

Form 3160-3  
(October 2024)FORM APPROVED  
OMB No. 1004-0220  
Expires: October 31, 2027UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
**APPLICATION FOR PERMIT TO DRILL OR REENTER**

|                                                                                                                                                   |                                       |                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|-----------------------------------------------|
| 1a. Type of work: <input type="checkbox"/> DRILL <input type="checkbox"/> REENTER                                                                 |                                       | 5. Lease Serial No.                           |
| 1b. Type of Well: <input type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other                              |                                       | 6. If Indian, Allottee or Tribe Name          |
| 1c. Type of Completion: <input type="checkbox"/> Hydraulic Fracturing <input type="checkbox"/> Single Zone <input type="checkbox"/> Multiple Zone |                                       | 7. If Unit or CA Agreement, Name and No.      |
| 2. Name of Operator                                                                                                                               |                                       | 8. Lease Name and Well No.                    |
| 3a. Address                                                                                                                                       |                                       | 9. API Well No.<br><b>30-015-57392</b>        |
| 3b. Phone No. (include area code)                                                                                                                 |                                       | 10. Field and Pool, or Exploratory            |
| 4. Location of Well (Report location clearly and in accordance with any State requirements. *)<br>At surface<br>At proposed prod. zone            |                                       | 11. Sec., T. R. M. or Blk. and Survey or Area |
| 14. Distance in miles and direction from nearest town or post office*                                                                             |                                       | 12. County or Parish                          |
|                                                                                                                                                   |                                       | 13. State                                     |
| 15. Distance from proposed* location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any)                             | 16. No of acres in lease              | 17. Spacing Unit dedicated to this well       |
| 18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft.                                        | 19. Proposed Depth                    | 20. BLM/BIA Bond No. in file                  |
| 21. Elevations (Show whether DF, KDB, RT, GL, etc.)                                                                                               | 22. Approximate date work will start* | 23. Estimated duration                        |
| 24. Attachments                                                                                                                                   |                                       |                                               |

The following, completed in accordance with the requirements of Onshore Oil and Gas Order No. 1, and the Hydraulic Fracturing rule per 43 CFR 3162.3-3 (as applicable)

- |                                                                                                                                                |                                                                                                 |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
| 1. Well plat certified by a registered surveyor.                                                                                               | 4. Bond to cover the operations unless covered by an existing bond on file (see Item 20 above). |
| 2. A Drilling Plan.                                                                                                                            | 5. Operator certification.                                                                      |
| 3. A Surface Use Plan (if the location is on National Forest System Lands, the SUPO must be filed with the appropriate Forest Service Office). | 6. Such other site specific information and/or plans as may be requested by the BLM.            |

|                         |                      |      |
|-------------------------|----------------------|------|
| 25. Signature           | Name (Printed/Typed) | Date |
| Title                   |                      |      |
| Approved by (Signature) | Name (Printed/Typed) | Date |
| Title                   | Office               |      |

Application approval does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.  
Conditions of approval, if any, are attached.

Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Continued on page 2)

\*(Instructions on page 2)



Approval Date: 10/09/2025

|                                                      |                                                                                                     |                                     |                      |                                                       |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------|----------------------|-------------------------------------------------------|
| C-102<br>Submit Electronically<br>Via OCD Permitting | State of New Mexico<br>Energy, Minerals & Natural Resources Department<br>OIL CONSERVATION DIVISION |                                     | Revised July 9, 2024 |                                                       |
|                                                      |                                                                                                     |                                     | Submittal<br>Type:   | <input checked="" type="checkbox"/> Initial Submittal |
|                                                      |                                                                                                     |                                     |                      | <input type="checkbox"/> Amended Report               |
|                                                      |                                                                                                     | <input type="checkbox"/> As Drilled |                      |                                                       |

## WELL LOCATION INFORMATION

|                                                                                                                                                        |                                                   |                                                                                                                                                        |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| API Number<br><b>30-015-57392</b>                                                                                                                      | Pool Code<br><b>96210</b>                         | Pool Name<br><b>EMPIRE; GLORIETA-YESO</b>                                                                                                              |
| Property Code<br><b>337838</b>                                                                                                                         | Property Name<br><b>GHOST 16-15 STATE COM</b>     | Well Number<br><b>70H</b>                                                                                                                              |
| OGRID No.<br><b>328947</b>                                                                                                                             | Operator Name<br><b>SPUR ENERGY PARTNERS LLC.</b> | Ground Level Elevation<br><b>3566'</b>                                                                                                                 |
| Surface Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal |                                                   | Mineral Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal |

