

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**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](mailto:jeverhart@bwenergyllaw.com)

#### Administrative Order NSP – 2401

**XTO Permian Operating, LLC [OGRID 373075]**

Big Eddy Unit 33 QR Well No. 301H (30-015-57288)

Big Eddy Unit 33 QR Well No. 302H (30-015-57265)

**Non - Standard Horizon Spacing Unit:**

**E/2 SE/4 Section 33, S/2 Section 34, S/2 Section 35 and S/2 Section 36, T21S R29E, Eddy County, New Mexico**

Reference is made to your application received on April 21<sup>st</sup>, 2026.

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

**Proposed Horizontal Spacing Unit:**

| <b>Description</b>  | <b>Acres</b> | <b>Pool</b>           | <b>Pool Code</b> |
|---------------------|--------------|-----------------------|------------------|
| E/2 SE/4 Section 33 | 1009.33      | Golden Lane; Wolfcamp | 77620            |
| S/2 Section 34      |              |                       |                  |
| S/2 Section 35      |              |                       |                  |
| S/2 Section 36      |              |                       |                  |

NSP – 2401  
XTO Permian Operating, LLC  
Page 2 of 2

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**Area of Exclusion:**

| <b><u>Description</u></b> | <b><u>Acres</u></b> |
|---------------------------|---------------------|
| W/2 SE/4 Section 33       | 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 - quarter section or equivalent in both sections, as required by Rule 19.15.16.15(B)(1) 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 SE/4 Section 33. The approved non-standard horizontal spacing unit will protect correlative rights and prevent waste underlying the E/2 SE/4 Section 33, S/2 Section 34, S/2 Section 35 and S/2 Section 36 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.



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Albert C.S. Chang  
Division Director  
AC/lrl

Date: 06/12/2026

ID NO. 577809

NSP - 2401

Revised March 23, 2017

|                           |           |       |         |
|---------------------------|-----------|-------|---------|
| RECEIVED: <b>04/21/26</b> | REVIEWER: | TYPE: | APP NO: |
|---------------------------|-----------|-------|---------|

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 33 QR 301H & 302H **API:** Various - See Attached C-102s  
**Pool:** GOLDEN LANE; 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 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.**

Jacob L. Everhart

Print or Type Name

Signature

4/21/26

Date

(505) 999 - 0401

Phone Number

Jeverhart@bwenergyllaw.com

e-mail Address

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**BEATTY & WOZNIAK, P.C.**

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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 33 QR 301H & 302H  
S/2 of Sections 34, 35, 36, and E/2 SE/4 of Section 33, 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 33 QR 301H and 302H well(s) located in a 1,040-acre, more or less, spacing unit underlying the S/2 of Sections 34, 35, 36, and the E/2 SE/4 of Section 33, 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 SE/4 of Section 33, 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 33 QR 301H** (API No. 30-015-57288)
  - o Well Type: Infill
  - o Pool Name: Golden Lane; Wolfcamp (Gas)
  - o Pool Code: [77620]
- **Big Eddy Unit 33 QR 302H** (API No. 30-015-57265)
  - o Well Type: Defining
  - 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:

- NMLC0068379
- E0-5232-07

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, Chad Smith.

**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@bwenergyllaw.com](mailto:msuazo@bwenergyllaw.com)

Jacob L. Everhart

[jeverhart@bwenergyllaw.com](mailto:jeverhart@bwenergyllaw.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 S/2 of Sections 34, 35, 36, and the E/2 SE/4 of Section 33, 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 33 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<br><b>30-015-57288</b>                                                                                                                      | Pool Code<br><b>77620</b>                           | Pool Name<br><b>GOLDEN LANE; WOLFCAMP (GAS)</b>                                                                                                                   |
| Property Code<br><b>337762</b>                                                                                                                         | Property Name<br><b>BIG EDDY UNIT 33 QR</b>         | Well Number<br><b>301H</b>                                                                                                                                        |
| OGRID No.<br><b>373075</b>                                                                                                                             | Operator Name<br><b>XTO PERMIAN OPERATING, LLC.</b> | Ground Level Elevation<br><b>3434'</b>                                                                                                                            |
| Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal |                                                     | Mineral Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal |

## Surface Location

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W   | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|----------------|------------------|--------------------|-------------|
|    | <b>33</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>740 FSL</b> | <b>392 FEL</b> | <b>32.431052</b> | <b>-103.982297</b> | <b>EDDY</b> |

## Bottom Hole Location

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W  | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|---------------|------------------|--------------------|-------------|
|    | <b>36</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>100 FSL</b> | <b>50 FEL</b> | <b>32.428851</b> | <b>-103.929818</b> | <b>EDDY</b> |

|                                    |                                          |                                          |                                                                                                               |                                |
|------------------------------------|------------------------------------------|------------------------------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------|
| Dedicated Acres<br><b>1,009.33</b> | Infill or Defining Well<br><b>INFILL</b> | Defining Well API<br><b>300-15-57265</b> | Overlapping Spacing Unit (Y/N)<br><b>N</b>                                                                    | Consolidation Code<br><b>U</b> |
| Order Numbers:                     |                                          |                                          | Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |                                |

## Kick Off Point (KOP)

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W   | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|----------------|------------------|--------------------|-------------|
|    | <b>33</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>100 FSL</b> | <b>440 FEL</b> | <b>32.429295</b> | <b>-103.982452</b> | <b>EDDY</b> |

## First Take Point (FTP)

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W   | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|----------------|------------------|--------------------|-------------|
|    | <b>33</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>100 FSL</b> | <b>440 FEL</b> | <b>32.429295</b> | <b>-103.982452</b> | <b>EDDY</b> |

## Last Take Point (LTP)

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W   | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|----------------|------------------|--------------------|-------------|
|    | <b>36</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>100 FSL</b> | <b>100 FEL</b> | <b>32.428852</b> | <b>-103.929980</b> | <b>EDDY</b> |

|                                                                    |                                                                                                    |                                         |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------|
| Unitized Area or Area of Uniform Interest<br><b>NMNM-105467880</b> | Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical | Ground Floor Elevation:<br><b>3434'</b> |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------|

