OIL CONSERVATION DIVISION RECEIVED

DEVON
ENERGY
OPERATING
CORPORATION

20 North Broadway, Suite 1500 Oklahoma City, Oklahoma 73102

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

April 7, 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

J. L. Keel "A" #32	2632' FSL & 2624' FWL, Sec. 7-17S-31E
J. L. Keel "B" #88	1310' FNL & 1200' FEL, Sec. 8-17S-31E
J. L. Keel "B" #91	2664' FSL & 2562' FEL. Sec. 8-T17S-R31E

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 three 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 operators that have production in offsetting 40 acre tracts. The 3 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,

Karen Rosa

Engineering Technician

riCT I Box 1980 6bs. NM 88241-1980

State of New Mexico Energy, Minerals, and Natural Resources Department Form C-102 Revised 02-10-94

Instructions on back

Submit to the Appropriate Submit to unDistrict Office

ISTRICT II P. O. Drawer DD Artesia, 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

AMENDED REPORT

State Lease — 4 copies Fee Lease — 3 copies

DISTR	101	TA .	
P. O.	Box	208	38
Santa	Fe.	NM	87507-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT 3 Pool Name 1 API Number ² Pool Code Well Number * Property Code ⁵ Property Name KEEL 'A' FEDERAL 35 J * Rievation OGRID No. ⁸ Operator Name DEVON ENERGY OPERATING COMPANY 3721' "SURFACE LOCATION Lot Ida Feet from the North/South line Feet from the East/West line County UL or lot no. Section Township 17 SOUTH 31 EAST, N.M.P.M. 2632' SOUTH 2624' **EDDY** "BOTTOM HOLE LOCATION IF DIFFERENT FROM SURFACE Lot Ida Feet from the North/South line Feet from the East/West line UL or lot no. Section Township Range 12 Dedicated Acres 13 Joint or Infill 14 Consolidation Code 18 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

0 (2) (3)

OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.

Signature Com Printed Name Randy Jackson District Engineer Date 1/23/95

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

	best of my belief.
	Date of Survey
	NOVEMBER 10, 1994
:	* V. LYNN * BEZNER NO. 7920
	Cortification Nonanananana
	V. L. CEZDENNO SK. PS. #7920
	UOB #35908 36 ≠ 98 SW / V.H.B.

UNITED STATES Form approved. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT 5. LEASE DESIGNATION AND SERIAL NO. LC 029435-A **APPLICATION FOR PERMIT TO DRILL OR DEEPEN** 6. IF INDIAN, ALLOTTEE OR TRIBE NAME NA Ia TYPE OF WORK: DEEPEN DRILL X 7 INST ACRESMENT NAME h TYPE OF WELL: NA MULTIPLE OIL X 8. FARM OR LEASE NAME, WELL NO. NAME OF OPERATOR KEEL "A" (3) FEDERA **DEVON ENERGY OPERATING CORPORATION** ADDRESS AND TELEPHONE NO. 20 N. BROADWAY, SUITE 1500, OKC, OK 73102 (405) 552-4560 10 FIELD AND POOL OR WILDCAT 4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements)* GRAYBURG-JACKSON 2632' FSL & 2624' FWL At surface UMORTHODOX Subject to 11.SEC., T., R., M., OR BLOCK AND SURVEY OR AREA LOCATION: Like Approval **SECTION 7-T17 S- R31 E** At top proposed prod. zone (SAME) By State 14 DISTANCE IN MILES AND DIRECTION FROM MEAREST TOWN OR POST OFFICE 12 COUNTY OF PARTER 13 STATE RUDY NM 4 miles east & 4 miles north of Loco Hills, N.M. 15.80. OF ACRES IN LEASE 15. DISTANCE FROM PROPOSED 17.NO. OF ACRES ASSIGNED TO THIS WELL LOCATION TO NEAREST 1285 2624 40 PROPERTY OR LEASE LINE, FT. (Also to nearest drig unit line if any)
18. DISTANCE FROM PROPOSED LOCATION® 19.PROPOSET DEPTH 20 ROTARY OR CABLE TOOLS TO MEAREST WELL, DRILLING, COMPLETED 4000 1000 OR APPLIED FOR, ON THIS LEASE, FT. 22 APPROX DATE WORK WILL STARTS 21. ELEVATIONS (Show whether DF, RT, GR, etc.) February 15, 1995 3721' GR PROPOSED CASING AND CEMENTING PROGRAM 23. GRADE, SIZE OF CASING SETTING DEPTH STEE OF HOLE WEIGHT PER FOOT QUANTITY OF CEMENT 200 sk RFC cmt + 200 sk Class "C" 12 1/4 8 5/8" J.55 **4**00° 24 0# CIRCULATI 500 ek Class "C" 35/65 + 500 ek 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-A Exhibit #6 = Rotary Rig Layout Legal Description: Section 7-T17N-R31E Exhibit #7 = Casing Design Bond Coverage: Nationwide Approval Subject to **H2S Operating Plan** BLM Bond No.: CO1151 General Requirements and Special Stipulations IN ABOVE SPACE DESCRIBE PROTESED TWOGRAM: 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 RANDY JACKSON DATE 1/24/55 TITLE DISTRICT ENGINEER *(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: DATE 4-4-25