## Surface Location

|                |                      |                        |                     |     |                                 |                               |                                 |                                   |                       |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|-------------------------------|---------------------------------|-----------------------------------|-----------------------|
| UL<br><b>L</b> | Section<br><b>16</b> | Township<br><b>17S</b> | Range<br><b>28E</b> | Lot | Ft. from N/S<br><b>1955 FSL</b> | Ft. from E/W<br><b>97 FWL</b> | Latitude<br><b>32.8322926°N</b> | Longitude<br><b>104.1890517°W</b> | County<br><b>EDDY</b> |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|-------------------------------|---------------------------------|-----------------------------------|-----------------------|

## Bottom Hole Location

|                |                      |                        |                     |     |                                 |                                 |                                 |                                   |                       |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|---------------------------------|---------------------------------|-----------------------------------|-----------------------|
| UL<br><b>K</b> | Section<br><b>15</b> | Township<br><b>17S</b> | Range<br><b>28E</b> | Lot | Ft. from N/S<br><b>1820 FSL</b> | Ft. from E/W<br><b>2559 FWL</b> | Latitude<br><b>32.8321607°N</b> | Longitude<br><b>104.1639776°W</b> | County<br><b>EDDY</b> |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|---------------------------------|---------------------------------|-----------------------------------|-----------------------|

|                               |                                          |                                            |                                                                                                               |                                        |
|-------------------------------|------------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------|----------------------------------------|
| Dedicated Acres<br><b>480</b> | Infill or Defining Well<br><b>INFILL</b> | Defining Well API<br><b>30-015-PENDING</b> | Overlapping Spacing Unit (Y/N)<br><b>N</b>                                                                    | Consolidation Code<br><b>F &amp; C</b> |
| Order Numbers. <b>PENDING</b> |                                          |                                            | Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |                                        |

## Kick Off Point (KOP)

|                |                      |                        |                     |     |                                 |                                |                                 |                                   |                       |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|--------------------------------|---------------------------------|-----------------------------------|-----------------------|
| UL<br><b>I</b> | Section<br><b>17</b> | Township<br><b>17S</b> | Range<br><b>28E</b> | Lot | Ft. from N/S<br><b>1837 FSL</b> | Ft. from E/W<br><b>674 FEL</b> | Latitude<br><b>32.8319676°N</b> | Longitude<br><b>104.1915507°W</b> | County<br><b>EDDY</b> |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|--------------------------------|---------------------------------|-----------------------------------|-----------------------|

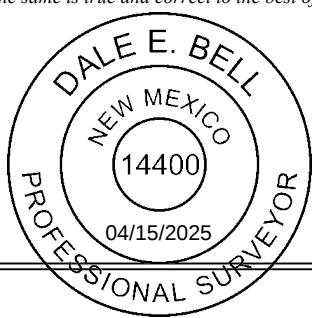
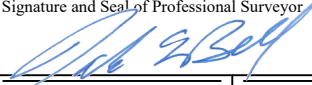
## First Take Point (FTP)

|                |                      |                        |                     |     |                                 |                                |                                 |                                   |                       |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|--------------------------------|---------------------------------|-----------------------------------|-----------------------|
| UL<br><b>L</b> | Section<br><b>16</b> | Township<br><b>17S</b> | Range<br><b>28E</b> | Lot | Ft. from N/S<br><b>1820 FSL</b> | Ft. from E/W<br><b>100 FWL</b> | Latitude<br><b>32.8319216°N</b> | Longitude<br><b>104.1890315°W</b> | County<br><b>EDDY</b> |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|--------------------------------|---------------------------------|-----------------------------------|-----------------------|

## Last Take Point (LTP)

|                |                      |                        |                     |     |                                 |                                 |                                 |                                   |                       |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|---------------------------------|---------------------------------|-----------------------------------|-----------------------|
| UL<br><b>K</b> | Section<br><b>15</b> | Township<br><b>17S</b> | Range<br><b>28E</b> | Lot | Ft. from N/S<br><b>1820 FSL</b> | Ft. from E/W<br><b>2509 FWL</b> | Latitude<br><b>32.8321599°N</b> | Longitude<br><b>104.1641403°W</b> | County<br><b>EDDY</b> |
|----------------|----------------------|------------------------|---------------------|-----|---------------------------------|---------------------------------|---------------------------------|-----------------------------------|-----------------------|

|                                                       |                                                                                                    |                                            |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------|
| Unitized Area or Area of Uniform Interest<br><b>Y</b> | Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical | Ground Floor Elevation:<br><b>3566' GR</b> |
|-------------------------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------|

