Form 3160-3 (June 2015)

#### OCD - REC'D 9/3/2020

FORM APPROVED OMB No. 1004-0137 Expires: January 31, 2018

#### **UNITED STATES** DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

5. Lease Serial No.

APPLICATION FOR PERMIT TO D	RILL OR I	REENTER	6. If Indian, Allotee	or Tribe Name
1a. Type of work: DRILL RE	EENTER		7. If Unit or CA Agr	reement, Name and No.
1b. Type of Well: Oil Well Gas Well Ot	8. Lease Name and	Wall No.		
1c. Type of Completion: Hydraulic Fracturing Sin	ngle Zone	Multiple Zone	8. Lease Name and	Well No.
	_			
2. Name of Operator			9. API Well No. 30 015 4741	7
3a. Address	3b. Phone N	o. (include area code)	10. Field and Pool, o	or Exploratory
4. Location of Well (Report location clearly and in accordance w	vith any State	requirements.*)	11. Sec., T. R. M. or	Blk. and Survey or Area
At surface				
At proposed prod. zone				
14. Distance in miles and direction from nearest town or post office	ce*		12. County or Parish	13. State
15. Distance from proposed*	16. No of ac	eres in lease 17. Spac	ing Unit dedicated to the	his well
location to nearest property or lease line, ft.				
(Also to nearest drig. unit line, if any)				
18. Distance from proposed location* to nearest well, drilling, completed,	19. Proposed	d Depth 20. BLM	I/BIA Bond No. in file	
applied for, on this lease, ft.				
21. Elevations (Show whether DF, KDB, RT, GL, etc.)	22. Approxim	mate date work will start*	23. Estimated durati	on
	24. Attac	hments		
The following, completed in accordance with the requirements of (as applicable)	Onshore Oil	and Gas Order No. 1, and the	Hydraulic Fracturing r	ule per 43 CFR 3162.3-3
Well plat certified by a registered surveyor.     A Drilling Plan.		4. Bond to cover the operation Item 20 above).	ns unless covered by ar	n existing bond on file (se
3. A Surface Use Plan (if the location is on National Forest Syster SUPO must be filed with the appropriate Forest Service Office)		Operator certification.     Such other site specific info BLM.	ormation and/or plans as	may be requested by the
25. Signature	Name	(Printed/Typed)		Date
Title				
Approved by (Signature)	Name	(Printed/Typed)		Date
Tral	2000			
Title	Office			
Application approval does not warrant or certify that the applican	t holds legal o	or equitable title to those rights	s in the subject lease w	hich would entitle the
applicant to conduct operations thereon.  Conditions of approval, if any, are attached.				
Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, m of the United States any false, fictitious or fraudulent statements of				any department or agency



District I

1625 N. French Dr., Hobbs, NM 88240 Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210

Phone: (575) 748-1283 Fax: (575) 748-9720 1000 Rio Brazos Road, Aztec, NM 87410

District III

Phone: (505) 334-6178 Fax: (505) 334-6170 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

Phone: (505) 476-3460 Fax: (505) 476-3462

#### State of New Mexico

### Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION

1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

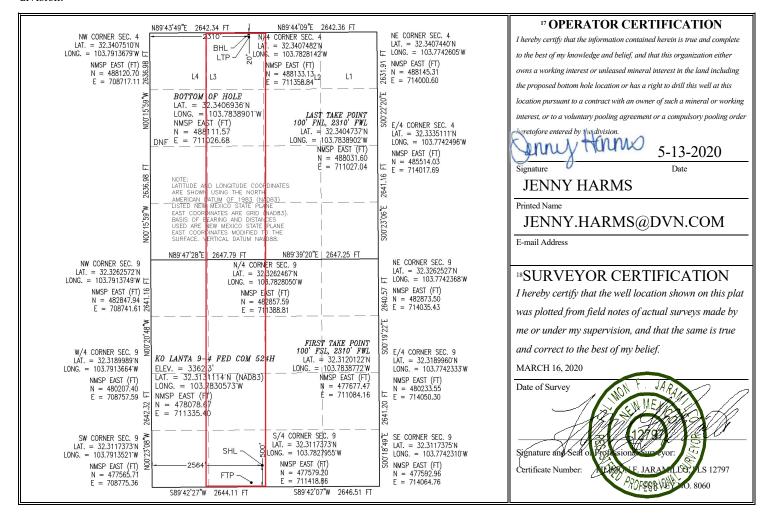
AMENDED REPORT

#### WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Numbe	40295 Pool Code	<sup>3</sup> Pool Name				
30 015 47417	40293	Los Medanos Bone Spring				
<sup>4</sup> Property Code	5 P	<sup>5</sup> Property Name				
321175	KO LANT	KO LANTA 9-4 FED COM				
<sup>7</sup> OGRID No.	8 O	8 Operator Name				
6137	DEVON ENERGY PR	DEVON ENERGY PRODUCTION COMPANY, L.P.				

					10 Surface	e Location			
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
N	9	23 S	31 E		500	SOUTH	2564	WEST	EDDY
			пE	ottom H	ole Location	If Different Fro	om Surface		
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
3	4	23 S	31 E		20	NORTH	2310	WEST	EDDY
Dedicated Acres 319.76	s 13 Joint	or Infill 14	Consolidation	n Code			<sup>15</sup> Order No.		

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



Inten	t X	As Drill	ed										
API#			]										
Ope	rator Nan	ne:	1			Property	Name	:					Well Number
DE	ON ENE	RGY PROI	DUCTIO	v co.,	L.P.	K	O LAN	TA 9-4	4 FED	COM	1		524H
Cick C	Off Point (	KOP)											
UL N	Section 9	Township 23S	Range <b>31E</b>	Lot	Feet 350 FSI	Fron	n N/S	Feet 2310	) FWL	From	n E/W	County EDDY	
Latitu	I ude 1270300	)			Longitu -10	I <sup>ude</sup> 3.783882	00					NAD 83	
irst 7	Take Point	t (FTP)			·								
UL <b>N</b>	Section <b>9</b>	Township <b>23S</b>	Range <b>31E</b>	Lot	Feet <b>100</b>		n N/S UTH	Feet <b>231</b>	0	From <b>WE</b>	n E/W <b>ST</b>	County <b>EDDY</b>	
Latitu	ude <b>32.312</b>				Longitu			2				NAD 83	
Last T	Section	Township 23S	Range <b>31E</b>	Lot <b>3</b>	Feet <b>100</b>	From N/S	Fee I 23		From <b>WES</b>	E/W <b>T</b>	Count <b>EDD</b>	 <b>Ү</b>	
Latitu		404737		1	Longitu	ude 103.78	 33890	)2			NAD	83	
s this	s well the	defining w	ell for the	e Horiz	ontal Spa	acing Unit?		NO	]				
f infi	s well an in II is yes p ng Unit.		ride API i	YES f avail	_	erator Nai	me and	d well	numb	er fo	r Defii	ning well	for Horizontal
API#													
Ope	rator Nan	ne:				Property	Name	:					Well Number

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Submit Original to Appropriate District Office

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505

#### **GAS CAPTURE PLAN**

Date: April 30, 2020	
⊠ Original	Devon & OGRID No.: <u>Devon Energy Production Co., L.P.</u> 6137
☐ Amended - Reason for Amendment:	

This Gas Capture Plan outlines actions to be taken by the Devon to reduce well/production facility flaring/venting for new completion (new drill, recomplete to new zone, re-frac) activity.

Note: Form C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule (Subsection A of 19.15.18.12 NMAC).

#### Well(s)/Production Facility - Name of facility

The well(s) that will be located at the production facility are shown in the table below.

