

**STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

**APPLICATIONS OF DEVON ENERGY
PRODUCTION COMPANY, L.P.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

**CASE NO. 22179
CASE NO. 22180
CASE NO. 22382**

**APPLICATIONS OF CIMAREX ENERGY CO.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

**CASE NO. 22313
CASE NO. 22314
CASE NO. 22315
CASE NO. 22316
ORDER NO. R-22205**

ORDER

The Director of the New Mexico Oil Conservation Division (“OCD”), having heard these matters through a Hearing Examiner on March 24 and 25, 2022, and after considering the testimony, evidence, and recommendation of the Hearing Examiner, issues the following Order.

FINDINGS AND CONCLUSIONS

1. Due public notice has been given as required by law, and OCD has jurisdiction of these cases and the subject matter.
2. These cases involve competing compulsorily pooling applications with overlapping horizontal spacing units filed by Cimarex Energy Co. (“Cimarex”) and Devon Energy Production Company (“Devon”). These cases were consolidated for hearing and a single order is being issued for the consolidated cases.
3. Both Cimarex and Devon have the right to drill within the proposed spacing units, and each seeks to be named operator of their proposed wells and spacing units
4. Applications: Devon Cases. Devon submitted three applications to pool the uncommitted oil and gas interests in the Bone Spring and Wolfcamp formations underlying the west half of Sections 12, 13, and 24, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. Case Nos. 22179 and 22180 seek to pool the Wolfcamp formation underlying standard 480-acre horizontal spacing units comprised of the west half of the west half (22179) and the east half of the west half (22180) of

those sections. Case 22382 seeks to pool the Bone Spring formation underlying the west half of those sections.

5. In Cases 22179 and 22180, Devon proposes to dedicate to the units two wells each with three-mile wellbores to be drilled from surface locations in Section 24 to bottom hole locations in Section 12. In Case 22382, Devon proposes six wells with five being three mile laterals and one being a two mile lateral.
6. Applications: Cimarex Cases. Cimarex submitted four applications to pool the uncommitted oil and gas interests in the Avalon, Bone Spring and Wolfcamp formations underlying the west half of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico. Case No. 22313 seeks to pool the Bone Spring formation, and Case No. 22315 seeks to pool the Avalon formation, each underlying a standard 640 acre horizontal spacing unit. Case Nos. 22314 and 22316 seek to pool the Wolfcamp formation underlying standard 320 acre horizontal spacing units comprised of the west half of the west half (22314) and the east half of the west half (22316) of these sections.
7. Cimarex proposes to dedicate wells with two-mile wellbores to each unit: seven wells in the Bone Spring unit (22313), two wells in the Avalon unit (22315) and one well each in the Wolfcamp units (22314 and 22316).
8. Hearing. Both cases were heard at a special OCD hearing docket on March 24 and 25, 2022. The hearing, which took place on a virtual platform, was conducted in accordance with the hearing procedures in 19.15.4 NMAC. Both Cimarex and Devon presented witnesses and exhibits. No other party presented evidence. Each of the witnesses were sworn, were qualified to present expert opinion testimony and were subject to cross-examination by the other party and by the OCD Hearing Examiners.
9. Devon presented three witnesses in support of its application:
 - a. Ryan Cloer, landman
 - b. Tom Peryam, geologist
 - c. Karsan Sprague, petroleum engineer
10. Cimarex presented three witnesses in support of its application:
 - a. Kelsi Henriques, landman
 - b. Jennifer Blake, geologist
 - c. Eddie Behm, reservoir engineer
11. Legal Background. The Oil and Gas Act authorizes OCD to compulsory pool the lands or interests in a spacing unit. When the owners of the interests in a spacing unit have not agreed to voluntarily pool their interests, and when one owner, who has the right to drill, applies to OCD, OCD can pool the lands or interests in the unit “to avoid the drilling of unnecessary wells or to protect correlative rights, or to prevent waste”. Section 70-2-17.C.

