DHE 8/31/99



20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260 Telephone 405/235-3611 FAX 405/552-4550

Candace R. Graham (405) 552-4520

August 6, 1999

Certified Mail No. Z 068 589 394

STATE OF NEW MEXICO

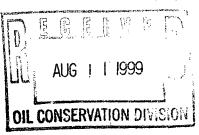
Energy, Minerals and Natural Resources Dept. Oil Conservation Division, District II 2040 South Pacheco

Santa Fe, NM 87505

RE:

Application for Downhole Commingling

API 30-015-20298 Todd "14K" Federal #1 Section 14-T23S-R31E Eddy County, New Mexico



2446

Gentlemen:

Concerning the referenced, Devon Energy Corporation (Nevada) requests administrative approval for an exception to Rule 303-A to permit the downhole commingling of production from James Ranch (Bone Spring), East and Wildcat (Wolfcamp) pools. As per Rule 303-D, enclosed please find Form C-107-A, Application for Downhole Commingling, with attachments.

Please direct inquiries concerning this matter to Wally Frank, District Engineer, in our Oklahoma City office at (405) 235-3611, X4595.

Yours truly,

DEVON ENERGY CORPORATION (NEVADA)

andace R. Graham

Candace R. Graham

Engineering Tech.

/cg

Enclosures

copy: NMOCD in Artesia, NM (Certified Mail No. Z 068 589 395)

BLM in Roswell, NM (Certified Mail No. Z 068 589 396)

file, engineer, foreman, area interest owners

DISTRICT I 1625 N. French Dr., Hobbs, NM 88240 DISTRICT II 811 South First St., Artesia, NM 88210 DISTRICT III 1000 Rio Brazos Rd, Aztec, NM 87410 DISTRICT IV 2040 S. Pacheco, Santa Fe, NM 87505	Energy, Minerals and Natu	Pacheco exico 87505-6429	Form C-107-A Revised March 17, 1999 APPROVAL PROCESS: X AdministrativeHearing EXISTING WELLBORE X YESNO
DEVON ENERGY CORPORATION	(NEVADA), 20 N. Broad	lway, Suite 1500, Okla	homa City, OK 73102
TODD ''14K'' FEDERAL		ss 14-23S-31E	Eddy
CGRID NO. 6137 Property Core		1 11 = 20200	County acing Unit Lease Types: (check 1 or more)
The following facts are submitted in support of downhole commingling:	Upper Zone Ranch (Bone Spring), Ea	Intermediate Zone	Wildcat (Wolfcamp)
Top and Bottom of Pay Section (Perforations)	10,800-11,597'		11,734-11,782'
Type of production (Oil or Gas)	Oi1		Oi1
Method of Production (Flowing or Artificial Lift)	Artificial Lift		Artificail Lift
Bottomhole Pressure Oil Zones - Artificial Lift:	a. (Current) 2400 psi	a.	^{a.} 2800 psi
Estimated Current Gas & Oil - Flowing: Measured Current All Gas Zones: Estimated Or Measured Original	b. ^(Original)	b.	b
Oil Gravity (^o API) or Gas BTU Content	400		420
7. Producing or Shut-In?	42 ⁰ Producing		42 ^o estimated Shut in
	Yes	,	Yes
Production Marginal? (yes or no)	Date:	Date:	Date: 01/ 8-10 /1999 swab
* If Shut-In, give date and oil/gas/ water rates of last production	Rates:	Rates:	Rates: 36 / 25 / 36 BO MCF BW
Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data	Date: 07-23-1999	Date:	Date:
If Producing, give date andoil/gas/ water rates of recent test (within 60 days)	Rates: 8 / 25 / 0 BO MCF BW	Rates:	Rates:
See attachment 8(A) 8. Fixed Percentage Allocation Formula -% for each zone (total of %'s to equal 100%)	Oil: 22 % Gas:44 %	Oil: Gas: %	Oil: 78 % Gas: 56 %
If allocation formula is based up attachments with supporting d	oon something other than current ata and/or explaining method a	t or past production, or is based nd providing rate projections or	upon some other method, submit other required data.
10. Are all working, overriding, and If not, have all working, overrid Have all offset operators been g			
11. Will cross-flow occur? \ flowed production be recovered.			
12. Are all produced fluids from all			
13. Will the value of production be			•
14. If this well is on, or communitiz United States Bureau of Land			Yes No
15. NMOCD Reference Cases for	Rule 303(D) Exceptions: C	ORDER NO(S).	
16. ATTACHMENTS: A* C-102 for each zone B* Production curve for B* For zones with no p B* Data to support allo C* Notification list of all N/A Notification list of w D* Any additional state	e to be commingled showing its r each zone for at least one yea roduction history, estimated pro- cation method or formula. I offset operators. orking, overriding, and royalty in ments, data, or documents requ	spacing unit and acreage dediger. (If not available, attach explaid duction rates and supporting deterests for uncommon interest aired to support commingling.	cation. anation.) ata. cases.
I hereby certify that the information	above is true and complete to	the best of my knowledge and	belief.
SIGNATURE Candaca R	Graham TITLE	Engr. Tech.	_DATE 08-06-1999
TYPE OR PRINT NAME	Candace R. Graham	TELEPHONE N	o. (405) 235-3611 X4520

