API NUMBER:	043 23460 Oil & Gas	OIL & GAS C P OKLAHOM	ORPORATION COMMISSION CONSERVATION DIVISION O. BOX 52000 IA CITY, OK 73152-2000 Sule 165:10-3-1)	Approval Date: 05/18/2016 Expiration Date: 11/18/2016
		PE	ERMIT TO DRILL	
WELL LOCATION				
SPOT LOCATION	I: SW SW SE SE	FEET FROM QUARTER: FROM SO	OUTH FROM EAST	
		270 SECTION LINES:	0 1100	
Lease Name:	DEBORAH LYNNE	Well No: 1H	I-6 W	ell will be 270 feet from nearest unit or lease boundary
Operator Name:	NEWFIELD EXPLORATION M	ID-CON INC	Telephone: 9188781290; 9188781	OTC/OCC Number: 20944 0
1 WILLIA	LD EXPLORATION MID-CO MS CTR STE 1900		BRUCE E. IR 233995 E. 60	VING & DEBORAH L. IRVING 0 ROAD
TULSA,	Ok	X 74172-0162	SELLING	OK 73663
2 3 4 5 Spacing Orders:	WOODFORD	10379 Location Exception Ord	7 8 9 10 Iers:	Increased Density Orders:
	No Spacing bers: 201601592			
Pending CD Num	201601594			Special Orders:
Total Depth:	14824 Ground Elevation	n: 1685 Surface Ca	sing: 1500	Depth to base of Treatable Water-Bearing FM: 270
Under Federal	I Jurisdiction: No	Fresh Water Su	pply Well Drilled: No	Surface Water used to Drill: Yes
PIT 1 INFORMA	TION		Approved Method for dispo	sal of Drilling Fluids:
Type of Pit Syste	em: ON SITE			nd backfilling of reserve pit.
Type of Mud Sys	stem: AIR		B. Solidification of pit cont	ents.
	f ground water greater than 10ft bek municipal water well? N xtion Area? N	bw base of pit? Y	617361	I farming facility: Sec. 6 Twn. 2N Rng. 4W Cnty. 137 Order No:
Pit <b>is</b> loca	ated in a Hydrologically Sensitive Ar	ea.	H. SEE MEMO	
Category of Pit	: 4			
Liner not require	red for Category: 4			
Pit Location is	BED AQUIFER			
Pit Location For	mation: MARLOW			
Mud System Ch	ange to Water-Based or Oil-Based N	Mud Requires an Amended Intent (Form	n 1000).	

PIT 2 INFORMATION Type of Pit System: CLOSED Closed System Means Steel Pits Type of Mud System: WATER BASED Chlorides Max: 8000 Average: 5000 Is depth to top of ground water greater than 10ft below base of pit? Y Within 1 mile of municipal water well? N Wellhead Protection Area? N Pit is located in a Hydrologically Sensitive Area. Category of Pit: C Liner not required for Category: C Pit Location is BED AQUIFER

Pit Location Formation: MARLOW

## PIT 3 INFORMATION

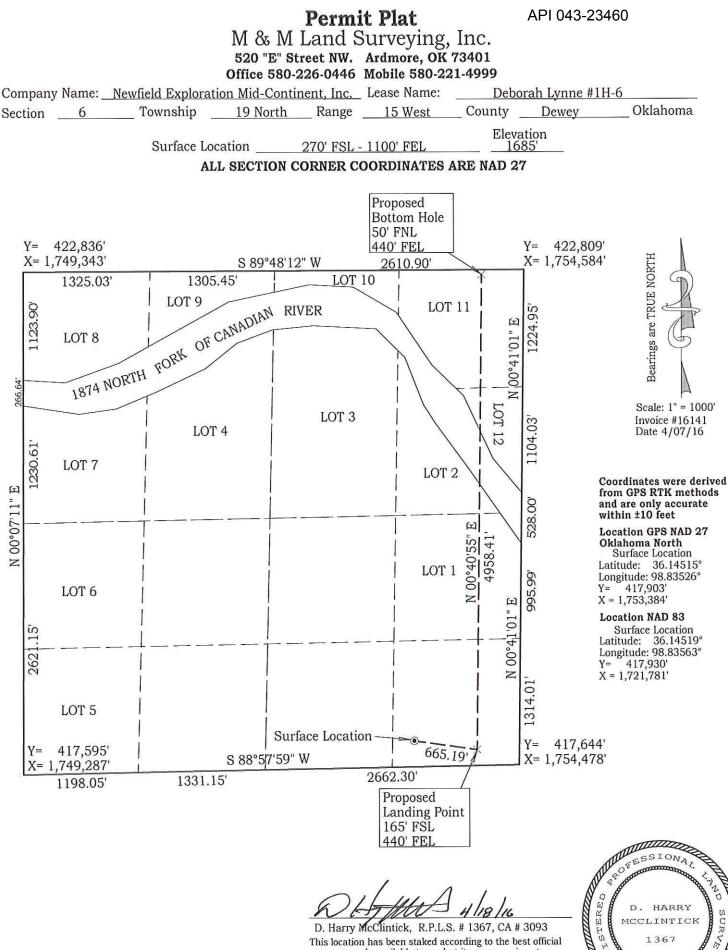
Type of Pit System: CLOSED Closed System Means Steel Pits Type of Mud System: OIL BASED Chlorides Max: 300000 Average: 150000 Is depth to top of ground water greater than 10ft below base of pit? Y Within 1 mile of municipal water well? N Wellhead Protection Area? N Pit is located in a Hydrologically Sensitive Area. Category of Pit: C Liner not required for Category: C Pit Location is BED AQUIFER Pit Location Formation: MARLOW