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |  |                                                                                                                                                                                                                                                                                                                                                      |                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| <b>OPERATOR CERTIFICATIONS</b><br><br><i>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.</i><br><br><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 order from the division.</i><br><br><b>Sarah Chapman</b> 04/29/2025 |  | <b>SURVEYOR CERTIFICATIONS</b><br><br><i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me under my supervision, and that the same is true and correct to the best of my belief.</i><br><br> |                                     |
| Signature<br><b>SARAH CHAPMAN</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |  | Signature and Seal of Professional Surveyor<br>                                                                                                                                                                                                                  |                                     |
| Printed Name<br><b>SCHAPMAN@SPURENERGY.COM</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  | Certificate Number<br><b>14400</b>                                                                                                                                                                                                                                                                                                                   | Date of Survey<br><b>03/25/2025</b> |
| Email Address                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |                                                                                                                                                                                                                                                                                                                                                      |                                     |

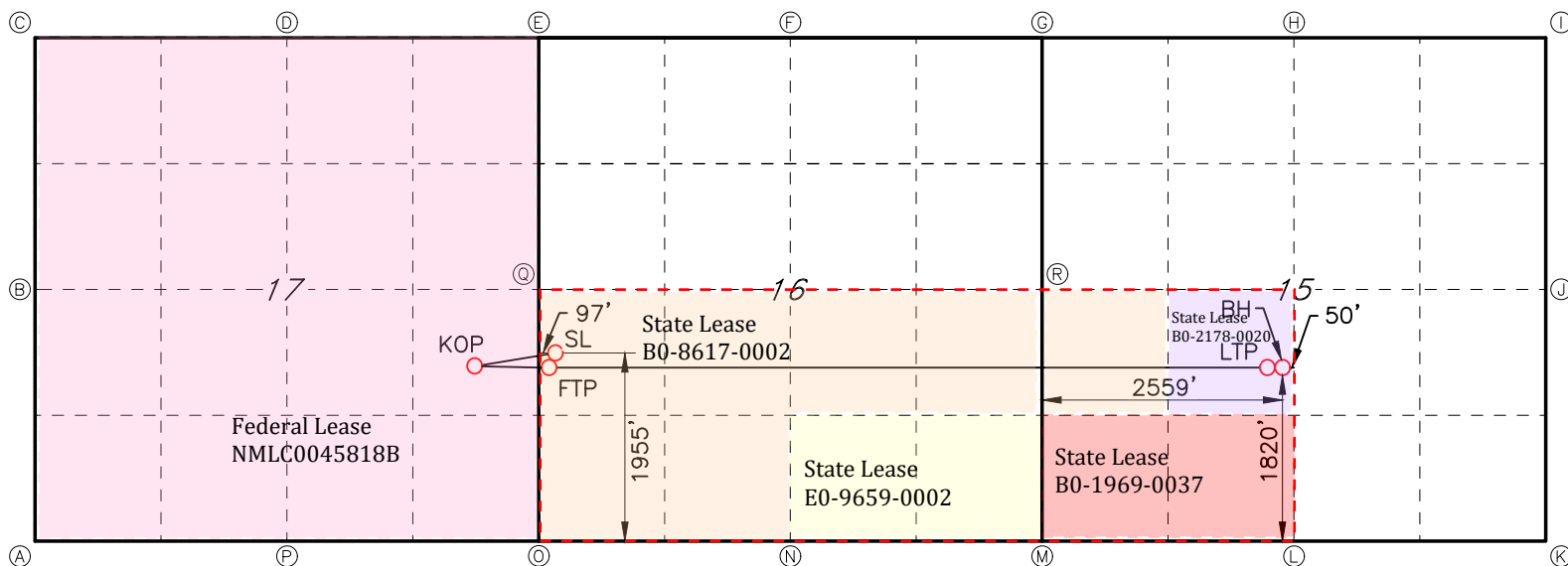
Note: No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

## ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or 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 a 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 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.

## GHOST 16-15 STATE COM #70H



**GEODETTIC DATA**  
NAD 83 GRID - NM EAST

SURFACE LOCATION (SL)  
1955' FSL & 97' FWL (SEC.16)  
N: 666551.2 - E: 585654.4  
LAT: 32.8322926° N  
LONG: 104.1890517° W

KICK OFF POINT (KOP)  
1837' FSL & 674' FEL (SEC.17)  
N: 666431.9 - E: 584887.0  
LAT: 32.8319676° N  
LONG: 104.1915507° W

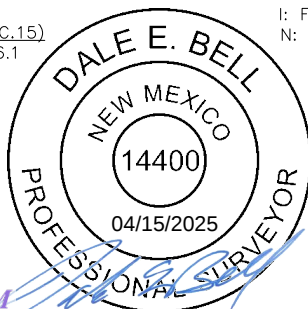
FIRST TAKE POINT (FTP)  
1820' FSL & 100' FWL (SEC.16)  
N: 666416.3 - E: 585660.8  
LAT: 32.8319216° N  
LONG: 104.1890315° W

