

Revised March 23, 2017

ID NO. 163103

NSL - 8499

RECEIVED:	REVIEWER:	TYPE:	APP NO: pLEL2233554410
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Geological & Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505

**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND
 REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Applicant: EOG Resources Inc. **OGRID Number:** 7377
Well Name: Ruthless 11 Fed Com 703H **API:** 30-025-48880
Pool: WC025 G09 S253309P; UPPER WOLFCAMP **Pool Code:** ~~51020~~ 98180

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION
 INDICATED BELOW**

1) TYPE OF APPLICATION: Check those which apply for [A]

A. Location – Spacing Unit – Simultaneous Dedication

☒ NSL ☐ NSP (PROJECT AREA) ☐ NSP (PRORATION UNIT) ☐ SD

B. Check one only for [I] or [II]

[I] Commingling – Storage – Measurement

☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[II] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery

☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR
2) NOTIFICATION REQUIRED TO: Check those which apply.

- A. ☒ Offset operators or lease holders
 B. ☒ Royalty, overriding royalty owners, revenue owners
 C. ☐ Application requires published notice
 D. ☐ Notification and/or concurrent approval by SLO
 E. ☒ Notification and/or concurrent approval by BLM
 F. ☐ Surface owner
 G. ☒ For all of the above, proof of notification or publication is attached, and/or,
 H. ☐ No notice required

FOR OCD ONLY

- ☐ Notice Complete
☐ Application Content Complete

3) CERTIFICATION: I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Jordan Kessler

Print or Type Name

Jordan Kessler

Signature

Digitally signed by Jordan Kessler
 Date: 2022.12.01 14:47:20 -0700

12/1/2022

Date

432 488 6108

Phone Number

jordan_kessler@eogresources.com

e-mail Address



Jordan Lee Kessler
Phone: (432) 488-6108
Email: jordan_kessler@eogresources.com

December 1, 2022

VIA ONLINE FILING

Adrienne Sandoval, Director
Oil Conservation Division
New Mexico Department of Energy, Minerals, and Natural Resources
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 703H well in the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Dear Director Sandoval,

EOG Resources, Inc. (OGRID No. 7377) seeks administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 703H well (API No. 30-025-48880). The spacing unit dedicated to the well is comprised of the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, Lea County, New Mexico and is within the WC025 G09 S253309P; Upper Wolfcamp pool 98180 (329701). The horizontal spacing unit for the well is approximately 640 acres, which includes proximity tracts. The defining well for the spacing unit is the Ruthless 11 Fed Com No. 706H well (API No. 30-025-47752).

The well has been drilled, as follows:

- The surface location is located 562 feet from the North line, 1581 feet from the West line (Unit C) of Section 11,
- The bottom hole location is located 110 feet from the South line, 2356 feet from the East West (Unit O) of Section 14,
- The first take point is located 720 feet from the North line, 2368 feet from the West line (Unit B) of Section 11,
- The last take point is located 110 feet from the South line, 2356 feet from the West line (Unit O) of Section 14.

The acreage is governed by the Division's statewide rules. The completed interval is unorthodox because, as drilled, it is closer than the 330 feet to the western boundary. It encroaches on the spacing units in the W/2 of Section 11 and the W/2 of Section 14. Approval of the unorthodox

location will allow EOG to use its preferred well spacing plan for horizontal wells, which will prevent waste, and reflects the as-drilled location of the well.

Exhibit A is the ad-drilled plat filed with the Division. The C-102 shows the location of the well, including the unorthodox completed interval. The completed interval encroaches on the spacing unit/tracts to the west.

Exhibit B is a plat that shows the Ruthless 11 Fed Com No. 703H well in relation to the adjoining spacing units/tracts to the west.

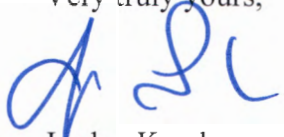
EOG is the operator of the spacing units to the west, however, the percent ownership amongst working interest owners varies slightly from the subject spacing unit. **Exhibit C** is a certification from the landman indicating that he has reviewed the tracts affected by this request. Exhibit C includes a list of the affected parties and proof that a copy of this application, including exhibits, was mailed to each affected party. This notice advises affected parties that any objection must be filed in writing with the Division within 20 days from the date the Division receives the application.