Production Allocation

Pool	BOPD	MCFGD	BWPD	Test Method
Travis (Wolfcamp)	36	25	36	ESTIMATE
Travis (Bone Spring)	_10	_20	7	PUMP TEST
Total	46	45	43	

Allocated Percentages (Post workover utilizing above production)

Pool	Oil%	Gas%	Water%
Travis (Wolfcamp)	78	56	84
Travis (Bone Spring)	22	<u>44</u>	<u>16</u>
Total	100	100	100

Todd 14K-1 (8/1999) C107A		Devon Energy Cor	poration (N
SENDER:		I als Todd "14K"	
 ■ Complete Items 1 and/or 2 for additional services. ■ Complete Items 3, 4a, and 4b. 		follo Eddy County.	
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SANTA FE NM 87505	7. Date of De		Ā
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 Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so that w 	e can return this	extra fee):	• •
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MEXICO OIL CONSERVATION CO

Devon Energy Corporation (Nevada) Todd "14K" Federal #1 Eddy County, New Mexico

Form C-102 Superseden C-128

WELL LOCATION AND ACREAGE DEDIC Downhole Commingling 8/6/1999 Effective 1-1-65 ATTACHMENT #16 (A)

DEVON E	NERGY CORPORA			n the outer	boundaries G			·/
perator TVEXXXXX	XAVOKE KANSKARIV STOLIX	CONN.	VADA)	.ease	Tobb 1	"FEDERAL	L	Well No. 1
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Ground Level Elev. 3484 '	Producing For	XXXXXXXXXXXX	[5.	AMES R	ANCH (BON) MXXKATACAAX X	E SPRING	0,, 11.01	cated Acreage: 40 Acres
	e acreage dedica		aubiect well			r hachure		
2. If more the interest as	nan one lease is nd royalty).	dedicated	to the well,	outline e	each and ide	ntify the c	ownership thereo	of (both as to working
	communitization,				,			owners been conson
X Yes	☐ No If a	nawer is "	yes;" type of	consolid			to joint o	perating
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Devon Energy Corporation (Nevada)

MEXICO OIL CONSERVATION CO **WELL LOCATION AND ACREAGE DEDIC**

Todd "14K" Federal #1 Eddy County, New Mexico Downhole Commingling 8/6/1999

Form C-102 Supersedes C-128 Effective 1-1-65

ATTACHMENT #16 (A) DEVON ENERGY CORPORATION distances must be from the outer boundaries o (NEVADA) Operator Well No. AND CONTROL OF THE CO FEDERAL 1 Topp Range 31 EAST Section Unit Letter Township County 14 ĸ 23 SOUTH EDDY Actual Footage Location of Well: 1980 SOUTH 1980 feet from the line and feet from the line Ground Level Elev. Producing Formation Dedicated Acreage: WILDCAT (WOLFCAMP) 3484' DEXXXXXXXXXX 40 Acres 1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below. 2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty). 3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling. etc? If answer is "yes," type of consolidation Pursuant to joint operating X Yes Agreement If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.). No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission. CERTIFICATION I hereby certify that the information contained herein is true and complete to the Roy K. Valla Production Manager Texas American Oil Corp April 3, 1970 Date Surveyed APRIL 1, 1970 Registered Professional Engineer 676 1920 1660 1980 2310 2000 1800 1000

Attach production curves for each zone for at least one year. (If not available, attach explanation.)