## 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.

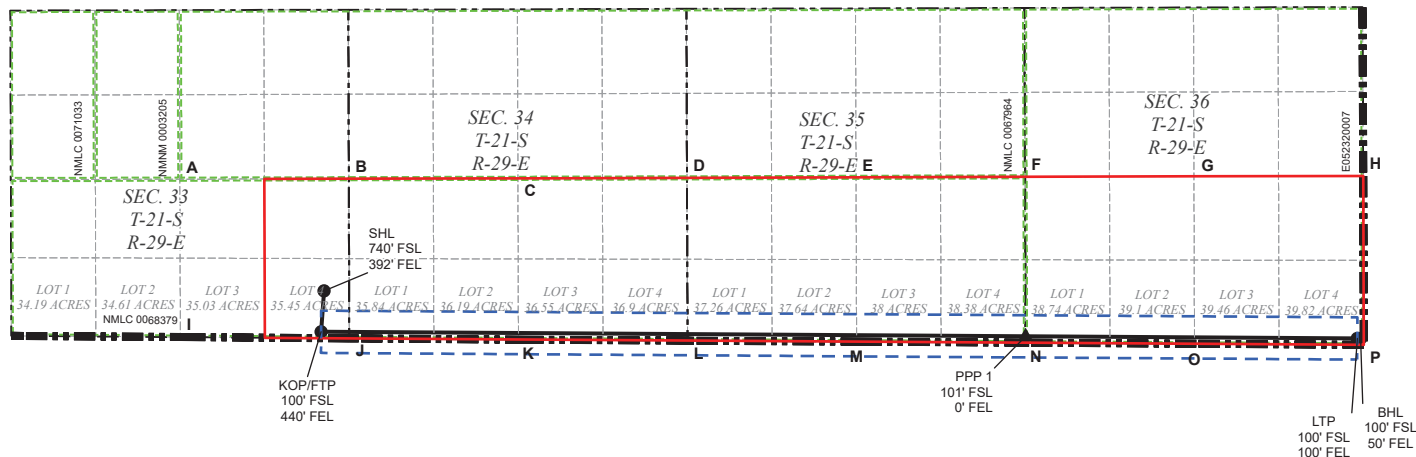


*[Signature]*

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     | 649,642.8    | 520,725.7    | 32.431052  | -103.982297 | 608,462.0    | 520,664.8    | 32.430930  | -103.981797 |
| KOP/FTP | 649,597.1    | 520,086.3    | 32.429295  | -103.982452 | 608,416.1    | 520,025.4    | 32.429173  | -103.981952 |
| LTP     | 665,787.1    | 519,982.4    | 32.428852  | -103.929980 | 624,606.2    | 519,921.4    | 32.428730  | -103.929482 |
| BHL     | 665,837.1    | 519,982.1    | 32.428851  | -103.929818 | 624,656.2    | 519,921.1    | 32.428728  | -103.929320 |
| PPP 1   | 660,603.7    | 520,015.7    | 32.428996  | -103.946780 | 619,422.7    | 519,954.7    | 32.428874  | -103.946281 |

CORNER COORDINATE TABLE

| CORNER | NAD 83 NME X | NAD 83 NME Y | NAD 27 NME X | NAD 27 NME Y |
|--------|--------------|--------------|--------------|--------------|
| A      | 647,389.9    | 522,471.2    | 606,209.1    | 522,410.3    |
| B      | 650,030.0    | 522,477.6    | 608,849.2    | 522,416.7    |
| C      | 652,672.0    | 522,484.6    | 611,491.1    | 522,423.7    |
| D      | 655,313.8    | 522,491.6    | 614,132.9    | 522,430.6    |
| E      | 657,955.2    | 522,499.7    | 616,774.3    | 522,438.7    |
| F      | 660,596.0    | 522,507.8    | 619,415.1    | 522,446.7    |
| G      | 663,235.4    | 522,514.9    | 622,054.5    | 522,453.8    |
| H      | 665,879.0    | 522,522.0    | 624,698.1    | 522,460.9    |
| I      | 647,397.3    | 520,004.1    | 606,216.4    | 519,943.2    |
| J      | 650,037.4    | 519,982.7    | 608,856.4    | 519,921.8    |
| K      | 652,679.6    | 519,965.0    | 611,498.7    | 519,904.1    |

## WELL LOCATION INFORMATION

|                                                                                                                                                        |                                                     |                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| API Number<br><b>30-015-57265</b>                                                                                                                      | Pool Code<br><b>77620</b>                           | Pool Name<br><b>GOLDEN LANE; WOLFCAMP (GAS)</b>                                                                                                                   |
| Property Code<br><b>337762</b>                                                                                                                         | Property Name<br><b>BIG EDDY UNIT 33 QR</b>         | Well Number<br><b>302H</b>                                                                                                                                        |
| OGRID No.<br><b>373075</b>                                                                                                                             | Operator Name<br><b>XTO PERMIAN OPERATING, LLC.</b> | Ground Level Elevation<br><b>3435'</b>                                                                                                                            |
| Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal |                                                     | Mineral Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal |

## Surface Location

| UL | Section   | Township   | Range      | Lot      | Ft. from N/S   | Ft. from E/W   | Latitude         | Longitude          | County      |
|----|-----------|------------|------------|----------|----------------|----------------|------------------|--------------------|-------------|
|    | <b>33</b> | <b>21S</b> | <b>29E</b> | <b>4</b> | <b>798 FSL</b> | <b>517 FEL</b> | <b>32.431217</b> | <b>-103.982702</b> | <b>EDDY</b> |

## Bottom Hole Location

| UL       | Section   | Township   | Range      | Lot | Ft. from N/S     | Ft. from E/W  | Latitude         | Longitude          | County      |
|----------|-----------|------------|------------|-----|------------------|---------------|------------------|--------------------|-------------|
| <b>I</b> | <b>36</b> | <b>21S</b> | <b>29E</b> |     | <b>1,420 FSL</b> | <b>50 FEL</b> | <b>32.432479</b> | <b>-103.929816</b> | <b>EDDY</b> |

|                                    |                                            |                   |                                                                                                               |                                |
|------------------------------------|--------------------------------------------|-------------------|---------------------------------------------------------------------------------------------------------------|--------------------------------|
| Dedicated Acres<br><b>1,009.33</b> | Infill or Defining Well<br><b>DEFINING</b> | Defining Well API | Overlapping Spacing Unit (Y/N)<br><b>N</b>                                                                    | Consolidation Code<br><b>U</b> |
| Order Numbers:                     |                                            |                   | Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |                                |