12. The Oil Conservation Commission (“Commission”) and the OCD have developed a number of factors to consider in evaluating competing compulsory pooling applications.
13. The Commission, in a 1997 order involving vertical well proposals, concluded that “the most important consideration in awarding operations to competing interest owners is geologic evidence as it relates to well location and recovery of oil and gas and associated risk.” *KCS Medallion Resources, Inc.*, Order R-10731-B, ¶ 23(f) (Feb. 28, 1997). In this Order, the Commission also listed several other factors such as lack of good faith negotiation, differences in proposed risk charge and ability to prudently operate the property but concluded that in the absence of “any reason why one operator would economically recover more oil or gas by virtue of being awarded operations than the other”, “working interest control” would be the “controlling factor”. *Id.* ¶ 24.
14. Since then, Commission and OCD decisions have applied the factors in Order R-10731-B, with some additions, in compulsory pooling cases including those involving horizontal well proposals. In a recent decision, the Commission listed the factors it “may consider” in evaluating competing compulsory pooling applications:
 - a. A comparison of geologic evidence presented by each party as it relates to the proposed well location and the potential of each proposed prospect to efficiently recover the oil and gas reserves underlying the property.
 - b. A comparison of the risk associated with the parties' respective proposal for the exploration and development of the property.
 - c. A review of the negotiations between the competing parties prior to the applications to force pool to determine if there was a "good faith" effort.
 - d. A comparison of the ability of each party to prudently operate the property and, thereby, prevent waste.
 - e. A comparison of the differences in well cost estimates (AFE) and other operational costs presented by each party for their respective proposals.
 - f. An evaluation of the mineral interest ownership held by each party at the time the application was heard
 - g. A comparison of the ability of the applicants to timely locate well sites and to operate on the surface (the "surface factor").Order R-21420, ¶ 9 (9/17/2020)
15. Proposals. The proposals cover four sections within Township 23 South, Range 32 East, NMPM, Lea County. Devon proposes horizontal spacing units that comprise the west half of Sections 12, 13 and 24. Chevron proposes units that comprise the west half of Sections 1 and 12. The overlap between the units is the west half of Section 12 (“Overlap Acreage”). Devon proposes wells with three mile laterals while Chevron proposes wells with two mile laterals.
16. Development Plans. The primary difference between the plans is the length of the proposed laterals (and therefore the size of the proposed spacing units): Devon proposes three mile laterals across sections 12, 13 and 24 while Cimarex proposes two

mile laterals across sections 1 and 12. If Devon's application is approved, Cimarex may develop section 1 with one mile laterals. If Cimarex's application is approved, Devon may develop sections 13 and 24 with two mile laterals.

17. Geology and Risk. Both parties offered evidence to support their proposals to drill wells in various zones of the Avalon, Bone Springs and Wolfcamp formations. There are some differences between the plans. Both parties propose to drill in the Avalon, Second Bone Spring and Upper Wolfcamp A zones. Only Cimarex proposes to drill in the First Bone Spring and Third Bone Spring zones while only Devon proposes to drill in the Wolfcamp XY Sands. (Cimarex ex. B-7). Cimarex also argued that its well spacing proposal is designed to coordinate with Cimarex's existing and proposed wells in the east half of sections 1 and 12. (Cimarex ex. B-8).
18. Cimarex testified that Cimarex's plan is superior and less risky. Cimarex is proposing to develop known producing zones which Devon is ignoring. Cimarex also argues that the Avalon formation is more challenging to drill due to the presence of limestone and chert. Therefore, Devon's plan to drill three mile laterals in the Avalon formation is especially risky.
19. Cimarex claims that restricting its development in section 1 to one mile wells will result, at minimum, in a delay of several years in drilling and could result in the acreage being stranded. This argument is based on the claim that one mile wells are disfavored and therefore given low priority in drilling schedules. If allowed to drill two mile wells in the west half of sections 1 and 12, Cimarex could move ahead quickly since Cimarex has already drilled two mile wells on the east half of the sections.
20. Devon argues that three mile wells are more efficient, and Devon has significant experience with drilling three mile wells in New Mexico. (Devon ex. C, R-D-17). The experience includes drilling three mile wells in the Avalon formation. (Devon ex. H).
21. Surface Factors. Both parties argued for the benefits of their existing and planned surface facilities. Cimarex is currently developing the east half of sections 1 and 12 and therefore has certain facilities already in place. (Cimarex ex. D, D-1). Devon has plans and contracts for the location of surface facilities and for the delivery of water and the takeaway of gas. (Devon ex. C, C-4).
22. Working Interest Control. The evidence on working interest control shows that both parties have a majority interest in the units they propose. For the Devon spacing unit which covers 960 acres, Devon testified that it had a working interest control of 79.17% of the acreage and Cimarex had control of 18.17%. (Devon ex. A3-a). For the Cimarex spacing unit which covers 640 acres, Cimarex has a 71% working interest control and Devon has a 25% working interest control. (Cimarex ex. B-6). For the Overlap Acreage of 320 acres, Devon has working interest control of 50% and Cimarex has 42%. (Devon ex. A3-b).

