DEVON
ENERGY
OPERATING
CORPORATION

O'L CONSERVATION DIVISION405/235-3611

20 North Broadway, Suite 1500 Fax 405/552-4550

Oklahoma City, Oklahoma 73102 Fin 8 52

January 17,1995

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
P.O. Box 2088
Santa Fe, New Mexico 87504 - 2088

Attention: David Catanach

WELL

Re: Non - Standard Location Approval

LOCATION

#### Dear Sir:

It is requested that administrative approval be granted under Rule 104F. (1) for unorthodox locations for the infill producing wells located within the Keel West Waterflood Project, at the following locations:

Keel "B" 78	1330' FSL & 2616' FEL 8-17S-31E
Keel "B" 82	2519' FNL & 1310' FEL 6-17S-31E
Keel "B" 83	2741' FNL & 1330' FWL 5-17S-31E
Keel "B" 85	1341' FSL & 10' FEL 5-17S-31E
West "B" 80	1410' FSL & 193' FWL 9-17S-31E

Attached is a plat of the Keel - West Waterflood Project showing the project boundaries that are adjacent to the subject wells. Forms 3160 - 3 and C - 102 are attached for each of the five wells listed above. The Keel - West Waterflood project is located on federal property and each proposed well is to be part of this active waterflood project.

The above locations do not conform to Rule 104. C. I. because they are located closer than 330' to the governmental quarter - quarter section boundaries. They will be drilled to a depth sufficient to produce the Grayburg - San Andres formation (approximately 4000'). The wells will be drilled at the unorthodox locations in order to prevent waste by developing an efficient production and injection pattern within the Keel - West Waterflood

Project, which was approved under Order R - 2268. When fully developed these wells will combine with the existing wells (some of which will eventually be converted to injection) to establish a 40 acre 5 spot waterflood pattern.

There are no other operators that have production in offsetting 40 acre tracts. The 5 wells listed are offset by wells that are already operated by Devon Energy Operating Corporation; therefore, no other notification is necessary.

Should you require any additional information regarding any of these unorthodox locations please notify me at 405-552-4527.

Sincerely,

Karen Rosa

Engineering Technician

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DEPARTMENT OF THE INTERIOR

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			See In	structions On Sev	erse Side				

<sup>2 18</sup> U.S.C. Section 1001, makes 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 ments or representations as to any matter within its jurisdiction

## State of New Mexico Energy, Minerals, and Natural Resources Department

Form C-102 Revised 02-10-94

instructions on back

Submit to the Appropriate District Office State Lease — 4 copies Fee Lease — 3 copies

## RICT II O. Drower DD rtesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec. NM 87410 OIL CONSERVATION DIVISION
P. 0. Box 2088
Santa Fe, New Mexico 87504-2088

AMENDED REPORT

V. L. PELNER L'O SR.P.S. 47920

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DEPARTMENT OF THE INTERIOR

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Drilling Program Exhibits #1/1-A Exhibit #2 Exhibit #3/3-A Exhibit #4 Exhibit #5 Exhibit #6 Exhibit #7 H2S Operating P	= Blowout Prevention I = Location and Elevation = Road Map and Topo = Wells Within 1 Mile is = Production Facilities = Rotary Rig Layout = Casing Design Castal Plan Carration Special Castal	Equipment on Plat Map Radius Plat Subject to Requirements	terms, cond restrictions conducted o thereof, as d Lease No. L Legal Descr Bond Cover. and BLM Bond	lition, stipu concerning n the leased lescribed b C029435-B iption: Sec age: Natio No.: CO11	g operations d land or por elow: s tion 6-T17N- nwide 51	R31E	DEC	9 5 1834
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Energy, Minerals, and Natural Resources Department

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O. Drawer DD
Artesia, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

# OIL CONSERVATION DIVISION P. 0. Box 2088 Santa Fe, New Mexico 87504-2088

Submit to the Appropriate District Office State Lease — 4 copies Fee Lease — 3 copies

