



Shell Western E&P

September 12, 2016

Mr. Tom Fouts
Railroad Commission of Texas- District 08
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Midland, Texas 79705-4515
(432) 684-5581

WCK E926C
P.O. Box 576
Houston, Texas 77001-0576
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Re: Phantom Wolfcamp Field Retroactive Form H-9 Filings (H₂S Field Designation Change).

In order to maintain Shell Western E&P's compliance with Statewide Rule (SWR) 36 for our existing operations in the recently H₂S-designated Phantom Wolfcamp field in RRC district 08, please find the enclosed Form H-9s for the following leases:

1. University 20-10 WNK (Winkler County)
2. University 20-33 WNK (Winkler County)
3. Betts 54-4-26 RVS (Reeves County)
4. Ward County Leases (53 leases)
5. Loving County Leases (50 leases)

Note that items 4 and 5 above represent a 'single' Form H-9 submitted for Ward and Loving Counties respectively that covers multiple leases as listed in the attachment to each H-9. Please contact me should you require any additional information regarding this submittal.

Sincerely,
Shell Western E&P

Jason Dupres
Environmental and Regulatory Specialist - Permian

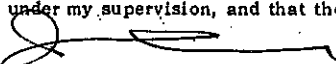
Attachments:

1. Original plus two (2) copies of Form H-9(including relevant attachments)

RAILROAD COMMISSION OF TEXAS
OIL AND GAS DIVISION
CERTIFICATE OF COMPLIANCE STATEWIDE RULE 36

FORM H-9
12/12/77

FILE WITH
DISTRICT OFFICE
IN TRIPLICATE

1. Operator Shell Western E&P				2. Operator Number (See Instruction 13) 774719		3. RRC Dist. 08	
4. Street or P. O. Box No. Permian Regulatory -150 N. Dairy Ashford Road				5. City Houston		6. State Texas	
7. Zip Code 77079				8. Name of Lease, Facility or Operation See Attachment - 50 Leases		9. Field or Area Name Phantom (Wolfcamp)	
10. County Loving				11. General Operation Type - Circle One:			
<input checked="" type="radio"/> A - Oil Field Production <input type="radio"/> B - Gas Field Production <input type="radio"/> C - Pipeline or Gathering Sys. <input type="radio"/> D - Gasoline Plant <input type="radio"/> E - Drilling or Workover <input type="radio"/> F - Sweetening Unit <input type="radio"/> G - Combination (explain) <input type="radio"/> H - Other (explain)				Other Explanation			
12. RRC ID# of Operation(s) to be Covered by This Certificate				13. Hydrogen Sulfide Concentration 55 PPM		14. Maximum Escape Volume 1000 MCF/Day	
Type ID Code (See Instruction 12) 1				15. 100 PPM Radius of Exposure (ROE) 16 Ft.		16. 500 PPM Radius of Exposure (ROE) 7 Ft.	
Indicate if Filing for Storage Facility Only YES NO				17. Operation is Existing New <input checked="" type="checkbox"/> <input type="checkbox"/>		18. Modification Resulting in Certificate Change <input type="checkbox"/> <input checked="" type="checkbox"/>	
See Attachments				19. Workover or Drilling Well with 100 PPM ROE Greater than 3000' feet on Rule 36 Certified Well/Lease <input type="checkbox"/> <input checked="" type="checkbox"/>		Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
				20. Previous Certificate Number if Available (For Amended Certificates)			
				21. The 100 PPM ROE includes any part of a public area except a public road <input type="checkbox"/> <input checked="" type="checkbox"/>			
				22. The 500 PPM ROE includes any part of a public road <input type="checkbox"/> <input checked="" type="checkbox"/>			
				23. Injection of fluid containing Hydrogen Sulfide (See Instruction 14) <input type="checkbox"/> <input checked="" type="checkbox"/>			
				24. Date (or Depth) of Compliance with all applicable provisions of Rule 36 09 / 9 / 19 2016 Mo Day Year			
				Depth of Compliance for Drilling Operation Ft. from Surface			
25. Contingency Plan Location of Plan (See Instruction 15) Not Applicable				Has been prepared <input type="checkbox"/> <input checked="" type="checkbox"/>			
26. Location of data used to prepare this certificate (See Instruction 15) 150 N. Dairy Ashford Road, Houston, Texas 77079							
CERTIFICATE							
I declare under penalties prescribed in Section 91.143, Natural Resources Code, that I am authorized to make this report, that this report was prepared by me or under my supervision, and that I am qualified to make this certification by virtue of my training and experience, and by my analysis of the operation being certified, or by the analysis of qualified person working under my supervision, and that the data and facts stated therein are true, correct, and complete, to the best of my knowledge.							
 Environmental Specialist				832-337-0687		9-9-16	
Representative of Company				Title		Phone No.	
						Date	

