

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Ben Shelton
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division



ADMINISTRATIVE NON-STANDARD SPACING UNIT

Jacob L. Everhart
jeverhart@bwenergyllaw.com

Administrative Order NSP – 2400

XTO Permian Operating, LLC [OGRID 373075]

Big Eddy Unit 28 QR Well No. 100H (30-015-57292)

Big Eddy Unit 28 QR Well No. 101H (30-015-57299)

Big Eddy Unit 28 QR Well No. 102H (30-015-57301)

Non - Standard Horizon Spacing Unit:

E/2 NE/4 Section 28, N/2 Section 27, N/2 Section 26 and N/2 Section 25, T21S R29E, Eddy County, New Mexico

Reference is made to your application received on April 21st, 2026.

You have requested approval of a non-standard horizontal spacing unit to be included in your proposed horizontal spacing unit, as follows:

Proposed Decreased Horizontal Spacing Unit:

Description	Acres	Pool	Pool Code
E/2 NE/4 Section 28	1040	Golden Lane; Wolfcamp	77620
N/2 Section 27			
N/2 Section 26			
N/2 Section 25			

NSP – 2400
XTO Permian Operating, LLC
Page 2 of 2

Area of Exclusion:

<u>Description</u>	<u>Acres</u>
W/2 NE/4 Section 28	80

You have requested an exception pursuant to Rule 19.15.16.15(A)(3) NMAC, to approve a non-standard horizontal spacing unit consisting of the entire area described above as the horizontal spacing unit. The proposed horizontal spacing unit does not consist of a quarter section or equivalent in both sections, as required by Rule 19.15.16.15(B)(3) NMAC.

We understand that you are seeking this exception for an allowance to create a non-standard horizontal spacing unit, comprised of the Proposed Horizontal Spacing Unit referenced above within Eddy County, New Mexico.

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in Paragraph (8) Subsection A of 19.15.2.7 NMAC, in all adjoining units which are to be being included.

You have requested this non-standard horizontal spacing unit in order to efficiently locate surface facilities, to reduce surface disturbance and to promote effective well spacing within the Wolfcamp formation. This non-standard unit excludes the W/2 NE/4 Section 28. The approved non-standard horizontal spacing unit will protect correlative rights and prevent waste underlying the E/2 NE/4 Section 28, N/2 Section 27, N/2 Section 26 and N/2 Section 25 within the referenced Horizontal Spacing Unit.

Pursuant to the authority conferred by Division Rule 19.15.16.15(B)(5) NMAC, the above-described **non-standard horizontal spacing unit is hereby approved**. Further, the Applicant may add additional wells to the non-standard spacing unit, the well(s) must be in the same horizontal spacing unit and pool/formation. The new well's APD shall reference this NSP order number on Form C-102 with an adjacent letter stating this request.

General Provisions

The above approvals are subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 19.15.5.9 NMAC.

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.



Albert C.S. Chang
Division Director
AC/lrl

Date: 06/12/2026

ID NO. 577804

DHC - 2400

Revised March 23, 2017

RECEIVED: 04/21/26	REVIEWER:	TYPE:	APP NO:
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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: XTO Permian Operating, LLC **OGRID Number:** 373075
Well Name: Big Eddy Unit 28 QR 100H, 101H, & 102H **API:** Various - See Attached C-102s
Pool: Golden Land; Wolfcamp (Gas) **Pool Code:** 77620

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 holdersB. ☒ Royalty, overriding royalty owners, revenue ownersC. ☐ Application requires published noticeD. ☐ Notification and/or concurrent approval by SLOE. ☒ Notification and/or concurrent approval by BLMF. ☐ Surface ownerG. ☒ 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.

4/21/26

Date

Jacob L. Everhart

Print or Type Name

(505) 999 - 0401

Phone Number

Jeverhart@bwenergyllaw.com

e-mail Address

Signature

BEATTY & WOZNIAK, P.C.