## HORIZONTAL HOLE 1

Sec 06 Twp 19N Rge 15W County DEWEY Spot Location of End Point: NW NF NF NF Feet From: NORTH 1/4 Section Line: 50 Feet From: EAST 1/4 Section Line: 440 Depth of Deviation: 9629 Radius of Turn: 750 Direction: 5 Total Length: 4017 Measured Total Depth: 14824 True Vertical Depth: 10379 End Point Location from Lease. Unit, or Property Line: 50 Notes: Category Description 5/17/2016 - G71 - APPROVED: NOTIFY OCC FIELD INSPECTOR IMMEDIATELY FOR ANY LOSS DEEP SURFACE CASING OF CIRCULATION OR FAILURE TO CIRCULATE CEMENT TO SURFACE ON CONDUCTOR OR SURFACE CASING HYDRAULIC FRACTURING 5/17/2016 - G71 - OCC 165:10-3-10 REQUIRES: 1) THE CHEMICAL DISCLOSURE OF HYDRAULIC

FRACTURING INGREDIENTS FOR ALL WELLS BE REPORTED TO FRACFOCUS USING THE FOLLOWING LINK HTTP://FRACFOCUS.ORG/ WITH NOTICE GIVEN 48 HOURS IN ADVANCE OF FRACTURING TO THE LOCAL OCC DISTRICT OFFICE; AND, 2) PRIOR TO COMMENCEMENT OF FRACTURING OPERATIONS FOR HORIZONTAL WELLS, NOTICE ALSO GIVEN FIVE BUSINESS DAYS IN ADVANCE TO OFFSET OPERATORS WITH WELLS COMPLETED IN THE SAME COMMON SOURCE OF SUPPLY WITHIN 1/2 MILE.

Category	Description		
INTERMEDIATE CASING	5/17/2016 - G71 - DUE TO THE KNOWN POTENTIAL RISK OF ENCOUNTERING AN OVER- PRESSURED ZONE IN THE MORROW SERIES IN THIS AREA, THE TECHNICAL MANAGER RECOMMENDS SETTING AN INTERMEDIATE STRING OF CASING IMMEDIATELY ABOVE THE MORROW SERIES		
МЕМО	5/17/2016 - G71 - PIT 2 & 3 - CLOSED SYSTEM=STEEL PITS PER OPERATOR REQUEST, WBM & OBM CUTTINGS CAPTURED IN CONCRETE-LINED PIT, SOLIDIFIED, AND BURIED ON SITE; PIT 3 - OBM TO VENDOR		
PENDING CD - 201601592	5/18/2016 - G75 - (640)(HOR) 6-19N-15W EXT 649817 MSSP, WDFD COMPL. INT. (MSSP) NLT 660' FB COMPL. INT. (WDFD) NLT 165' FNL & FSL, NLT 330' FEL & FWL (COEXIST SP. ORDER # 115301 CSTR & ORDER # 177011 MPLM) REC 5-16-2016 (MCKEOWN)		
PENDING CD - 201601594	5/18/2016 - G75 - (I.O.) 6-19N-15W X201601592 MSSP, WDFD SHL NCT 150 FSL, NCT 330 FEL COMPL. INT. NCT 165 FSL, NCT 165 FNL, NCT 330 FEL NO OP. NAMED REC 5-16-2016 (MCKEOWN)		



survey records available to us, but its accuracy is not guaranteed. Please review this plat and notify us immediately of any discrepancy.

W. STERED SURVELON OKLAHOMA Bob Anthony Commissioner

## Corporation Commission

OKLAHOMA CITY OKLAHOMA 73152-2000

OIL & GAS CONSERVATION DIVISION



255 Jim Thorpe Building Telephone: (405)521-2302 FAX: (405)521-3099

Dana Murphy

Commissioner

Lori Wrotenbery, Director

API 043-23460

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November 15, 2010

J. Blake Scott Scott Environmental Services, Inc. P.O. Box 6215 Longview, Texas 75608

RE: Requests for variances to liner requirements for pits used to contain oil-based cuttings or other ed

Jeff Cloud

Commissioner

Dear Mr. Scott:

This is in response to your inquiry concerning the procedure by which operators of wells in the State of Oklahoma regulated by the Commission's Oil and Gas Conservation Division may request variances to liner requirements for pits used to contain oil-based cuttings (OBC). OAC 165:10-7-16(b)(1)(B)(iv) provides that any pit used to contain oil-based drilling fluids, cuttings and/or completion/fracture/workover fluids shall be required to have a geomembrane liner. OAC 165:10-7-16(b)(5) states that any variance from the liner requirements of OAC 165:10-7-16(b)(5) states that any variance from the liner requirements of OAC 165:10-7-16(b)(5) states that any variance from the liner requirements of OAC 165:10-7-16 may be granted by the Manager of the Technical Services Department after receipt of a written request and supporting documentation required by the Department. Operators must submit written requests for variances to liner requirements for pits used to contain OBC to the Commission's Technical Services Department (TSD) Manager as attachments to initial or amended OCC Form 1000 Applications to Drill, Recomplete or Reenter.