Well Name	API	Well Location	SHL Fo	SHL Footages			Expected MCF/D	Flared or Vented	Comments
KO LANTA 9-4 FED COM 231H		9-23S-31E	945	FWL	350	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 232H		9-23S-31E	975	FWL	350	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 512H		9-23S-31E	735	FWL	500	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 522H		9-23S-31E	765	FWL	500	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 621H		9-23S-31E	885	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 711H		9-23S-31E	915	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 331H		9-23S-31E	945	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 622H		9-23S-31E	975	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 514H		9-23S-31E	2534	FWL	500	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 524H		9-23S-31E	2564	FWL	500	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 712H		9-23S-31E	2534	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 332H		9-23S-31E	2564	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 623H		9-23S-31E	2594	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 713H		9-23S-31E	2624	FWL	200	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 233H		9-23S-31E	1250	FEL	350	FSL			KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 234H		9-23S-31E	1220	FEL	350	FSL			KO LANTA 9 CTB 3

KO LANTA 9-4 FED COM 516H	9-23S	-31E 1430	FEL	350	FSL	KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 526H	9-23S	-31E 1400	FEL	350	FSL	KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 333H	9-23S	-31E 1130	FEL	200	FSL	KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 624H	9-23S	-31E 1100	FEL	200	FSL	KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 714H	9-23S	-31E 1070	FEL	200	FSL	KO LANTA 9 CTB 3
KO LANTA 9-4 FED COM 334H	9-23S	-31E 1040	FEL	200	FSL	KO LANTA 9 CTB 3

#### **Gathering System and Pipeline Notification**

Well(s) will be connected to a production facility after flowback operations are complete, if DCP system is in place. The gas produced from production facility is dedicated to <u>DCP</u> and will be connected to <u>DCP</u> low/high pressure gathering system located in Lea County, New Mexico. It will require 0' of pipeline to connect the facility to low/high pressure gathering system. <u>Devon</u> provides (periodically) to <u>DCP</u> a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, <u>Devon</u> and <u>DCP</u> have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at <u>DCP</u> Processing Plant located in the reference table. The actual flow of the gas will be based on compression operating parameters and gathering system pressures.

#### Flowback Strategy

After the fracture treatment/completion operations, well(s) will be produced to temporary production tanks and gas will be flared or vented. During flowback, the fluids and sand content will be monitored. When the produced fluids contain minimal sand, the wells will be turned to production facilities. Gas sales should start as soon as the wells start flowing through the production facilities, unless there are operational issues on <u>DCP</u> system at that time. Based on current information, it is <u>Devon's</u> belief the system can take this gas upon completion of the well(s).

Safety requirements during cleanout operations from the use of underbalanced air cleanout systems may necessitate that sand and non-pipeline quality gas be vented and/or flared rather than sold on a temporary basis.

#### Alternatives to Reduce Flaring

Below are alternatives considered from a conceptual standpoint to reduce the amount of gas flared.

- Power Generation On lease
  - Only a portion of gas is consumed operating the generator, remainder of gas will be flared
- Compressed Natural Gas On lease
  - o Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal On lease
  - o Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines

#### **Reference Table:**

DCP Plant locations Artesia Sec. 7, T18S, R28E, Eunice Sec. 5, T21S, R36E Linam Sec. 6, T19S, R37E Zia II Sec. 19, T19S, R32E

#### Ko Lanta 9-4 Fed Com 524H

#### 1. Geologic Formations

TVD of target	8732	Pilot hole depth	N/A
MD at TD:	18678	Deepest expected fresh water	

#### Basin

Dasin	D (1	XX7 4 /N/C* 1	
	Depth	Water/Mineral	
Formation	(TVD)	Bearing/Target	Hazards*
	from KB	Zone?	
Rustler	485		
Salt	815		
Base of Salt	3965		
Delaware	4195		
Bone Spring 1st	9148		
Bone Spring 2nd	9682		
Bone Spring 3rd	10900		
Wolfcamp	11375		
-			

<sup>\*</sup>H2S, water flows, loss of circulation, abnormal pressures, etc.

#### Ko Lanta 9-4 Fed Com 524H

2. Casing Program

		Wt			Casing	Interval	Casing Interval	
Hole Size	Csg. Size	(PPF)	Grade	Conn	From (MD)	To (MD)	From (TVD)	To (TVD)
17 1/2	13 3/8	48	H40	ВТС	0	510	0	510
12 1/4	9 5/8	40	J-55	ВТС	0	4170	0	4170
8 3/4	5 1/2	17	P110	ВТС	0	18678	0	8732

<sup>•</sup> All casing strings will be tested in accordance with Onshore Oil and Gas Order #2 IILB.1.h Must have table for continengcy casing.

3. Cementing Program (3-String Primary Design)

Casing	# Sks	TOC	Wt. (lb/gal)	Yld (ft3/sack)	Slurry Description
Surface	408	Surf	13.2	1.4	Lead: Class C Cement + additives
I 1	452	Surf	9.0	3.3	Lead: Class C Cement + additives
Int 1	154	500' above shoe	13.2	1.4	Tail: Class H / C + additives
Int 1	As Needed	Surf	9.0	3.3	Squeeze Lead: Class C Cement + additives
Intermediate	452	Surf	9.0	3.3	Lead: Class C Cement + additives
Squeeze	154	500' above shoe	13.2	1.4	Tail: Class H / C + additives
Production	384	500' tieback	9.0	3.3	Lead: Class H /C + additives
Froduction	2028	KOP	13.2	1.4	Tail: Class H / C + additives

Casing String	% Excess
Surface	50%
Intermediate	30%
Production	10%

4. Pressure Control Equipment (Three String Design)

BOP installed and tested before drilling which hole?	Size?	Min. Required WP	T	Туре		Tested to:		
			Anı	Annular		Annular X		50% of rated working pressure
Int 1	13-58"	5M	Blind	d Ram	X			
	13-36	3101	Pipe	Ram		5M		
			Doub	le Ram	X	3101		
			Other*					
			Annular		X	50% of rated working pressure		
Dun dunting	12.5/01	5M	Blind Ram		X			
Production	13-5/8"		Pipe Ram			5M		
			Double Ram		X	5 DIVI		
			Other*					
			Annular (5M)  Blind Ram  Pipe Ram					
			Doub	Double Ram				
			Other*					

5. Mud Program (Three String Design)

Section	Туре	Weight (ppg)
Surface	FW Gel	8.5-9
Intermediate	Brine	10-10.5
Production	WBM	8.5-9

Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all times.

What will be used to monitor the loss or gain of fluid?	PVT/Pason/Visual Monitoring

6. Logging and Testing Procedures

Logging, C	Coring and Testing
	Will run GR/CNL from TD to surface (horizontal well - vertical portion of hole). Stated logs run will be in the
X	Completion Report and sbumitted to the BLM.
	No logs are planned based on well control or offset log information.
	Drill stem test? If yes, explain.
	Coring? If yes, explain.

Additional	logs planned	Interval
	Resistivity	
	Density	
X	CBL	Production casing
X	Mud log	KOP to TD
	PEX	

7. Drilling Conditions

Condition	Specfiy what type and where?
BH pressure at deepest TVD	4087
Abnormal temperature	No

Mitigation measure for abnormal conditions. Describe. Lost circulation material/sweeps/mud scavengers.

Hydrogren Sulfide (H2S) monitors will be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the operator will comply with the provisions of Onshore Oil and Gas Order #6. If Hydrogen Sulfide is encountered measured values and formations will be provided to the BLM.

encou	sicountered measured values and formations will be provided to the BEN.					
N	H2S is present					
Y	H2S plan attached.					

#### 8. Other facets of operation

Is this a walking operation? Potentially

- 1 If operator elects, drilling rig will batch drill the surface holes and run/cement surface casing; walking the rig to next wells on the pad.
- 2 The drilling rig will then batch drill the intermediate sections and run/cement intermediate casing; the wellbore will be isolated with a blind flange and pressure gauge installed for monitoring the well before walking to the next well.
- 3 The drilling rig will then batch drill the production hole sections on the wells with OBM, run/cement production casing, and install TA caps or tubing heads for completions.

NOTE: During batch operations the drilling rig will be moved from well to well however, it will not be removed from the pad until all wells have production casing run/cemented.

#### Will be pre-setting casing? Potentially

- 1 Spudder rig will move in and batch drill surface hole.
  - a. Rig will utilize fresh water based mud to drill surface hole to TD. Solids control will be handled entirely on a closed loop basis.
- 2 After drilling the surface hole section, the spudder rig will run casing and cement following all of the applicable rules and regulations (OnShore Order 2, all COAs and NMOCD regulations).
- $^{3}$  The wellhead will be installed and tested once the surface casing is cut off and the WOC time has been reached.
- 4 A blind flange with the same pressure rating as the wellhead will be installed to seal the wellbore. Pressure will be monitored with a pressure gauge installed on the wellhead.
- 5 Spudder rig operations is expected to take 4-5 days per well on a multi-well pad.
- 6 The NMOCD will be contacted and notified 24 hours prior to commencing spudder rig operations.
- 7 Drilling operations will be performed with drilling rig. At that time an approved BOP stack will be nippled up and tested on the wellhead before drilling operations commences on each well.
  - a. The NMOCD will be contacted / notified 24 hours before the drilling rig moves back on to the pad with the pre-set surface casing.