Exhibit D is a statement from a petroleum engineer providing justification for the requested non-standard location.

Exhibit E is a C-102 for the defining well for the horizontal spacing unit, the Ruthless 11 Fed Com No. 706H well (API No. 30-025-47752).

Thank you for your attention to this matter.

Very truly yours,



Jordan Kessler
Senior Regulatory Advisor

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

District III
1000 Rio Brazos Road, Aztec, NM 87410
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

AS-DRILLED PLAT

¹ API Number 30-025-48880	² Pool Code 98180	³ Pool Name WC025 G09 S253309P; UPPER WOLFCAMP
⁴ Property Code 329701	⁵ Property Name RUTHLESS 11 FED COM	
⁷ OGRID No. 7377	⁸ Operator Name EOG RESOURCES, INC.	⁹ Elevation 3500'

¹⁰Surface Location

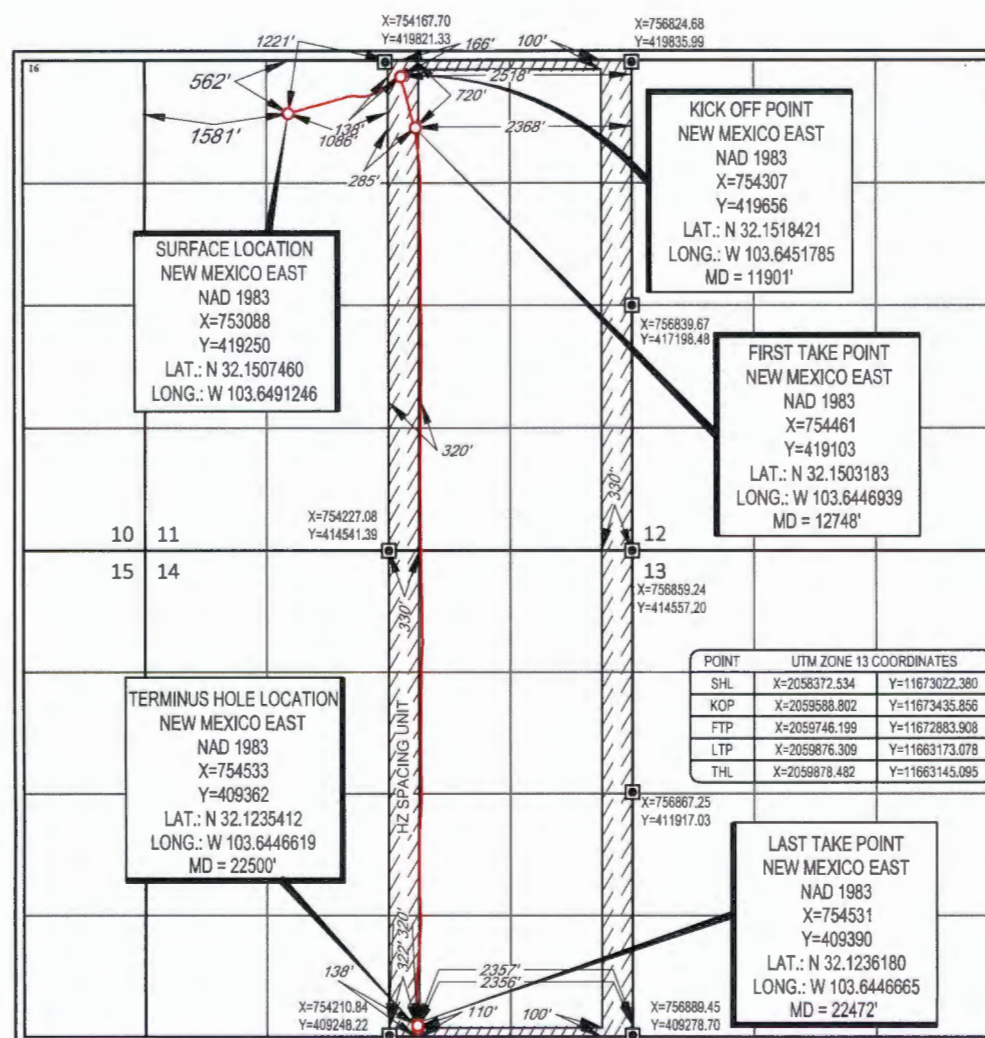
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	11	25-S	32-E	-	562'	NORTH	1581'	WEST	LEA

