

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



Paula M. Vance
pmvance@hollandhart.com

Administrative Order NSP – 2406

ADMINISTRATIVE NON-STANDARD HORIZONTAL SPACING UNIT

XTO Energy, Inc. [OGRID 5380]

Sophia 20 Federal Com Well No. 308H (API No. 30-015-58346)
HSU: E/2 Section 20, E/2 Section 29, & E/2 (equivalent) Section 32,
T26S R30E, Eddy County

Reference is made to your application received on April 27th, 2026.

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

Proposed Increased Horizontal Spacing Unit:

Description	Acres	Pool	Pool Code
E/2 Section 20	769.28	Wildcat; Bone Spring	97863
E/2 Section 29			
E/2 (equivalent) Section 32			

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.

NSP - 2406
XTO Energy, Inc.
Page 2 of 2

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 as your preferred well spacing to prevent waste within Bone Spring formation underlying the E/2 Section 20, E/2 Section 29 and E/2 (equivalent) Section 31 within the referenced Horizontal Spacing Unit.2

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: 07/02/2026

Revised March 23, 2017

ID NO. 579494

NSP - 2406

RECEIVED: 04/27/26	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 Energy, Inc. **OGRID Number:** 5380
Well Name: Sophia 20 Federal Com 308H **API:** 30-015-various
Pool: WC G-03 S263016K; Bone Spring **Pool Code:** 97863

**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.

April 27, 2026

Date

Paula M. Vance

Print or Type Name

505-988-4421

Phone Number

Signature

pmvance@hollandhart.com

e-mail Address



Paula M. Vance
Associate
Phone (505) 954-7286
PMVance@hollandhart.com

April 27, 2026

VIA ONLINE FILING

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

Re: Application of XTO Energy, Inc. for administrative approval of a 769.28-acre non-standard horizontal spacing unit in the WC G-03 S263016K; Bone Spring [97863] comprised of the E/2 of Sections 20 & 29, and N/2 NE/4 & Lots 1-2 (NE/4 equivalent) of irregular Section 32, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico

Dear Mr. Chang:

XTO Energy, Inc. ("XTO") (OGRID No. 5380), pursuant to Division Rules 19.15.16.15(B)(5) and 19.15.15.11.B NMAC and applicable rules governing acreage and well spacing requirements for the WC G-03 S263016K; Bone Spring [97863], seeks administrative approval of a non-standard 769.28-acre, more or less, horizontal spacing unit comprised of the E/2 of Sections 20 & 29, and N/2 NE/4 & Lots 1-2 (NE/4 equivalent) of irregular Section 32, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. The non-standard spacing unit will be dedicated to the following wells:

- **Sophia 20 Federal Com 308H** (API No. 30-015-PENDING)

XTO seeks administrative approval of a non-standard spacing unit to match its state and federal communitization agreements and its preferred well spacing (where it owns 100% of the working interest) because it is necessary to prevent waste. XTO plans to drill infill wells within the proposed non-standard spacing unit.

Exhibit A is a map showing the proposed non-standard spacing unit, the subject leases, and the proposed wells, along with a list of affected parties.

Exhibit B is a Form C-102 for the initial well within the proposed non-standard spacing unit.

T 505.988.4421 F 505.983.6043
110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849
Mail to: P.O. Box 2208, Santa Fe, NM 87504-2208
www.hollandhart.com

Alaska
Colorado
Idaho

Montana
Nevada
New Mexico

Utah
Washington, D.C.
Wyoming

Exhibit C is a spreadsheet listing all “affected persons”¹ in the affected offset acreage to be noticed. Exhibit C also includes tracking information demonstrating that each of the affected persons was sent a copy of this application with all 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. A copy of this application has been provided to the New Mexico State Land Office and Bureau of Land Management since state and federal lands are involved.

Your attention to this matter is appreciated.

Sincerely,



Paula M. Vance
**ATTORNEY FOR
XTO ENERGY, INC.**

¹ See NMAC §§ 19.15.2.7.A(8) [defining “affected persons” as, “in the absence of an operator, or with respect to an application wherein the operator of the spacing unit or identified tract is the applicant, each working interest owner”] and 19.15.4.12.A(2)(a).