ATTORNEYS AT LAW

1675 BROADWAY, SUITE 600
DENVER, COLORADO 80202
TELEPHONE 303-407-4499
FAX 1-800-886-6566
www.bwenergylaw.com

OFFICE LOCATIONS

COLORADO

NEW MEXICO

WYOMING

MIGUEL A. SUAZO
ALSO ADMITTED IN TX, CO

JACOB L. EVERHART
ALSO ADMITTED IN CO, ND, & UT

April 21, 2026

VIA ONLINE FILING

Albert Chang
Division Director
Oil Conservation Division
Energy, Minerals and Natural Resource Department
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

ATTN: Leonard Lowe

**RE: Application of XTO Permian Operating, LLC., for Administrative Approval of
1,040-acre Non-Standard Horizontal Spacing Unit (NSP)**

Big Eddy Unit 28 QR 100H, 101H, & 102H
N/2 of Sections 25, 26, 27, and E/2 NE/4 of Section 28, Township 21 South, Range 29
East, N.M.P.M., Eddy County, NM
Golden Lane; Wolfcamp (Gas) [Pool Code: 77620]

Dear Mr. Chang,

XTO Permian Operating, LLC. ("XTO"), (OGRID No. 373075), pursuant to Division rules 19.15.16.15.(B)(5) and 19.15.15.11.B. NMAC, seeks administrative approval of a Non-Standard Horizontal Spacing Unit ("NSP") for its Big Eddy Unit 28 QR well(s) located in a 1,040-acre, more or less, spacing unit underlying the N/2 of Sections 25, 26, 27, and the E/2 NE/4 of Section 28, Township 21 South, Range 29 East, N.M.P.M., Eddy County, NM.

Reason for the Request: The proposed NSP is unorthodox in size and acreage under both 19.15.15.11.B.(1) and 19.15.16.15(B)(3-4) NMAC. The NSP well(s) dedicate 1,040-acres, which is more than the 320-acre (quarter section) spacing unit building blocks provided under 19.15.16.15.B(3). Also, the NSP pulls in the 80-acres consisting of the E/2 of the NE/4 of Section 28, making the NSP's size and shape non-standard. The NSP is located within the Big Eddy Federal Unit. XTO is the unit operator of the Big Eddy Federal Unit. As such, only unit operators can drill and operate wells within federal units.

Notice is provided under 19.15.16.15.B.(5)(b)(ii) NMAC to affected persons in all tracts that *adjoin the non-standard horizontal spacing unit*.

The proposed 1,040-acre Non-Standard Spacing Unit will be developed by the following well(s):

- **Big Eddy Unit 28 QR 100H** (API No. 30-015-57292)
 - o Well Type: Defining
 - o Pool Name: Golden Lane; Wolfcamp (Gas)
 - o Pool Code: [77620]
- **Big Eddy Unit 28 QR 101H** (API No. 30-015-57299)
 - o Well Type: Infill
 - o Pool Name: Golden Lane; Wolfcamp (Gas)
 - o Pool Code: [77620]
- **Big Eddy Unit 28 QR 102H** (API No. 30-015-57301)
 - o Well Type: Infill
 - o Pool Name: Golden Lane; Wolfcamp (Gas)
 - o Pool Code: [77620]

The Division has placed the well(s) listed above in the Golden Lane; Wolfcamp (Gas) Pool [No. 77620] which provides for 320-acre spacing, comprised of one or more contiguous tracts that the horizontal gas well's completed interval penetrates, each of which consists of a governmental quarter section or equivalent. 19.15.16.15.B.(3) NMAC.

The acreage included in the Non-Standard Spacing Unit will be subject to the following leases:

- NMLC0061396
- NMLC0069241
- NMLC0069144A
- NMLC0069144
- NMLC0065609
- NMNM0000915
- NMNM0004105A

In addition to the reasons stated above, XTO seeks administrative approval of a Non-Standard Spacing Unit to develop the acreage as a single development area and to maximize the productive lateral(s). Doing so allows XTO to efficiently locate surface facilities, such as well pad locations and centralized tank batteries, reduce disturbance impacts, reduce emissions and leak points, consolidate roadways, reduce traffic, consolidate pipeline(s), and promotes effective well spacing, thereby ensuring the promotion of conservation, the prevention of waste, and the protection of correlative rights. Division rules 19.15.16.7.P and 19.15.16.15.B(8) NMAC encourage oil and gas development, where possible, in enlarged areas of common ownership to minimize surface disturbance and to promote efficient well spacing. Further, Division rule 19.15.16.15.(B)(5) NMAC authorizes administrative approval of such a request.

