with NMSLO, and NMSLO consented.

46145
As stated
in order