DISTRICT IV						
P. O. Box 2088						
Santa Fe, NM 87507-2088	WELL.	LOCATION	AND	ACREAGE	DEDICATION	PLAT

*Property Code H  *Froperty Code H  *Froperty Code H  *Froperty Code H  *Property Code H  *Invalidation BEVON ENERGY DEFATING COMPANY  *SURFACE LOCATION  *SURFACE LOCATION  *Post from the County Post f	¹ API Number	<del></del> <del></del> -		<sup>2</sup> Pool Code		³ Poc	ol Name					
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NO ALLOWABLE WELL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION  OPERATOR CERTIFICATION  I hereby certify that the information contained herein is frue and complete to the best of my knowledge and belief.  Signature  Prinated Names Randy Jackson Title District Engineer Date  12/1/94  SURVEYOR CERTIFICATION  I hereby certify that the well location shown on this plot was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.  Date of Survey  NOVEMBER 2, 1994	UL er let no.	Section	Township	Range		Lot Ida	Feet from the	North/South	line	Feet from the	Bast/West line	County
CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION  OPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and bekel.  Signature  Printed Name  Randy Jackson Title  District Engineer  Date  1310  1310  1310  Date of Survey made by me or under my supervision, and that the same is true and correct to the best of my belief.  Date of Survey  NOVEMBER 2, 1994	12 Dedicated A	cres 13 J	pint or Infill	** Consolidatio	n Code	16 Order	No.	<u> </u>			. :	<u></u>
OPERATOR CERTIFICATION  I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.  Rignature  Printed Name Randy Jackson Title District Engineer Date  12/1/94  SURVEYOR CERTIFICATION  I hereby certify that the well location shown on this plat was plotted from lied notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.  Data of Survey NOVEMBER 2, 1994		NO AL	LOWABLE WI	ELL BE ASSI	GNED TO	THIS	COMPLETION	UNTIL AL	L IN	TERESTS HA	VE BEEN	
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			<u> </u>	l					┚╏		2R MI R.B.S. 30-7-98 SE	/ V.H.B.

3160-3 en ber 1990)

# UNITED STATES OPERATOR'S COPY SUBMIT IN TRIPLICATE.

•	DEPART	AUOFLANI			PRIVATES II	<del>(de</del> )			NATION AND SERI	AL NO.
	APPLICATION	COD DEDMIT	TO DOLL O	D DEEDEN				29435-B	ALLOTTEE OR TRE	NAME NAME
TURE OF WORK	****		DEEPEN	N DEEFEN			NA.	JULIAN, A	ALLOTTEE OR TRU	SE NAME
la TYPE OF WORK: b TYPE OF WELL:		_		1×011	MOLTIFLE [7]		7.UNII NA	AGREDA	INT NAME	<del></del>
2 NAME OF OPERAT		Other		ONE	ZONE	<del></del>		OR LEA	SE NAME, WELL NO	D.
3. ADDRESS AND TE	DEVON ENER	GY OPERA	ING CORP	URATION			9.API	WELL NO.		
3. ADDRESS AND IE	20 N. BROADY	VAY, SUITE	1500, OKC,	OK 73102 (40	5) 552-4560					
4. LOCATION OF WEI At surface 2741'	L (Report location cli FNL & 1330' FWL								JACKSON	r
At top proposed prod.	zone (SAME)	13/10/1	(1000)	K LOCAT	CO.C.				M., OR BLOCK AND T17 S - R31 E	D EURVEY OR AREA
14.DISTANCE IN MILES A			POST OFFICE.	in the second		<u> </u>	l.	DUNTY OR	PARISH	13. STATE
4 miles east & 4 mile	es north of Loco H	ills, N.M.					EDDY			NM
15.DISTANCE FROM PROPO LOCATION TO NEAREST PROPERTY OR LEASE L	-	741	16.80. OF AC 1885.00	RES DI LIENSE	<del></del>	<del></del>		- 1	NO. OF ACRES A. TO THIS WELL	SSICHED
(Also to nearest drig unit limit is in it is a constant of the	HILDIG, COMPLETED,	00'	19.PROPOSED   4000	DEPTH				20	ROTARY OR CABL	E TOOLS*
21. ELEVATIONS (Show what 3811 GR			L						(. DATE WORK WII 1, 1995	LL START
23.			ROPOSED CA	SING AND CEN	MENTING PR	OGRAM	!			<del></del>
SIZE OF HOLE	GRADE, SIZE OF	CASING	WEIGH	PER FOOT	<b>8</b> 2	TING DEPTH			QUARTITY O	I CD4DIT
12 1/4"	8 5/8" J-55		24.0#		400'	CIRCUL	1 k 1 m	1	lite omt + 200	
7 <i>1</i> 8"	5 1/2" J-55		15.5#		4000'	OHEST !		1	Class °C" 35/6	55 + 500 sk Class
Exhibit #3/3-A = Exhibit #4 = Exhibit #5 = Exhibit #6 = =	Blowout Prever Location and E Road Map and Wells Within 1 Production Fac Rotary Rig La Casing Design	ntion Equipm levation Plat Topo Map Mile Radius ilities Plat yout Towal Subjected Programs Deposits Subjected Deposits Subjected Deposits Subjected Deposits Subjected Deposits Subjected Deposits Subjected Deposits Subjected	ents.  nent  t  S  CO to  COCOSE ANA  COCOSE ANA  COCOSES ANA	The undersiterms, conducted or thereof, as described Described Described BLM Bond	gned acceptition, stipul concerning the leased becaribed be C029435-B iption: Sectage: Nation No.: CO115	ts all applica lations and operations I land or por clow: ion 5-T17N- nwide	tions R31E	posed n	DEC 05 18	994
. <del></del>									1999 a Salaman	
SIGNED (	in Trelow		<b>T</b> I	RANDY .	IACKSON CT ENGINE	ER DAT	'E	12/2	194	
(This space for Feder	al or State office u	se)		<del></del>		<del></del>				
ERMIT NO					APPROV	AL DATE				
oplication approval does no ONDITIONS OF APP	ot warrant or certify the ROVAL OIF ADEX:	it the applicant bo		Adi	ghts in the subje	ct lease which wou			icant to conduct of	perations thereon.
TROVEDBY			See in	E structions On Rev	rerse Side	S. C.	_ D	ATE	1/11/0	<u>J</u>