Please find the below listed Exhibits included in this application:

Exhibit 1 is a statement from XTO Commercial & Land Advisor - Regulatory Lead, R. Charles Bassett.

Exhibit 2 is a copy of the Well Location and Acreage Dedication Plat (C-102) for each well within the proposed Non-Standard Spacing Unit and includes the SHL, FTP, LTP, and BHL for each well.

Exhibit 3 includes: (1) a lease map showing the proposed Non-Standard Horizontal Spacing Unit, (2) the adjoining tracts identifying the notification area, (3) and maps depicting the entirety of the Big Eddy Federal Unit.

Exhibit 4 is a list of affected persons under 19.15.16.15.B(5)(b)(ii) who were sent a copy of this application, proof of publication, and attachments by certified mail advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

Thank you for your time and attention to this matter. Please let me know if you require additional information.

Very truly yours,

BEATTY & WOZNIAK, P.C.



Miguel Suazo

msuazo@bwenergylaw.com

Jacob L. Everhart

jeverhart@bwenergylaw.com

Attorney(s) for XTO Permian Operating,
LLC.

Exhibit 1



Land Dept.
22777 Springwoods Village Pkwy
Spring TX 77389-1425
281-939-3707 - Direct Phone
chad.d.smith@ExxonMobil.com

April 21, 2026

Landman Statement

I have reviewed the ownership of the oil and gas leasehold in the proposed 1,040-acre, more or less, Non-Standard Horizontal Spacing Unit ("NSHSU") underlying the N/2 of Sections 25, 26, 27, and the E/2 NE/4 of Section 28, Township 21 South, Range 29 East, N.M.P.M., Eddy County, NM, for the purposes of the administrative NSP approval for **XTO's BEU 28 QR well(s)**. As of the date of this letter, the affected parties are:

See Attached EXHIBIT "4"

XTO is seeking approval of the non-standard well location to eliminate the need for separate production facilities and additional administrative approvals. Approval of the NSP will allow for efficient surface facility placement, reduced surface disturbance, and the consolidation of roads, storage tanks, and pipelines. These measures support effective well spacing, conservation of the resource, enhanced recoveries and economics, and waste prevention, while also helping to minimize environmental impacts such as emissions from multiple tank batteries and associated facilities. The Oil Conservation Division's rules encourage such developments to maximize efficiency and reduce surface disturbance in areas of common ownership.

Sincerely,

XTO Permian Operating, LLC.

Chad Smith

Chad Smith

Exhibit 2

WELL LOCATION INFORMATION

API Number 30-015-57292	Pool Code 77620	Pool Name GOLDEN LANE; WOLFCAMP (GAS)
Property Code 337783	Property Name BIG EDDY UNIT 28 QR	Well Number 100H
OGRID No. 373075	Operator Name XTO PERMIAN OPERATING, LLC.	Ground Level Elevation 3413'
Surface Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		Mineral Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	29E		1,175 FNL	410 FEL	32.454427	-103.982351	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	25	21S	29E		1,650 FNL	50 FEL	32.453068	-103.929805	EDDY

Dedicated Acres 1,040.00	Infill or Defining Well DEFINING	Defining Well API	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers:			Well setbacks are under Common Ownership: ☐ Yes ☒ No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	28	21S	29E		1,650 FNL	330 FEL	32.453122	-103.982090	EDDY

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	28	21S	29E		1,650 FNL	330 FEL	32.453122	-103.982090	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	25	21S	29E		1,650 FNL	100 FEL	32.453069	-103.929967	EDDY

Unitized Area or Area of Uniform Interest NMNM-105467880	Spacing Unit Type ☒ Horizontal ☐ Vertical	Ground Floor Elevation: 3413'
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OPERATOR CERTIFICATIONS

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.

L. Srinivas Naveen

7/23/25

Signature

Date

Srinivas Naveen Laghuyarapu

SURVEYOR CERTIFICATIONS

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 and correct to the best of my belief.