**Sophia 20 Fed Com 308H
Non-Standard Spacing Unit
Bone Spring Pool**

Non Standard Spacing Unit Description:
26S - 30E Sec. 20: E2
26S - 30E Sec. 29: E2
26S - 30E Sec. 32: E2

Proposed Non-Standard
Horizontal Spacing Unit
 Operator: XTO Energy Inc
Type: Federal
WI Owner: XTO Holdings LLC

Developed
 Operator: Devon
Type: Federal

 Operator: XTO Energy Inc.
Type: Federal

 Operator: XTO Energy Inc.
Type: State

Developed
 Operator: Devon
Type: Loving County Texas

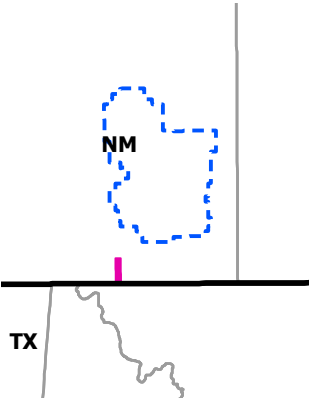
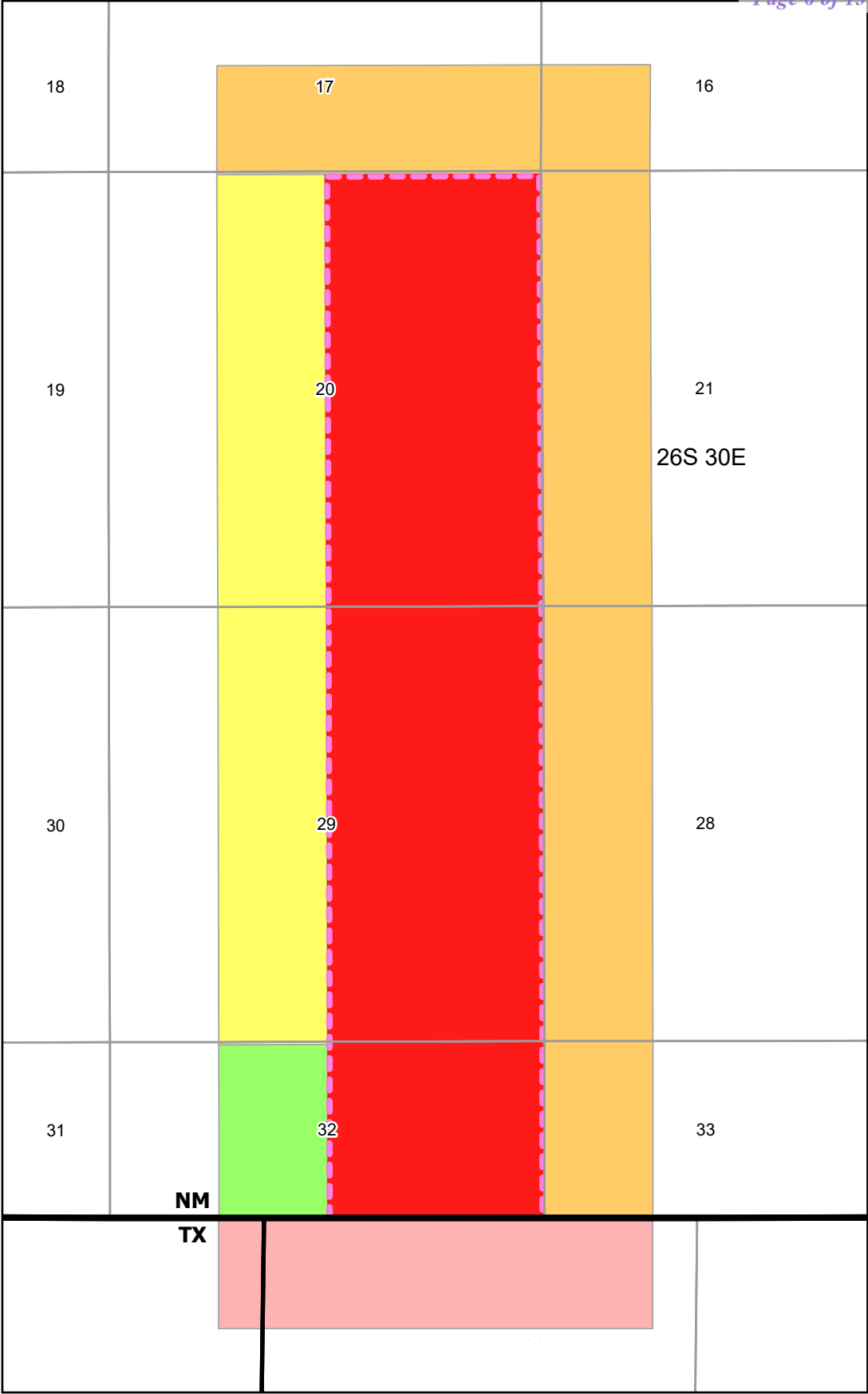