Attachments	
X	Directional Plan
	Other, describe

## **WCDSC Permian NM**

Eddy County (NAD 83 NM Eastern) Sec 09-T23S-R31E Ko Lanta 9-4 Fed Com 524H

Wellbore #1

Plan: Permit Plan 1

## **Standard Planning Report - Geographic**

03 May, 2020

EDM r5000.141\_Prod US Database: Company: WCDSC Permian NM

Eddy County (NAD 83 NM Eastern)

Project: Site: Well:

Sec 09-T23S-R31E Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1 Permit Plan 1 Design:

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

**Survey Calculation Method:** 

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

Minimum Curvature

Project Eddy County (NAD 83 NM Eastern)

Map System: Geo Datum:

Map Zone:

US State Plane 1983 North American Datum 1983 New Mexico Eastern Zone

System Datum:

Mean Sea Level

Sec 09-T23S-R31E Site

477,565.71 usft Northing: Site Position: Latitude: 32.311737 -103.791352 708,775.36 usft Мар Easting: From: Longitude: Position Uncertainty: Slot Radius: 0.29 0.00 ft 13-3/16 " **Grid Convergence:** 

Well Ko Lanta 9-4 Fed Com 524H

**Well Position** +N/-S 0.00 ft Northing: 478,078.67 usft Latitude: 32.313112 +E/-W 0.00 ft Easting: 711,335.40 usft Longitude: -103.783058

**Position Uncertainty** 0.50 ft Wellhead Elevation: **Ground Level:** 3,362.30 ft

Wellbore #1 Wellbore Magnetics **Model Name** Sample Date Declination Dip Angle Field Strength (°) (°) (nT) 60.07 47,674.60206018 IGRF2015 4/28/2020 6.75

Design	Permit Plan 1					
Audit Notes:						
Version:		Phase:	PROTOTYPE	Tie On Depth:	0.00	
Vertical Section:		Depth From (TVD)	+N/-S	+E/-W	Direction	
		(ft)	(ft)	(ft)	(°)	
		0.00	0.00	0.00	358.24	

**Plan Survey Tool Program** Date 5/3/2020

> Depth From Depth To

> > 0.00

(ft)

(ft) Survey (Wellbore)

18,677.63 Permit Plan 1 (Wellbore #1)

**Tool Name** 

MWD+HDGM OWSG MWD + HDGM Remarks

**Plan Sections** Measured Vertical Dogleg Build Turn Inclination +N/-S Depth Azimuth Depth +E/-W Rate Rate Rate TFO (ft) (°) (°) (ft) (ft) (ft) (°/100usft) (°/100usft) (°/100usft) Target (°) 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 2,500.00 0.00 0.00 2,500.00 0.00 0.00 0.00 0.00 0.00 0.00 2.835.68 3.36 239.44 2.835.49 -5.00 -8.46 1.00 1.00 0.00 239.44 7.593.70 3.36 239.44 7,585.34 -146.67 -248.36 0.00 0.00 0.00 0.00 7,817.48 0.00 0.00 7,809.00 -150.00 -254.00 1.50 -1.50 0.00 180.00 8,167.52 0.00 0.00 8,159.04 -150.00 -254.00 0.00 0.00 0.00 9,067.53 90.00 359.69 8,732.00 422.95 -257.08 10.00 10.00 0.00 359.69 PBHL - Ko Lanta 9-4 -308.72 18,677.63 90.00 359.69 8,732.00 10,032.92 0.00 0.00 0.00 0.00 PBHL - Ko Lanta 9-4

Database: EDM r5000.141\_Prod US Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

 Site:
 Sec 09-T23S-R31E

 Well:
 Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1

Design: Permit Plan 1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

Planned Survey									
Measured Depth (ft)	Inclination (°)	Azimuth (°)	Vertical Depth (ft)	+N/-S (ft)	+E/-W (ft)	Map Northing (usft)	Map Easting (usft)	Latitude	Longitude
0.00	0.00	0.00	0.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
100.00	0.00	0.00	100.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
200.00	0.00	0.00	200.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
300.00	0.00	0.00	300.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
400.00	0.00	0.00	400.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
500.00	0.00	0.00	500.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
600.00	0.00	0.00	600.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
700.00	0.00	0.00	700.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
800.00	0.00	0.00	800.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
900.00	0.00	0.00 0.00	900.00 1,000.00	0.00 0.00	0.00 0.00	478,078.67	711,335.40 711,335.40	32.313112	-103.783058 -103.783058
1,100.00	0.00	0.00	1,100.00	0.00	0.00	478,078.67 478,078.67	711,335.40	32.313112 32.313112	-103.783058
1,200.00	0.00	0.00	1,200.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,300.00	0.00	0.00	1,300.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,400.00	0.00	0.00	1,400.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,500.00	0.00	0.00	1,500.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,600.00	0.00	0.00	1,600.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,700.00	0.00	0.00	1,700.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,800.00	0.00	0.00	1,800.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
1,900.00	0.00	0.00	1,900.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,000.00	0.00	0.00	2,000.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,100.00	0.00	0.00	2,100.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,200.00	0.00	0.00	2,200.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,300.00	0.00	0.00	2,300.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,400.00	0.00	0.00	2,400.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,500.00	0.00	0.00	2,500.00	0.00	0.00	478,078.67	711,335.40	32.313112	-103.783058
2,600.00	1.00	239.44	2,599.99	-0.44	-0.75	478,078.23	711,334.64	32.313110	-103.783060
2,700.00	2.00	239.44	2,699.96	-1.77	-3.01	478,076.90	711,332.39	32.313107	-103.783067
2,800.00	3.00	239.44	2,799.86	-3.99	-6.76	478,074.68	711,328.63	32.313101	-103.783080
2,835.68	3.36	239.44	2,835.49	-5.00	-8.46	478,073.67	711,326.93	32.313098	-103.783085
2,900.00	3.36	239.44	2,899.70	-6.91	-11.71	478,071.76	711,323.69	32.313093	-103.783096
3,000.00	3.36	239.44	2,999.53	-9.89	-16.75	478,068.78	711,318.65	32.313085	-103.783112
3,100.00	3.36	239.44	3,099.35	-12.87	-21.79	478,065.80	711,313.60	32.313076	-103.783128
3,200.00	3.36	239.44	3,199.18	-15.85	-26.83	478,062.82	711,308.56	32.313068	-103.783145
3,300.00	3.36	239.44	3,299.01	-18.82	-31.87	478,059.85	711,303.52	32.313060	-103.783161
3,400.00 3,500.00	3.36	239.44 239.44	3,398.84 3,498.67	-21.80 -24.78	-36.92 -41.96	478,056.87	711,298.48 711,293.44	32.313052	-103.783177 -103.783194
3,600.00	3.36 3.36	239.44	3,598.50	-24.76 -27.76	-41.96 -47.00	478,053.89 478,050.91	711,293.44	32.313044 32.313036	-103.783210
3,700.00	3.36	239.44	3,698.33	-30.73	-47.00 -52.04	478,047.94	711,283.35	32.313028	-103.783227
3,800.00	3.36	239.44	3,798.15	-33.71	-57.08	478,044.96	711,203.33	32.313020	-103.783243
3,900.00	3.36	239.44	3,897.98	-36.69	-62.13	478,041.98	711,273.27	32.313012	-103.763243
4,000.00		239.44	3,997.81	-39.67	-67.17	478,039.00	711,268.23	32.313003	-103.783276
4,100.00		239.44	4,097.64	-42.64	-72.21	478,036.03	711,263.19	32.312995	-103.783292
4,200.00	3.36	239.44	4,197.47	-45.62	-77.25	478,033.05	711,258.14	32.312987	-103.783308
4,300.00		239.44	4,297.30	-48.60	-82.29	478,030.07	711,253.10	32.312979	-103.783325
4,400.00		239.44	4,397.12	-51.58	-87.34	478,027.09	711,248.06	32.312971	-103.783341
4,500.00		239.44	4,496.95	-54.55	-92.38	478,024.12	711,243.02	32.312963	-103.783357
4,600.00		239.44	4,596.78	-57.53	-97.42	478,021.14	711,237.98	32.312955	-103.783374
4,700.00		239.44	4,696.61	-60.51	-102.46	478,018.16	711,232.94	32.312947	-103.783390
4,800.00	3.36	239.44	4,796.44	-63.49	-107.50	478,015.18	711,227.89	32.312939	-103.783407
4,900.00	3.36	239.44	4,896.27	-66.46	-112.54	478,012.21	711,222.85	32.312930	-103.783423
5,000.00	3.36	239.44	4,996.09	-69.44	-117.59	478,009.23	711,217.81	32.312922	-103.783439
5,100.00	3.36	239.44	5,095.92	-72.42	-122.63	478,006.25	711,212.77	32.312914	-103.783456
5,200.00		239.44	5,195.75	-75.40	-127.67	478,003.28	711,207.73	32.312906	-103.783472
5,300.00	3.36	239.44	5,295.58	-78.37	-132.71	478,000.30	711,202.68	32.312898	-103.783488