¹¹Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	14	25-S	32-E	-	110'	SOUTH	2356'	EAST	LEA

¹² Dedicated Acres 640.00	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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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.



17 OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization neither owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Kay Maddox 11/30/2022
Signature Date

KAY MADDOX

Printed Name _____

KAY MADDOX@EOGRESOURCES.COM

E-mail Address _____

18 SURVEYOR CERTIFICATION

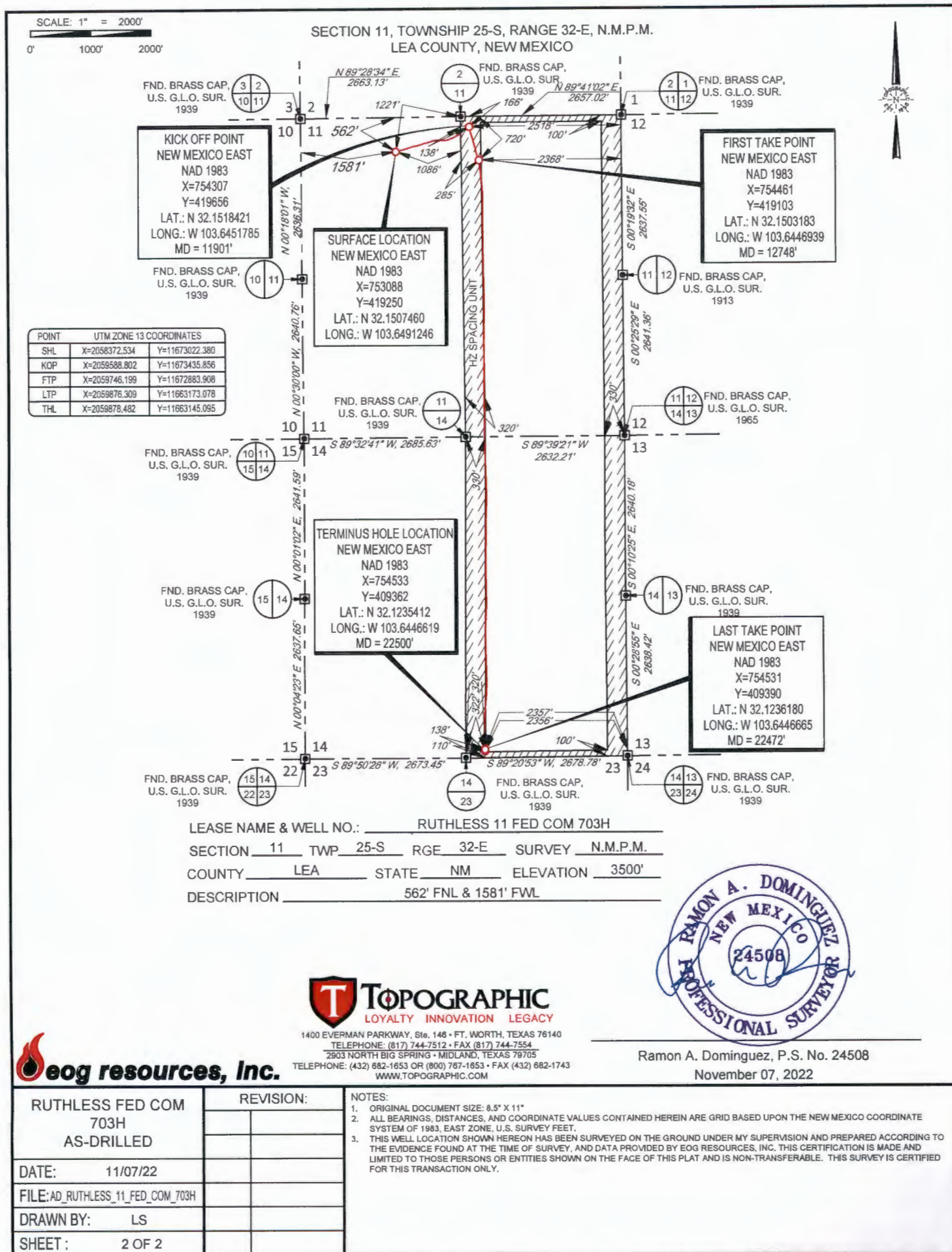
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true to the best of my belief.