EXHIBIT
A

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION		Issued July 9, 2024	
			Submittal Type:	☐ Initial Submittal
				☒ Amended Report
☐ As Drilled				

WELL LOCATION INFORMATION				
API Number 30-015-	Pool Code 97863	Pool Name WILDCAT G-03 S263016K; BONE SPRING		
Property Code	Property Name SOPHIA 20 FEDERAL COM		Well Number 308H	
ORGID No. 005380	Operator Name XTO ENERGY, INC.		Ground Level Elevation 3,123'	
Surface Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		Mineral Owner: ☐ State ☐ Fee ☐ Tribal ☒ Federal		

Surface Location									
UL D	Section 20	Township 26 S	Range 30 E	Lot	Ft. from N/S 159' FNL	Ft. from E/W 1,080' FWL	Latitude 32.034784	Longitude -103.908554	County EDDY
Bottom Hole Location									
UL	Section 32	Township 26 S	Range 30 E	Lot 1	Ft. from N/S 50' FSL	Ft. from E/W 600' FEL	Latitude 32.000265	Longitude -103.896724	County EDDY
Dedicated Acres 769.28		Infill or Defining Well DEFINING		Defining Well API		Overlapping Spacing Unit (Y/N) N		Consolidation Code C	
Order Numbers.						Well setbacks are under Common Ownership: ☒ Yes ☐ No			

Kick Off Point (KOP)									
UL A	Section 20	Township 26 S	Range 30 E	Lot	Ft. from N/S 142' FNL	Ft. from E/W 563' FEL	Latitude 32.034861	Longitude -103.896741	County EDDY
First Take Point (FTP)									
UL A	Section 20	Township 26 S	Range 30 E	Lot	Ft. from N/S 100' FNL	Ft. from E/W 563' FEL	Latitude 32.034976	Longitude -103.896741	County EDDY
Last Take Point (LTP)									
UL	Section 32	Township 26 S	Range 30 E	Lot 1	Ft. from N/S 100' FSL	Ft. from E/W 600' FEL	Latitude 32.000402	Longitude -103.896724	County EDDY
Unitized Area or Area of Uniform Interest		Spacing Unit Type ☒ Horizontal ☐ Vertical				Ground Floor Elevation: 3,123'			

OPERATOR CERTIFICATIONS <i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i> <i>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 form the division.</i>		SURVEYOR CERTIFICATIONS <i>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.</i> I, TIM C. PAPPAS, NEW MEXICO PROFESSIONAL SURVEYOR NO. 21209, DO HEREBY CERTIFY THAT THIS SURVEY PLAT AND THE ACTUAL SURVEY ON THE GROUND UPON WHICH IT IS BASED WERE PERFORMED BY ME OR UNDER MY DIRECT SUPERVISION; THAT I AM RESPONSIBLE FOR THIS SURVEY, THAT THIS SURVEY MEETS THE MINIMUM STANDARDS FOR SURVEYING IN NEW MEXICO, AND THAT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. <i>Tim</i> 9 February 2026 TIM C. PAPPAS REGISTERED PROFESSIONAL LAND SURVEYOR STATE OF NEW MEXICO NO. 21209	
Signature		Signature and Seal of Professional Surveyor	
Date			
Printed Name		Certificate Number	Date of Survey
		TIM C. PAPPAS 21209	02/09/2026
Email Address			

Note: 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.