23. Analysis. The Cimarex and Devon cases involve a particular category of competing compulsory pooling cases which the Commission has recently analyzed: a partial overlap of proposed spacing units. In two recent cases involving partial overlap, the Commission compared the parties' proposals and focused on the following concerns: a) which proposal avoids waste by not stranding acreage; b) which proposal best protects correlative rights "by presenting the best opportunity for each party to develop its own acreage"; and c) which party had the greatest interest in their proposed unit. *Marathon Oil Permian LLC*, Order R-21416-A (Sept. 17, 2020); *Novo Oil & Gas Northern Delaware, LLC*, Order R-21420-A (Sept. 17, 2020). In neither case did the Commission's decision rely on the relative strength of the well proposals (location, density, length, etc.). In each case, the Commission reached a different result than the Division.
24. In a recent OCD compulsory pooling case that involved a similar overlap scenario as the current cases (i.e., three mile wells versus two mile wells with one section overlap), OCD decided in favor of the three mile well proposals of COG Operating. *COG Operating, LLC*, Order R-21826 (August 31, 2021). The deciding factor in that case, however, was the clear difference in working interest control; COG controlled over 96% of its proposed spacing unit including 100% of the overlap acreage. No such difference exists in the current cases; Cimarex and Devon each has a clear majority of interest in its proposed unit and the overlap acreage is almost evenly divided.
25. Regarding the current Devon and Cimarex cases, the Commission's directive to determine which proposal presents "the best opportunity for each party to develop its own acreage" favors the Cimarex plan. If the Cimarex applications are approved, each applicant would have the opportunity to develop two mile wells in units where they control a large majority of the working interest. Devon would still be able to develop two mile wells in sections 13 and 24. Devon controls over 93% of the working interest in the remaining acreage. If the Devon applications were approved, Cimarex would be left to develop one mile wells in the west half of section 1.
26. Other Factors. No other factor is decisive. OCD finds that the evidence on competing development plans to be insufficient to support one plan over the other. The arguments about both the riskiness of three mile laterals and the possible stranding of acreage because one mile wells are no longer practicable were raised less than a year ago in another compulsory pooling case. OCD rejected both claims. *COG Operating LLC*, Order R-21826 (August 31, 2021). Cimarex's claims that it can develop the units quickly is supported by the presence of surface facilities used for adjacent development.
27. OCD concludes that, following the Commission's precedent in analyzing proposed overlapping spacing units, the Cimarex applications prevent waste and protect correlative rights by presenting the best opportunity for each party to develop its own acreage. Each party will be left in control of units where they have the significant majority, or almost the entirety, of the working interest control.

28. Cimarex will dedicate the well(s) described in Exhibit A ("Well(s)") to the Cimarex Unit.
29. Cimarex proposes the supervision and risk charges for the Well(s) described in Exhibit A.
30. Cimarex identified the owners of uncommitted interests in oil and gas minerals in the Cimarex Unit and provided evidence that notice was given.
31. The Cimarex Unit contains separately owned uncommitted interests in oil and gas minerals.
32. Some of the owners of the uncommitted interests have not agreed to commit their interests to the Cimarex Unit.
33. The pooling of uncommitted interests in the Cimarex Unit will prevent waste and protect correlative rights, including the drilling of unnecessary wells.
34. This Order affords to the owner of an uncommitted interest the opportunity to produce his just and equitable share of the oil or gas in the pool.

ORDER

35. The applications of Cimarex Energy Co. ("Operator") in Case Nos. 22313, 22314, 22315 and 22316 are granted.
36. The applications of Devon Energy Production Company in Case Nos. 22179, 22180 and 22382 are denied.
37. The uncommitted interests in the Cimarex Unit are pooled as set forth in Exhibit A.
38. The Cimarex Unit shall be dedicated to the Well(s) set forth in Exhibit A.
39. Operator is designated as operator of the Unit and the Well(s).
40. If the location of a well will be unorthodox under the spacing rules in effect at the time of completion, Operator shall obtain the OCD's approval for a non-standard location in accordance with 19.15.16.15(C) NMAC.
41. The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.
42. This Order shall terminate automatically if Operator fails to comply with Paragraph 19 unless Operator obtains an extension by amending this Order for good cause shown.

43. The infill well requirements in 19.15.13.9 NMAC through 19.15.13.12 NMAC shall be applicable.
44. Operator shall submit each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").
45. No later than thirty (30) days after Operator submits the Estimated Well Costs, the owner of a Pooled Working Interest shall elect whether to pay its share of the Estimated Well Costs or its share of the actual costs to drill, complete and equip the well ("Actual Well Costs") out of production from the well. An owner of a Pooled Working Interest who elects to pay its share of the Estimated Well Costs shall render payment to Operator no later than thirty (30) days after the expiration of the election period, and shall be liable for operating costs, but not risk charges, for the well. An owner of a Pooled Working Interest who fails to pay its share of the Estimated Well Costs or who elects to pay its share of the Actual Well Costs out of production from the well shall be considered to be a "Non-Consenting Pooled Working Interest."
46. No later than one hundred eighty (180) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the Actual Well Costs. The Actual Well Costs shall be considered to be the Reasonable Well Costs unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.
47. No later than sixty (60) days after the expiration of the period to file a written objection to the Actual Well Costs or OCD's order determining the Reasonable Well Costs, whichever is later, each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs shall pay to Operator its share of the Reasonable Well Costs that exceed the Estimated Well Costs, or Operator shall pay to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs its share of the Estimated Well Costs that exceed the Reasonable Well Costs.
48. The reasonable charges for supervision to drill and produce a well ("Supervision Charges") shall not exceed the rates specified in Exhibit A, provided however that the rates shall be adjusted annually pursuant to the COPAS form entitled "Accounting Procedure-Joint Operations."
49. No later than within ninety (90) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the reasonable charges for operating and maintaining the well ("Operating Charges"), provided however that Operating Charges shall not include the Reasonable Well Costs or Supervision Charges. The Operating Charges shall be considered final unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working

Interest files a timely written objection, OCD shall determine the Operating Charges after public notice and hearing.