[Handwritten Signature]

Signature and Seal of Professional Surveyor

23786

07-21-2025



 SECTION LINE
  330' BUFFER
  PPP

 TOWNSHIP LINE
  MINERAL LEASE
  WELL

 DEDICATED ACREAGE
  WELLBORE

CORNER COORDINATE TABLE				
CORNER	NAD 83 NME X	NAD 83 NME Y	NAD 27 NME X	NAD 27 NME Y
A	647,365.4	530,397.8	606,184.8	530,336.8
B	650,004.7	530,406.0	608,824.1	530,344.9
C	652,649.3	530,409.5	611,468.7	530,348.4
D	655,289.3	530,414.2	614,108.6	530,353.1
E	657,928.7	530,421.4	616,748.1	530,360.3
F	660,575.1	530,423.4	619,394.5	530,362.2
G	663,209.1	530,440.9	622,028.5	530,379.8
H	665,850.6	530,442.5	624,669.9	530,381.3
I	647,373.7	527,756.4	606,193.0	527,695.4
J	650,013.4	527,765.9	608,832.7	527,704.9
K	652,656.6	527,769.4	611,475.9	527,708.4

WELL LOCATION INFORMATION

API Number 30-015- 57299	Pool Code 77620	Pool Name GOLDEN LANE; WOLFCAMP (GAS)
Property Code 337783	Property Name BIG EDDY UNIT 28 QR	Well Number 101H
OGRID No. 373075	Operator Name XTO PERMIAN OPERATING, LLC.	Ground Level Elevation 3413'
Surface Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		Mineral Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	29E		715 FNL	410 FEL	32.455691	-103.982351	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	25	21S	29E		990 FNL	50 FEL	32.454883	-103.929806	EDDY

Dedicated Acres 1,040.00	Infill or Defining Well INFILL	Defining Well API 300-15-57292	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers:			Well setbacks are under Common Ownership: ☐ Yes ☒ No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	29E		990 FNL	330 FEL	32.454936	-103.982090	EDDY

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	29E		990 FNL	330 FEL	32.454936	-103.982090	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	25	21S	29E		990 FNL	100 FEL	32.454883	-103.929968	EDDY

Unitized Area or Area of Uniform Interest NMNM-105467880	Spacing Unit Type ☒ Horizontal ☐ Vertical	Ground Floor Elevation: 3413'
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OPERATOR CERTIFICATIONS

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.

L. Srinivas Naveen

7/23/2025

Signature

Date

Srinivas Naveen Laghuyarapu

SURVEYOR CERTIFICATIONS

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 and correct to the best of my belief.

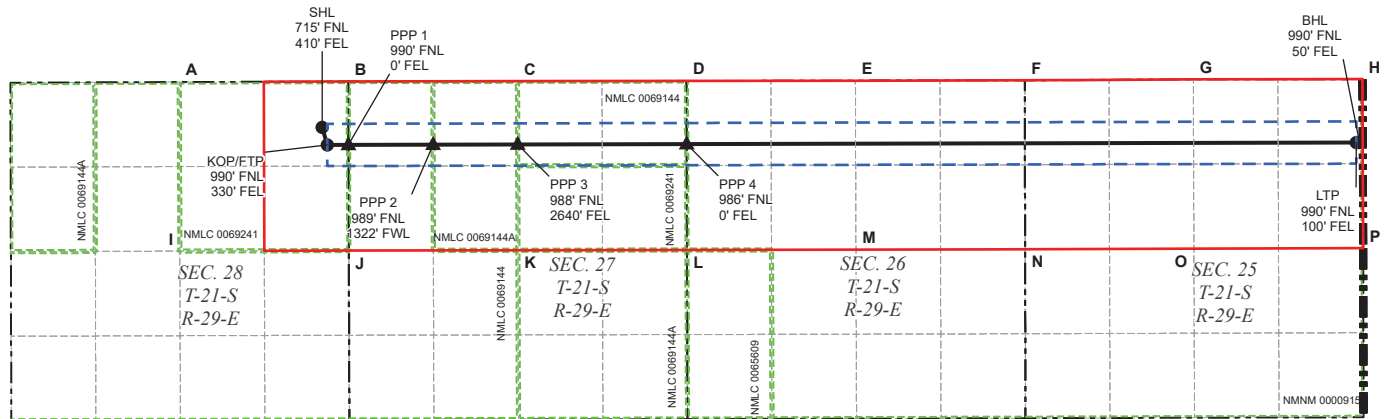


[Handwritten Signature]