LAST TAKE POINT (LTP)  
1820' FSL & 2509' FWL (SEC.15)  
N: 666514.3 - E: 593306.1  
LAT: 32.8321599° N  
LONG: 104.1641403° W

BOTTOM HOLE (BH)  
1820' FSL & 2559' FWL (SEC.15)  
N: 666514.7 - E: 593356.1  
LAT: 32.8321607° N  
LONG: 104.1639776° W

**CORNER DATA**  
NAD 83 GRID - NM EAST

|                                                                   |                                                        |
|-------------------------------------------------------------------|--------------------------------------------------------|
| A: FOUND BRASS CAP "1941"<br>N: 664598.7 - E: 580344.4            | J: FOUND BRASS CAP "1941"<br>N: 667371.0 - E: 595986.7 |
| B: FOUND 1/2" REBAR CIRCLE OF STONES<br>N: 667242.8 - E: 580307.6 | K: FOUND BRASS CAP "1941"<br>N: 664715.7 - E: 596062.5 |
| C: FOUND BRASS CAP "1941"<br>N: 669888.2 - E: 580272.7            | L: FOUND BRASS CAP "1941"<br>N: 664696.3 - E: 593458.5 |
| D: FOUND BRASS CAP "1941"<br>N: 669891.3 - E: 582874.8            | M: FOUND BRASS CAP "1941"<br>N: 664676.8 - E: 590857.1 |
| E: FOUND BRASS CAP "1941"<br>N: 669895.3 - E: 585475.8            | N: FOUND BRASS CAP "1941"<br>N: 664637.7 - E: 588231.8 |
| F: FOUND BRASS CAP "1941"<br>N: 669932.6 - E: 588081.1            | O: FOUND BRASS CAP "1941"<br>N: 664595.7 - E: 585605.5 |
| G: CALCULATED CORNER<br>N: 669970.6 - E: 590686.3                 | P: FOUND BRASS CAP "1941"<br>N: 664596.6 - E: 582975.3 |
| H: FOUND BRASS CAP "1941"<br>N: 670001.6 - E: 593305.7            | Q: FOUND BRASS CAP "1941"<br>N: 667245.5 - E: 585540.4 |
| I: FOUND BRASS CAP "1941"<br>N: 670028.0 - E: 595911.3            | R: FOUND BRASS CAP "1941"<br>N: 667324.8 - E: 590770.1 |



State of New Mexico  
Energy, Minerals and Natural Resources Department

Submit Electronically  
Via E-permitting

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

## NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

### Section 1 – Plan Description Effective May 25, 2021

**I. Operator:** SPUR ENERGY PARTNERS LLC **OGRID:** 328947 **Date:** 04 / 14 / 2025

**II. Type:** ☒ Original ☐ Amendment due to ☐ 19.15.27.9.D(6)(a) NMAC ☐ 19.15.27.9.D(6)(b) NMAC ☐ Other.

If Other, please describe: \_\_\_\_\_

**III. Well(s):** Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

| Well Name                 | API     | ULSTR        | Footages           | Anticipated Oil BBL/D | Anticipated Gas MCF/D | Anticipated Produced Water BBL/D |
|---------------------------|---------|--------------|--------------------|-----------------------|-----------------------|----------------------------------|
| GHOST 16 15 STATE COM 10H | 30-015- | M-16-17S-28E | 1095' FSL 100' FWL | 369 BBL/D             | 602 MCF/D             | 2216 BBL/D                       |
| GHOST 16 15 STATE COM 20H | 30-015- | L-16-17S-28E | 1975' FSL 97' FWL  | 369 BBL/D             | 602 MCF/D             | 2216 BBL/D                       |
| GHOST 16 15 STATE COM 21H | 30-015- | M-16-17S-28E | 1055' FSL 99' FWL  | 369 BBL/D             | 602 MCF/D             | 2216 BBL/D                       |
| GHOST 16 15 STATE COM 70H | 30-015- | L-16-17S-28E | 1955' FSL 97' FWL  | 338 BBL/D             | 1014 MCF/D            | 2367 BBL/D                       |
| GHOST 16 15 STATE COM 71H | 30-015- | M-16-17S-28E | 1075' FSL 99' FWL  | 338 BBL/D             | 1014 MCF/D            | 2367 BBL/D                       |