06/29/2022

Date of Survey _____
Signature and Seal of Professional Surveyor _____

Date of Survey _____
Signature and Seal of Professional Surveyor _____

Certificate Number



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

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Phone: (505) 334-6178 Fax: (505) 334-6170

District IV
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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

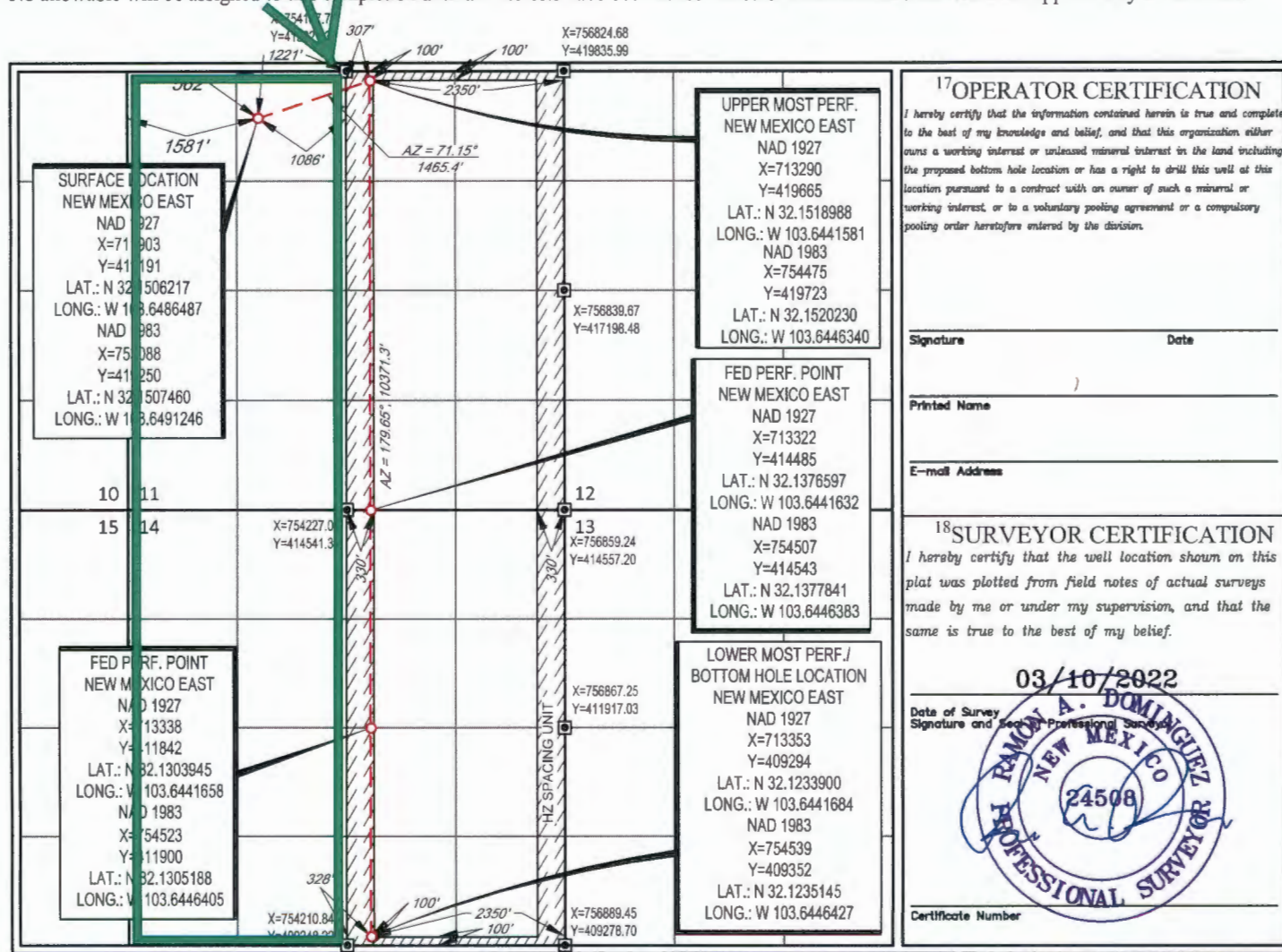
¹ API Number 30-025-		² Pool Code	³ Pool Name
⁴ Property Code	⁵ Property Name RUTHLESS 11 FED COM		⁶ Well Number 703H
⁷ OGRID No. 7377	⁸ Operator Name EOG RESOURCES, INC.		⁹ Elevation 3500'