Attached is the Bone Spring production curve for the Todd "14K" Federal #1, which had initial production on 2/3/1999. This well produces into a single well battery at the Todd "14K" Federal #1 well site. The Bone Spring production graph that is attached illustrates the marginal production rates from the Bone Spring zone. DEC plans to allocate production by assuming any incremental production gain realized after the commingle of the Bone Spring and Wolfcamp would come from the Wolfcamp. Attached is an estimated Wolfcamp production graph for two years along with the corresponding tabular information. The decline rate for the first year is the same James Ranch Unit (Wolfcamp) wells which produce in Section 6 of the same township and range. The decline rate estimated during the second year is exactly one half of the previous year.

For zones with no production history, estimated production rates and supporting data.

DEC's estimated initial production rate for the Wolfcamp is based upon swab tests performed during recompletion activities. Both the Wolfcamp and Bone Spring are currently downhole commingled in five of the Bass Enterprises, Section 6, T23S, R31E, James Ranch Unit wells and are geologically correlative to the intervals being proposed for downhole commingle in the Todd "14K" Federal #1. Attached is a summary graph of the production from the five (#17, 30, 65, 73, & 76) James Ranch Unit wells. The decline for each product curve has been calculated and used as the basis for the projected decline curve of the Wolfcamp in the Todd 14-1. The decline rate for the first year of estimated Wolfcamp production is the same as the James Ranch Unit (Wolfcamp) wells. The estimated decline rate for the second year is one half that of the first.

Data to support allocation method or formula.

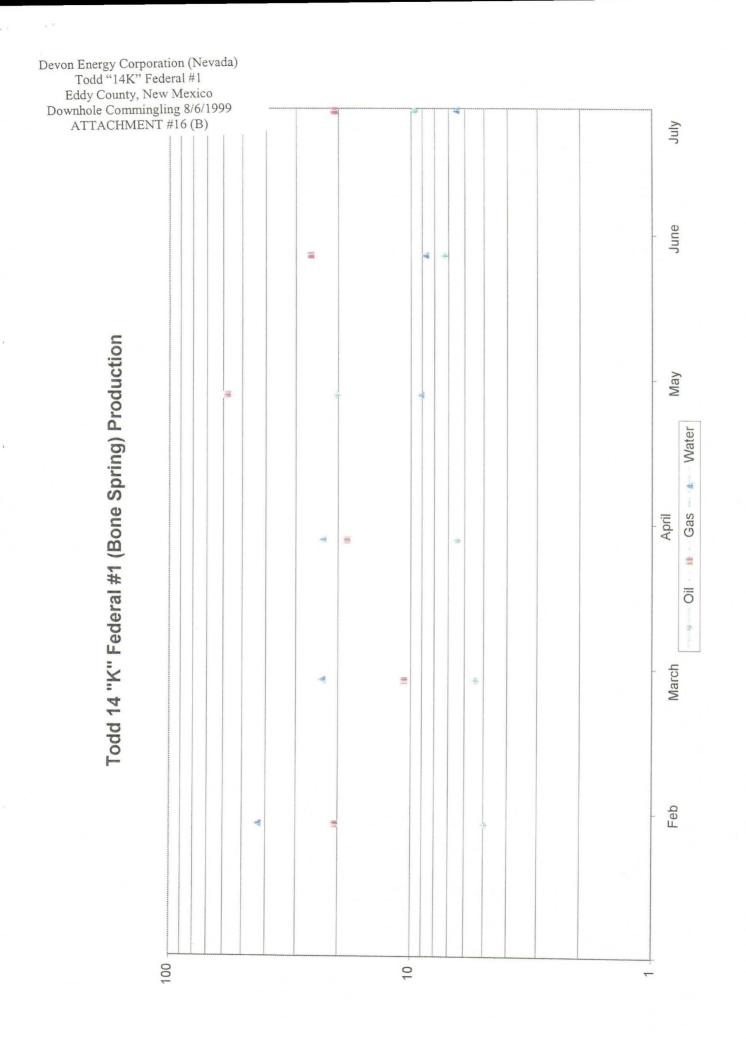
The attached spreadsheet printout of well tests from the Todd "14K" Federal #1 provides a good history of the Bone Spring production. This data indicates a fairly consistent production rate. Once commingled, the incremental production of the well will be allocated to the Wolfcamp with the remaining production being allocated to the Bone Spring.