Box 1980 .s. NM 88241-1980

Energy, Minerals, and Natural Resources Department

Revised 02-10-94 Instructions on back

Submit to the Appropriate District Office State Lease — 4 copies Fee Lease — 3 copies

STRICT II
O. Drower DD Artesia, NM 88211-0719

<u>DISTRICT III</u> 1000 Rio Brazos Rd. Aztec, NM 87410

## OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088

<u>DISTRICT IV</u> P. O. Box 2088 Santo Fe, NM 87507-208	8 WELL LOCATIO	N AND ACE	LEAGE DE	DICATION I	PLAT		
API Number	<sup>2</sup> Pool Code	3 Pool 1	iame				
* Property Code   5 Prop	perty Name	KEEL 'B'	FEDERAL	<u> </u>		• Vell Number	
OGRID No.	nator Name DEVON	ENERGY DI	PERATING	COMPANY		* Elevation 3811	•
	10	SURFACE L	OCATION				
UL or lot no. Section Towns 5 17 SC	ahip Range OUTH 31 EAST, N.M.I		et from the ) 2741'	North/South line NORTH	Feet from the 1330'	East/West line WEST	County EDDY
"B	OTTOM HOLE LOC	ATION IF I	OIFFEREN'	T FROM SU	IRFACE		
UL or lot no. Section Towns	ship Range	Lot Ida Fe	et from the	North/South line	Feet from the	Bast/West line	County
12 Dedicated Acres 13 Joint or I	Infill " Consolidation Co	e 15 Order No.	<u> </u>		<u>, , , , , , , , , , , , , , , , , , , </u>		• • •
	LE WELL BE ASSIGNED ATED OR A NON-STA						
1330'-	\$1°				I hereby certification of the best of Signature Printed Name Randy Ja Title District Date 12/1/94  SURVEYOR I hereby collocation show pointed from surveys made my supervises ame is true best of my  Date of Survey NOVER Signature and Signatu	CERTIFICA  CERTIFICA  Certify that the price of the price	TION  TON  The well at was actual under at the to the