Database: EDM r5000.141\_Prod US Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

 Site:
 Sec 09-T23S-R31E

 Well:
 Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1

Design: Permit Plan 1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

Survey Calculation Method:

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

Planned Survey									
Measured Depth (ft)	Inclination (°)	Azimuth (°)	Vertical Depth (ft)	+N/-S (ft)	+E/-W (ft)	Map Northing (usft)	Map Easting (usft)	Latitude	Longitude
5,400.00	3.36	239.44	5,395.41	-81.35	-137.75	477,997.32	711,197.64	32.312890	-103.783505
5,500.00	3.36	239.44	5,495.24	-84.33	-142.80	477,994.34	711,192.60	32.312882	-103.783521
5,600.00	3.36	239.44	5,595.07	-87.31	-147.84	477,991.37	711,187.56	32.312874	-103.783538
5,700.00	3.36	239.44	5,694.89	-90.28	-152.88	477,988.39	711,182.52	32.312866	-103.783554
5,800.00	3.36	239.44	5,794.72	-93.26	-157.92	477,985.41	711,177.47	32.312857	-103.783570
5,900.00	3.36	239.44	5,894.55	-96.24	-162.96	477,982.43	711,172.43	32.312849	-103.783587
6,000.00	3.36	239.44	5,994.38	-99.22	-168.01	477,979.46	711,167.39	32.312841	-103.783603
6,100.00	3.36	239.44	6,094.21	-102.19	-173.05	477,976.48	711,162.35	32.312833	-103.783619
6,200.00	3.36	239.44	6,194.04	-105.17	-178.09	477,973.50	711,157.31	32.312825	-103.783636
6,300.00	3.36	239.44	6,293.86	-108.15	-183.13	477,970.52	711,152.27	32.312817	-103.783652
6,400.00	3.36	239.44	6,393.69	-111.13	-188.17	477,967.55	711,147.22	32.312809	-103.783668
6,500.00	3.36	239.44	6,493.52	-114.10	-193.21	477,964.57	711,142.18	32.312801	-103.783685
6,600.00	3.36	239.44	6,593.35	-117.08	-198.26	477,961.59	711,137.14	32.312792	-103.783701
6,700.00		239.44	6,693.18	-120.06	-203.30	477,958.61	711,132.10	32.312784	-103.783718
6,800.00		239.44	6,793.01	-123.04	-208.34	477,955.64	711,127.06	32.312776	-103.783734
6,900.00		239.44	6,892.83	-126.01	-213.38	477,952.66	711,122.01	32.312768	-103.783750
7,000.00		239.44	6,992.66	-128.99	-218.42	477,949.68	711,116.97	32.312760	-103.783767
7,100.00		239.44	7,092.49	-131.97	-223.47	477,946.70	711,111.93	32.312752	-103.783783
7,200.00		239.44	7,192.32	-134.95	-228.51	477,943.73	711,106.89	32.312744	-103.783799
7,300.00		239.44	7,292.15	-137.92	-233.55	477,940.75	711,101.85	32.312736	-103.783816
7,400.00		239.44	7,391.98	-140.90	-238.59	477,937.77	711,096.81	32.312728	-103.783832
7,500.00		239.44	7,491.81	-143.88	-243.63	477,934.79	711,091.76	32.312719	-103.783849
7,593.70		239.44	7,585.34	-146.67	-248.36	477,932.00	711,087.04	32.312712	-103.783864
7,600.00		239.44	7,591.63	-146.85	-248.67	477,931.82	711,086.73	32.312711	-103.783865
7,700.00		239.44	7,691.54	-149.08	-252.44	477,929.59	711,082.95	32.312705	-103.783877
7,800.00		239.44	7,791.52	-149.98	-253.97	477,928.69	711,081.43	32.312703	-103.783882
7,817.48		0.00	7,809.00	-150.00	-254.00	477,928.67	711,081.40	32.312703	-103.783882
7,900.00		0.00	7,891.52	-150.00	-254.00	477,928.67	711,081.40	32.312703	-103.783882
8,000.00		0.00	7,991.52	-150.00	-254.00	477,928.67	711,081.40	32.312703	-103.783882
8,100.00		0.00	8,091.52	-150.00	-254.00	477,928.67	711,081.40	32.312703	-103.783882
8,167.52		0.00	8,159.04	-150.00	-254.00	477,928.67	711,081.40	32.312703	-103.783882
	TP @ 8168' M								
8,200.00		359.69	8,191.50	-149.08	-254.00	477,929.59	711,081.39	32.312705	-103.783882
8,300.00		359.69	8,290.34	-134.75	-254.08	477,943.92	711,081.31	32.312745	-103.783882
8,400.00		359.69	8,385.19	-103.48	-254.25	477,975.19	711,081.15	32.312831	-103.783882
8,500.00		359.69	8,473.17	-56.21	-254.50	478,022.46	711,080.89	32.312961	-103.783882
8,600.00		359.69	8,551.60	5.61	-254.84	478,084.28	711,080.56	32.313131	-103.783882
8,700.00 8,800.00	53.25 63.25	359.69 359.69	8,618.11 8,670.67	80.12 165.04	-255.24 -255.69	478,158.79	711,080.16 711,079.70	32.313335 32.313569	-103.783882 -103.783882
		359.69		257.80	-255.69 -256.19	478,243.71 478,336.47	,	32.313824	-103.783883
8,900.00 9,000.00		359.69	8,707.68 8,728.02	355.58	-256.72	478,434.25	711,079.20 711,078.68	32.314093	-103.783883
9,067.53		359.69	8,732.00	422.95	-257.08	478,501.62	711,078.32	32.314278	-103.783883
9,100.00		359.69	8,732.00	455.42	-257.06	478,534.09	711,078.14	32.314367	-103.783883
9,200.00		359.69	8,732.00	555.42	-257.79	478,634.09	711,073.14	32.314642	-103.783883
9,300.00		359.69	8,732.00	655.42	-258.33	478,734.09	711,077.07	32.314917	-103.783883
9,400.00		359.69	8,732.00	755.42	-258.87	478,834.09	711,077.07	32.315192	-103.783883
9,500.00		359.69	8,732.00	855.42	-259.40	478,934.09	711,075.99	32.315466	-103.783883
9,600.00		359.69	8,732.00	955.42	-259.94	479,034.09	711,075.46	32.315741	-103.783883
9,700.00		359.69	8,732.00	1,055.42	-260.48	479,134.08	711,074.92	32.316016	-103.783883
9,800.00		359.69	8,732.00	1,155.41	-261.01	479,134.08	711,074.38	32.316291	-103.783883
9,900.00		359.69	8,732.00	1,255.41	-261.55	479,334.08	711,073.84	32.316566	-103.783883
10,000.00		359.69	8,732.00	1,355.41	-262.09	479,434.08	711,073.31	32.316841	-103.783883
10,100.00		359.69	8,732.00	1,455.41	-262.63	479,534.08	711,072.77	32.317116	-103.783883
10,200.00		359.69	8,732.00	1,555.41	-263.16	479,634.08	711,072.23	32.317391	-103.783884

Database: EDM r5000.141\_Prod US Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

 Site:
 Sec 09-T23S-R31E

 Well:
 Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1

Design: Permit Plan 1

Local Co-ordinate Reference:

TVD Reference:
MD Reference:
North Reference:

Survey Calculation Method:

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

Planned Survey	,								
Measured Depth (ft)	Inclination (°)	Azimuth (°)	Vertical Depth (ft)	+N/-S (ft)	+E/-W (ft)	Map Northing (usft)	Map Easting (usft)	Latitude	Longitude
10,300.00	90.00	359.69	8,732.00	1,655.41	-263.70	479,734.07	711,071.69	32.317666	-103.783884
10,400.00	90.00	359.69	8,732.00	1,755.41	-264.24	479,834.07	711,071.16	32.317940	-103.783884
10,500.00	90.00	359.69	8,732.00	1,855.40	-264.78	479,934.07	711,070.62	32.318215	-103.783884
10,600.00	90.00	359.69	8,732.00	1,955.40	-265.31	480,034.07	711,070.08	32.318490	-103.783884
10,700.00	90.00	359.69	8,732.00	2,055.40	-265.85	480,134.07	711,069.55	32.318765	-103.783884
10,800.00	90.00	359.69	8,732.00	2,155.40	-266.39	480,234.07	711,069.01	32.319040	-103.783884
10,900.00	90.00	359.69	8,732.00	2,255.40	-266.93	480,334.07	711,068.47	32.319315	-103.783884
11,000.00	90.00	359.69	8,732.00	2,355.40	-267.46	480,434.06	711,067.93	32.319590	-103.783884
11,100.00	90.00	359.69	8,732.00	2,455.40	-268.00	480,534.06	711,067.40	32.319865	-103.783884
11,200.00	90.00	359.69	8,732.00	2,555.39	-268.54	480,634.06	711,066.86	32.320139	-103.783884
11,300.00	90.00	359.69	8,732.00	2,655.39	-269.08	480,734.06	711,066.32	32.320414	-103.783884
11,400.00	90.00	359.69	8,732.00	2,755.39	-269.61	480,834.06	711,065.78	32.320689	-103.783885
11,500.00	90.00	359.69	8,732.00	2,855.39	-270.15	480,934.06	711,065.25	32.320964	-103.783885
11,600.00		359.69	8,732.00	2,955.39	-270.69	481,034.05	711,064.71	32.321239	-103.783885
11,700.00	90.00	359.69	8,732.00	3,055.39	-271.23	481,134.05	711,064.17	32.321514	-103.783885
11,800.00		359.69	8,732.00	3,155.39	-271.76	481,234.05	711,063.63	32.321789	-103.783885
11,900.00		359.69	8,732.00	3,255.38	-272.30	481,334.05	711,063.10	32.322064	-103.783885
12,000.00		359.69	8,732.00	3,355.38	-272.84	481,434.05	711,062.56	32.322338	-103.783885
12,100.00		359.69	8,732.00	3,455.38	-273.37	481,534.05	711,062.02	32.322613	-103.783885
12,200.00		359.69	8,732.00	3,555.38	-273.91	481,634.04	711,061.48	32.322888	-103.783885
12,300.00	90.00	359.69	8,732.00	3,655.38	-274.45	481,734.04	711,060.95	32.323163	-103.783885
12,400.00		359.69	8,732.00	3,755.38	-274.99	481,834.04	711,060.41	32.323438	-103.783885
12,500.00		359.69	8,732.00	3,855.38	-275.52	481,934.04	711,059.87	32.323713	-103.783885
12,600.00		359.69	8,732.00	3,955.37	-276.06	482,034.04	711,059.34	32.323988	-103.783885
12,700.00		359.69	8,732.00	4,055.37	-276.60	482,134.04	711,058.80	32.324263	-103.783886
12,800.00		359.69	8,732.00	4,155.37	-277.14	482,234.03	711,058.26	32.324537	-103.783886
12,900.00	90.00	359.69	8,732.00	4,255.37	-277.67	482,334.03	711,057.72	32.324812	-103.783886
13,000.00		359.69	8,732.00	4,355.37	-278.21	482,434.03	711,057.19	32.325087	-103.783886
13,100.00	90.00	359.69	8,732.00	4,455.37	-278.75	482,534.03	711,056.65	32.325362	-103.783886
13,200.00		359.69	8,732.00	4,555.37	-279.29	482,634.03	711,056.11	32.325637	-103.783886
13,300.00		359.69	8,732.00	4,655.36	-279.82	482,734.03	711,055.57	32.325912	-103.783886
13,400.00		359.69	8,732.00	4,755.36	-280.36	482,834.02	711,055.04	32.326187	-103.783886
13,429.00		359.69	8,732.00	4,784.36	-280.52	482,863.02	711,054.88	32.326266	-103.783886
	ection @ 1342								
13,500.00	90.00	359.69	8,732.00	4,855.36	-280.90	482,934.02	711,054.50	32.326462	-103.783886
13,600.00		359.69	8,732.00	4,955.36	-281.44	483,034.02	711,053.96	32.326736	-103.783886
13,700.00		359.69	8,732.00	5,055.36	-281.97	483,134.02	711,053.42	32.327011	-103.783886
13,800.00	90.00	359.69	8,732.00	5,155.36	-282.51	483,234.02	711,052.89	32.327286	-103.783886
13,900.00		359.69	8,732.00	5,255.36	-283.05	483,334.02	711,052.35	32.327561	-103.783887
14,000.00	90.00	359.69	8,732.00	5,355.35	-283.58	483,434.01	711,051.81	32.327836	-103.783887
14,100.00		359.69	8,732.00	5,455.35	-284.12	483,534.01	711,051.27	32.328111	-103.783887
14,200.00		359.69	8,732.00	5,555.35	-284.66	483,634.01	711,050.74	32.328386	-103.783887
14,300.00		359.69	8,732.00	5,655.35	-285.20	483,734.01	711,050.20	32.328661	-103.783887
14,400.00		359.69	8,732.00	5,755.35	-285.73	483,834.01	711,049.66	32.328935	-103.783887
14,500.00		359.69	8,732.00	5,855.35	-286.27	483,934.01	711,049.13	32.329210	-103.783887
14,600.00		359.69	8,732.00	5,955.35	-286.81	484,034.00	711,048.59	32.329485	-103.783887
14,700.00		359.69	8,732.00	6,055.34	-287.35	484,134.00	711,048.05	32.329760	-103.783887
14,800.00		359.69	8,732.00	6,155.34	-287.88	484,234.00	711,047.51	32.330035	-103.783887
14,900.00		359.69	8,732.00	6,255.34	-288.42	484,334.00	711,046.98	32.330310	-103.783887
15,000.00		359.69	8,732.00	6,355.34	-288.96	484,434.00	711,046.44	32.330585	-103.783887
15,100.00		359.69	8,732.00	6,455.34	-289.50	484,534.00	711,045.90	32.330860	-103.783887
15,200.00		359.69	8,732.00	6,555.34	-290.03	484,633.99	711,045.36	32.331134	-103.783888
15,300.00		359.69	8,732.00	6,655.34	-290.57	484,733.99	711,044.83	32.331409	-103.783888
15,400.00	90.00	359.69	8,732.00	6,755.33	-291.11	484,833.99	711,044.29	32.331684	-103.783888

Database: EDM r5000.141\_Prod US Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

Site: Sec 09-T23S-R31E

Well: Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1
Design: Permit Plan 1

Local Co-ordinate Reference:

TVD Reference:
MD Reference:
North Reference:

**Survey Calculation Method:** 

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

lanned Survey									
Measured Depth (ft)	Inclination (°)	Azimuth (°)	Vertical Depth (ft)	+N/-S (ft)	+E/-W (ft)	Map Northing (usft)	Map Easting (usft)	Latitude	Longitude
15,500.00	90.00	359.69	8,732.00	6,855.33	-291.65	484,933.99	711,043.75	32.331959	-103.783888
15,600.00	90.00	359.69	8,732.00	6,955.33	-292.18	485,033.99	711,043.21	32.332234	-103.783888
15,700.00	90.00	359.69	8,732.00	7,055.33	-292.72	485,133.99	711,042.68	32.332509	-103.783888
15,800.00	90.00	359.69	8,732.00	7,155.33	-293.26	485,233.98	711,042.14	32.332784	-103.783888
15,900.00	90.00	359.69	8,732.00	7,255.33	-293.79	485,333.98	711,041.60	32.333059	-103.783888
16,000.00	90.00	359.69	8,732.00	7,355.33	-294.33	485,433.98	711,041.06	32.333333	-103.783888
16,100.00	90.00	359.69	8,732.00	7,455.32	-294.87	485,533.98	711,040.53	32.333608	-103.783888
16,200.00	90.00	359.69	8,732.00	7,555.32	-295.41	485,633.98	711,039.99	32.333883	-103.783888
16,300.00	90.00	359.69	8,732.00	7,655.32	-295.94	485,733.98	711,039.45	32.334158	-103.783888
16,400.00	90.00	359.69	8,732.00	7,755.32	-296.48	485,833.97	711,038.92	32.334433	-103.783889
16,500.00	90.00	359.69	8,732.00	7,855.32	-297.02	485,933.97	711,038.38	32.334708	-103.783889
16,600.00	90.00	359.69	8,732.00	7,955.32	-297.56	486,033.97	711,037.84	32.334983	-103.783889
16,700.00	90.00	359.69	8,732.00	8,055.32	-298.09	486,133.97	711,037.30	32.335258	-103.783889
16,800.00	90.00	359.69	8,732.00	8,155.31	-298.63	486,233.97	711,036.77	32.335532	-103.783889
16,900.00	90.00	359.69	8,732.00	8,255.31	-299.17	486,333.97	711,036.23	32.335807	-103.783889
17,000.00	90.00	359.69	8,732.00	8,355.31	-299.71	486,433.96	711,035.69	32.336082	-103.783889
17,100.00	90.00	359.69	8,732.00	8,455.31	-300.24	486,533.96	711,035.15	32.336357	-103.783889
17,200.00	90.00	359.69	8,732.00	8,555.31	-300.78	486,633.96	711,034.62	32.336632	-103.783889
17,300.00	90.00	359.69	8,732.00	8,655.31	-301.32	486,733.96	711,034.08	32.336907	-103.783889
17,400.00	90.00	359.69	8,732.00	8,755.31	-301.86	486,833.96	711,033.54	32.337182	-103.783889
17,500.00	90.00	359.69	8,732.00	8,855.30	-302.39	486,933.96	711,033.00	32.337457	-103.783889
17,600.00	90.00	359.69	8,732.00	8,955.30	-302.93	487,033.96	711,032.47	32.337731	-103.783889
17,700.00	90.00	359.69	8,732.00	9,055.30	-303.47	487,133.95	711,031.93	32.338006	-103.783890
17,800.00	90.00	359.69	8,732.00	9,155.30	-304.00	487,233.95	711,031.39	32.338281	-103.783890
17,900.00	90.00	359.69	8,732.00	9,255.30	-304.54	487,333.95	711,030.85	32.338556	-103.783890
18,000.00	90.00	359.69	8,732.00	9,355.30	-305.08	487,433.95	711,030.32	32.338831	-103.783890
18,100.00	90.00	359.69	8,732.00	9,455.30	-305.62	487,533.95	711,029.78	32.339106	-103.783890
18,200.00	90.00	359.69	8,732.00	9,555.29	-306.15	487,633.95	711,029.24	32.339381	-103.783890
18,300.00	90.00	359.69	8,732.00	9,655.29	-306.69	487,733.94	711,028.71	32.339656	-103.783890
18,400.00	90.00	359.69	8,732.00	9,755.29	-307.23	487,833.94	711,028.17	32.339931	-103.783890
18,500.00	90.00	359.69	8,732.00	9,855.29	-307.77	487,933.94	711,027.63	32.340205	-103.783890
18,598.00	90.00	359.69	8,732.00	9,953.29	-308.29	488,031.94	711,027.10	32.340475	-103.783890
	8598' MD, 100			2,222.20		,	,		
18,600.00	90.00	359.69	8,732.00	9,955.29	-308.30	488,033.94	711,027.09	32.340480	-103.783890
18,677.62	90.00	359.69	8,732.00	10,032.91	-308.72	488,111.56	711,026.68	32.340694	-103.783890
	0' FNL, 2310'		3,7 32.30	. 5,552.51	000.72	100,111.00	7 77,020.00	02.010004	100.7 00000
18,677.63	90.00	359.69	8,732.00	10,032.92	-308.72	488,111.57	711,026.68	32.340694	-103.783890

Design Targets									
Target Name - hit/miss target - Shape	Dip Angle (°)	Dip Dir. (°)	TVD (ft)	+N/-S (ft)	+E/-W (ft)	Northing (usft)	Easting (usft)	Latitude	Longitude
PBHL - Ko Lanta 9-4 Fe - plan misses target o - Point	0.00 center by 8732	0.00 2.00ft at 1867	0.00 77.63ft MD	10,032.92 (8732.00 TVD,	-308.72 , 10032.92 N,	488,111.57 -308.72 E)	711,026.68	32.340694	-103.783890

Database: EDM r5000.141\_Prod US
Company: WCDSC Permian NM

Project: Eddy County (NAD 83 NM Eastern)

Site: Sec 09-T23S-R31E

Well: Ko Lanta 9-4 Fed Com 524H

Wellbore: Wellbore #1

Design: Permit Plan 1

Local Co-ordinate Reference:

TVD Reference: MD Reference: North Reference:

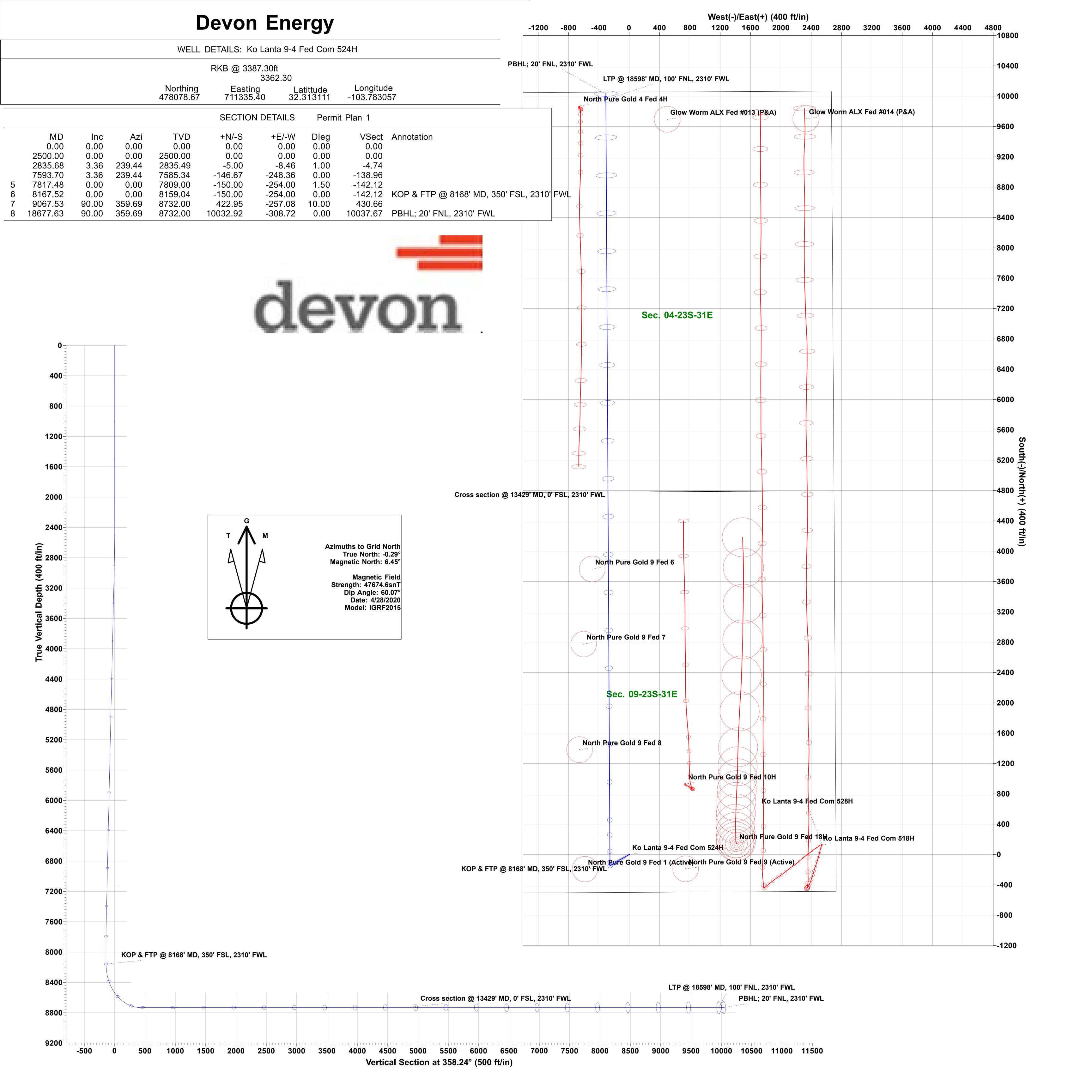
**Survey Calculation Method:** 

Well Ko Lanta 9-4 Fed Com 524H

RKB @ 3387.30ft RKB @ 3387.30ft

Grid

Plan Annotations										
	Measured	Vertical	Local Coor	dinates						
	Depth	Depth	+N/-S	+E/-W						
	(ft)	(ft)	(ft)	(ft)	Comment					
	8,167.52	8,159.04	-150.00	-254.00	KOP & FTP @ 8168' MD, 350' FSL, 2310' FWL					
	13,429.00	8,732.00	4,784.36	-280.52	Cross section @ 13429' MD, 0' FSL, 2310' FWL					
	18,598.00	8,732.00	9,953.29	-308.29	LTP @ 18598' MD, 100' FNL, 2310' FWL					
	18.677.62	8.732.00	10,032.91	-308.72	PBHL; 20' FNL, 2310' FWL					



## PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'		<b>Devon Energy Production Company LP</b>						
	ASE NO.:	NMNM077046						
	CATION:	Section 9, T.23 S., R.31 E., NMPM						
(	COUNTY:	Eddy County, New Mexico						
<u> </u>		<u> </u>						
WELL NAM		Ko Lanta	Ko Lanta 9-4 Fed Com 512H					
SURFACE HOLE FO		500'/S &	735'/W					
BOTTOM HOLE F	OOTAGE	20'/N & 3	330'/W					
WELL NAM	E & NO.:	Ko Lanta	Ko Lanta 9-4 Fed Com 514H					
SURFACE HOLE FO	OTAGE:	500'/S &	2534'/W					
BOTTOM HOLE F	OOTAGE	20'/N &	1650'/W					
WELL NAM	E & NO.:	Ko Lanta	9-4 Fed Com 516H					
SURFACE HOLE FO	OTAGE:	350'/S &	1430'/E					
BOTTOM HOLE F	OOTAGE	20'/N & 2	2310'/E					
WELL NAM	E & NO.:	Ko Lanta 9-4 Fed Com 522H						
SURFACE HOLE FO	OTAGE:	500'/S & 765'/W						
BOTTOM HOLE F	OOTAGE	20'/N & 9	990'/W					
		l						
WELL NAM	E & NO.:	Ko Lanta	9-4 Fed Com 524H					
SURFACE HOLE FO		500'/S &	2564'/W					
BOTTOM HOLE F	OOTAGE	20'/N & 2	2310'/W					
		I						
WELL NAM	E & NO.:	Ko Lanta	9-4 Fed Com 526H					
SURFACE HOLE FO		350'/S &						
BOTTOM HOLE F		20'/N &						
		CO	A					
			A					
			,					
H2S	☐ Yes		<b>☑</b> No					
Potash	None None		Secretary	□ R-111-P				
Cave/Karst Potential Low			☐ Medium	☐ High				
Cave/Karst Potential Critical								
Variance			Flex Hose	Other				
Wellhead Conven		ntional	Multibowl	□ Both				
Other	□4 String	Area	☐ Capitan Reef	□WIPP				
Other		illed	✓ Cement Squeeze	☐ Pilot Hole				

Page 1 of 8

▼ Cement Squeeze

**▼** COM

□ Unit

Special Requirements 

Water Disposal

#### A. HYDROGEN SULFIDE

Hydrogen Sulfide (H2S) monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet Onshore Order 6 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

#### B. CASING

- 1. The 13-3/8 inch surface casing shall be set at approximately 550 feet (a minimum of 70 feet (Eddy County) into the Rustler Anhydrite and above the salt) and cemented to the surface.
  - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
  - b. Wait on cement (WOC) time for a primary cement job will be a minimum of **24 hours in the Potash Area** or 500 pounds compressive strength, whichever is greater. (This is to include the lead cement)
  - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
  - d. If cement falls back, remedial cementing will be done prior to drilling out that string.
- 2. The minimum required fill of cement behind the 9-5/8 inch intermediate casing shall be set at approximately 4170 feet is:
  - Cement to surface. If cement does not circulate see B.1.a, c-d above. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst or potash.
  - ❖ In <u>Secretary Potash Areas</u> if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.

Operator has proposed to pump down 13-3/8" X 9-5/8" annulus. Operator must run a CBL from TD of the 9-5/8" casing to surface. Submit results to BLM.

- 3. The minimum required fill of cement behind the 5-1/2 inch production casing is:
  - Cement should tie-back at least 500 feet into previous casing string.
     Operator shall provide method of verification.
     Cement excess is less than 25%, more cement might be required.

#### C. PRESSURE CONTROL

- 1. Variance approved to use flex line from BOP to choke manifold. Manufacturer's specification to be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no hard bends).'
- 2. Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the surface casing. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be **3000** (**3M**) psi.
  - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
  - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
  - c. Manufacturer representative shall install the test plug for the initial BOP test.
  - d. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
  - e. Whenever any seal subject to test pressure is broken, all the tests in OOGO2.III.A.2.i must be followed.

#### D. SPECIAL REQUIREMENT (S)

#### **Communitization Agreement**

- The operator will submit a Communitization Agreement to the Santa Fe Office, 301 Dinosaur Trail Santa Fe, New Mexico 87508, at least 90 days before the anticipated date of first production from a well subject to a spacing order issued by the New Mexico Oil Conservation Division. The Communitization Agreement will include the signatures of all working interest owners in all Federal and Indian leases subject to the Communitization Agreement (i.e., operating rights owners and lessees of record), or certification that the operator has obtained the written signatures of all such owners and will make those signatures available to the BLM immediately upon request.
- If the operator does not comply with this condition of approval, the BLM may take enforcement actions that include, but are not limited to, those specified in 43 CFR 3163.1.
- In addition, the well sign shall include the surface and bottom hole lease numbers. When the Communitization Agreement number is known, it shall also be on the sign.

### GENERAL REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)

  - Lea County
     Call the Hobbs Field Station, 414 West Taylor, Hobbs NM 88240, (575)
     393-3612
- 1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
  - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
  - b. When the operator proposes to set surface casing with Spudder Rig
    - Notify the BLM when moving in and removing the Spudder Rig.
    - Notify the BLM when moving in the 2<sup>nd</sup> Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
    - BOP/BOPE test to be conducted per Onshore Oil and Gas Order No. 2 as soon as 2nd Rig is rigged up on well.
- 2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the dog house or stairway area.
- 3. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

#### A. CASING

- 1. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.
- 2. Wait on cement (WOC) for Potash Areas: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi for all cement blends, 2) until cement has been in place at least 24 hours. WOC time will be recorded in the driller's log. The casing intergrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 3. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing intergrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 4. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
- 5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
- 6. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
- 7. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.
- 8. Whenever a casing string is cemented in the R-111-P potash area, the NMOCD requirements shall be followed.
- B. PRESSURE CONTROL

- 1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in Onshore Oil and Gas Order No. 2 and API RP 53 Sec. 17.
- 2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.
- 3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
- 4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
  - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
  - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
  - c. Manufacturer representative shall install the test plug for the initial BOP test.
  - d. Whenever any seal subject to test pressure is broken, all the tests in OOGO2.III.A.2.i must be followed.
  - e. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
- 5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
  - a. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead when specified), whichever is greater. However, if the float does not

- hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).
- b. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the plug. However, **no tests** shall commence until the cement has had a minimum of 24 hours setup time, except the casing pressure test can be initiated immediately after bumping the plug (only applies to single stage cement jobs).
- c. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to Onshore Order 2 with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for water basin (8 hours) or potash (24 hours) or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- d. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- e. The results of the test shall be reported to the appropriate BLM office.
- f. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- g. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- h. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per Onshore Order No. 2.