¹⁰Surface Location

<p>Surface Location</p> <p>on Township Range Lot Idn Feet from the North/South line Feet from the East/West line County</p> <p>25-S 32-E - 562' NORTH 1581' WEST LEA</p>							
<p>11 Bottom Hole Location If Different From Surface</p> <p>on Township Range Lot Idn Feet from the North/South line Feet from the East/West line County</p> <p>25-S 32-E - 100' SOUTH 2350' EAST LEA</p>							
<p>12 Infill</p>		<p>14 Consolidation Code</p>		<p>15 Order No.</p>			

Offset spacing unit (Ruthless) EOG is the Operator. Notice provided to affected parties

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.



PAD B

S:\SURVEY\EOG MIDLAND\RUTHLESS 11 FED COM\FINAL PRODUCTS\LO RUTHLESS 11 FED COM 703H C-102.DWG 3/10/2022 3:20:52 PM bzollinger



P.O. Box 2267, Midland, Texas 79702
Phone: (432) 686-3600 Fax: (432) 686-3773

November 30, 2022

Certification of Ownership

I have reviewed the ownership of the oil and gas leasehold in Sections 11 & 14 -25S-32E, Lea County, New Mexico, for purposes of the unorthodox location for EOG's Ruthless 11 Fed Com #703H well located in the W/2E/2 of Sections 11 & 14-25S-32E. As of the date of this letter, the affected parties are:

Tract 1:

1. BUREAU OF LAND MANAGEMENT (ROYALTY OWNER)
301 DINOSAUR TR.
SANTA FE, NM 87508
2. MCCLELLAN OIL CORPORATION (WORKING INTEREST OWNER)
P O BOX 730
ROSWELL, NM 88202-0730
3. HERITAGE OIL AND GAS LLC (WORKING INTEREST OWNER)
PO BOX 100
ARTESIA, NM 88211-0000
4. TOLES COMPANY (WORKING INTEREST OWNER)
P O BOX 1300
ROSWELL, NM 88202-1300
5. XTO ENERGY INC. AN EXXONMOBIL SUBSIDIARY (WORKING INTEREST OWNER)
22777 SPRINGWOODS VILLAGE PKWAY, #115
SPRING, TX 77389
6. SHARBRO ENERGY LLC (WORKING INTEREST OWNER)
P O BOX 840
ARTESIA, NM 88211-0840
7. EOG RESOURCES, INC. (WORKING INTEREST OWNER)
5509 CHAMPIONS DR.
MIDLAND, TX 79706

Exhibit C



Jordan Lee Kessler
Phone: (432) 488-6108
Email: jordan_kessler@eogresources.com

December 1, 2022

VIA FEDEX

TO: AFFECTED PARTIES

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 703H well in the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Matt Gray
EOG Resources, Inc.
(432) 686-3633
Matthew_Gray@eogresources.com

Very truly yours,

A handwritten signature in blue ink, appearing to read "J. Kessler", written over a white rectangular background.