Signature and Seal of Professional Surveyor

23786

07-21-2025



LEGEND

	SECTION LINE		330' BUFFER		PPP
	TOWNSHIP LINE		MINERAL LEASE		WELL
	DEDICATED ACREAGE		WELLBORE		

WELL COORDINATE TABLE

WELL	NAD 83 NME X	NAD 83 NME Y	NAD 83 LAT	NAD 83 LON	NAD 27 NME X	NAD 27 NME Y	NAD 27 LAT	NAD 27 LON
SHL	649,596.6	529,689.3	32.455691	-103.982351	608,416.0	529,628.2	32.455570	-103.981850
KOP/FTP	649,678.0	529,415.0	32.454936	-103.982090	608,497.4	529,353.9	32.454815	-103.981589
LTP	665,755.0	529,452.5	32.454883	-103.929968	624,574.4	529,391.3	32.454761	-103.929469
BHL	665,805.0	529,452.5	32.454883	-103.929806	624,624.4	529,391.3	32.454761	-103.929307
PPP 1	650,008.0	529,415.7	32.454935	-103.981020	608,827.4	529,354.7	32.454814	-103.980520
PPP 2	651,330.0	529,418.8	32.454932	-103.976734	610,149.4	529,357.8	32.454811	-103.976234
PPP 3	652,652.0	529,421.9	32.454928	-103.972448	611,471.4	529,360.8	32.454807	-103.971948
PPP 4	655,292.2	529,428.1	32.454920	-103.963889	614,111.6	529,367.0	32.454799	-103.963389

CORNER COORDINATE TABLE

CORNER	NAD 83 NME X	NAD 83 NME Y	NAD 27 NME X	NAD 27 NME Y
A	647,365.4	530,397.8	606,184.8	530,336.8
B	650,004.7	530,406.0	608,824.1	530,344.9
C	652,649.3	530,409.5	611,468.7	530,348.4
D	655,289.3	530,414.2	614,108.6	530,353.1
E	657,928.7	530,421.4	616,748.1	530,360.3
F	660,575.1	530,423.4	619,394.5	530,362.2
G	663,209.1	530,440.9	622,028.5	530,379.8
H	665,850.6	530,442.5	624,669.9	530,381.3
I	647,373.7	527,756.4	606,193.0	527,695.4
J	650,013.4	527,765.9	608,832.7	527,704.9
K	652,656.6	527,769.4	611,475.9	527,708.4

WELL LOCATION INFORMATION

API Number 30-015-57301	Pool Code 77620	Pool Name GOLDEN LANE; WOLFCAMP (GAS)
Property Code 337783	Property Name BIG EDDY UNIT 28 QR	Well Number 102H
OGRID No. 373075	Operator Name XTO PERMIAN OPERATING, LLC.	Ground Level Elevation 3413'
Surface Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		Mineral Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	29E		1,235 FNL	410 FEL	32.454262	-103.982351	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	25	21S	29E		2,310 FNL	50 FEL	32.451254	-103.929803	EDDY

Dedicated Acres 1,040.00	Infill or Defining Well INFILL	Defining Well API 300-15-57292	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers:			Well setbacks are under Common Ownership: ☐ Yes ☒ No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	28	21S	29E		2,310 FNL	330 FEL	32.451308	-103.982090	EDDY

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	28	21S	29E		2,310 FNL	330 FEL	32.451308	-103.982090	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	25	21S	29E		2,310 FNL	100 FEL	32.451255	-103.929965	EDDY

Unitized Area or Area of Uniform Interest NMNM-105467880	Spacing Unit Type ☒ Horizontal ☐ Vertical	Ground Floor Elevation: 3413'
--	--	---

OPERATOR CERTIFICATIONS

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.

L. Srinivas Naveen 7/23/25

Signature Date

Srinivas Naveen Lashuvaranu

Printed Name

SURVEYOR CERTIFICATIONS

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 and correct to the best of my belief.