50. Operator may withhold the following costs and charges from the share of production due to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs: (a) the proportionate share of the Supervision Charges; and (b) the proportionate share of the Operating Charges.
51. Operator may withhold the following costs and charges from the share of production due to each owner of a Non-Consenting Pooled Working Interest: (a) the proportionate share of the Reasonable Well Costs; (b) the proportionate share of the Supervision and Operating Charges; and (c) the percentage of the Reasonable Well Costs specified as the charge for risk described in Exhibit A.
52. Operator shall distribute a proportionate share of the costs and charges withheld pursuant to paragraph 29 to each Pooled Working Interest that paid its share of the Estimated Well Costs.
53. Each year on the anniversary of this Order, and no later than ninety (90) days after each payout, Operator shall provide to each owner of a Non-Consenting Pooled Working Interest a schedule of the revenue attributable to a well and the Supervision and Operating Costs charged against that revenue.
54. Any cost or charge that is paid out of production shall be withheld only from the share due to an owner of a Pooled Working Interest. No cost or charge shall be withheld from the share due to an owner of a royalty interests. For the purpose of this Order, an unleased mineral interest shall consist of a seven-eighths (7/8) working interest and a one-eighth (1/8) royalty interest.
55. Except as provided above, Operator shall hold the revenue attributable to a well that is not disbursed for any reason for the account of the person(s) entitled to the revenue as provided in the Oil and Gas Proceeds Payment Act, NMSA 1978, Sections 70-10-1 et seq., and relinquish such revenue as provided in the Uniform Unclaimed Property Act, NMSA 1978, Sections 7-8A-1 et seq.
56. The Unit shall terminate if (a) the owners of all Pooled Working Interests reach a voluntary agreement; or (b) the well(s) drilled on the Unit are plugged and abandoned in accordance with the applicable rules. Operator shall inform OCD no later than thirty (30) days after such occurrence.
57. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

**STATE OF NEW MEXICO
OF CONSERVATION DIVISION**



**ADRIENNE SANDOVAL
DIRECTOR
AES/bb**

Date: 7/25/2022

Exhibit A

COMPULSORY POOLING APPLICATION CHECKLIST (pdf)	
ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 22313	APPLICANT'S RESPONSE
Date: March 24, 2022	
Applicant	Cimarex Energy Co.
Designated Operator & OGRID (affiliation if applicable)	Cimarex Energy Co. (215099)
Applicant's Counsel:	Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett, Jamie L. Allen & Bryce H. Smith)
Case Title:	Amended Application of Cimarex Energy Co. for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenors:	Devon Energy Production Company, L.P. Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com ConocoPhillips Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 (505) 428-0485 Facsimile Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com
Well Family	Coriander
Formation/Pool	
Formation Name(s) or Vertical Extent:	Bone Spring
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Bone Spring
Pool Name and Pool Code:	Diamondtail; Bone Spring (17644)




Well Location Setback Rules:	Statewide
Spacing Unit Size:	640
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	640 acres
Building Blocks:	40 acres
Orientation:	North-South
Description: TRS/County	W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Y
Other Situations	
Depth Severance: Y/N. If yes, description	None
Proximity Tracts: If yes, description	Yes
Proximity Defining Well: if yes, description	Coriander 1-12 Fed Com 27H
Applicant's Ownership in Each Tract	See Exhibits B-2, B-6, and B-9. See also Tab B, Declarataion of Kelsi Henriques.
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	See Exhibit B-13. See also Tab B, Declarataion of Kelsi Henriques.
Well #1	<p>Coriander 1-12 Fed Com 12H API No.: TBD SHL: 370 feet from the North line and 2,537 feet from the East line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 2,324 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 12,230' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibit B-13 for C102s.</p>
Well #2	<p>Coriander 1-12 Fed Com 16H API No.: TBD SHL: 310 feet from the North line and 2,638 feet from the East line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 2,034 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 11,030' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>