## Kick Off Point (KOP)

| UL       | Section   | Township   | Range      | Lot | Ft. from N/S     | Ft. from E/W   | Latitude         | Longitude          | County      |
|----------|-----------|------------|------------|-----|------------------|----------------|------------------|--------------------|-------------|
| <b>I</b> | <b>33</b> | <b>21S</b> | <b>29E</b> |     | <b>1,420 FSL</b> | <b>330 FEL</b> | <b>32.432920</b> | <b>-103.982094</b> | <b>EDDY</b> |

## First Take Point (FTP)

| UL       | Section   | Township   | Range      | Lot | Ft. from N/S     | Ft. from E/W   | Latitude         | Longitude          | County      |
|----------|-----------|------------|------------|-----|------------------|----------------|------------------|--------------------|-------------|
| <b>I</b> | <b>33</b> | <b>21S</b> | <b>29E</b> |     | <b>1,420 FSL</b> | <b>330 FEL</b> | <b>32.432920</b> | <b>-103.982094</b> | <b>EDDY</b> |

## Last Take Point (LTP)

| UL       | Section   | Township   | Range      | Lot | Ft. from N/S     | Ft. from E/W   | Latitude         | Longitude          | County      |
|----------|-----------|------------|------------|-----|------------------|----------------|------------------|--------------------|-------------|
| <b>I</b> | <b>36</b> | <b>21S</b> | <b>29E</b> |     | <b>1,420 FSL</b> | <b>100 FEL</b> | <b>32.432481</b> | <b>-103.929978</b> | <b>EDDY</b> |

|                                                                    |                                                                                                    |                                         |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------|
| Unitized Area or Area of Uniform Interest<br><b>NMNM-105467880</b> | Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical | Ground Floor Elevation:<br><b>3435'</b> |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------|

## 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

## 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.

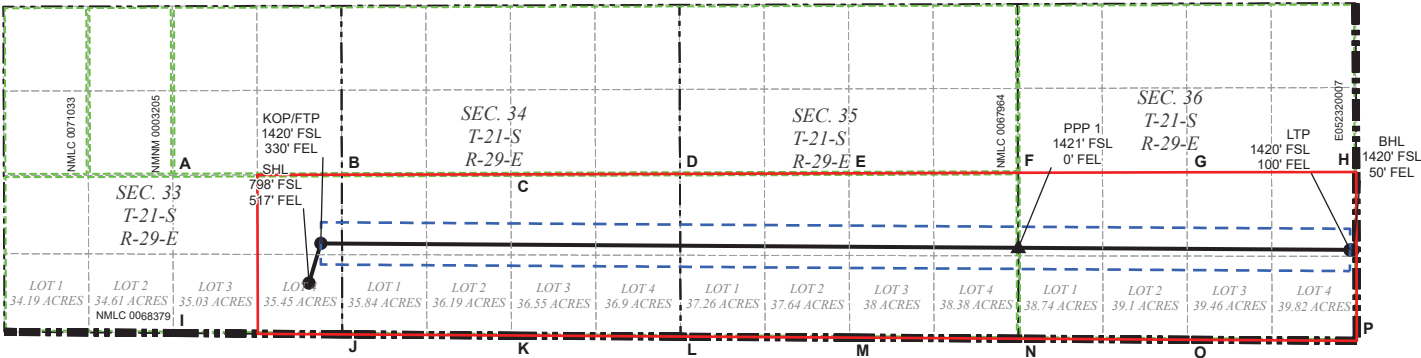


*[Signature]*

Signature and Seal of Professional Surveyor

23786

07-21-2025



| 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                   | 649,517.7    | 520,785.3    | 32.431217  | -103.982702 | 608,336.8    | 520,724.5    | 32.431095  | -103.982202 |
| KOP/FTP               | 649,703.2    | 521,405.4    | 32.432920  | -103.982094 | 608,522.3    | 521,344.5    | 32.432798  | -103.981594 |
| LTP                   | 665,782.9    | 521,302.5    | 32.432481  | -103.929978 | 624,602.0    | 521,241.4    | 32.432359  | -103.929480 |
| BHL                   | 665,832.9    | 521,302.1    | 32.432479  | -103.929816 | 624,652.0    | 521,241.1    | 32.432357  | -103.929317 |
| PPP 1                 | 660,599.6    | 521,335.7    | 32.432624  | -103.946777 | 619,418.7    | 521,274.7    | 32.432503  | -103.946279 |