**IV. Central Delivery Point Name:** GHOST 16 15 STATE COM TANK BATTERY [See 19.15.27.9(D)(1) NMAC]

**V. Anticipated Schedule:** Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

| Well Name                 | API     | Spud Date  | TD Reached Date | Completion Commencement Date | Initial Flow Back Date | First Production Date |
|---------------------------|---------|------------|-----------------|------------------------------|------------------------|-----------------------|
| GHOST 16 15 STATE COM 10H | 30-015- | 11/05/2025 | 11/13/2025      | 12/24/2025                   | 01/14/2026             | 01/29/2026            |
| GHOST 16 15 STATE COM 20H | 30-015- | 11/13/2025 | 11/21/2025      | 12/24/2025                   | 01/14/2026             | 01/29/2026            |
| GHOST 16 15 STATE COM 21H | 30-015- | 11/21/2025 | 11/29/2025      | 12/24/2025                   | 01/14/2026             | 01/29/2026            |
| GHOST 16 15 STATE COM 70H | 30-015- | 11/29/2025 | 12/07/2025      | 12/24/2025                   | 01/14/2026             | 01/29/2026            |
| GHOST 16 15 STATE COM 71H | 30-015- | 12/07/2025 | 12/15/2025      | 12/24/2025                   | 01/14/2026             | 01/29/2026            |

**VI. Separation Equipment:** ☒ Attach a complete description of how Operator will size separation equipment to optimize gas capture.

**VII. Operational Practices:** ☒ Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.

**VIII. Best Management Practices:** ☒ Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

## **Section 2 – Enhanced Plan**

### **EFFECTIVE APRIL 1, 2022**

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

☒ Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

#### **IX. Anticipated Natural Gas Production:**

| Well | API | Anticipated Average Natural Gas Rate MCF/D | Anticipated Volume of Natural Gas for the First Year MCF |
|------|-----|--------------------------------------------|----------------------------------------------------------|
|      |     |                                            |                                                          |
|      |     |                                            |                                                          |

#### **X. Natural Gas Gathering System (NGGS):**

| Operator | System | ULSTR of Tie-in | Anticipated Gathering Start Date | Available Maximum Daily Capacity of System Segment Tie-in |
|----------|--------|-----------------|----------------------------------|-----------------------------------------------------------|
|          |        |                 |                                  |                                                           |
|          |        |                 |                                  |                                                           |

**XI. Map.** ☐ Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

**XII. Line Capacity.** The natural gas gathering system ☐ will ☐ will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

**XIII. Line Pressure.** Operator ☐ does ☐ does not anticipate that its existing well(s) connected to the same segment, or portion, of the natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by the new well(s).

☐ Attach Operator's plan to manage production in response to the increased line pressure.

**XIV. Confidentiality:** ☐ Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information provided in Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of the specific information for which confidentiality is asserted and the basis for such assertion.

### **Section 3 - Certifications**

**Effective May 25, 2021**

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

☒ Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or

☐ Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.

***If Operator checks this box, Operator will select one of the following:***

**Well Shut-In.** ☐ Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

**Venting and Flaring Plan.** ☐ Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- (b) power generation for grid;
- (c) compression on lease;
- (d) liquids removal on lease;
- (e) reinjection for underground storage;
- (f) reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- (h) fuel cell production; and
- (i) other alternative beneficial uses approved by the division.

### **Section 4 - Notices**

1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

(a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or

(b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.

2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

|                                                                                                  |                          |
|--------------------------------------------------------------------------------------------------|--------------------------|
| Signature:                                                                                       | <i>Sarah Chapman</i>     |
| Printed Name:                                                                                    | SARAH CHAPMAN            |
| Title:                                                                                           | REGULATORY DIRECTOR      |
| E-mail Address:                                                                                  | SCHAPMAN@SPUREENERGY.COM |
| Date:                                                                                            | 04/14/2025               |
| Phone:                                                                                           | 832-930-8613             |
| <b>OIL CONSERVATION DIVISION</b><br><b>(Only applicable when submitted as a standalone form)</b> |                          |
| Approved By:                                                                                     |                          |
| Title:                                                                                           |                          |
| Approval Date:                                                                                   |                          |
| Conditions of Approval:                                                                          |                          |



## Natural Gas Management Plan – Attachment

VI. Separation equipment will be sized by construction engineering staff based on anticipated daily production to ensure adequate capacity.

VII. Spur Energy Partners LLC (“Spur”) will take the following actions to comply with the regulations listed in 19.15.27.8:

- A. Spur will maximize the recovery of natural gas by minimizing waste, as defined by 19.15.2 NMAC, of natural gas through venting and flaring. Spur will ensure that our wells will be connected to a natural gas gathering system with sufficient capacity to transport natural gas.
- B. All drilling operations will be equipped with a rig flare at least 100 feet from the nearest surface hole location. Rig flare will be utilized to combust any natural gas that is brought to surface during normal operations. In the case of emergency, flaring volumes will be reported appropriately.
- C. During completion operations any natural gas brought to surface will be flared. Immediately following completion operations, wells will flow to permanent separation equipment. Produced natural gas from separation equipment will be sent to sales. If natural gas does not meet gathering pipeline specifications, Spur will flare for 60 days or until natural gas meets the pipeline specifications. Spur will ensure flare is properly sized and is equipped with an automatic igniter or continuous pilot. Gas samples will be taken twice per week and natural gas will be routed into a gathering system as soon as the pipeline specifications are met.
- D. Natural gas will not be flared with the exception of 19.15.27.8(D)(1-4). If there is no adequate takeaway for the separator gas, wells will be shut-in until that natural gas gathering system is available with exception of emergency or malfunction situations. Volumes will be reported appropriately.
- E. Spur will comply with performance standards pursuant to 19.15.27.8(E)(1-8). All equipment will be designed and sized to handle maximum pressures to minimize waste. Storage tanks constructed after May 25, 2021 will be equipped with an automatic gauging system that reduces venting of natural gas. Flare stacks installed or replaced after May 25, 2021 will be equipped with an automatic igniter or continuous pilot. Spur will conduct AVO inspections as described in 19.15.27.8(E)(5)(a) with frequencies specified in 19.15.27.8(E)(5)(b) and (c). All emergencies or malfunctions will be resolved as quickly and safely as possible to minimize waste.
- F. The volume of natural gas that is vented or flared as the result of an emergency or malfunction during drilling and/or completion operations will be estimated and reported accordingly. The volume of natural gas that is vented, flared or beneficially used during production operations, will be measured and reported accordingly. Spur will install equipment to measure the volume of natural gas flared from existing piping or a flowline piped from equipment such as high-pressure separators, heater treaters, or VRUs associated with a well or facility associated with a well authorized by an APD after May 25, 2021 that has an average daily production of less than 60,000 cubic feet of natural gas. If metering is not practicable due to circumstances such as low flow rate or low pressure venting or flaring, Spur will estimate the volume of flared or vented natural gas. Measuring equipment will conform to industry standards and will not be equipped with a manifold



that allows the diversion of natural gas around the metering element except for the sole purpose of inspecting and servicing equipment.

VIII. For maintenance activities involving production equipment and compression, venting be limited to the depressurization of the subject equipment to ensure safe working conditions. For maintenance of production equipment, the associated producing wells will be shut-in to eliminate venting. For maintenance of VRUs, all natural gas normally routed to the VRU will be routed to flare.

## Spur Energy Partners LLC – Ghost 16-15 State Com 70H

### 1. Geologic Formations

|               |         |
|---------------|---------|
| TVD of Target | 4,265'  |
| MD at TD      | 12,402' |

| Formation       | Depth | Lithology                             | Expected Fluids  |
|-----------------|-------|---------------------------------------|------------------|
| Quaternary      | 0'    | Dolomite, other: Caliche              | Useable Water    |
| Tansill         | 275'  | Sandstone, Dolomite                   | None             |
| Yates           | 355'  | Dolomite, Limestone, Shale, Siltstone | None             |
| Seven Rivers    | 615'  | Dolomite, Limestone                   | Natural Gas, Oil |
| Queen           | 1145' | Anhydrite, Dolomite, Sandstone        | Natural Gas, Oil |
| Grayburg        | 1585' | Anhydrite                             | Natural Gas, Oil |
| San Andres      | 1945' | Dolomite                              | Natural Gas, Oil |
| Glorieta        | 3310' | Dolomite, Siltstone                   | Natural Gas, Oil |
| Paddock         | 3390' | Dolomite, Limestone                   | Natural Gas, Oil |
| Upper Blinberry | 3845' | Dolomite, Limestone                   | Natural Gas, Oil |
| Abo             | 5450' | Dolomite, Limestone                   | Natural Gas, Oil |

\*H<sub>2</sub>S, water flows, loss of circulation, abnormal pressures, etc.

### 2. Casing Program

All casing strings will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.h

| Casing<br>Formation Set<br>Interval | Hole Size (in) | Casing Interval |         | Csg. Size<br>(in) | Weight<br>(lbs) | Grade | Conn. | SF<br>Collapse | SF Burst | Buoyant<br>Body SF | Buoyant<br>Joint SF |
|-------------------------------------|----------------|-----------------|---------|-------------------|-----------------|-------|-------|----------------|----------|--------------------|---------------------|
|                                     |                | From (ft)       | To (ft) |                   |                 |       |       |                |          | Tension            | Tension             |
| Yates                               | 17.5           | 0               | 450     | 13.375            | 54.5            | J-55  | BTC   | 1.125          | 1.2      | 1.4                | 1.4                 |
| San Andres                          | 12.25          | 0               | 2200    | 9.625             | 36              | J-55  | BTC   | 1.125          | 1.2      | 1.4                | 1.4                 |
| N/A                                 | 8.75           | 0               | 4500    | 7                 | 32              | L-80  | GBCD  | 1.125          | 1.2      | 1.4                | 1.4                 |
| Yeso                                | 8.75           | 4500            | 12402   | 5.5               | 20              | L-80  | GBCD  | 1.125          | 1.2      | 1.4                | 1.4                 |
| SF Values will meet or Exceed       |                |                 |         |                   |                 |       |       |                |          |                    |                     |