2205 Walnut Street – Columbus, TX 78934
Ph: 817.349.9800 – Fax: 979.732.5271
TBPE Firm 17957 | TBPLS Firm 10000100
www.fscinc.net

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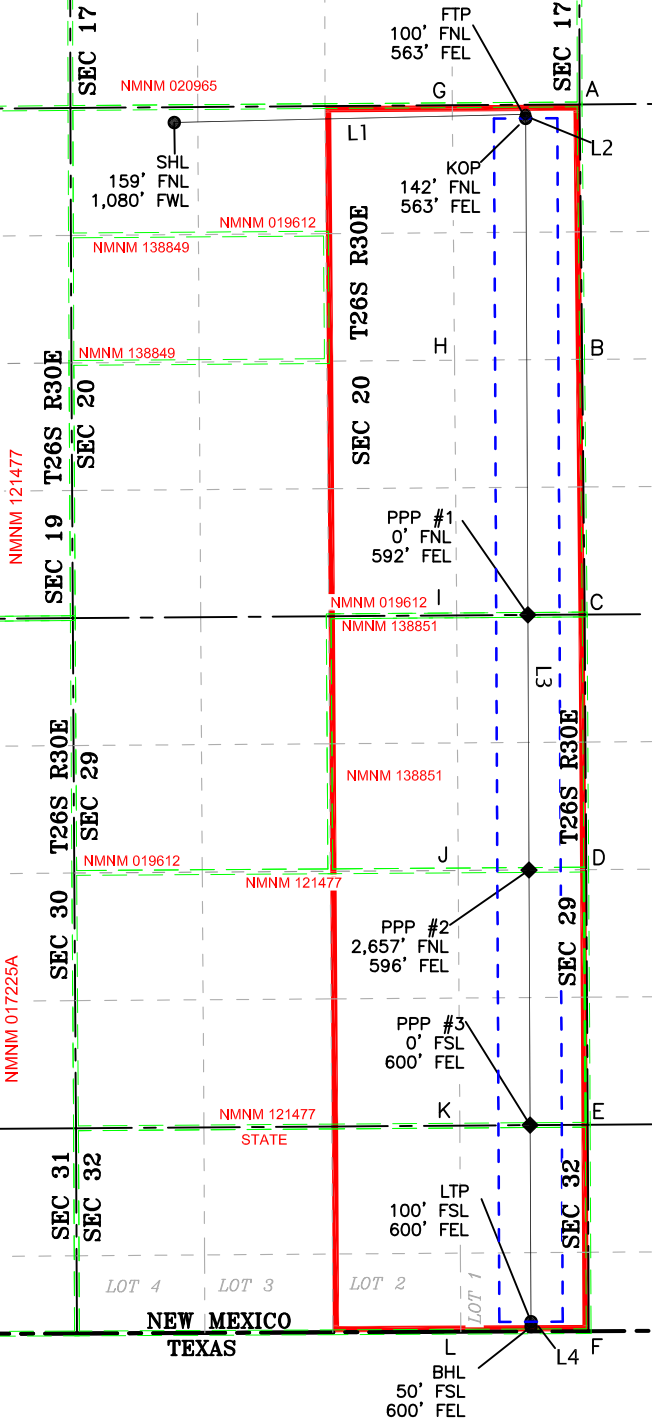
DATE:	2-9-2026	PROJECT NO:	2024070339
DRAWN BY:	WL	SCALE:	
CHECKED BY:	LM	SHEET:	1 OF 2
FIELD CREW:	IR	REVISION:	

ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or a larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is the closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.