| CORNER COORDINATE TABLE |              |              |              |              |
|-------------------------|--------------|--------------|--------------|--------------|
| CORNER                  | NAD 83 NME X | NAD 83 NME Y | NAD 27 NME X | NAD 27 NME Y |
| A                       | 647,389.9    | 522,471.2    | 606,209.1    | 522,410.3    |
| B                       | 650,030.0    | 522,477.6    | 608,849.2    | 522,416.7    |
| C                       | 652,672.0    | 522,484.6    | 611,491.1    | 522,423.7    |
| D                       | 655,313.8    | 522,491.6    | 614,132.9    | 522,430.6    |
| E                       | 657,955.2    | 522,499.7    | 616,774.3    | 522,438.7    |
| F                       | 660,596.0    | 522,507.8    | 619,415.1    | 522,446.7    |
| G                       | 663,235.4    | 522,514.9    | 622,054.5    | 522,453.8    |
| H                       | 665,879.0    | 522,522.0    | 624,698.1    | 522,460.9    |
| I                       | 647,397.3    | 520,004.1    | 606,216.4    | 519,943.2    |
| J                       | 650,037.4    | 519,982.7    | 608,856.4    | 519,921.8    |
| K                       | 652,679.6    | 519,965.0    | 611,498.7    | 519,904.1    |

