

DEVON
ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500
Oklahoma City, Oklahoma 73102

405/235-3611
Fax 405/552-4550
Fax 405/552-4552

March 2, 1995

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504 - 2088

Attention: Mike Stogner

Re: Non - Standard Location Approval

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:

WELL	LOCATION
WEST "B" #85	2614' FSL & 2621' FWL, Sec. 3-17S-31E
WEST "B" #86	2588' FSL & 2526' FWL, Sec. 4-17S-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 two 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.

25 MAR 9 1995

RECEIVED
OIL CONSERVATION DIVISION

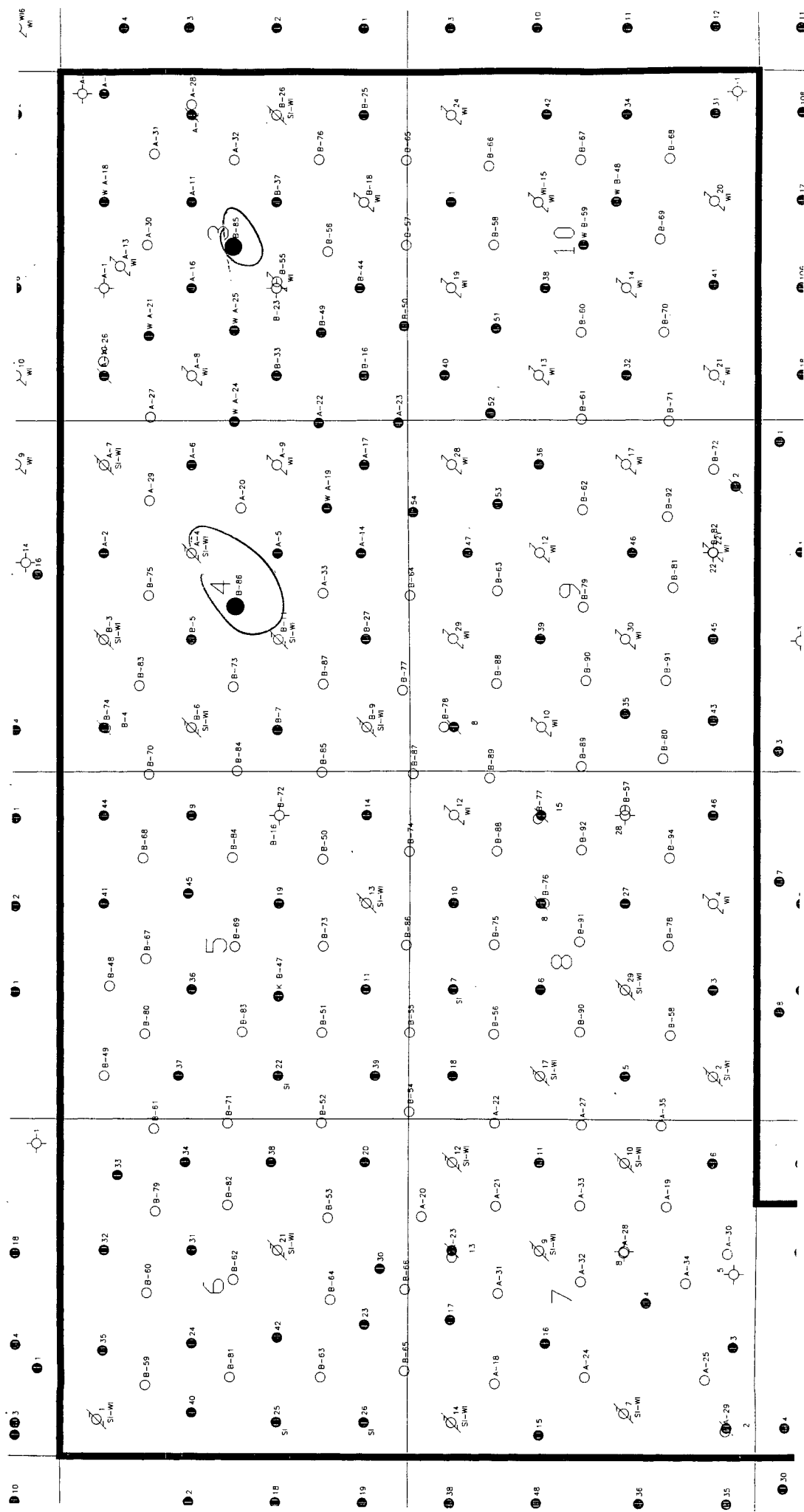
There are no operators that have production in offsetting 40 acre tracts. The 2 wells listed are offset by wells that are already operated by Devon Energy Operating Corporation; therefore, no notification is necessary.