Jordan Kessler
Senior Regulatory Advisor

Well Name	Date NSL Sent	Owners NSL Sent to	Certified Mail Tracking #
Ruthless 11 Fed Com #703H	12/1/2022	Tract 1: Bureau of Land Management	7021 2720 0002 7469 5882
		Tract 1: McClellan Oil Corporation	7021 2720 0002 7469 5899
		Tract 1: Heritage Oil & Gas LLC	7021 2720 0002 7469 5905
		Tract 1: The Toles Company	7021 2720 0002 7469 5912
		Tract 1: XTO Energy Inc.	7021 2720 0002 7469 5929
		Tract 1: Sharbro Energy LLC	7021 2720 0002 7469 5936
		Tract 1: Magnum Hunter Production Inc.	7021 2720 0002 7469 5943



P.O. Box 2267, Midland, Texas 79702
Phone: (432) 686-3600 Fax: (432) 686-3773

8. MAGNUM HUNTER PRODUCTION INC
4031 SOLUTIONS CENTER
CHICAGO, IL 60677

Sincerely,

EOG Resources, Inc.

Matthew Gray

Matthew Gray
Landman



November 30th, 2022

Re: EOG Resources, Inc. NSL Application
Ruthless 11 Fed Com #703H (Well)
W/2 E/2 of Section 11 & W/2 E/2 of Section 14 T25S-R32E
Lea County, New Mexico

To Whom it may concern:

Considering the distance between wells in the development plan for the Upper Wolfcamp formation in Sections 11&14, T25S-R32E, EOG believes the non-standard location is necessary to develop the Upper Wolfcamp resource in an economic fashion. The non-standard location also reflects the as-drilled location of the well. Based on analog Upper Wolfcamp wells along with geologic analysis, EOG believes placing the well at this location maintains optimal spacing to continue development of resources in the formation. Granting the exception will allow for more total production from the section and more efficient development of the asset therefore protecting correlative rights.

Sincerely

EOG Resources, Inc.

A handwritten signature in black ink, appearing to read "Matthew Williamson", is written over a horizontal line.

Matthew Williamson
Sr. Reservoir Engineer

Exhibit D

District I
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Energy, Minerals & Natural Resources
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1220 South St. Francis Dr.
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FORM C-102