Well #3	<p>Coriander 1-12 Fed Com 18H API No.: TBD SHL: 250 feet from the North line and 2,538 feet from the East line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 1,884 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 10,200 TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>
Well #4	<p>Coriander 1-12 Fed Com 25H API No.: TBD SHL: 370 feet from the North line and 874 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 990 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 12,230' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibits 2 and 5.</p>
Well #5	<p>Coriander 1-12 Fed Com 27H API No.: TBD SHL: 310 feet from the North line and 794 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 1,175 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 10,770' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>
Well #6	<p>Coriander 1-12 Fed Com 28H API No.: TBD SHL: 310 feet from the North line and 754 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 330 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 11,030' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>

Well #7	<p>Coriander 1-12 Fed Com 31H API No.: TBD SHL: 250 feet from the North line and 833 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 330 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Bone Spring Formation at approximately 10,200' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibit B-13 for C102s.</p>
Horizontal Well First and Last Take Points	See Exhibit B-13 for C102s.
Well #1	<p>Coriander 1-12 Fed Com 12H FTP: 370 feet from the North line and 2314 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 2,324 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Well #2	<p>Coriander 1-12 Fed Com 16H FTP: 310 feet from the North line and 2,024 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 2,034 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Well #3	<p>Coriander 1-12 Fed Com 18H FTP: 250 feet from the North line and 1,874 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 1,884 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Well #4	<p>Coriander 1-12 Fed Com 25H FTP: 370 feet from the North line and 990 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 990 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Well #5	<p>Coriander 1-12 Fed Com 27H FTP: 370 feet from the North line and 1,175 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 1,175 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>

Well #6	Coriander 1-12 Fed Com 28H FTP: 310 feet from the North line and 330 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 330 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.
Well #7	Coriander 1-12 Fed Com 31H FTP: 250 feet from the North line and 330 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 330 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.
Completion Target (Formation, TVD and MD)	See Exhibits B-13 and B-14.
Well #1	Coriander 1-12 Fed Com 12H Formation: Bone Spring TVD: 12,230' MD: 22,230'
Well #2	Coriander 1-12 Fed Com 16H Formation: Bone Spring TVD: 11,030' MD: 21,030'
Well #3	Coriander 1-12 Fed Com 18H Formation: Bone Spring TVD: 10,200' MD: 20,200'
Well #4	Coriander 1-12 Fed Com 25H Formation: Bone Spring TVD: 12,230' MD: 22,230'
Well #5	Coriander 1-12 Fed Com 27H Formation: Bone Spring TVD: 10,770' MD: 20,770'
Well #6	Coriander 1-12 Fed Com 28H Formation: Bone Spring TVD: 11,030' MD: 21,030'
Well #7	Coriander 1-12 Fed Com 31H Formation: Bone Spring TVD: 11,030' MD: 20,200'
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$8,000/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Production Supervision/Month \$	\$800/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Justification for Supervision Costs	See Tab B, Declaration of Kelsi Henriques, ¶ 50.

Requested Risk Charge	200%. See Tab B, Declaration of Kelsi Henriques, ¶ 51.
Notice of Hearing	
Proposed Notice of Hearing	Exhibit B-16
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit B-16
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit B-16
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibits B-2 and B-6
Tract List (including lease numbers and owners)	Exhibit B-9
Pooled Parties (including ownership type)	Exhibit B-10
Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	N/A
Joinder	
Sample Copy of Proposal Letter	Exhibit B-11
List of Interest Owners (ie Exhibit A of JOA)	Exhibit B-10
Chronology of Contact with Non-Joined Working Interests	Exhibit B-15
Overhead Rates In Proposal Letter	Exhibit B-11
Cost Estimate to Drill and Complete	Exhibit B-14
Cost Estimate to Equip Well	Exhibit B-14
Cost Estimate for Production Facilities	Exhibit B-14
Geology	
Summary (including special considerations)	Tab C
Spacing Unit Schematic	Exhibits C-3 through C-6
Gunbarrel/Lateral Trajectory Schematic	Exhibits C-3 through C-6
Well Orientation (with rationale)	Exhibit C-2
Target Formation	Exhibits C-3 through C-6
HSU Cross Section	Exhibits C-3 through C-6
Depth Severance Discussion	N/A
Forms, Figures and Tables	
C-102	Exhibit B-13
Tracts	Exhibit B-9
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit B-9
General Location Map (including basin)	Exhibit C-1
Well Bore Location Map	Exhibit C-1
Structure Contour Map - Subsea Depth	Exhibits C-3 through C-6
Cross Section Location Map (including wells)	Exhibits C-3 through C-6
Cross Section (including Landing Zone)	Exhibits C-3 through C-6
Additional Information	


Special Provisions/Stipulations	N/A
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Deana M. Bennett
Signed Name (Attorney or Party Representative):	
Date:	Thursday, March 17, 2022