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

Sincerely,

A handwritten signature in cursive script that reads "Karen Rosa".

Karen Rosa
Engineering Technician



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

SUBMIT IN TRIPlicate*

(See other instructions on
reverse side)

Form approved.

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

a. TYPE OF WORK: DRILL ☒ DEEPEN ☐

b. TYPE OF WELL:

OIL WELL ☒ GAS WELL ☐ Other ☐ SINGLE ZONE ☐ MULTIPLE ZONE ☐

c. NAME OF OPERATOR

DEVON ENERGY OPERATING CORPORATION

d. ADDRESS AND TELEPHONE NO.

20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560

e. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)*

At surface 2614' FSL & 2621' FWL

At top proposed prod. zone (SAME)

f. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*

4 miles east & 4 miles north of Loco Hills, N.M.

g. DISTANCE FROM PROPOSED
LOCATION TO NEARESTPROPERTY OR LEASE LINE, FT. 26'
(Also to nearest dist. unit line if any)

h. DISTANCE FROM PROPOSED LOCATION*

TO NEAREST WELL, DRILLING, COMPLETED,
OR APPLIED FOR, ON THIS LEASE, FT. 900'

i. ELEVATIONS (Show whether DF, RT, GR, etc.)

961' GR

j. NO. OF ACRES IN LEASE

1919.88

k. PROPOSED DEPTH

4400

l. NO. OF ACRES ASSIGNED
TO THIS WELL

40

m. ROTARY OR CABLE TOOLS*

Rotary

n. APPROX. DATE WORK WILL START*

February 1, 1995

3. PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
1 1/4"	8 5/8" J-55	24.0#	600'	200 sk RFC cement + 200 sk Class "C"
7/8"	5 1/2" J-55	15.5#	4400'	500 sk Class "C" 35/65 + 500 sk Class "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 4400' 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.

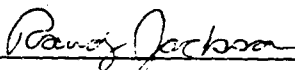
Drilling Program

Exhibits #1/1-A = Blowout Prevention Equipment
Exhibit #2 = Location and Elevation Plat
Exhibit #3/3-A = Road Map and Topo Map
Exhibit #4 = Wells Within 1 Mile Radius
Exhibit #5 = Production Facilities Plat
Exhibit #6 = Rotary Rig Layout
Exhibit #7 = Casing Design
2S Operating Plan

The undersigned accepts all applicable terms, condition, stipulations and restrictions concerning operations conducted on the leased land or portions thereof, as described below:
Lease No. LC029426-B
Legal Description: Section 3-T17N-R31E
Bond Coverage: Nationwide
BLM Bond No.: CO1151

ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

SIGNED



TITLE

RANDY JACKSON

DISTRICT ENGINEER

DATE

11/5/94

(is space for Federal or State office use)

MIT NO.