COORDINATE TABLE											
SHL (NAD 83 NME)			FTP (NAD 83 NME)			BHL (NAD 83 NME)			PPP #2 (NAD 83 NME)		
Y =	376,651.5	N	Y =	376,736.1	N	Y =	364,109.2	N	Y =	368,865.2	N
X =	672,964.9	E	X =	676,625.1	E	X =	676,681.4	E	X =	676,660.2	E
LAT. =	32.034784	°N	LAT. =	32.034976	°N	LAT. =	32.000265	°N	LAT. =	32.013339	°N
LONG. =	103.908554	°W	LONG. =	103.896741	°W	LONG. =	103.896724	°W	LONG. =	103.896730	°W
KOP (NAD 83 NME)			LTP (NAD 83 NME)			PPP #1 (NAD 83 NME)			PPP #3 (NAD 83 NME)		
Y =	376,694.2	N	Y =	364,159.2	N	Y =	371,522.5	N	Y =	366,207.7	N
X =	676,625.3	E	X =	676,681.2	E	X =	676,648.4	E	X =	676,672.1	E
LAT. =	32.034861	°N	LAT. =	32.000402	°N	LAT. =	32.020644	°N	LAT. =	32.006034	°N
LONG. =	103.896741	°W	LONG. =	103.896724	°W	LONG. =	103.896734	°W	LONG. =	103.896727	°W
SHL (NAD 27 NME)			FTP (NAD 27 NME)			BHL (NAD 27 NME)			PPP #2 (NAD 27 NME)		
Y =	376,593.9	N	Y =	376,678.5	N	Y =	364,052.0	N	Y =	368,807.8	N
X =	631,779.2	E	X =	635,439.3	E	X =	635,495.3	E	X =	635,474.2	E
LAT. =	32.034658	°N	LAT. =	32.034851	°N	LAT. =	32.000139	°N	LAT. =	32.013214	°N
LONG. =	103.908073	°W	LONG. =	103.896261	°W	LONG. =	103.896245	°W	LONG. =	103.896251	°W
KOP (NAD 27 NME)			LTP (NAD 27 NME)			PPP #1 (NAD 27 NME)			PPP #3 (NAD 27 NME)		
Y =	376,636.6	N	Y =	364,102.0	N	Y =	371,465.1	N	Y =	366,150.4	N
X =	635,439.5	E	X =	635,495.1	E	X =	635,462.5	E	X =	635,486.0	E
LAT. =	32.034735	°N	LAT. =	32.000277	°N	LAT. =	32.020518	°N	LAT. =	32.005908	°N
LONG. =	103.896261	°W	LONG. =	103.896245	°W	LONG. =	103.896255	°W	LONG. =	103.896248	°W



SEC 32 LOT ACREAGE TABLE	
LOT 1	- 24.69 ACRES
LOT 2	- 24.59 ACRES
LOT 3	- 24.49 ACRES
LOT 4	- 24.39 ACRES

LEGEND	
---	SECTION LINE
---	PROPOSED WELLBORE
---	NEW MEXICO MINERAL LEASE LINE
---	330' BUFFER
---	DEDICATED ACREAGE

LINE TABLE		
LINE	AZIMUTH	LENGTH
L1	88° 40'33"	3,661.17'
L2	179° 40'40"	41.88'
L3	179° 44'40"	12,535.15'
L4	179° 45'22"	50.00'

CORNER COORDINATES (NAD83 NME)					
A - Y =	376,839.9	N	A - X =	677,187.1	E
B - Y =	374,184.2	N	B - X =	677,214.1	E
C - Y =	371,526.6	N	C - X =	677,240.2	E
D - Y =	368,869.1	N	D - X =	677,256.0	E
E - Y =	366,211.9	N	E - X =	677,272.5	E
F - Y =	364,061.9	N	F - X =	677,281.6	E
G - Y =	376,830.9	N	G - X =	675,861.3	E
H - Y =	374,175.0	N	H - X =	675,884.4	E
I - Y =	371,517.3	N	I - X =	675,907.1	E
J - Y =	368,860.3	N	J - X =	675,923.2	E
K - Y =	366,202.6	N	K - X =	675,939.7	E
L - Y =	364,055.9	N	L - X =	675,949.4	E
CORNER COORDINATES (NAD27 NME)					
A - Y =	376,782.3	N	A - X =	636,001.3	E
B - Y =	374,126.7	N	B - X =	636,028.2	E
C - Y =	371,469.2	N	C - X =	636,054.3	E
D - Y =	368,811.7	N	D - X =	636,070.0	E
E - Y =	366,154.6	N	E - X =	636,086.4	E
F - Y =	364,004.7	N	F - X =	636,095.5	E
G - Y =	376,773.3	N	G - X =	634,675.5	E
H - Y =	374,117.5	N	H - X =	634,698.6	E
I - Y =	371,459.9	N	I - X =	634,721.2	E
J - Y =	368,802.9	N	J - X =	634,737.2	E
K - Y =	366,145.3	N	K - X =	634,753.6	E
L - Y =	363,998.7	N	L - X =	634,763.3	E



