

DEVON  
ENERGY  
OPERATING  
CORPORATION

OIL CONSERVATION DIVISION  
RECEIVED  
APR 12 PM 8 52  
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,

A handwritten signature in black ink that reads "Karen Rosa". The signature is written in a cursive, flowing style.

Karen Rosa  
Engineering Technician

DISTRICT I  
Box 1980  
Artesia, 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 J		5 Property Name KEEL 'A' FEDERAL			6 Well Number 32
7 OGRID No.		8 Operator Name DEVON ENERGY OPERATING COMPANY			9 Elevation 3721'

### 10 SURFACE LOCATION

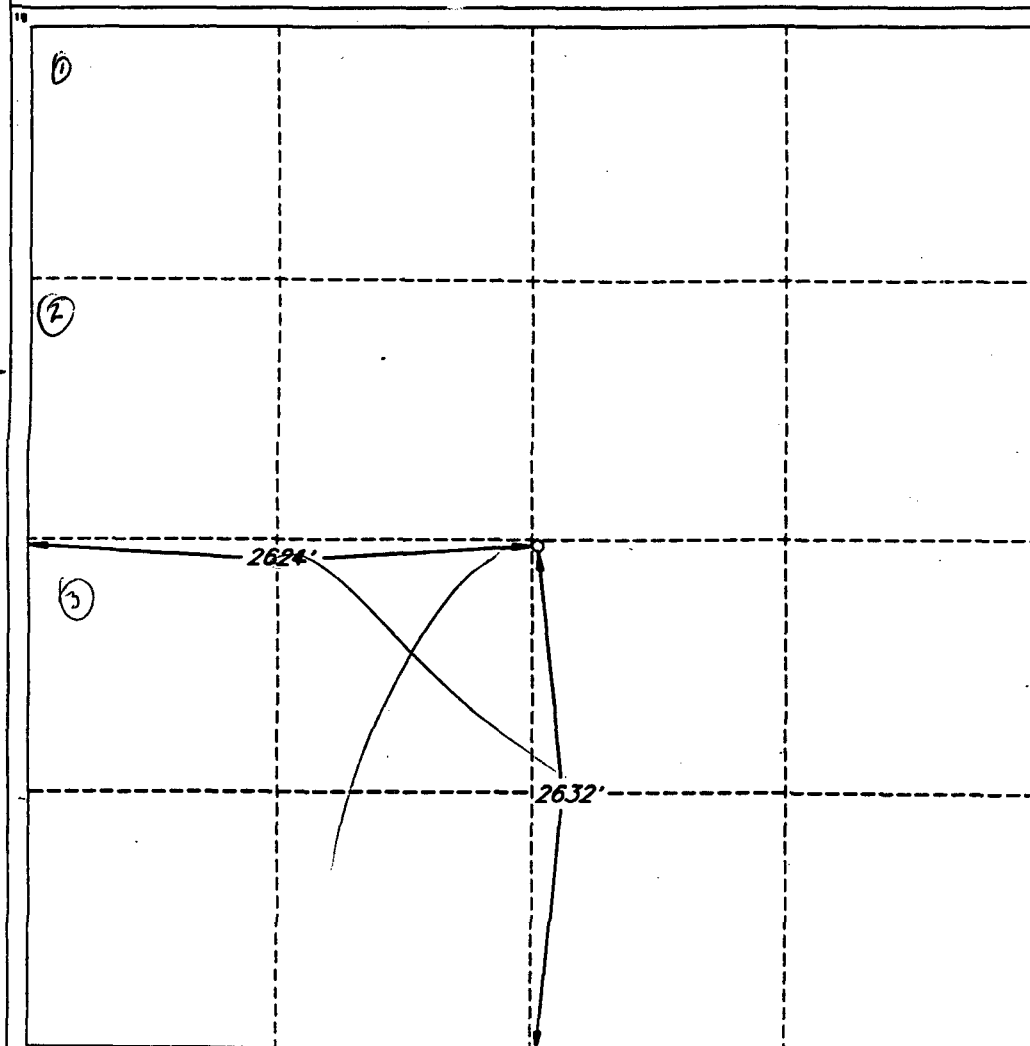
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
	7	17 SOUTH	31 EAST, N.M.P.M.		2632'	SOUTH	2624'	WEST	EDDY

### "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

1/23/95

### 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  
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  
V. L. BEZNER AND SONS, #7920

JOB #35908-36-98 SW / V.H.B.