## Spur Energy Partners LLC – Ghost 16-15 State Com 70H

|                                                                                                                                                  | Y or N |
|--------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| Is casing new? If used, attach certification as required in Onshore Order #1                                                                     | Y      |
| Does casing meet API specifications? If no, attach casing specification sheet.                                                                   | Y      |
| Is premium or uncommon casing planned? If yes attach casing specification sheet.                                                                 | N      |
| Does the above casing design meet or exceed BLM's minimum standards? If not provide justification (loading assumptions, casing design criteria). | Y      |
| Will the intermediate pipe be kept at a minimum 1/3 fluid filled to avoid approaching the collapse pressure rating of the casing?                | Y      |
| Is well located within Capitan Reef?                                                                                                             | N      |
| If yes, does production casing cement tie back a minimum of 50' above the Reef?                                                                  |        |
| Is well within the designated 4 string boundary.                                                                                                 |        |
| Is well located in SOPA but not in R-111-P?                                                                                                      | N      |
| If yes, are the first 2 strings cemented to surface and 3 <sup>rd</sup> string cement tied back 500' into previous casing?                       |        |
| Is well located in R-111-P and SOPA?                                                                                                             | N      |
| If yes, are the first three strings cemented to surface?                                                                                         |        |
| Is 2 <sup>nd</sup> string set 100' to 600' below the base of salt?                                                                               |        |
| Is well located in high Cave/Karst?                                                                                                              | N      |
| If yes, are there two strings cemented to surface?                                                                                               |        |
| Is well located in critical Cave/Karst?                                                                                                          | N      |
| If yes, are there three strings cemented to surface?                                                                                             |        |

## 3. Cementing Program

| Casing String       | Top (ft) | Bottom (ft) | % Excess |
|---------------------|----------|-------------|----------|
| Surface Tail        | 0        | 450         | 100%     |
| Intermediate (Lead) | 0        | 450         | 50%      |
| Intermediate (Tail) | 450      | 2200        | 100%     |
| Production (Lead)   | 0        | 3500        | 0%       |
| Production (Tail)   | 3500     | 12402       | 50%      |

| Casing String       | # Sks | Wt.<br>(lb/gal) | Yld<br>(ft3/sack) | H2O<br>(gal/sk) | 500# Comp.<br>Strength<br>(hours) | Slurry Description         |
|---------------------|-------|-----------------|-------------------|-----------------|-----------------------------------|----------------------------|
| Surface Tail        | 278   | 13.2            | 2.32              | 9.92            | 6:59                              | Clas C Premium Plus Cement |
| Intermediate (Lead) | 89    | 12.2            | 1.84              | 13.48           | 8:12                              | Clas C Premium Plus Cement |
| Intermediate (Tail) | 481   | 13.2            | 2.32              | 9.92            | 6:59                              | Clas C Premium Plus Cement |
| Production (Lead)   | 598   | 11.8            | 2.54              | 15.29           | N/A                               | Clas C Premium Plus Cement |
| Production (Tail)   | 1784  | 13.2            | 1.81              | 9.81            | N/A                               | Clas C Premium Plus Cement |

## Spur Energy Partners LLC – Ghost 16-15 State Com 70H

### 4. Pressure Control Equipment

#### **\*Spur Energy Partners LLC variance for flex hose\***

Spur requests a variance to use a flex line from the BOP to the choke manifold. Documentation will be attached in the APD and be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no bends).

| BOP installed and tested before drilling which hole? | Size?   | Min. Required WP | Type       | ✓ | Tested to:              |
|------------------------------------------------------|---------|------------------|------------|---|-------------------------|
| 12.25" Hole                                          | 13-5/8" | 5M               | Annular    | ✓ | 70% of working pressure |
|                                                      |         | 5M               | Blind Ram  | ✓ | 250 psi / 3000 psi      |
|                                                      |         |                  | Pipe Ram   | ✓ |                         |
|                                                      |         |                  | Double Ram |   |                         |
|                                                      |         |                  | Other*     |   |                         |
| 8.75" Hole                                           | 13-5/8" | 5M               | Annular    | ✓ | 70% of working pressure |
|                                                      |         | 5M               | Blind Ram  | ✓ | 250 psi / 3000 psi      |
|                                                      |         |                  | Pipe Ram   | ✓ |                         |
|                                                      |         |                  | Double Ram |   |                         |
|                                                      |         |                  | Other*     |   |                         |

#### **\*Spur Energy Partners LLC will be utilizing a 5M BOP\***

| Condition                     | Specify what type and where? |
|-------------------------------|------------------------------|
| BH Pressure at deepest TVD    | 1974 psi                     |
| Abnormal Temperature          | No                           |
| BH Temperature at deepest TVD | 115°F                        |

\*Specify if additional ram is utilized.