Devon Energy Corporation (Nevada) Todd "14K" Federal #1 Eddy Cnty, NM

Bone Spring - Actual Production

	OIL	GAS	WTR
Feb, 1999	139	577	1208
Mar, 1999	168	330	724
Apr, 1999	193	552	696
May, 1999	630	1796	283
June, 1999	218	783	262
July, 1999	300	648	203

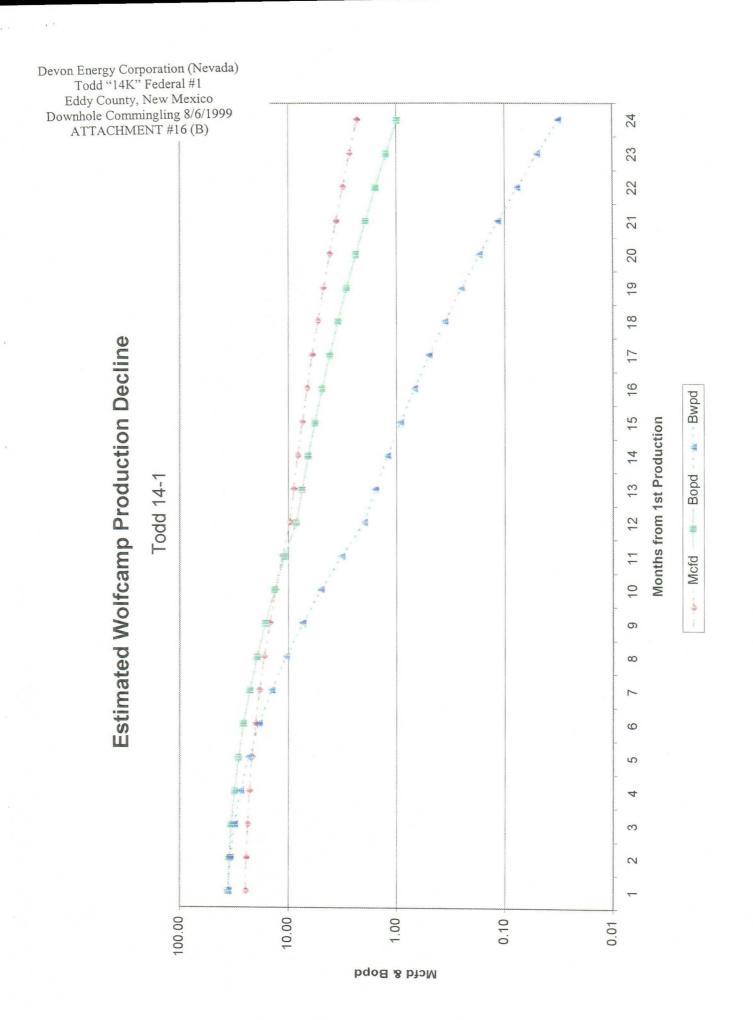
Devon Energy Corporation (Nevada)
Todd "14K" Federal #1
Eddy County, New Mexico
Downhole Commingling 8/6/1999
ATTACHMENT #16 (B)



Estimated Wolfcamp Production Todd 14-1

Devon Energy Corporation (Nevada) Todd "14K" Federal #1 Eddy County, New Mexico Downhole Commingling 8/6/1999 ATTACHMENT #16 (B)