UNITED STATES OPERATOR'S CUP 60-3 SUBMIT IN TRIPLICATE\* Form approved. aber 1990) DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT 5. LEAST DESIGNATION AND SERVAL NO. LC 029435-B APPLICATION FOR PERMIT TO DRILL OR DEEPEN 6. IF INDIAN. ALLOTTEE OR TRIBE NAME. NA DEEPEN IA TYPE OF WORK DRILL 7. UNIX ACRUMENT MANE **b** TYPE OF WELL: NA . 🛛 B. FARM OR LEASE NAME, WELL NO. NAME OF OPERATOR Keel "B" #85 **DEVON ENERGY OPERATING CORPORATION** 9.API WELL NO. 3. ADDRESS AND TELEPHONE NO. 20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4530 4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements) SUBJECT TO 10. FIELD AND POOL, OR WILDCAT GRAYBURG-JACKSON 1341 FSL & 10 FEL Non-11. SEC. T. R. M. OR BLOCK AND SURVEY OR AREA LIKE APPROVAL Stand and SECTION 5 T17 S - R31 E At top proposed prod. zone (SAME) BY STATE Location ... 14. DISTANCE IN MILES AND DIRECTION FROM MEAREST TOWN OR POST OFFICE 12. COUNTY OR PARISH 4 miles east & 4 miles north of Loco Hills, N.M. 16.NO. OF ACRES IN LEASE 17.NO. OF ACRES ASSIGNED 15.DISTANCE FROM PROPOSED TO THIS WELL LOCATION TO MEAREST 1225.0 10' FEL. 40 PROPERTY OR LEASE LINE, ST. (Also to nearest drig unit line if any)
18 DISTANCE FROM PROPOSED LOCATION 19. PROPOSED DEPTH 20 ROTARY OR CARLE TOOLS TO MEASURY WELL, DRILLING, COMPLETED 4000 Rotary 1300' OR APPLIED FOR, ON THIS LEASE, FI. 22. APPROX. DATE WORK WILL START 21 . ELEVATIONS (Show whether DF. RT. GR. etc.) DECEMBER 1, 1994 3886' GR PROPOSED CASING AND CEMENTING PROGRAM SIZE OF HOLE GRADE, SIZE OF CASING WEIGHT PER POOT SETTING DEPTH QUARTITY OF CEMENT 165 sk lite cat + 200 sk Class "C" 12 1/4 8 5/8" J.55 500 mk Class "C" 35/65 + 500 mk Class 7 7/8" 5 1/2" J-55 15.5# 4000 "C" + 1/4 lb/sk cellophane flakes We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4000' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are outlined in the following exhibits and attachments. **Drilling Program** The undersigned accepts all applicable Exhibits #1/1-A = Blowout Prevention Equipment terms, condition, stipulations and Exhibit #2 = Location and Elevation Plat restrictions concerning operations Exhibit #3/3-A = Road Map and Topo Map conducted on the leased land or portions Exhibit #4 = Wells Within 1 Mile Radius thereof, as described below: Exhibit #5 = Production Facilities Plat Lease No. LC029435-B Exhibit #6 ≈ Rotary Rig Layout Legal Description: Section 5-T17N-R31E Exhibit #7 = Casing Design Bond Coverage: Nationwide **H2S Operating Plan** BLM Bond No.: PENDING N ABOYE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any. RANDY JACKSON SIGNED TITLE DISTRICT ENGINEER DATE October 27, 1994 This space for Federal or State office use) OF TELEBUR JAVUATION GENERAL REDUTREMENTS AND ERMIT NO. APPROVAL DATE SPECIAL SUBULATIONS plication approval does not warrant or certify that the applicant holds legal or equitable title to the ONDITIONS OF APPROVAL, IF ANY ATTACHED PROVED BY

See Instructions On Reverse Side

1980 x0x AM 88241-1980

### State of New Mexico Energy, Minerals, and Natural Resources Department

Form C-102 Revest 02-10-94

instructions on back

Submit to the Appropriate Detrict Office State Lease — 4 copies Fee Lease — 3 copies

TRICT II
O. Drawer DD
Artesio, NM 88211-0719

DISTRICT III 1000 Rio Brazos Rd. Aztec, NM 87410

## OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088

<u>DISTRICT IV</u> P. O. Box 2088 Santo Fe, NM 87507	RRAC				~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	DATA MA	N 1	DT AT		
API Number	-2500 W	Post Code	CHON 1		CREAGE D	EDICATIO				<del></del>
• Property Pole	9 Property No	n.St.o	KI	EEL 1	B' FEDERA		<del>,</del>		• Voll Humber	
OGEED No.	* Operator No	DE\	/DN EN	ERGY	OPERATIN	G COMPA	NY		* Elevation 3886	5 <i>'</i>
1	<u> </u>		- SUI	RFACE	LOCATION					
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UL er let no. Section	Township	Range		Lot 1de	Feet from the	North/South	line	Post from the	Rasi/Vest line	County
12 Dedicated Acres 12 Jet	at or laffil	** Connelidation	n Code	** Order	Ne.	<u> </u>		<u> </u>	<u> </u>	<u></u>
NO ALL	-							TERESTS HA		
						1341		I hereby cert contained here to the best of  Bignature Printed Name RANDY JACI Title DISTRICT I  Date November  I hereby co location sho platted from surveys ma my supervisame is true best of my  Date of Burvey OCCOM  Bignature and Presenting and Title The contained of the cont	CERTIFIC ertify that to the order of the ord	ATION  he well formation complete and belief.