The TSD Manager will require operators to submit documentation in support of requests for variances. Variances to liner requirements for pits containing OBC are not effective until granted by the TSD Manager. If operators requesting variances to liner requirements for pits containing OBC fail to submit acceptable documentation to the TSD Manager, or if such variance requests are denied, then operators are required to deposit the solidified OBC in pits containing geomembrane liners and close the pits as required by OAC 165:10-7-16, or otherwise dispose of the solidified OBC in accordance with Commission rules.

If the processes employed by your company and any other entity demonstrate through the submission of laboratory analyses, chain of custody forms and any other documentation required by the TSD Manager that the solidified OBC for which a variance from the pit liner requirements is sought meet acceptable criteria, then the TSD Manager could approve such variance requests submitted by operators.

Your company has demonstrated in three separate trials to date that solidified OBC for which variances were sought by operators have met the criteria of the Technical Services Department for burying such materials in pits with no geomembrane liners.

If you have any questions concerning the foregoing, please contact me at (405) 522-2763.

Sincerely

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Tim Baker Manager, Pollution Abatement Department Oklahoma Corporation Commission

Cc: Lori Wrotenbery, Ron Dunkin, Wayne Wright, Grant Ellis, Tony Cupp, Terry Grooms, Gayland Darity, Sally Shipley, Keith Thomas, Susan Conrad, Jim Hamilton, Connie Moore

Section 2 States of the

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SERVICE • ASSISTANCE • COMPLIANCE EXCELLENCE IS OUR STANDARD



**Newfield Exploration Mid-Continent, Inc. One Williams Center: Suite 1900** Tulsa, OK 741729 918-582-2690 Fax: 918-732-1787

May 17, 2016

API 043-23460

**Oklahoma Corporation Commission** Oil & Gas Conservation Division P.O. Box 52000 Oklahoma City, Oklahoma 73152-2000

ATTN: Manager of the Technical Services Department

RE: Liner Variance Request **DEBORAH LYNNE 1H-6** Sec 06-19N-15W, DEWEY County

## Dear Sir:

We are requesting a variance to the liner requirements for the burial of oil-based cuttings (OBC) as stated in rules of the Oklahoma Corporation Commission (OCC). We intend to bury the OBC from the above mentioned well using Scott Environmental Services Inc.'s (SESI) stabilization and solidification process, Duro<sup>SM</sup>. Specifically, the request for a variance is because the chosen process cannot be practically carried out under current Oklahoma rules due to the rules stating that OBC burial requires a geomembrane liner but the rules do not allow stirring within geomembrane lined pits.

In a letter dated November 15, 2010, Mr. Tim Baker confirmed that use of a Duro<sup>™</sup> process had met the requirements of the Commission. It is requested that a variance be approved for this well site, provided that the following conditions are met:

- 1. A soil liner may be used instead of a geomembrane liner if the unconfined compressive strength (UCS) of the Duro<sup>SM</sup> material is at least 70 pounds per square inch (psi), or 2. No liner is required if the Duro<sup>SM</sup> material meets all of the following conditions:
- - a. A permeability of not more than  $1 \times 10^{-6}$  cm/sec;
  - b. A UCS of at least 35 psi; and
  - c. Concentrations in a leachate of the Duro<sup>SM</sup> material according to EPA's SPLP procedure do not exceed the following values for the constituents named:
    - i. Total Petroleum Hydrocarbons, 100 mg/l;
    - ii. pH, 12.49 SU, plus a lower limit no less than 6;
    - iii. Arsenic, 5.00 mg/l;
    - iv. Barium, 100 mg/l;
    - v. Cadmium, 1.00 mg/l;
    - vi. Chromium, 5.00 mg/l;
    - vii. Lead, 5.00 mg/l;
    - viii. Mercury, 0.20 mg/l;

- ix. Selenium, 1.00 mg/l;
- x. Silver, 5.00 mg/l;
- xi. Zinc, 5.00 mg/l; and
- xii. Benzene, 0.5 mg/l.

The permeability value specified in item 2(a) is the same as that required for a standard soil liner, so that in effect the Duro<sup>SM</sup> processed material becomes its own liner but is even more effective, because the low permeability extends throughout the bulk of the Duro<sup>SM</sup> material.

Conformance with the specified criteria is determined on laboratory samples made with a representative sample of the waste to be subjected to the Duro<sup>SM</sup> process. The results of the testing will be provided to the Pollution Abatement Department of the OCC.

Your prompt attention to this matter is appreciated.

Sincerely,

Cristy Kennel

Cristy Kennedye Regulatory Specialist