[Signature]

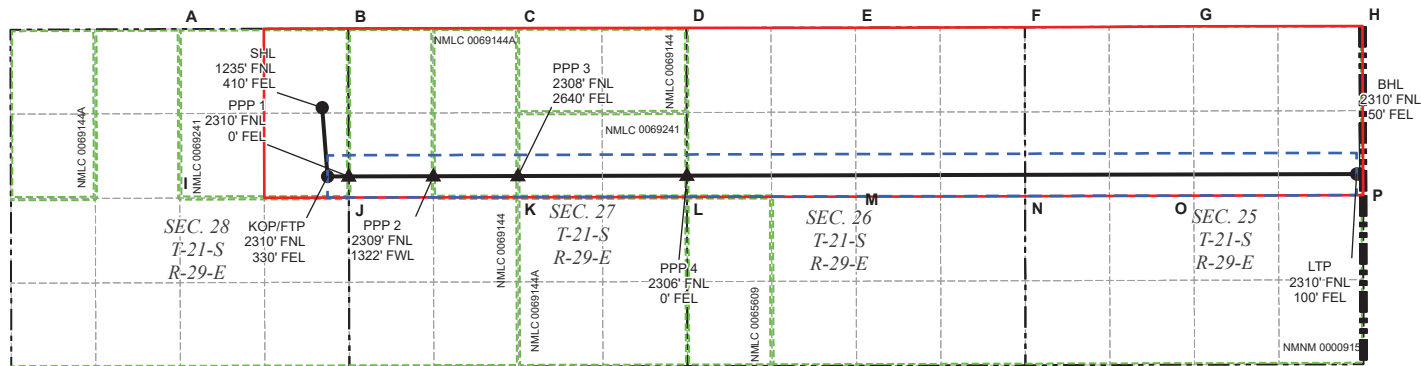
Signature and Seal of Professional Surveyor

23786

07-21-2025

Certificate Number

Date of Survey



LEGEND

- SECTION LINE
- TOWNSHIP LINE
- DEDICATED ACREAGE
- 330' BUFFER
- MINERAL LEASE
- WELLBORE
- PPP
- WELL

WELL COORDINATE TABLE

WELL	NAD 83 NME X	NAD 83 NME Y	NAD 83 LAT	NAD 83 LON	NAD 27 NME X	NAD 27 NME Y	NAD 27 LAT	NAD 27 LON
SHL	649,598.3	529,169.3	32.454262	-103.982351	608,417.7	529,108.2	32.454140	-103.981851
KOP/FTP	649,682.3	528,095.0	32.451308	-103.982090	608,501.7	528,034.0	32.451187	-103.981590
LTP	665,761.0	528,132.5	32.451255	-103.929965	624,580.3	528,071.3	32.451133	-103.929466
BHL	665,811.0	528,132.5	32.451254	-103.929803	624,630.3	528,071.3	32.451132	-103.929304
PPP 1	650,012.3	528,095.8	32.451307	-103.981020	608,831.6	528,034.7	32.451186	-103.980520
PPP 2	651,334.0	528,098.8	32.451303	-103.976735	610,153.3	528,037.8	32.451182	-103.976235
PPP 3	652,655.7	528,101.9	32.451300	-103.972451	611,475.0	528,040.9	32.451178	-103.971951
PPP 4	655,296.2	528,108.1	32.451292	-103.963891	614,115.5	528,047.0	32.451170	-103.963391

CORNER COORDINATE TABLE

CORNER	NAD 83 NME X	NAD 83 NME Y	NAD 27 NME X	NAD 27 NME Y
A	647,365.4	530,397.8	606,184.8	530,336.8
B	650,004.7	530,406.0	608,824.1	530,344.9
C	652,649.3	530,409.5	611,468.7	530,348.4
D	655,289.3	530,414.2	614,108.6	530,353.1
E	657,928.7	530,421.4	616,748.1	530,360.3
F	660,575.1	530,423.4	619,394.5	530,362.2
G	663,209.1	530,440.9	622,028.5	530,379.8
H	665,850.6	530,442.5	624,669.9	530,381.3
I	647,373.7	527,756.4	606,193.0	527,695.4
J	650,013.4	527,765.9	608,832.7	527,704.9
K	652,656.6	527,769.4	611,475.9	527,708.4