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Ph: 817.349.9800 – Fax: 979.732.5271
TBPE Firm 17957 | TBPLS Firm 10000100
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DATE:	2-9-2026	PROJECT NO:	2024070339
DRAWN BY:	WL	SCALE:	1" = 2,000'
CHECKED BY:	LM	SHEET:	2 OF 2
FIELD CREW:	IR	REVISION:	0

C

Devon Energy Production Company, L.P.	Attn: Tim Prout, 333 W. Sheridan Ave.	Oklahoma OK	73102
Bureau of Land Management	301 Dinosaur Trail	Santa Fe NM	87508
New Mexico State Land Office	310 Old Santa Fe Trail	Santa Fe NM	87501
New Mexico State Land Office	P.O. Box 1148	Santa Fe NM	87504



Paula M. Vance
Associate
Phone (505) 954-7286
PMVance@hollandhart.com

April 09, 2026

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

Re: Application of XTO Energy, Inc. for administrative approval of a 769.28-acre non-standard horizontal spacing unit in the WC G-03 S263016K; Bone Spring [97863] comprised of the E/2 of Sections 20 & 29, and N/2 NE/4 & Lots 1-2 (NE/4 equivalent) of irregular Section 32, Township 26 South, Range 30 East, NMPM, Eddy 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 the date this application is received by 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:

Chad Smith
ExxonMobil
(281) 939-3707
Chad.d.smith@exxonmobil.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Paula M. Vance".

Paula M. Vance
ATTORNEY FOR
XTO ENERGY, INC.



Paula M. Vance
Associate
Phone (505) 954-7286
PMVance@hollandhart.com

April 23, 2026

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

Re: Application of XTO Energy, Inc. for administrative approval of a 769.28-acre non-standard horizontal spacing unit in the WC G-03 S263016K; Bone Spring [97863] comprised of the E/2 of Sections 20 & 29, and N/2 NE/4 & Lots 1-2 (NE/4 equivalent) of irregular Section 32, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico

Ladies and Gentlemen:

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

Chad Smith
ExxonMobil
(281) 939-3707
Chad.d.smith@exxonmobil.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Paula M. Vance".

Paula M. Vance
ATTORNEY FOR
XTO ENERGY, INC.

XTO - Sophia - NSP
Postal Delivery Report

9214 8901 9403 8365 9341 27	NEW MEXICO STATE LAND OFFICE 310 OLD SANTA FE TRAIL SANTA FE NM 87501	Delivered Signature Received
9214 8901 9403 8365 9341 34	NEW MEXICO STATE LAND OFFICE PO BOX 1148 SANTA FE NM 87504	Delivered Signature Received
	DEVON ENERGY PRODUCTION COMPANY L P ATTN: TIM PROUT 333 W SHERIDAN AVE	
9214 8901 9403 8365 9341 41	OKLAHOMA CITY OK 73102	Delivered Signature Received
9214 8901 9403 8365 9341 58	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	In-Transit
1ZA2594X0198070186	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	Delivered Signature Received

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 579494

CONDITIONS

Operator: XTO ENERGY, INC 3617 North Big Spring Street Midland, TX 79705	OGRID: 5380
	Action Number: 579494
	Action Type: [UF-NSP] Non-Standard Proration (NSP)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	5/5/2026