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

OPERATOR'S COPY  
SUBMIT 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 2632' FSL & 2624' FWL UNORTHODOX Subject to  
LOCATION: Like Approval  
By State  
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. 2624  
(Also to nearest drilg. unit line if any)

16. NO. OF ACRES IN LEASE  
1885

17. NO. OF ACRES ASSIGNED TO THIS WELL  
40

18. DISTANCE FROM PROPOSED LOCATION\* TO NEAREST WELL, DRILLING, COMPLETED, OR APPLIED FOR, ON THIS LEASE, FT. 1000'

19. PROPOSED DEPTH  
4000

20. ROTARY OR CABLE TOOLS\*  
Rotary

21. ELEVATIONS (Show whether DF, RT, GR, etc.)  
3721' GR

22. APPROX. DATE WORK WILL START\*  
February 15, 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#	400'	200 sk RFC cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4000'	500 sk Class "C" 35/65 + 500 sk Class "C" + 1/4 lb/sk cellophane flakes

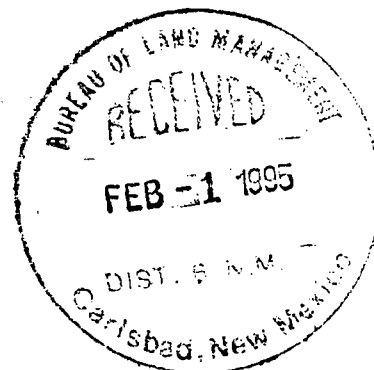
We plan to circulate cement to surface on all casing strings. Devon Energy Operating Corporation proposes to drill to 4000' to test the Grayburg-Jackson formation for commercial quantities of oil. If the Grayburg-Jackson is deemed non-commercial, the wellbore will be plugged and abandoned per Federal Regulations. Programs to adhere to onshore oil and gas regulations are outlined in the following exhibits and attachments.

Drilling Program

- 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

Approval Subject to  
General Requirements and  
Special Stipulations  
Attached

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. LC029435-A  
Legal Description: Section 7-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 Randy Jackson

TITLE RANDY JACKSON  
DISTRICT ENGINEER

DATE 1/24/95

\*(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 Timothy P. O'Brien

TITLE Acting  
AREA MANAGER  
See Instructions On Reverse Side

DATE 4-4-95

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

3  
1990)

UNITED STATES OPERATIONS COPY  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

(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 1310' FNL & 1200' FEL

UNORTHODOX Subject to  
LOCATION: Like Approval  
By State

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. 1200  
(Also to nearest drlg. 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.)

3827' GR

5. LEASE DESIGNATION AND SERIAL NO.

LC 029435-B

6. IF INDIAN, ALLOTTEE OR TRIBE NAME

NA

7. UNIT AGREEMENT NAME

NA

8. FARM OR LEASE NAME, WELL NO.

KEEL "B" FEDERAL NO. 88

9. API WELL NO.

10. FIELD AND POOL, OR WILDCAT

GRAYBURG-JACKSON

11. SEC., T., R., M., OR BLOCK AND SURVEY OR AREA

SECTION 8-T17 S- R31 E

12. COUNTY OR PARISH

EDDY

13. STATE

NM

17. NO. OF ACRES ASSIGNED  
TO THIS WELL

40

20. ROTARY OR CABLE TOOLS\*

Rotary

22. APPROX. DATE WORK WILL START\*

February 15, 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#	400' CIRCULATE	200 sk RFC cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4000'	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 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

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

Approval Subject to  
General Requirements and  
Special Stipulations  
Attached

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. LC029435-B

Legal Description: Section 8-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 prevention program, if any.

24.

SIGNED

*Randy Jackson*

RANDY JACKSON  
TITLE DISTRICT ENGINEER

DATE

1/24/95

\*(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

*Timothy P. O'Brien*

TITLE

*Acting*  
See Instructions On Reverse Side

DATE

4-4-95

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

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

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

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

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		2 Pool Code		3 Pool Name			
4 Property Code A		5 Property Name J.L. KEEL 'B' FEDERAL				6 Well Number 88	
7 GRID No.		8 Operator Name DEVON ENERGY OPERATING COMPANY				9 Elevation 3827'	