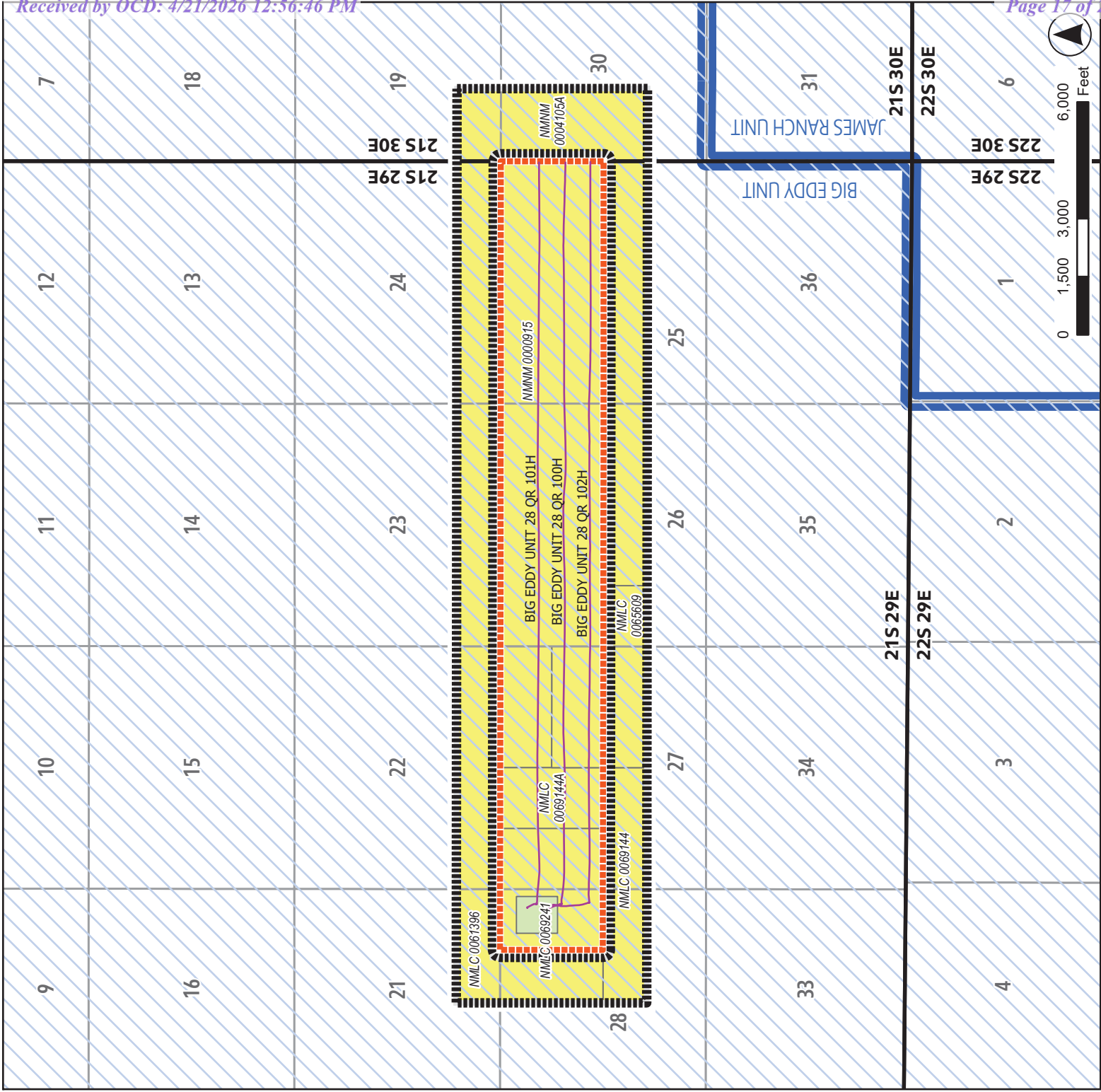
Exhibit 3

BEU 28 QR
00H, 101H, 102H
NSP Exhibit

ddy County, New Mexico
21S-R29E : E2NE4 Sec 28, N2 Sec 27,
2 Sec 26, N2 Sec 25
040 acres more or less