COMPULSORY POOLING APPLICATION CHECKLIST (pdf)	
ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 22314	APPLICANT'S RESPONSE
Date: March 24, 2022	
Applicant	Cimarex Energy Co.
Designated Operator & OGRID (affiliation if applicable)	Cimarex Energy Co. (215099)
Applicant's Counsel:	Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett, Jamie L. Allen & Bryce H. Smith)
Case Title:	Application of Cimarex Energy Co. for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenors:	Devon Energy Production Company, L.P. Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com ConocoPhillips Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 (505) 428-0485 Facsimile Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com
Well Family	Coriander
Formation/Pool	
Formation Name(s) or Vertical Extent:	Wolfcamp
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Wolfcamp
Pool Name and Pool Code:	WC-025 G-09 S223332A; UPR Wolfcamp



Well Location Setback Rules:	Statewide
Spacing Unit Size:	320 acres
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320 acres
Building Blocks:	40 acres
Orientation:	North-South
Description: TRS/County	W/2 W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Y
Other Situations	
Depth Severance: Y/N. If yes, description	None
Proximity Tracts: If yes, description	N/A
Proximity Defining Well: if yes, description	N/A
Applicant's Ownership in Each Tract	See Exhibits B-2, B-6, and B-9. See also Tab B, Declarataion of Kelsi Henriques.
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	See Exhibit B-13. See also Tab B, Declarataion of Kelsi Henriques.
Well #1	<p>Coriander 1-12 Fed Com 26H API No.: TBD SHL: 370 feet from the North line and 834 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 330 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Wolfcamp Formation at approximately 12,525' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>
Horizontal Well First and Last Take Points	See Exhibits B-13 and B-14.
Well #1	<p>Coriander 1-12 Fed Com 26H FTP: 370 feet from the North line and 330 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 330 feet from the South line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Completion Target (Formation, TVD and MD)	See Exhibits B-13 and B-14.

Well #1	Coriander 1-12 Fed Com 26H Formation: Wolfcamp TVD: 12,525' MD: 22,525'
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$8,000/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Production Supervision/Month \$	\$800/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Justification for Supervision Costs	See Tab B, Declaration of Kelsi Henriques, ¶ 50.
Requested Risk Charge	200%. See Tab B, Declaration of Kelsi Henriques, ¶ 51.
Notice of Hearing	
Proposed Notice of Hearing	Exhibit B-16
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit B-16
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit B-16
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibits B-2 and B-6
Tract List (including lease numbers and owners)	Exhibit B-9
Pooled Parties (including ownership type)	Exhibit B-10
Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	N/A
Joinder	
Sample Copy of Proposal Letter	Exhibit B-11
List of Interest Owners (ie Exhibit A of JOA)	Exhibit B-10
Chronology of Contact with Non-Joined Working Interests	Exhibit B-15
Overhead Rates In Proposal Letter	Exhibit B-11
Cost Estimate to Drill and Complete	Exhibit B-14
Cost Estimate to Equip Well	Exhibit B-14
Cost Estimate for Production Facilities	Exhibit B-14
Geology	
Summary (including special considerations)	Tab C
Spacing Unit Schematic	Exhibits C-3 through C-6
Gunbarrel/Lateral Trajectory Schematic	Exhibits C-3 through C-6
Well Orientation (with rationale)	Exhibit C-2
Target Formation	Exhibits C-3 through C-6
HSU Cross Section	Exhibits C-3 through C-6
Depth Severance Discussion	N/A
Forms, Figures and Tables	
C-102	Exhibit B-13

Tracts	Exhibit B-9
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit B-9
General Location Map (including basin)	Exhibit C-1
Well Bore Location Map	Exhibit C-1
Structure Contour Map - Subsea Depth	Exhibits C-3 through C-6
Cross Section Location Map (including wells)	Exhibits C-3 through C-6
Cross Section (including Landing Zone)	Exhibits C-3 through C-6
Additional Information	
Special Provisions/Stipulations	
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Deana M. Bennett
Signed Name (Attorney or Party Representative):	
Date:	Thursday, March 17, 2022


COMPULSORY POOLING APPLICATION CHECKLIST (pdf)	
ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 22315	APPLICANT'S RESPONSE
Date: March 24, 2022	
Applicant	Cimarex Energy Co.
Designated Operator & OGRID (affiliation if applicable)	Cimarex Energy Co. (215099)
Applicant's Counsel:	Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett, Jamie L. Allen & Bryce H. Smith)
Case Title:	Application of Cimarex Energy Co. for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenor:	Devon Energy Production Company, L.P. Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com
	ConocoPhillips Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 (505) 428-0485 Facsimile Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com
Well Family	Coriander
Formation/Pool	
Formation Name(s) or Vertical Extent:	Avalon
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Avalon
Pool Name and Pool Code:	Diamondtail; Bone Spring (17644)