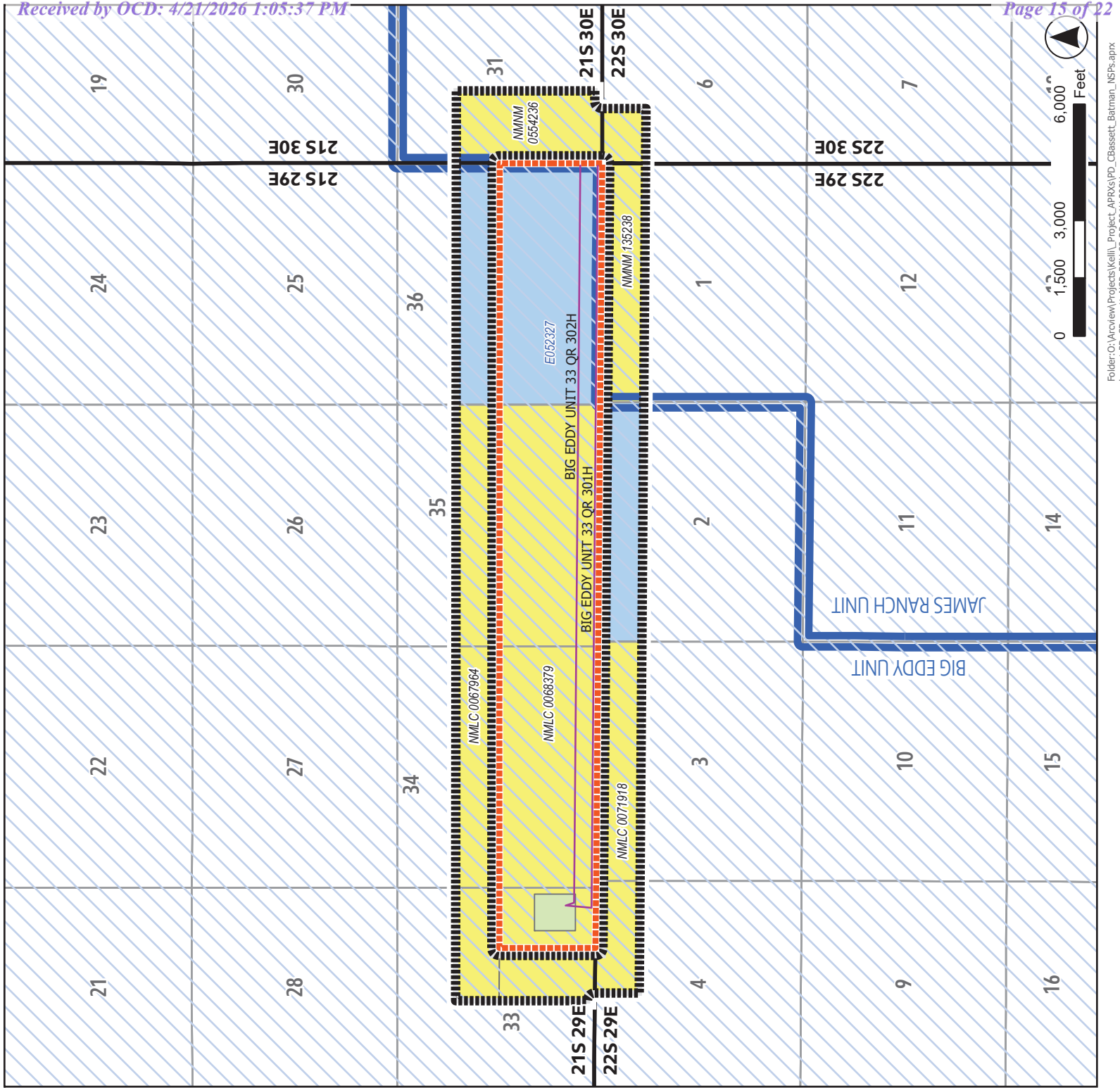
# Exhibit 3

**BEU 33 QR  
01H, 302H  
NSP Exhibit**

ddy County, New Mexico  
21S-R29E : E2SE4 Sec 33, S2 Sec 34,  
S2 Sec 35, S2 Sec 36  
040 acres more or less

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

Date: 4/16/2026



22S - 30E

# Exhibit 4

| BEU 33 QR 301H & 302H                                                                                    | Tracking Info               |
|----------------------------------------------------------------------------------------------------------|-----------------------------|
| NM State Land Office<br>310 Old Santa Fe Trail PO Box 1148<br>Santa Fe, NM 87504                         | 9589 0710 5270 2981 1394 62 |
| XTO Permian Operating LLC<br>ATTN: Land Dept.<br>22777 Springwoods Village<br>Pkwy, Spring, TX 77389     | Self Waive                  |
| Bureau of Land Management<br>New Mexico State Office<br>301 Dinosaur Trail<br>Santa Fe, New Mexico 87508 | 9589 0710 5270 2981 1394 79 |

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**BEATTY & WOZNIAK, P.C.**

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ATTORNEYS AT LAW

1675 BROADWAY, SUITE 600  
DENVER, COLORADO 80202  
TELEPHONE 303-407-4499  
FAX 1-800-886-6566  
[www.bwenergylaw.com](http://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 33 QR 301H & 302H  
S/2 of Sections 34, 35, 36 and E/2 SE/4 of Section 33, 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](mailto: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](mailto: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](mailto:msuazo@bwenergyllaw.com)

Jacob L. Everhart  
[jeverhart@bwenergyllaw.com](mailto: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 577809

COMMENTS

|                                                                                                  |                                                           |
|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| Operator:<br><br>XTO PERMIAN OPERATING LLC.<br>3617 North Big Spring Street<br>MIDLAND, TX 79705 | OGRID:<br><br>373075                                      |
|                                                                                                  | Action Number:<br><br>577809                              |
|                                                                                                  | Action Type:<br><br>[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 <a href="mailto:ocd.engineer@emnrd.nm.gov">ocd.engineer@emnrd.nm.gov</a> . 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 577809

CONDITIONS

|                                                                                              |                                                       |
|----------------------------------------------------------------------------------------------|-------------------------------------------------------|
| Operator:<br>XTO PERMIAN OPERATING LLC.<br>3617 North Big Spring Street<br>MIDLAND, TX 79705 | OGRID:<br>373075                                      |
|                                                                                              | Action Number:<br>577809                              |
|                                                                                              | Action Type:<br>[UF-NSP] Non-Standard Proration (NSP) |

CONDITIONS

|            |           |                |
|------------|-----------|----------------|
| Created By | Condition | Condition Date |
| llowe      | None      | 5/4/2026       |