13160-3 ·mber (990)

# UNITED STATES OPERATORS COPY

DEPARTMENT OF THE INTERIOR

		LAND MANAG	EMENT		1	DE D	esignation and s 26-B	ERIAL NO.
	APPLICATION FOR PER	RMIT TO DRILL	OR DEEPEN		6. IF	DOL	AN, ALLOTTEE OR	TRUBE NAME
la TYPE OF WORK:	DRILL 🔀	DEEPEN			1	T MG	REDUCET NAME	
b TYPE OF WELL:	ant Other		SINGLE	MULTIPLE ZONE	NA			
NAME OF OPERAT		ERATING COR	PORATION		8. PAR West		HEAST NAME, WELL #80	1 NO.
. ADDRESS AND TE					9.API	WELL	L MO.	
	20 N. BROADWAY, SU				- 10.FI	1 0.25	NED POOL, OR WILL	DCAT
. LOCATION OF WEI At surface 1310	LL (Report jocation clearly and i FSL & 95 FWL			eurject to	GRA	YBU	J <b>RG-JACKSO</b> N	
At top proposed prod.	113"	Non- Standar Location		AME APPROVAL BY STATE		-	.,R.,M.,OR BLOCK N 9 -T17 S - R31	E AND EURVEY OR AR
	und direction from measurest towes north of Loco Hills, N.M.				12. C		Y OR PARISH	13. STATE NM
5.DISTANCE FROM PROPO LOCATION TO MEAREST		16.80. OF .	ACRES IN LEASE				17.NO. OF ACRE	
PROPERTY OR LEASE L	.DGC, FT. 93' FWL	1919.66					40	_
(Also to nearest drip unit im 8.DISTANCE FROM PROPO TO MEAREST WELL, DR OR APPLIED FOR, ON	MED LOCATION* ILLING, COMPLETED,	19.9R09082 4400	D DEPTH	<del></del>			20.ROZARY OR C	ABLE TOOLS
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B30					ם	ECE	MBER 1, 1994	i .
3.				MENTING PROGRAM				
SIZE OF HOLE	GRADE, SIZE OF CASING		T PER FOOT	SETTING DEPTH	! 	1.,		TY OF CEMENT
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willned in the fo		er Federal Re	gulations. Pro	the Grayburg-Jackso ograms to adhere to o	n is deen nshore o	ned il ar	id gas regulat	cial, the tions are
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0. Box 1980 tobus, NM 88241-1980

Energy, Minerals, and Natural Resources Department

instructions on back

Submit to the Appropriate District Office Stole Lease — 6 copies Fee Lease — 3 copies

P. O. Drower DO Artesio, NM 88211-0719

OIL CONSERVATION DIVISION P. O. Box 2088 Santa Fe, New Mexico 87504-2088 DISTRICT III 1000 Rio Brozos Rd. Aztec, NM 87410

<u>DISTRICT IV</u> 2. O. Box 2088 Santo Fe, NM 8750	7-2088	ELL LOCATION A	AND A	CREAGE DI	EDICATION I	<b>TAT</b>		
1 AFI Number		<sup>2</sup> Posl Cods	3 Pos	i Neme	***			
• Property Code L  1 Property			EST 1	EST 'B' FEDERAL			* Well Number 80	
OCHIB No. Operator 1			ERGY	OPERATIN	G COMPANY		• Elevetion 3841	
		- su		LOCATION				, —————
II. er let me. Section 9	Tevneble 17 SOUTH	Range 31 BAST, N.M.P.M.	ı	Post from the	North/South hine SOUTH	Fest from the 193'	WEST	KDDY
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P Budicated Acres 19 Jan	but or hefull	> Consolidation Code	16 Order	jin.	<del></del>		<u> </u>	ł
		PLL BE ASSIGNED TO OR A NON-STAND						
193'						Contained her to the best of the best of my supervisoring street of my supe	R CERTIFIC Service that the and correct basis.  LYNN EZNER  D. 7920  BLANS  S. S	ATION The wall was a crucker to the