APPROVAL DATE

condition approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.
CONDITIONS OF APPROVAL, IF ANY:

APPROVED BY

TITLE

DATE

See Instructions On Reverse Side

8 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 statements or representations as to any matter within its jurisdiction

DISTRICT I
P. O. Box 1980
Hobbs, NM 88241-1980

DISTRICT II
P. O. Drawer DD
Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd.
Aztec, NM 87410

DISTRICT IV
P. O. Box 2088
Santa Fe, NM 87507-2088

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

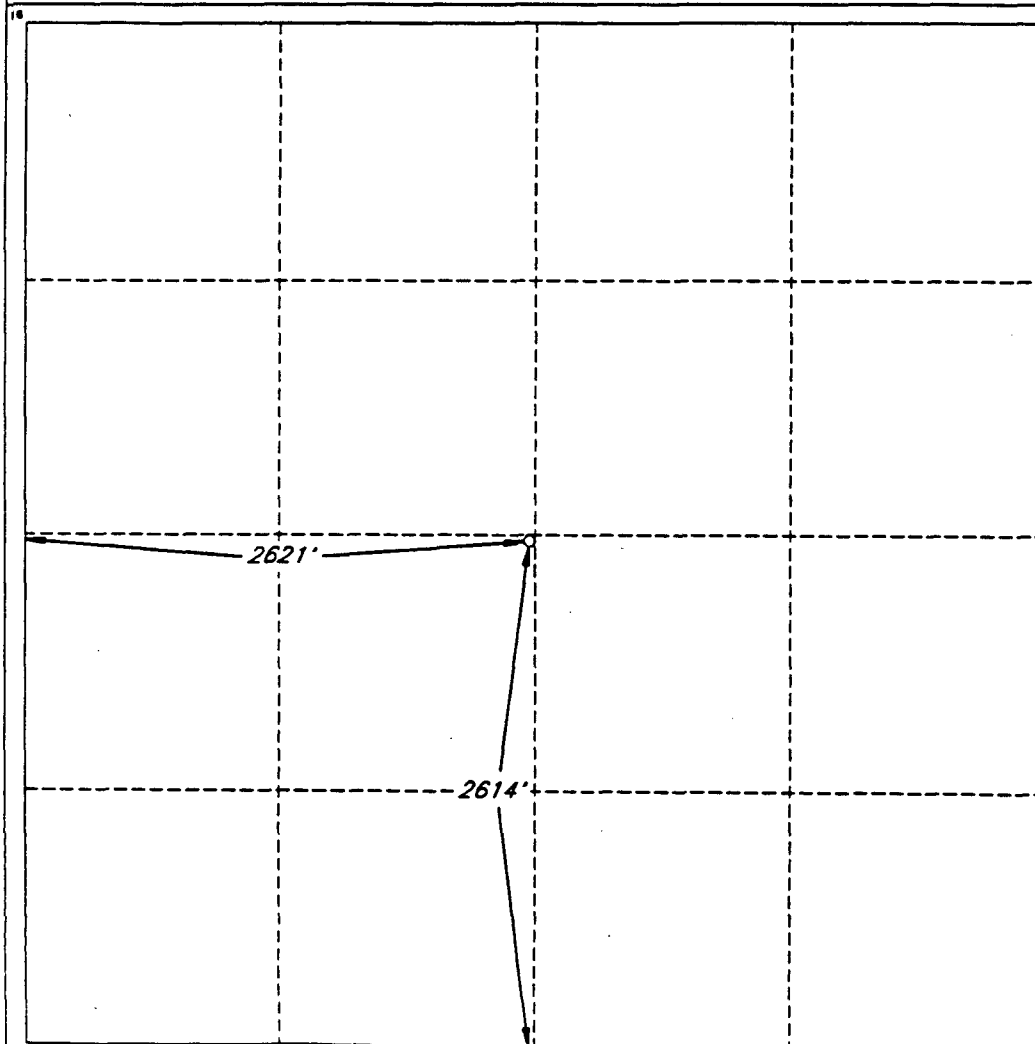
OIL CONSERVATION DIVISION
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		2 Pool Code		3 Pool Name					
4 Property Code K		5 Property Name WEST 'B' FEDERAL						6 Well Number 85	
7 OGRID No.		8 Operator Name DEVON ENERGY OPERATING COMPANY						9 Elevation 3961'	
10 SURFACE LOCATION									
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
	3	17 SOUTH	31 EAST, N.M.P.M.		2614'	SOUTH	2621'	WEST	EDDY
11 BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE									
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
12 Dedicated Acres		13 Joint or Infill		14 Consolidation Code		15 Order No.			

