



**Shell Western E&P**

September 12, 2016

Mr. Tom Fouts  
Railroad Commission of Texas- District 08  
10 Desta Drive, Suite 500E  
Midland, Texas 79705-4515  
(432) 684-5581

WCK E926C  
P.O. Box 576  
Houston, Texas 77001-0576  
Tel (832) 337 0687  
Fax (832) 337 0043  
Email [jason.dupres@shell.com](mailto:jason.dupres@shell.com)  
Internet [www.shell.com](http://www.shell.com)

Re: Phantom Wolfcamp Field Retroactive Form H-9 Filings (H<sub>2</sub>S 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 H<sub>2</sub>S-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

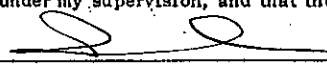
**Attachments:**

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 University 20-10 WNK		9. Field or Area Name Phantom (Wolfcamp)	
10. County Winkler				11. General Operation Type - Circle One:			
A - Oil Field Production      B - Gas Field Production C - Pipeline or Gathering Sys.      D - Gasoline Plant E - Drilling or Workover      F - Sweetening Unit G - Combination (explain)      H - Other (explain)				Other Explanation			
12. RRC ID# of Operation(s) to be Covered by This Certificate 45259		Type ID Code (See Instruction 12) 1		Indicate if Filing for Storage Facility Only YES      NO X		13. Hydrogen Sulfide Concentration      0      PPM	
						14. Maximum Escape Volume 1000      MCF/Day	
						15. 100 PPM Radius of Exposure (ROE)      0      Ft.	
						16. 500 PPM Radius of Exposure (ROE)      0      Ft.	
						17. Operation is Existing      New <input checked="" type="checkbox"/> <input type="checkbox"/>	
						18. Modification Resulting in Certificate Change      Yes      No <input type="checkbox"/> <input checked="" type="checkbox"/>	
						19. Workover or Drilling Well with 100 PPM ROE Greater than 3000' feet on Rule 36 Certified Well/Lease      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      Yes      No <input type="checkbox"/> <input checked="" type="checkbox"/>	
						22. The 500 PPM ROE includes any part of a public road      Yes      No <input type="checkbox"/> <input checked="" type="checkbox"/>	
						23. Injection of fluid containing Hydrogen Sulfide (See Instruction 14)      Yes      No <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							
26. Location of data used to prepare this certificate (See Instruction 15) 150 N. Dairy Ashford Road, Houston, Texas 77079							
<b>CERTIFICATE</b>							
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: \_\_\_\_\_