\* SURFACE LOCATION

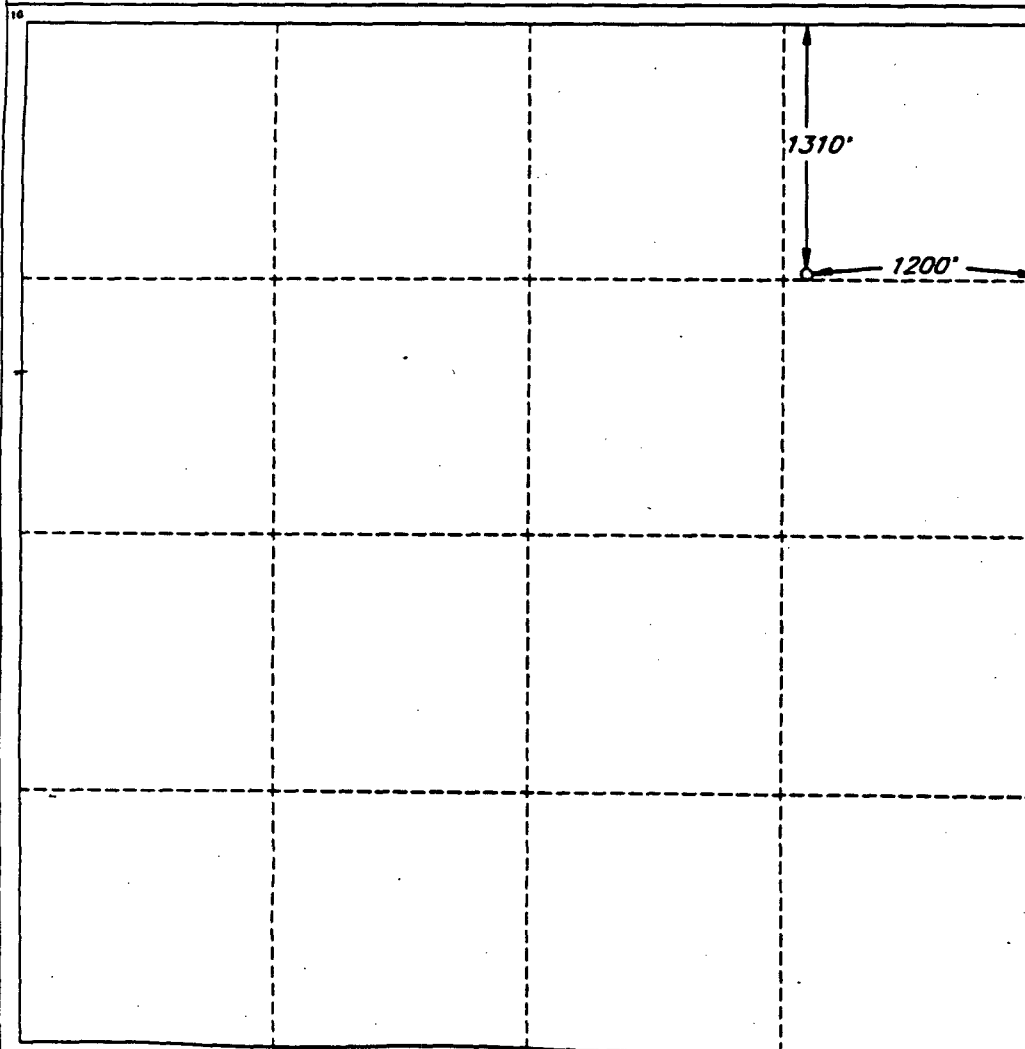
UL or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
	8	17 SOUTH	31 EAST, N.M.P.M.		1310'	NORTH	1200'	EAST	EDDY

"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 40	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  
1/23/95

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  
same is true and correct to the  
best of my belief.

Date of Survey  
NOVEMBER 8, 1994

Signature and Seal of  
Professional Surveyor  
*V. Lynn Bezner*  
STATE OF NEW MEXICO  
V. LYNN  
BEZNER  
NO. 7920  
Certification No.  
V. L. BEZNER  
#7920  
JOB #3590

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

Form approved.

## APPLICATION FOR PERMIT TO DRILL OR DEEPEN

1a. TYPE OF WORK: DRILL ☒ DEEPEN ☐  
1b. 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 2664' FSL & 2562' FEL **UNORTHODOX** Subject to  
At top proposed prod. zone (SAME) **LOCATION: Like Approval**  
**By State**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. **2562**  
(Also to nearest drile 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.)  
3763' GR16. NO. OF ACRES IN LEASE  
606.9219. PROPOSED DEPTH  
400017. NO. OF ACRES ASSIGNED TO THIS WELL  
4020. ROTARY OR CABLE TOOLS\*  
Rotary22. APPROX. DATE WORK WILL START\*  
February 15, 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#	400'	200 sk RFC cmt + 200 sk Class "C"
7 7/8"	5 1/2" J-55	15.5#	4000'	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 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

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. LC029435-B  
Legal Description: Section 8-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.