Well Location Setback Rules:	Statewide
Spacing Unit Size:	640 acres
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	640 acres
Building Blocks:	40 acres
Orientation:	North-South
Description: TRS/County	W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Y
Other Situations	
Depth Severance: Y/N. If yes, description	None
Proximity Tracts: If yes, description	Yes
Proximity Defining Well: if yes, description	Coriander 1-12 Fed Com 19H
Applicant's Ownership in Each Tract	Exhibit X.
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	See Exhibit B-13. See also Tab B, Declarataion of Kelsi Henriques.
Well #1	<p>Coriander 1-12 Fed Com 19H API No.: TBD SHL: 250 feet from the North line and 2,558 feet from the East line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 1,647 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Avalon Formation at approximately 9,700' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibit B-13 for C102s.</p>
Well #2	<p>Coriander 1-12 Fed Com 29H API No.: TBD SHL: 250 feet from the North line and 873 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 981 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Avalon Formation at approximately 9,700' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibit B-13 for C102s.</p>

Well #3	Coriander 1-12 Fed Com 30H API No.: TBD SHL: 250 feet from the North line and 853 feet from the West line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 330 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Avalon Formation at approximately 9,700' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See Exhibit B-13 for C102s.
Horizontal Well First and Last Take Points	See Exhibit B-13 for C102s.
Well #1	Coriander 1-12 Fed Com 19H FTP: 250 feet from the North line and 1,637 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 1,647 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.
Well #2	Coriander 1-12 Fed Com 29H FTP: 250 feet from the North line and 981 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 981 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.
Well #3	Coriander 1-12 Fed Com 30H FTP: 250 feet from the North line and 330 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 330 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.
Completion Target (Formation, TVD and MD)	See Exhibits B-13 and B-14.
Well #1	Coriander 1-12 Fed Com 19H Formation: Avalon TVD: 9,700' MD: 19,700'
Well #2	Coriander 1-12 Fed Com 29H Formation: Avalon TVD: 9,700' MD: 19,700'
Well #3	Coriander 1-12 Fed Com 30H Formation: Avalon TVD: 9,700' MD: 19,700'

AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$8,000/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Production Supervision/Month \$	\$800/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Justification for Supervision Costs	See Tab B, Declaration of Kelsi Henriques, ¶ 50.
Requested Risk Charge	200%. See Tab B, Declaration of Kelsi Henriques, ¶ 51.
Notice of Hearing	
Proposed Notice of Hearing	Exhibit B-16
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit B-16
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit B-16
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibits B-2 and B-6
Tract List (including lease numbers and owners)	Exhibit B-9
Pooled Parties (including ownership type)	Exhibit B-10
Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	N/A
Joinder	
Sample Copy of Proposal Letter	Exhibit B-11
List of Interest Owners (ie Exhibit A of JOA)	Exhibit B-10
Chronology of Contact with Non-Joined Working Interests	Exhibit B-15
Overhead Rates In Proposal Letter	Exhibit B-11
Cost Estimate to Drill and Complete	Exhibit B-14
Cost Estimate to Equip Well	Exhibit B-14
Cost Estimate for Production Facilities	Exhibit B-14
Geology	
Summary (including special considerations)	Tab C
Spacing Unit Schematic	Exhibits C-3 through C-6
Gunbarrel/Lateral Trajectory Schematic	Exhibits C-3 through C-6
Well Orientation (with rationale)	Exhibit C-2
Target Formation	Exhibits C-3 through C-6
HSU Cross Section	Exhibits C-3 through C-6
Depth Severance Discussion	N/A
Forms, Figures and Tables	
C-102	Exhibit B-13
Tracts	Exhibit B-9
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit B-9
General Location Map (including basin)	Exhibit C-1

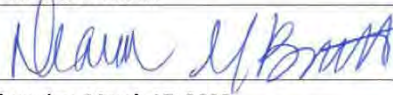
Well Bore Location Map	Exhibit C-1
Structure Contour Map - Subsea Depth	Exhibits C-3 through C-6
Cross Section Location Map (including wells)	Exhibits C-3 through C-6
Cross Section (including Landing Zone)	Exhibits C-3 through C-6
Additional Information	
Special Provisions/Stipulations	N/A
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Deana M. Bennett
Signed Name (Attorney or Party Representative):	
Date:	Thursday, March 17, 2022