#### C. DRILLING MUD

Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation, and shall be used until production casing is run and cemented.

#### D. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area.

Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

Page 8 of 8



Devon Energy Center 333 West Sheridan Avenue Oklahoma City, Oklahoma 73102-5015

# Hydrogen Sulfide (H<sub>2</sub>S) Contingency Plan

For

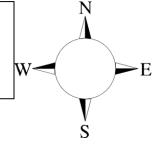
Ko Lanta 9-4 Fed Com 524H

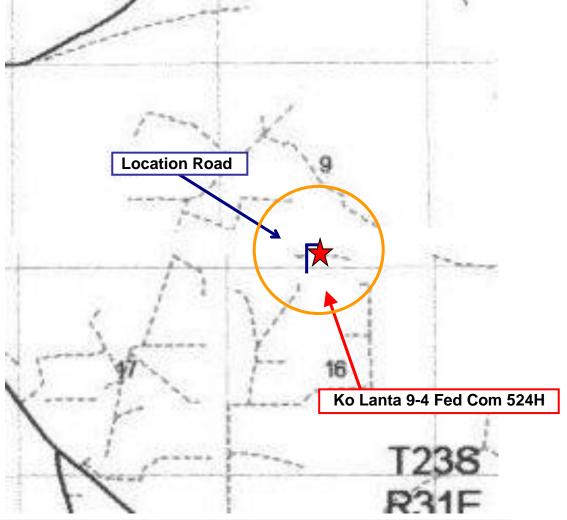
Sec-9 T-23S R-31E 500' FSL & 2564' FWL LAT. = 32.3131114' N (NAD83) LONG = 103.7830573' W

**Eddy County NM** 

## Ko Lanta 9-4 Fed Com 524H

This is an open drilling site.  $H_2S$  monitoring equipment and emergency response equipment will be used within 500' of zones known to contain  $H_2S$ , including warning signs, wind indicators and  $H_2S$  monitor.





Assumed 100 ppm ROE = 3000' (Radius of Exposure)
100 ppm H2S concentration shall trigger activation of this plan.

#### **Escape**

Crews shall escape upwind of escaping gas in the event of an emergency release of gas. Escape can be facilitated from the location entrance road. Crews should then block the entrance to the location from the lease road so as not to allow anyone traversing into a hazardous area. The blockade should be at a safe distance outside of the ROE. There are no homes or buildings in or near the ROE.

**Assumed 100 ppm ROE = 3000'** 

#### 100 ppm H<sub>2</sub>S concentration shall trigger activation of this plan.

#### **Emergency Procedures**

In the event of a release of gas containing H<sub>2</sub>S, the first responder(s) must

- Isolate the area and prevent entry by other persons into the 100 ppm ROE.
- Evacuate any public places encompassed by the 100 ppm ROE.
- Be equipped with H<sub>2</sub>S monitors and air packs in order to control the release.
- Use the "buddy system" to ensure no injuries occur during the response
- Take precautions to avoid personal injury during this operation.
- Contact operator and/or local officials to aid in operation. See list of phone numbers attached.
- Have received training in the
  - Detection of H₂S, and
  - Measures for protection against the gas,
  - Equipment used for protection and emergency response.

#### **Ignition of Gas Source**

Should control of the well be considered lost and ignition considered, take care to protect against exposure to Sulfur Dioxide (SO<sub>2</sub>). Intentional ignition must be coordinated with the NMOCD and local officials. Additionally the NM State Police may become involved. NM State Police shall be the Incident Command on scene of any major release. Take care to protect downwind whenever there is an ignition of the gas

#### Characteristics of H<sub>2</sub>S and SO<sub>2</sub>

Common Name	Chemical Formula	Specific Threshold Gravity Limit		Hazardous Limit	Lethal Concentration
Hydrogen Sulfide	H <sub>2</sub> S	1.189 Air = 1	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO <sub>2</sub>	2.21 Air = 1	2 ppm	N/A	1000 ppm

#### **Contacting Authorities**

Devon Energy Corp. personnel must liaison with local and state agencies to ensure a proper response to a major release. Additionally, the OCD must be notified of the release as soon as possible but no later than 4 hours. Agencies will ask for information such as type and volume of release, wind direction, location of release, etc. Be prepared with all information available. The following call list of essential and potential responders has been prepared for use during a release. Devon Energy Corp. Company response must be in coordination with the State of New Mexico's 'Hazardous Materials Emergency Response Plan' (HMER)

#### **Hydrogen Sulfide Drilling Operation Plan**

#### I. HYDROGEN SULFIDE (H<sub>2</sub>S) TRAINING

All personnel, whether regularly assigned, contracted, or employed on an unscheduled basis, will receive training from a qualified instructor in the following areas prior to commencing drilling operations on this well:

- 1. The hazards and characteristics of hydrogen sulfide (H<sub>2</sub>S)
- 2. The proper use and maintenance of personal protective equipment and life support systems.
- 3. The proper use of H<sub>2</sub>S detectors, alarms, warning systems, briefing areas, evacuation procedures, and prevailing winds.
- 4. The proper techniques for first aid and rescue procedures.

In addition, supervisory personnel will be trained in the following areas:

- 1. The effects of H<sub>2</sub>S metal components. If high tensile tubulars are to be used, personnel will be trained in their special maintenance requirements.
- 2. Corrective action and shut-in procedures when drilling or reworking a well and blowout prevention and well control procedures.
- 3. The contents and requirements of the H<sub>2</sub>S Drilling Operations Plan and Public Protection Plan.

There will be an initial training session just prior to encountering a known or probable H<sub>2</sub>S zone (within 3 days or 500 feet) and weekly H<sub>2</sub>S and well control drills for all personnel in each crew. The initial training session shall include a review of the site specific H<sub>2</sub>S Drilling Operations Plan and the Public Protection Plan.

#### II. HYDROGEN SULFIDE TRAINING

Note: All H<sub>2</sub>S safety equipment and systems will be installed, tested, and operational when drilling reaches a depth of 500 feet above, or three days prior to penetrating the first zone containing or reasonably expected to contain H<sub>2</sub>S.

#### 1. Well Control Equipment

- A. Flare line
- B. Choke manifold Remotely Operated
- C. Blind rams and pipe rams to accommodate all pipe sizes with properly sized closing unit
- D. Auxiliary equipment may include if applicable: annular preventer and rotating head.
- E. Mud/Gas Separator

#### 2. Protective equipment for essential personnel:

30-minute SCBA units located at briefing areas, as indicated on well site diagram, with escape units available in the top doghouse. As it may be difficult to communicate audibly while wearing these units, hand signals shall be utilized.

#### 3. H<sub>2</sub>S detection and monitoring equipment:

Portable H<sub>2</sub>S monitors positioned on location for best coverage and response. These units have warning lights which activate when H<sub>2</sub>S levels reach 10 ppm and audible sirens which activate at 15 ppm. Sensor locations:

- Bell nipple
   Possum Belly/Shale shaker
- Rig floor
- Choke manifold
- Cellar

#### Visual warning systems:

- A. Wind direction indicators as shown on well site diagram
- B. Caution/ Danger signs shall be posted on roads providing direct access to locations. Signs will be painted a high visibility yellow with black lettering of sufficient size to be reasonable distance from the immediate location. Bilingual signs will be used when appropriate.

#### 4. Mud program:

The mud program has been designed to minimize the volume of H<sub>2</sub>S circulated to surface. Proper mud weight, safe drilling practices and the use of H<sub>2</sub>S scavengers will minimize hazards when penetrating H<sub>2</sub>S bearing zones.

#### 5. Metallurgy:

- A. All drill strings, casings, tubing, wellhead, blowout preventer, drilling spool, kill lines, choke manifold lines, and valves shall be H<sub>2</sub>S trim.
- B. All elastomers used for packing and seals shall be H<sub>2</sub>S trim.

#### 6. Communication:

- Company personnel have/use cellular telephones in the field.
- B. Land line (telephone) communications at Office

#### 7. Well testing:

- A. Drill stem testing will be performed with a minimum number of personnel in the immediate vicinity, which are necessary to safety and adequately conduct the test. The drill stem testing will be conducted during daylight hours and formation fluids will not be flowed to the surface. All drill-stem-testing operations conducted in an H<sub>2</sub>S environment will use the closed chamber method of testing.
- B. There will be no drill stem testing.