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 true and complete to the best of my knowledge and belief.

Signature

Randy Jackson

Printed Name

Randy Jackson

Title

District Engineer

Date

1/5/95

SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat 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 10, 1994

Signature and Seal of Professional Surveyor

V. Lynn Bezner
STATE OF NEW MEXICO
V. LYNN BEZNER
NO. 7920

Certification No.
V. L. BEZNER AND S.P.S. #7920

JOB #35908-16-98 SE / V.H.B.

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENTSUBMIT IN TRIPLICATE*
(See other instructions on
reverse side)

Form approved.

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a TYPE OF WORK: DRILL ☒ DEEPEN ☐

b TYPE OF WELL:

OIL WELL ☒ GAS WELL ☐ Other ☐ SINGLE ZONE ☐ MULTIPLE ZONE ☐

2 NAME OF OPERATOR

DEVON ENERGY OPERATING CORPORATION

3 ADDRESS AND TELEPHONE NO.

20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560

4 LOCATION OF WELL (Report location clearly and in accordance with any State requirements)*

At surface 2588' FSL & 2526' FWL

At top proposed prod. zone (SAME)

14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*

4 miles east & 4 miles north of Loco Hills, N.M.

15. DISTANCE FROM PROPOSED

LOCATION TO NEAREST

PROPERTY OR LEASE LINE, FT. 114

(Also to nearest drg. unit line if any)

18. DISTANCE FROM PROPOSED LOCATION*

TO NEAREST WELL, DRILLING, COMPLETED,

OR APPLIED FOR, ON THIS LEASE, FT. 900'

21. ELEVATIONS (Show whether DF, RT, GR, etc.)

3928' GR

16. NO. OF ACRES IN LEASE

1919.88

19. PROPOSED DEPTH

4400

17. NO. OF ACRES ASSIGNED

TO THIS WELL

40

20. ROTARY OR CABLE TOOLS*

Rotary

22. APPROX. DATE WORK WILL START*

February 1, 1995

23. PROPOSED CASING AND CEMENTING PROGRAM

SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
12 1/4"	8 5/8" J-55	24.0#	600'	200 sk RFC cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4400'	500 sk Class "C" 35/65 + 500 sk Class
				"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 4400' 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

Exhibits #1/1-A = Blowout Prevention Equipment

Exhibit #2 = Location and Elevation Plat

Exhibit #3/3-A = Road Map and Topo Map

Exhibit #4 = Wells Within 1 Mile Radius

Exhibit #5 = Production Facilities Plat

Exhibit #6 = Rotary Rig Layout

Exhibit #7 = Casing Design

H2S Operating Plan

The undersigned accepts all applicable terms, condition, stipulations and restrictions concerning operations conducted on the leased land or portions thereof, as described below:

Lease No. LC029426-B

Legal Description: Section 4-T17N-R31E

Bond Coverage: Nationwide

BLM Bond No.: CO1151

IN ABOVE SPACE DESCRIBE PROPOSED PROGRAM: If proposal is to deepen, give data on present productive zone and proposed new productive zone. If proposal is to drill or deepen directionally, give pertinent data on subsurface locations and measured and true vertical depths. Give blowout preventer program, if any.

24.

SIGNED



TITLE

RANDY JACKSON

DISTRICT ENGINEER

DATE

1/5/94

*(This space for Federal or State office use)

PERMIT NO. _____

APPROVAL DATE _____

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

CONDITIONS OF APPROVAL, IF ANY:

APPROVED BY _____

TITLE _____

DATE _____

See Instructions On Reverse Side

Title 18 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 statements or representations as to any matter within its jurisdiction