Month	Mcfd	Bopd	Bwpd
1	25	36	36
2	25	35	34
3	24	34	32
4	23	32	28
5	22	29	23
6	20	26	19
7	19	23	14
8	17	19	11
9	15	16	7
10	13	13	5
11	11	11	3.2
12	10	8	2.0
13	9	7	1.6
14	8	7	1.2
15	7	6	0.9
16	7	5	0.7
17	6	4	0.5
18	5	3	0.4
19	5	3	0.3
20	4	2	0.2
21	4	2	0.1
22	3	2	0.1
23	3	_ 1	0.1
24	2	1	0.0



Offset Operators' Address List

Pogo Producing Inc. P.O. Box 10340 Midland, TX 79702-7340

Sonat Exploration Company 110 West Louisiana, Suite 500 Midland, TX 79701

SENDER: Complete items 1 and/or 2 for additional services. Complete items 3, 4a, and 4b. Print your name and address on the reverse of this form so that card to you. Attach this form to the front of the mailpiece, or on the back if a permit. Write "Return Receipt Requested" on the mailpiece below the The Return Receipt will show to whom the article was delivered delivered.	pace does not article number, d and the date	I also wish to recifollowing services extra fee): 1. Addresse 2. Restricted Consult postmas	s (for an ee's Address d Delivery ter for fee.
3. Article Addressed to:	4a. Article N Z 068	umber 3 589 400	
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Working Interest Owners' Address List

Mabee Flynt Lease Trust 11010 Crestmore Houston, TX 77096 Mary Dougherty Trust c/o Northern Bank & Trust of Texas P. O. Box 226270 Dallas, TX 75222-6270

Thomas Hastings, Sr 14254 Misty Meadow Houston TX 77079 Mary Dougherty Trust c/o Northern Bank & Trust of Texas 2701 Kirby Drive Houston, TX 77098-1218

Bascom L. Mitchell No. 1 Live Oak Midland, TX 79705 Joe N. Gifford 10 Desta Drive, Suite 300E Midland, TX 79705-4513

Catherine M. Grace c/o Dan Serna & Co. 6031 West I-20, Suite 251 Arlington, TX 76017

T. E. K. Properties, Ltd. The Highlands Seattle, Washington 98177

Obie & Company c/o Texas Commerce Bank Attn: Bruce Wallace P. O. Box 200555 Houston, TX 77216 Miranda Energy Corp. Building "O" #115 731 West Wadley Midland, TX 79705