3 er 1990)

UNITED STATES OPERATORISHED PHOPLICATES

DEPARTMENT OF THE INTERIOR

(See other instructions en'

Form approved.

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	and direction from nearest tow les north of Loco Hills, N.M.			`		12. CO	UNITY OR PARISH	13. STATE NM			
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7 7/8"	5 1/2" J-55	15.5#		4000'		"C" + 1/4 lb/sk cellophane					
outlined in the fo 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 Eq Location and Elevation Road Map and Topo M Wells Within 1 Mile R Production Facilities P Rotary Rig Layout Casing Design Prevail S Ian General Ro	chments. uipment Plat Iap adius lat uipiest to uirements a viicitons	The undersiterms, conducted of thereof, as of Lease No. L. Legal Descr. Bond Cover. BLM Bond	gned accellition, stip concernin n the leas lescribed C029435- iption: Se age: Nati No.: CO1	epts all applica culations and ng operations ed land or por below: B cction 8-T17N- ionwide 151	tions R31E	SURFAU OF FEB - 1 CO DIST GOVERNOON	1995			
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SIGNED C	uns Jackon	1	RANDY	JACKSON CT_ENGIN	<u>VEER</u> DAT	:B/	1/24/95				
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PERMIT NO			·	APPRO	VAL DATE						
Application approval does to CONDITIONS OF API	not warrant or certify that the application of the second control	ant holds legal or equ	uitable title to those ri	ghts in the sui	pject lease which wou	ild entitle	the applicant to conduct	operations thereon.			
APPROVED BY	mothy P.OB.	TIT See	LE Instructions On Re	rerse Side	£ k	DA	ATE 4-4-5	25			

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

Form C-102 Revised 02-10-94

Instructions on bock

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

ASTRICT II P. 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

AMENDED REPORT

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Property Cod	le .	⁵ Property N	eme								• Well Number	
·. A .					J.L.K	EEL '	B' FEDERA	L			88	
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160-3 mber 1990)	UNITED DEPARTMENT O	STATES ATTENTED OF THE INTERIOR		E*	Form approved.	
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•	NO DIRECTION FROM NEAREST TOWN OF	POST OFFICE		12. COU	NTY OR PARISH	13. STATE
4 miles east & 4 mile	es north of Loco Hills, N.M.		•	EDDI		NM
15. DISTANCE FROM PROPO- LOCATION TO NEAREST PROPERTY OR LEASE LI		16.NO. OF ACRES IN LEASE 606.92		<u>. </u>	17.MO. OF ACRES TO THIS WELL 40	ASSICKED
(Also to nearest drie, unit line 18. DISTANCE FROM PROPO	ifany)	19.PROPOSED DEPTH			20.ROTARY OR CAL	UE TOOLS*
TO MEAREST WELL, DRI	ILLING, COMPLETED,	4000			Rotary	
21.ELEVATIONS (Show wheth			<u> </u>	22.	APPROX. DATE WORK W	ILL START*
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23.		PROPOSED CASING AND CE	MENTING PROGRAM			
SIZE OF HOLE	GRADE, SIZE OF CASING	Weight per foot	SETTING DEPTH		_	OF CEMENT
12 1/4"	8 5/8" J-55	24.0#			200 sk RFC cmt + 20	
7 7/8"	5 1/2" J-55	15.5#	4000'		500 sk Class "C" 35 "C" + 1/4 lb/sk cel	
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CONDITIONS OF APPL	nothy POBu	Acting	ANAGER		TE	3-
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Box 1980 NM 88241-1980

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

TRICT II O. Drawer DD Artesia, 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

AMENDED REPORT

DISTRICT I P. O. Box 2 Santa Fe, N	2088	7-2088	TELL LOCA	TION A	IND A	CREAGE D	EDICATION	N PLAT			
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