Revised August 1, 2011

Submit one copy to appropriate

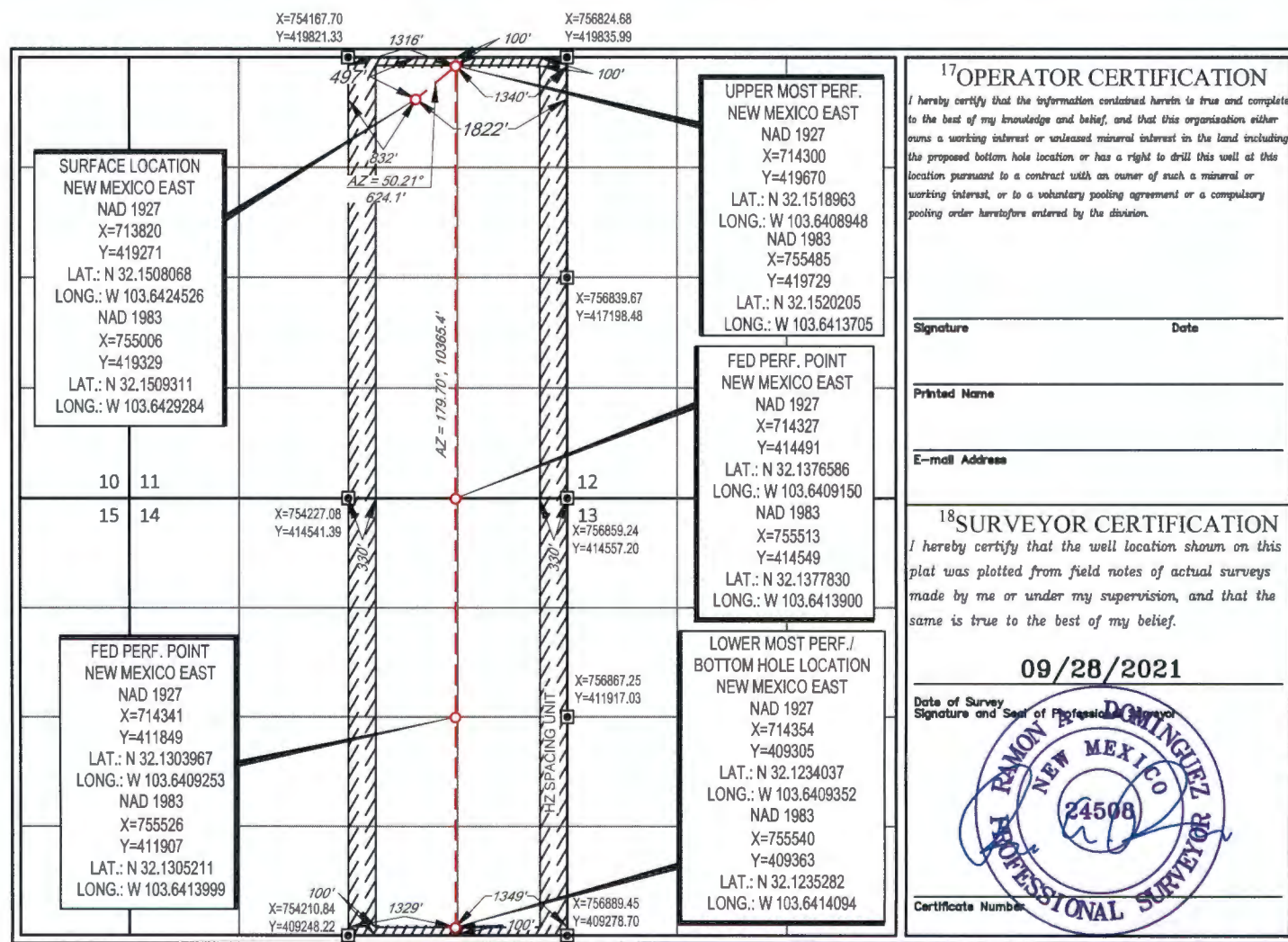
District Office

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-025-		² Pool Code		³ Pool Name					
⁴ Property Code		⁵ Property Name RUTHLESS 11 FED COM				⁶ Well Number 706H			
⁷ OGRID No. 7377		⁸ Operator Name EOG RESOURCES, INC.				⁹ Elevation 3512'			
¹⁰ Surface Location									
UL or lot no. B	Section 11	Township 25-S	Range 32-E	Lot Idn -	Feet from the 497'	North/South line NORTH	Feet from the 1822'	East/West line EAST	County LEA
¹¹ Bottom Hole Location If Different From Surface									
UL or lot no. O	Section 14	Township 25-S	Range 32-E	Lot Idn -	Feet from the 100'	North/South line SOUTH	Feet from the 1349'	East/West line EAST	County LEA
¹² Dedicated Acres 640.00		¹³ Joint or Infill		¹⁴ Consolidation Code		¹⁵ 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.



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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

COMMENTS

Action 163103

COMMENTS

Operator: EOG RESOURCES INC P.O. Box 2267 Midland, TX 79702	OGRID: 7377
	Action Number: 163103
	Action Type: [UF-NSL] Non-Standard Location (NSL)

COMMENTS

Created By	Comment	Comment Date
llowe	12/01/22 sent J.K. an e-mail about what Pool/Formation this well is seeking.	12/1/2022

District I

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

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 163103

CONDITIONS

Operator: EOG RESOURCES INC P.O. Box 2267 Midland, TX 79702	OGRID: 7377
	Action Number: 163103
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
Ilowe	NSL - 8499 is approved. The approved Order can be retrieved at the following OCD website link. https://ocdimage.emnrd.nm.gov/imaging/AEOrderCriteria.aspx	12/1/2022