DISTRICT I
P. O. Box 1980
Artesia, NM 88241-1980

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

Form C-102
Revised 02-10-94
Instructions on back

DISTRICT II
P. O. Drawer DD
Artesia, NM 88211-0719

OIL CONSERVATION DIVISION

P. O. Box 2088
Santa Fe, New Mexico 87504-2088

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

☐ AMENDED REPORT

DISTRICT III
1000 Rio Brazos Rd.
Aztec, NM 87410

DISTRICT IV
P. O. Box 2088
Santa Fe, NM 87507-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		2 Pool Code		3 Pool Name			
4 Property Code K		5 Property Name WEST 'B' FEDERAL				6 Well Number 86	
7 OGRID No.		8 Operator Name DEVON ENERGY OPERATING COMPANY				9 Elevation 3928'	

10 SURFACE LOCATION

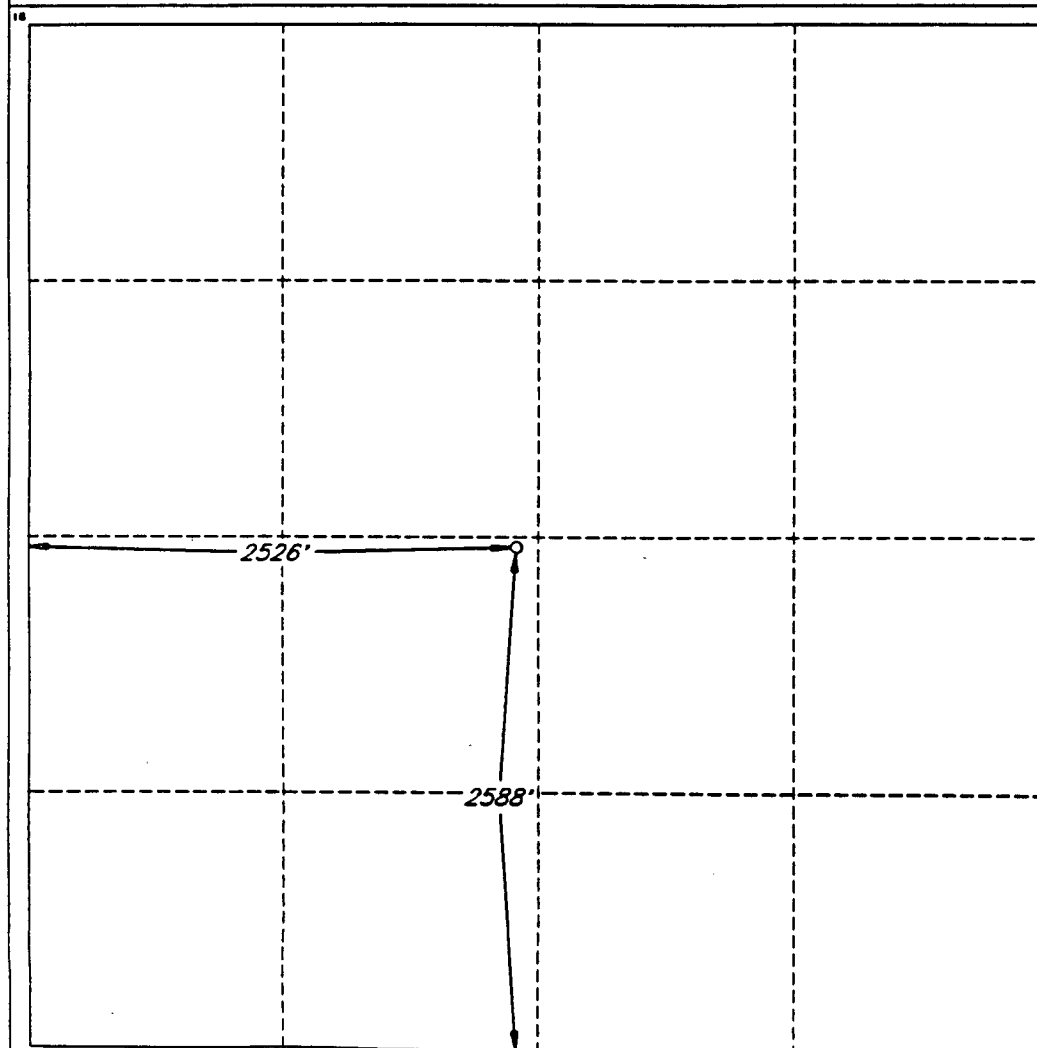
UL or lot no.	Section 4	Township 17 SOUTH	Range 31 EAST, N.M.P.M.	Lot Ida	Feet from the 2588'	North/South line SOUTH	Feet from the 2526'	East/West line WEST	County EDDY
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"BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE

UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
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12 Dedicated Acres	13 Joint or Infill	14 Consolidation Code	15 Order No.
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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 true and complete
to the best of my knowledge and belief.