SIGNED

TITLE **RANDY JACKSON**  
**DISTRICT ENGINEER**

DATE

**1/24/95**

\*(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

**Acting**  
**AREA MANAGER**

DATE

**4-4-95**

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

CT 1  
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

STRICT 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

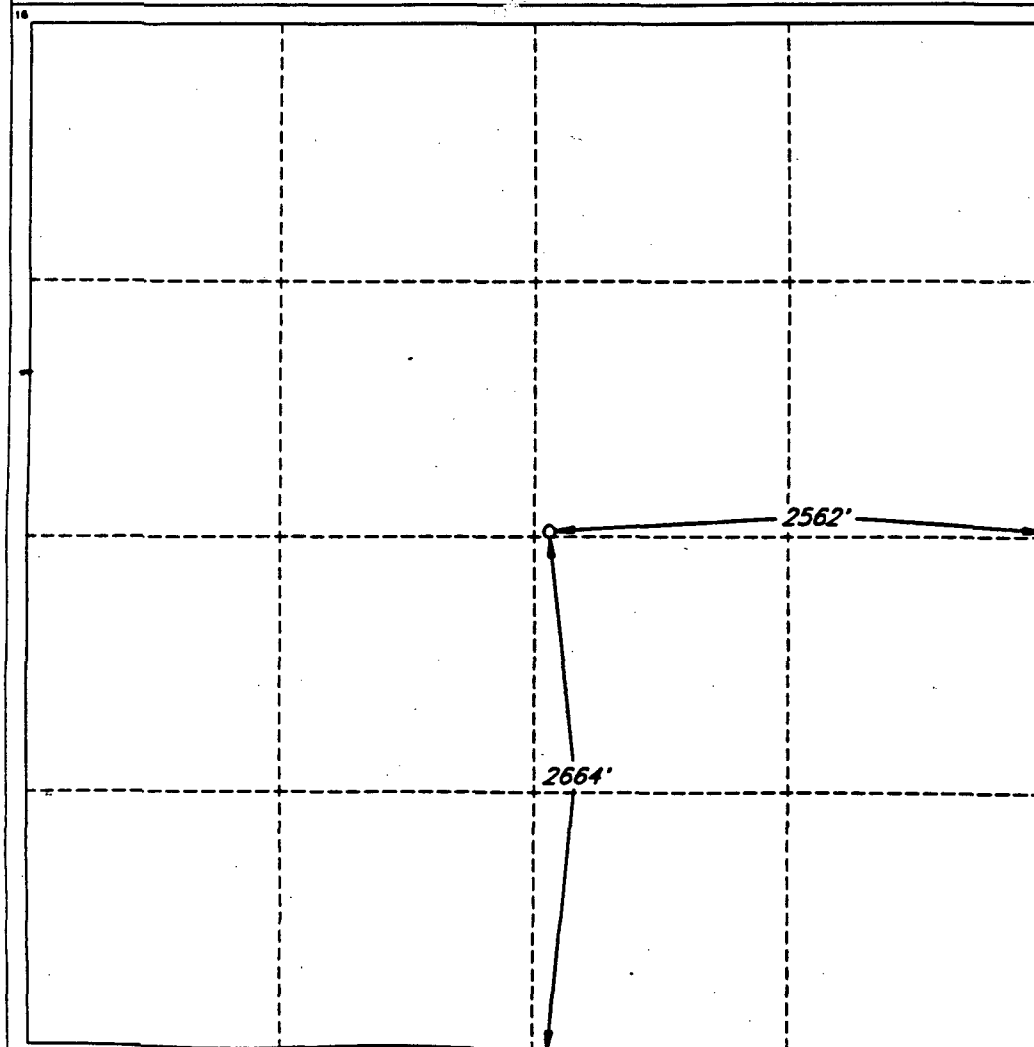
DISTRICT III  
1000 Rio Brazos Rd.  
Aztec, NM 87410

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 G		5 Property Name JL KEEL 'B' FEDERAL						6 Well Number 91	
7 OGRID No.		8 Operator Name DEVON ENERGY OPERATING COMPANY						9 Elevation 3763'	
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
	8	17 SOUTH	31 EAST, N.M.P.M.		2664'	SOUTH	2562'	EAST	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

1/23/95

**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  
same is true and correct to the  
best of my belief.

Date of Survey

NOVEMBER 8, 1994

Signature and Seal of  
Professional Surveyor

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

Certified by  
V. L. BEZNER AND SURVEYOR #7920

JOB #35908-17-08 SE / V.H.B.