Otto E. Schroeder, Jr. 1311 Academy Circle Arlington, TX 76013

L. Edward Innerarity, Jr. P. O. Box 2113 Midland, TX 79702

Mary M. Olson RR 2, Box 202A Boyd, TX 76023

Enron Oil & Gas Attn Patrick Tower PO Box 2267 Midland TX 79702

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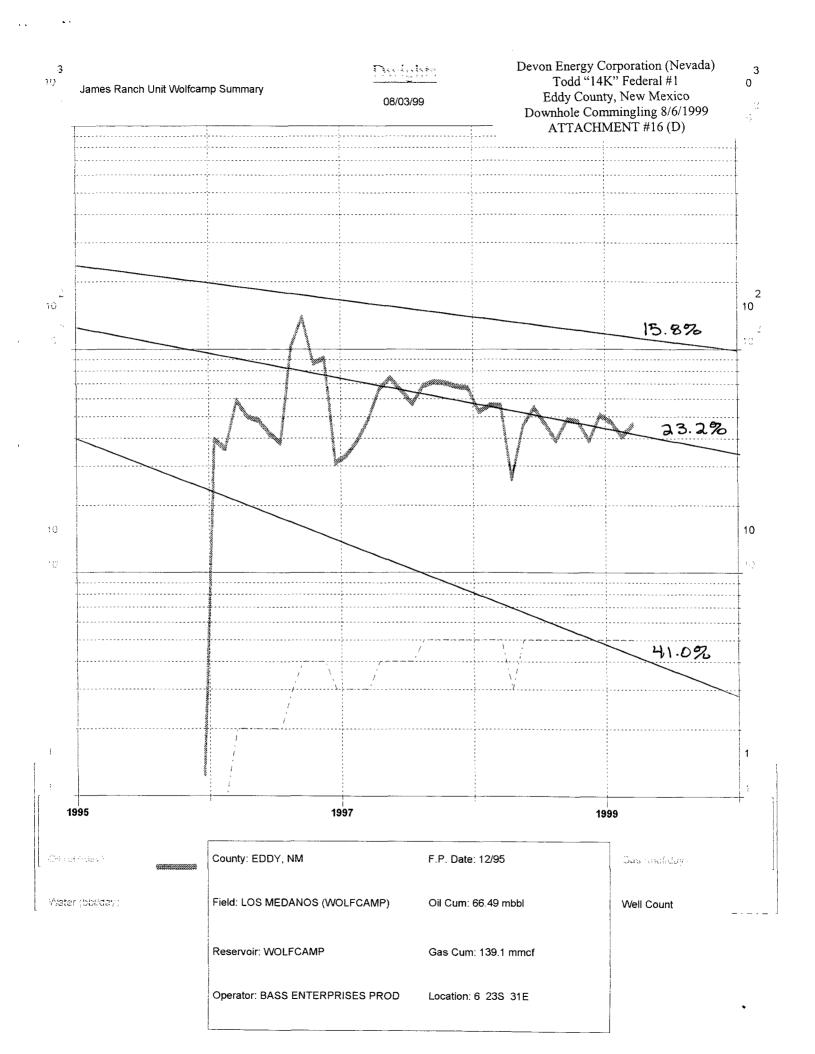
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PS Form **3811**, December 1994

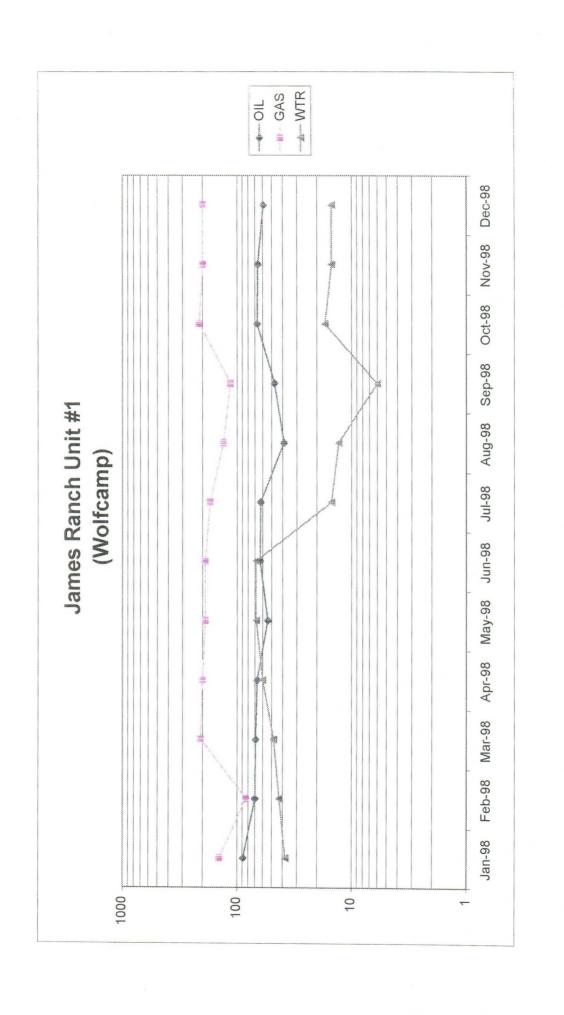
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INGLE WELLS/SAND DUNES Eddy & Lea Counties, New Mexico	Devon Energy Com												ATTACHMENT #16 (D)	Devon Energy Corporation (Nevada) Todd "14K" Federal #1 Eddy County, New Mexico Downhole Commingling 8/6/1999