Signature <i>Randy Jackson</i>
Printed Name Randy Jackson
Title District Engineer
Date 1/5/95

SURVEYOR CERTIFICATION

I hereby certify that the well
location shown on this plat 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 10, 1994
Signature and Seal of Professional Surveyor <i>V. Lynn Bezner</i> STATE OF NEW MEXICO V. LYNN BEZNER NO. 7920
Certificate No. V. L. BEZNER PROF. LAND SURV. #7920
JOB #35908-12-98 SW / V.H.B.

SENT BY:

3-7-95 1:01PM

DEVON ENERGY

5058275741;# 17 8

DEVON ENERGY CORPORATION
70 NORTH BROADWAY, SUITE 1500
OKLAHOMA CITY, OK 73102
OFFICE (405) 235-3611

FAX TRANSMISSION
XEROX 7032 (405) 552-4550
11:01 AM 03/07/95 000 000

DATE:

3/7/95

TO:

Mike Stagner

COMPANY:

NM OCD - Santa Fe

FAX PHONE:

(505) 827-8177

OFFICE PHONE:

FROM:



Karen Rosa

DEVON ENERGY CORPORATION

NUMBER OF PAGES FOLLOWING:

2

TRANSMISSION COMPLETED:

Here are  copies of Approved 3160-4's
 for non-standard location application
sent to you earlier ~~this~~ week.
MMT

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT(See other instructions on
reverse side)

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a. TYPE OF WORK: DRILL ☒ DEEPEN ☐b. TYPE OF WELL: OIL WELL ☒ GAS WELL ☐ Other ☐ SINGLE TUBE ☐ MULTIPLE TUBE ☐2. NAME OF OPERATOR
DEVON ENERGY OPERATING CORPORATION3. ADDRESS AND TELEPHONE NO.
20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-45604. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)*
At surface 2588' FSL & 2526' FWLAt top proposed prod. zone (SAME)
Non-standard Location... SUBJECT TO LIKE APPROVAL BY STATE14. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*
4 miles east & 4 miles north of Loco Hills, N.M.15. DISTANCE FROM PROPOSED LOCATION TO NEAREST PROPERTY OR LEASE LINE, FT. 114
(Also nearest dty. unit line if any)

18. DISTANCE FROM PROPOSED LOCATION TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 900'

21. ELEVATIONS (Show whether DF, RT, GR, etc.)
3928' GR22. APPROX. DATE WORK WILL START*
February 1, 1995

23. PROPOSED CASING AND CEMENTING PROGRAM				
SIZE OF HOLE	GRADE, SIZE OF CASING	WEIGHT PER FOOT	SETTING DEPTH	QUANTITY OF CEMENT
12 1/4"	8 5/8" J-55	24.0#	600'	200 sk RFC cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4400'	500 sk Class "C" 35/65 + 500 sk Class "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 4400' 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

Exhibits #1/1-A = Blowout Prevention Equipment
Exhibit #2 = Location and Elevation Plat
Exhibit #3/3-A = Road Map and Topo Map
Exhibit #4 = Wells Within 1 Mile Radius
Exhibit #5 = Production Facilities Plat
Exhibit #6 = Rotary Rig Layout
Exhibit #7 = Casing Design
H2S Operating Plan

The undersigned accepts all applicable terms, condition, stipulations and restrictions concerning operations conducted on the leased land or portions thereof, as described below:
Lease No. LC029426-B
Legal Description: Section 4-T17N-R31E
Bond Coverage: Nationwide
BLM Bond No.: CO1151

