



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

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

December 15, 2015

State of New Mexico
Oil Conservation Division
District 4
1220 South St. Francis Drive
Santa Fe, NM 87505

Re: Cotton Draw 32 State SWD 2 – C-108 Extension

Dear Mr. Goetze,

Devon Energy Production Co., L.P. respectfully request to extend this C-108 which will expire January 31, 2016. We are currently drilling this well and are not planning to inject until March or April of 2016.

Sincerely,

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

Linda Good
Regulatory Compliance Specialist

30-025-41524
SWD-1459
Issued 01/31/2014

Goetze, Phillip, EMNRD

From: Good, Linda <Linda.Good@dvn.com>
Sent: Tuesday, December 15, 2015 7:29 AM
To: Goetze, Phillip, EMNRD
Subject: Cotton Draw 32 State SWD 2 - C-108 Extension
Attachments: Ltr to NMOCD in Santa Fe to Extend C-108.pdf

Good morning,

Please see the attached letter requesting to extend the C-108.

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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Goetze, Phillip, EMNRD

From: Good, Linda <Linda.Good@dvn.com>
Sent: Monday, December 21, 2015 9:48 AM
To: Goetze, Phillip, EMNRD
Subject: RE: Cotton Draw 32 State SWD 2 - C-108 Extension

We would like a 6 month extension.

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



From: Goetze, Phillip, EMNRD [<mailto:Phillip.Goetze@state.nm.us>]
Sent: Tuesday, December 15, 2015 10:41 AM
To: Good, Linda <Linda.Good@dvn.com>
Subject: RE: Cotton Draw 32 State SWD 2 - C-108 Extension

Linda:

I received Devon's request for an extension. How extension of an extension would be necessary to provide an adequate time for injection to commence? Thanks. 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, December 15, 2015 7:29 AM
To: Goetze, Phillip, EMNRD <Phillip.Goetze@state.nm.us>
Subject: Cotton Draw 32 State SWD 2 - C-108 Extension

Good morning,

Please see the attached letter requesting to extend the C-108.

Thank you,

Linda Good
Regulatory Compliance Specialist
Devon Energy Corporation
Devon Energy Center-Tower - OKDEC 18.532
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devon

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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 Bailey, Division Director
Oil Conservation Division



Administrative Order SWD-1459
January 31, 2014

ADMINISTRATIVE ORDER
OF THE OIL CONSERVATION DIVISION

Pursuant to the provisions of Division Rule 19.15.26.8B. NMAC, Devon Energy Production Company, LP (the "operator") seeks an administrative order for its proposed Cotton Draw 32 State SWD Well No. 2 with a location of 1180 feet from the South line and 1000 feet from the East line, Unit letter P of Section 32, Township 24 South, Range 32 East, NMPM, Lea 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 and no objections have been received within the prescribed waiting period. 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:

The applicant, Devon Energy Production Company, LP (OGRID 6137), is hereby authorized to utilize its Cotton Draw 32 State SWD Well No. 2 (API 30-025-41524) with a location of 1180 feet from the South line and 1000 feet from the East line, Unit letter P of Section 32, Township 24 South, Range 32 East, NMPM, Lea County, for disposal of oil field produced water (UIC Class II only) into the interval from the top of the Devonian formation to **100 feet below the contact between the Ordovician Simpson group and the Ellenburger formation** through open hole from approximately 16992 feet to **approximately 19385 feet**. Injection will occur through internally-coated, 4 ½-inch tubing and a packer set within 100 feet of the permitted interval.

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.

The operator shall supply the Division with a copy of a mudlog over the permitted disposal interval and an estimated insitu water salinity based on open-hole logs. If significant hydrocarbon shows occur while drilling, the operator shall notify the Division's

district I and the operator shall be required to receive written permission prior to commencing disposal.

The operator shall also provide the following items to the Division's district I office prior to commencing disposal:

- 1. a copy of a cement bond log (CBL) or equivalent demonstrating the top of cement for the 7-inch casing; and**
- 2. a summary of depths (picks) for formation tops in the injection interval.**

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 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 3398 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 I office of the date and time of the installation of disposal equipment and of any MIT 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 – Hobbs District Office
State Land Office – Oil, Gas and Minerals Division