ACTUAL PRODUCTION

LEASE NAME	#	DATE	OIL	GAS	WTR
JAMES RANCH UNIT	71	Jan-98	89	144	38
JAMES RANCH UNIT	71	Feb-98	70	84	43
JAMES RANCH UNIT	71	Mar-98	69	210	48
JAMES RANCH UNIT	71	Apr-98	67	202	60
JAMES RANCH UNIT	71	May-98	54	191	68
JAMES RANCH UNIT	71	Jun-98	63	190	68
JAMES RANCH UNIT	71	Jul-98	62	173	15
JAMES RANCH UNIT	71	Aug-98	39	132	13
JAMES RANCH UNIT	71	Sep-98	47	115	6
JAMES RANCH UNIT	71	Oct-98	67	215	17
JAMES RANCH UNIT	71	Nov-98	66	200	15
JAMES RANCH UNIT	71	Dec-98	59	202	15
JAMES RANCH UNIT	71	Totals	752	2058	406





20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102-8260 Telephone 405/235-3611 FAX 405/552-4550

Candace R. Graham (405) 552-4520

August 6, 1999

To Whom It May Concern:

RE: Application for Downhole Commingling

Todd "14K" Federal #1 Section 14-T23S-R31E Eddy County, New Mexico

Gentlemen:

Concerning the referenced, enclosed please find a copy of our submittal of Form C107A, with attachments, to the NMOCD in Santa Fe, New Mexico.

Please direct inquiries concerning this matter to Wally Frank, District Engineer, in our Oklahoma City office at (405) 235-3611, X4595.

Sincerely,

Candace R. Graham

Engineering Tech.

Attachments

/cg

copy: NMOCD in Santa Fe and in Artesia, NM

BLM in Roswell, NM

Candace R. Graham

file, engineer, foreman, area interest owners

Application for Downhole Commingling Todd "14K" Federal #1 Eddy County, New Mexico August 6, 1999 Page 2

Area Interest Owners Address List

	Certified Mail No.
Pogo Producing Inc. P.O. Box 10340 Midland, TX 79702-7340	Z 068 589 400
Sonat Exploration Company 110 West Louisiana, Suite 500 Midland, TX 79701	Z 068 589 401
Mary Dougherty Trust c/o Northern Bank & Trust of Text P. O. Box 226270 Dallas, TX 75222-6270	Z 068 589 403 as
Mary Dougherty Trust c/o Northern Bank & Trust of Tex 2701 Kirby Drive Houston, TX 77098-1218	Z 068 589 404 as
Joe N. Gifford 10 Desta Drive, Suite 300E Midland, TX 79705-4513	Z 068 589 405
T. E. K. Properties, Ltd. The Highlands Seattle, Washington 98177	Z 386 088 101
Miranda Energy Corp. Building "O" #115 731 West Wadley Midland, TX 79705	Z 386 088 102
L. Edward Innerarity, Jr. P. O. Box 2113 Midland, TX 79702	Z 386 088 103

Application for Downhole Commingling Todd "14K" Federal #1 Eddy County, New Mexico August 6, 1999 Page 3

Area Interest Owners Address List

	Certified Mail No.
Mabee Flynt Lease Trust 11010 Crestmore Houston, TX 77096	Z 386 088 104
Thomas Hastings, Sr 14254 Misty Meadow Houston TX 77079	Z 386 088 105
Bascom L. Mitchell No. 1 Live Oak Midland, TX 79705	Z 386 088 106
Catherine M. Grace c/o Dan Serna & Co. 6031 West I-20, Suite 251 Arlington, TX 76017	Z 386 088 107
Obie & Company c/o Texas Commerce Bank Attn: Bruce Wallace P. O. Box 200555 Houston, TX 77216	Z 386 088 108
Otto E. Schroeder, Jr. 1311 Academy Circle Arlington, TX 76013	Z 386 088 109
Mary M. Olson RR 2, Box 202A Boyd, TX 76023	Z 386 088 110
Enron Oil & Gas Attn Patrick Tower PO Box 2267 Midland TX 79702	Z 386 088 111

DIMAR ENERGY CORPORATION
BLDG 'O' #115
731 WEST WADLEY
MIDLAND TX 79705

Z 386 088 119