Proposed Owl Oil and Gas SWD

Havenor stated that Bone Springs produced water might be one of the sources of disposal water. The Examiner requested a Bone Springs water analysis. No Bone Springs analyses were found in GoTech's water analyses database in a 5-mile radius of the proposed SWD, Unit K, Sec. 9, T21S-R27E. Well records in a much broader area failed to uncover any Bone Springs water analyses.

Regional experience has shown Bone Springs Formation waters generally tend to be slightly less saline than the immediately overlying Brushy Canyon Formation of the Delaware Mountain Group. Devon Energy Corporation's Lone Tree State #2-H, 30-015-40987 located in Unit N, Sec. 2, T21S-R27E, slightly outside and northeast of the Owl 2-mile area of interest reported a Delaware water sample with a TDS of 207014 ppm. From this it is reasonable to predict Bone Springs water from the surrounding area might be in the range of, or exceed, 150000 ppm TDS. The proposed Owl Oil and Gas basal Yates Formation and upper-most Seven Rivers Formation interval does not contain protected waters.

Oil Conservation Division

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Exhibit No.