IF THE APPLICANT HAS PREVIOUSLY OBTAINED A PERMIT TO DRILL OR DEEPEN, GIVE DATE ON PRESENT PRODUCTIVE ZONE AND PROPOSED NEW PRODUCTIVE ZONE. IF PROPOSED NEW PRODUCTIVE ZONE IS IN A DIFFERENT SECTION, TOWNSHIP, RANGE, OR COUNTY, GIVE LOCATION OF NEW PRODUCTIVE ZONE. ALSO INDICATE PREVIOUS PERMIT NO. IF ANY.

SIGNED Randy JacksonTITLE RANDY JACKSON
DISTRICT ENGINEERDATE 1/5/94

(This space for Federal or State office use)

PERMIT NO. _____

APPROVAL DATE _____

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

CONDITIONS OF APPROVAL, IF ANY:

APPROVAL SUBJECT TO
GENERAL REQUIREMENTS AND
SPECIAL STIPULATIONS
ATTACHEDAPPROVED BY Glenn A. KingTITLE AREA MANAGERDATE 3/1/95

See Instructions On Reverse Side

Title 18 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 statements or representations as to any matter within its jurisdiction

SENT BY:

3-7-95 1:03PM

DEVON ENERGY-

5058275741;# 3/ 3

UNITED STATES

SUBMIT IN TRIPLICATE*

Form approved.

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1. TYPE OF WORK: DRILL ☒ DEEPEN ☐2. TYPE OF WELL: OIL WELL ☒ GAS WELL ☐ Other ☐ SINGLE ZONE ☐ MULTIPLE ZONE ☐

3. NAME OF OPERATOR

DEVON ENERGY OPERATING CORPORATION

4. ADDRESS AND TELEPHONE NO.

20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560

5. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)*

At surface 2614' FSL & 2621' FWL

At top proposed prod. zone (SAME)

Non-
Standard
Location...... SUBJECT TO
LIKE APPROVAL
BY STATE

6. DISTANCE IN MILES AND DIRECTION FROM NEAREST TOWN OR POST OFFICE*

4 miles east & 4 miles north of Loco Hills, N.M.

7. DISTANCE FROM PROPOSED LOCATION TO NEAREST

PROPERTY OR LEASE LINE, FT. 26'

18. DISTANCE FROM PROPOSED LOCATION TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 900'

19. PROPOSED DEPTH 4400

20. ROTARY OR CABLE TOOL* Rotary

21. ELEVATIONS (Show whether DP, RT, GR, etc.)

3961' GR

22. APPROX. DATE WORK WILL START* February 1, 1995

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SIZE OF HOLES	DEPTH	STUD AND NUMBER	QUANTITY OF CEMENT
12 1/4"	8 5/8" J-55	24.0W	200 sk RSC cement + 200 sk Class "C"
7 7/8"	6 1/2" J-EE	18.5W	300 sk Class "C" 35/85 + 500 sk Class "C" + 1/4 lb/sk collophane flakes

We plan to circulate cement to seal the wellbore in all intervals between the Grayburg-Jackson formation for commercial production 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

- Exhibits #1/1-A - Blowout Prevention Equipment
- Exhibit #2 - Location and Elevation Plat
- Exhibit #3/3-A - Road Map and Topo Map
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Lease No. LC029426-B
Legal Description: Section 3-T17N-R31E
Bond Coverage: nationwide
BLM Bond No.: C01151

ABOVE SPACE DESCRIBE PROPOSED WORK AND IF POSSIBLE, L. L. 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.

SIGNED Randy JacksonTITLE RANDY JACKSON
DISTRICT ENGINEERDATE 1/5/94

This space for Federal or State office use)

PERMIT NO. _____

APPROVAL DATE _____

APPROVAL SUBJECT TO
GENERAL REQUIREMENTS AND
SPECIAL STIPULATIONS

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APPROVED BY Melinda KeyTITLE AREA MANAGER
See Instructions On Reverse SideDATE 3/1/95

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