RAILROAD COMMISSION USE ONLY

This operation and the equipment used therein is approved on the basis of the above certification and is subject to further Commission audit for compliance with the required provisions of Statewide Rule 36. This approval may be cancelled if investigation determines that the operation does not comply with the provisions of Statewide Rule 36.

APPROVED BY: _____

DATE: _____

REMARKS:

CERTIFICATION NUMBER: _____

SHELL WESTERN E&P
LOVING COUNTY H-9 ATTACHMENT

50 PHANTOM WOLFCAMP LEASES COVERED UNDER SINGLE FORM H-9

ALLEN 55-2-44 LOV UNIT	LOVING	46733
CONN 53-2-36 LOV UNIT	LOVING	46861
JOHNSON 1-86	LOVING	43876
LINDLEY 55-2-32 LOV	LOVING	43890
SPURDOG 1-62 LOV	LOVING	44818
TUCKER 1-75 LOV	LOVING	44927
UNIVERSITY 19-18 LOV	LOVING	46542
UNIVERSITY 19-19	LOVING	42401
WHEAT 1-60 LOV	LOVING	44648
WHEAT 1-77 LOV UNIT	LOVING	44986
WHEAT TRUST 1-73 LOV UNIT 2	LOVING	45546
WHEAT TRUST 1-78 LOV UNIT 2	LOVING	45047
BULLHEAD STATE 55-1-44	LOVING	47186
ROCAZOLLER STATE 54-1-12 LOV	LOVING	47561
TAHITI 55-2-15 LOV	LOVING	45569
UNIVERSITY 19-15	LOVING	44052
UNIVERSITY 19-22	LOVING	42423
University 19-23 LOV 2H	LOVING	47659
UNIVERSITY 20-4 LOV	LOVING	47500
UNIVERSITY 20-7	LOVING	44345
APC FEE 6	LOVING	43431
BATES 1-77 LOV UNIT	LOVING	44788
JOHNSON 1-76	LOVING	44777
SLACK BOX 54-2-28 LOV UNIT	LOVING	44767
JOHNSON 1-87 LOV	LOVING	44657
OWENS 1-75 LOV UNIT	LOVING	45388
SLACKBOX 54-2-32 LOV UNIT	LOVING	45393
WHEAT 1-59 LOV	LOVING	44148
WHEAT TRUST 1-63 LOV	LOVING	42375
WHEAT TRUST 1-60 LOV	LOVING	46743
BATES 1-63 LOV UNIT	LOVING	44469
JOHNSON 1-88 LOV	LOVING	45637
RAMSLAND 1-61 LOV	LOVING	42141
WHEAT TRUST 1-78 LOV UNIT 1	LOVING	45390
HUESO SALTO STATE 55-2-48 LOV	LOVING	47562
WHEAT STATE 1-64 LOV	LOVING	44458
UNIVERSITY 20-5	LOVING	44020
WHEAT 1-59 LOV UNIT 2	LOVING	45556
UNIVERSITY 19-17	LOVING	43275
UNIVERSITY 20-20	LOVING	44605
UNIVERSITY 19-13	LOVING	43520
BONNETHEAD 53-2-1 LOV UNIT A	LOVING	47556
BONNETHEAD 53-2-13 LOV UNIT	LOVING	46807
JOHNSON 53-2-10 LOV	LOVING	46589
JOHNSON 53-2-2 LOV	LOVING	47190
JOHNSON C26-22 LOV	LOVING	46510
KINGSTON 55-2-35 LOV	LOVING	46670
LINDLEY 33-92 LOV	LOVING	47569
LINDLEY 33-98 LOV	LOVING	47505
LINDLEY 55-2-42 LOV UNIT	LOVING	47048
ROAN 53-2 LOV UNIT	LOVING	45429
SANDBAR 54-2-27 LOV	LOVING	47338
WHEAT TRUST 1-73 LOV UNIT 1	LOVING	45883