COMPULSORY POOLING APPLICATION CHECKLIST (pdf)	
ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 22316	APPLICANT'S RESPONSE
Date: March 24, 2022	
Applicant	Cimarex Energy Co.
Designated Operator & OGRID (affiliation if applicable)	Cimarex Energy Co. (215099)
Applicant's Counsel:	Modrall, Sperling, Roehl, Harris & Sisk, P.A. (Earl E. DeBrine, Jr., Deana M. Bennett, Jamie L. Allen & Bryce H. Smith)
Case Title:	Application of Cimarex Energy Co. for Compulsory Pooling, Lea County, New Mexico
Entries of Appearance/Intervenors:	Devon Energy Production Company, L.P. Michael H. Feldewert Adam G. Rankin Julia Broggi Kaitlyn A. Luck Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504 TEL: (505) 988-4421 FAX: (505) 983-6043 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com kaluck@hollandhart.com ConocoPhillips Ocean Munds-Dry Elizabeth Ryan ConocoPhillips 1048 Paseo de Peralta Santa Fe, New Mexico 87501 (505) 780-8000 (505) 428-0485 Facsimile Ocean.Munds-Dry@conocophillips.com Beth.Ryan@conocophillips.com
Well Family	Coriander
Formation/Pool	
Formation Name(s) or Vertical Extent:	Wolfcamp
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Wolfcamp
Pool Name and Pool Code:	Wolfcamp



Well Location Setback Rules:	WC-025 G-09 S223332A; UPR Wolfcamp
Spacing Unit Size:	320 acres
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320 acres
Building Blocks:	40 acres
Orientation:	North-South
Description: TRS/County	E/2 W/2 of Sections 1 and 12, Township 23 South, Range 32 East, NMPM, Lea County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe	Y
Other Situations	
Depth Severance: Y/N. If yes, description	None
Proximity Tracts: If yes, description	N/A
Proximity Defining Well: if yes, description	N/A
Applicant's Ownership in Each Tract	See Exhibits B-2, B-6, and B-9. See also Tab B, Declarataion of Kelsi Henriques.
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	See Exhibit B-13. See also Tab B, Declarataion of Kelsi Henriques.
Well #1	<p>Coriander 1-12 Fed Com 13H API No.: TBD SHL: 370 feet from the North line and 2,557 feet from the East line, Section 1, Township 23 South, Range 32 East, NMPM, Lea County, NM. BHL: 100 feet from the South line and 1,664 feet from the West line, Section 12, Township 23 South, Range 32 East, NMPM, Lea County, NM. Completion Target: Wolfcamp Formation at approximately 12,525' TVD. Well Orientation: North-South Completion Location: Expected to be standard. See See Exhibit B-13 for C102s.</p>
Horizontal Well First and Last Take Points	See Exhibits B-13 and B-14.
Well #1	<p>Coriander 1-12 Fed Com 13H FTP: 370 feet from the North line and 1,654 feet from the West line of Section 1, Township 23 South, Range 32 East. LTP: 100 feet from the South line and 1,664 feet from the West line of Section 12, Township 23 South, Range 32 East. See Exhibit B-13.</p>
Completion Target (Formation, TVD and MD)	See Exhibits B-13 and B-14.

Well #1	Coriander 1-12 Fed Com 13H Formation: Wolfcamp TVD: 12,525' MD: 22,525'
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$8,000/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Production Supervision/Month \$	\$800/month. See Tab B, Declaration of Kelsi Henriques, ¶ 50; see also Exhibit B-11.
Justification for Supervision Costs	See Tab B, Declaration of Kelsi Henriques, ¶ 50.
Requested Risk Charge	200%. See Tab B, Declaration of Kelsi Henriques, ¶ 51.
Notice of Hearing	
Proposed Notice of Hearing	Exhibit B-16
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit B-16
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit B-16
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibits B-2 and B-6
Tract List (including lease numbers and owners)	Exhibit B-9
Pooled Parties (including ownership type)	Exhibit B-10
Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	N/A
Joinder	
Sample Copy of Proposal Letter	Exhibit B-11
List of Interest Owners (ie Exhibit A of JOA)	Exhibit B-10
Chronology of Contact with Non-Joined Working Interests	Exhibit B-15
Overhead Rates In Proposal Letter	Exhibit B-11
Cost Estimate to Drill and Complete	Exhibit B-14
Cost Estimate to Equip Well	Exhibit B-14
Cost Estimate for Production Facilities	Exhibit B-14
Geology	
Summary (including special considerations)	Tab C
Spacing Unit Schematic	Exhibits C-3 through C-6
Gunbarrel/Lateral Trajectory Schematic	Exhibits C-3 through C-6
Well Orientation (with rationale)	Exhibit C-2
Target Formation	Exhibits C-3 through C-6
HSU Cross Section	Exhibits C-3 through C-6
Depth Severance Discussion	N/A
Forms, Figures and Tables	
C-102	Exhibit B-13

Tracts	Exhibit B-9
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit B-9
General Location Map (including basin)	Exhibit C-1
Well Bore Location Map	Exhibit C-1
Structure Contour Map - Subsea Depth	Exhibits C-3 through C-6
Cross Section Location Map (including wells)	Exhibits C-3 through C-6
Cross Section (including Landing Zone)	Exhibits C-3 through C-6
Additional Information	
Special Provisions/Stipulations	
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Deana M. Bennett
Signed Name (Attorney or Party Representative):	
Date:	Thursday, March 17, 2022