- FEDERAL UNIT
- NOTIFICATION AREA
- SPACING UNIT
- FEDERAL ACREAGE
- PAD

Date: 4/16/2026



Received by OCD: 4/21/2026 12:56:46 PM

12	07	08	09	10	11	12	07	08	09	10									
13	18	17	16	15	14	13	18	17	16	15	20S - 30E								
24	19	20	21	22	23	24	19	20	21	22									
25	30	29	28	27	26	25	30	29	28	27									
36	31	32	33	34	35	36	31	32	33	34									
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18	17	16	15	14	13	18	17	16	15	14	21S - 29E								
19	20	21	22	23	24	19	20	21	22	23	21S - 30E								
30	29	28	27	26	25	30	29	28	27	26									
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07	08	09	10	11	12	07	08	09	10	11									

Exhibit 4

BEU 28 QR 100H, 101H, 102H	Tracking Info
XTO Permian Operating LLC ATTN: Land Dept. 22777 Springwoods Village Pkwy, Spring, TX 77389	Self Waive
Bureau of Land Management New Mexico State Office 301 Dinosaur Trail Santa Fe, New Mexico 87508	9589 0710 5270 2981 1394 79

BEATTY & WOZNIAK, P.C.

ATTORNEYS AT LAW

1675 BROADWAY, SUITE 600
DENVER, COLORADO 80202
TELEPHONE 303-407-4499
FAX 1-800-886-6566
www.bwenergylaw.com

OFFICE LOCATIONS

COLORADO

NEW MEXICO

WYOMING

MIGUEL A. SUAZO
ALSO ADMITTED IN TX, CO

JACOB L. EVERHART
ALSO ADMITTED IN CO, ND, & UT

April 21, 2026

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

**RE: Application of XTO Permian Operating, LLC., for Administrative Approval of
1,040-acre Non-Standard Horizontal Spacing Unit (NSP)**

Big Eddy Unit 28 QR 100H, 101H, & 102H
N/2 of Sections 25, 26, 27, and E/2 NE/4 of Section 28, Township 21 South, Range 29
East, N.M.P.M., Eddy County, NM
Golden Lane; Wolfcamp (Gas) [Pool Code: 77620]

To Whom It May Concern,

Enclosed is a copy of the above-referenced application filed with the New Mexico Oil Conservation Division (the "Division") on this date. Any objections that you have to these applications must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, within twenty (20) days from the date the Division receives the above-referenced applications. If no objection is received within the twenty-day period, the application may be approved administratively by the Division.

This Application would have been filed with, and received by, the Division either on the date of this letter as referenced above, or no later than two (2) days after the date referenced above. Email correspondence for this matter can be sent to the Division at OCD.Engineer@emnrd.nm.gov. If you have any questions about this application, please contact the following:

R. Charles Bassett – Commercial & Land Advisor – Regulatory Lead
ExxonMobil
(346) 382-2588
Ralph.c.bassett@exxonmobil.com

Very truly yours,
BEATTY & WOZNIAK, P.C.

A handwritten signature in blue ink, appearing to read "Miguel A. Suazo".

Miguel A. Suazo
msuazo@bwenergyllaw.com

Jacob L. Everhart
jeverhart@bwenergyllaw.com

*Attorney(s) for XTO Permian Operating,
LLC*

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

COMMENTS

Action 577804

COMMENTS

Operator: XTO PERMIAN OPERATING LLC. 3617 North Big Spring Street MIDLAND, TX 79705	OGRID: 373075
	Action Number: 577804
	Action Type: [UF-NSP] Non-Standard Proration (NSP)

COMMENTS

Created By	Comment	Comment Date
llowe	If the Operator wants to add existing wells within the same NSP HSU, the operator will need to submit a C-103 X or Z to the OCD online portal. The sundry shall state the following: "Adding Wells to an NSP HSU: Well Name, Well API No., Pool Name, Pool Code, NSP Order Number". Send an email to ocd.engineer@emnrd.nm.gov . TITLED: Adding existing wells to NSP-XXXX, C-103 X or Z. NSP-XXXX.	6/25/2026

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 577804

CONDITIONS

Operator: XTO PERMIAN OPERATING LLC. 3617 North Big Spring Street MIDLAND, TX 79705	OGRID: 373075
	Action Number: 577804
	Action Type: [UF-NSP] Non-Standard Proration (NSP)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	4/27/2026