BOP/BOPE will be tested by an independent service company to 250 psi low and the high pressure indicated above per Onshore Order 2 requirements. The System may be upgraded to a higher pressure but still tested to the working pressure listed in the table above. If the system is upgraded all the components installed will be functional and tested.

Pipe rams will be operationally checked each 24-hour period. Blind rams will be operationally checked on each trip out of the hole. These checks will be noted on the daily tour sheets. Other accessories to the BOP equipment will include a Kelly cock and floor safety valve (inside BOP) and choke lines and choke manifold. See attached schematics.

|                                                                                                                                                                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Formation integrity test will be performed per Onshore Order #2.<br>On Exploratory wells or on that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Will be tested in accordance with Onshore Oil and Gas Order #2 III.B.1.i. |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Spur Energy Partners LLC – Ghost 16-15 State Com 70H**

|   |                                                                                                                                                                                                                                                                                                              |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Y | Are anchors required by manufacturer?                                                                                                                                                                                                                                                                        |
|   | A conventional wellhead system will be employed. The wellhead and connection to the BOPE will meet all API 6A requirements. The BOP will be tested per Onshore Order #2 after installation on the surface casing which will cover testing requirements for a maximum of 30 days.<br>See attached schematics. |

**5. BOP Break Testing Request**

Spur Energy Partners LLC requests permission to adjust the BOP break testing requirements as follows:

BOP break test under the following conditions:

- After a full BOP test is conducted
- When skidding to drill the production section, where the surface casing point is shallower than the 3 Bone Spring or 10,000 TVD.
- When skidding to drill a production section that does not penetrate the 3<sup>rd</sup> Bone Spring or deeper.

If the kill line is broken prior to skid, four tests will be performed.

- 1) The void between the wellhead and the spool (this consists of two tests)
- 2) The spool between the kill lines and the choke manifold (this consists of two tests)

If the kill line is not broken prior to skid, two tests will be performed.

- 1) The void between the wellhead and the pipe rams

**6. Mud Program**

Sufficient mud materials to maintain mud properties and meet minimum lost circulation and weight increase requirements will be kept on location at all times. The following is a general list of products: Barite, Bentonite, Gypsum, Lime, Soda Ash, Caustic Soda, Nut Plug, Cedar Fiber, Cotton Seed Hulls, Drilling Paper, Salt Water Clay, CACL2. Spur will use a closed mud system.

| Depth     |         | Type            | Weight (ppg) | Viscosity | Water Loss |
|-----------|---------|-----------------|--------------|-----------|------------|
| From (ft) | To (ft) |                 |              |           |            |
| 0         | 450     | Water-Based Mud | 8.6-8.9      | 32-36     | N/C        |
| 450       | 2200    | Brine           | 9.0-10.0     | 32-36     | N/C        |
| 2200      | 12402   | Brine           | 9.0-10.0     | 32-36     | N/C        |

|                                                         |                             |
|---------------------------------------------------------|-----------------------------|
| What will be used to monitor the loss or gain of fluid? | PVT/PASON/Visual Monitoring |
|---------------------------------------------------------|-----------------------------|

## Spur Energy Partners LLC – Ghost 16-15 State Com 70H

## 7. Logging and Testing Procedures

| Logging, Coring and Testing. |                                                                                                                                                         |          |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| Yes                          | Will run GR from TD to surface (horizontal well – vertical portion of hole). Stated logs run will be in the Completion Report and submitted to the BLM. |          |
| No                           | Logs are planned based on well control or offset log information.                                                                                       |          |
| No                           | Drill stem test? If yes, explain                                                                                                                        |          |
| No                           | Coring? If yes, explain                                                                                                                                 |          |
| Additional logs planned      | Interval                                                                                                                                                |          |
| No                           | Resistivity                                                                                                                                             |          |
| No                           | Density                                                                                                                                                 |          |
| No                           | CBL                                                                                                                                                     |          |
| Yes                          | Mud log                                                                                                                                                 | ICP - TD |
| No                           | PEX                                                                                                                                                     |          |

## 8. Drilling Conditions

Pump high viscosity sweeps as needed for hole cleaning. The mud system will be monitored visually/manually as well as with an electronic PVT. The necessary mud products for additional weight and fluid loss control will be on location at all times. Appropriately weighted mud will be used to isolate potential gas, oil, and water zones until such time as casing can be cemented into place for zonal isolation.

|                                                                                                                                                                                                                                                                                                                                                              |                                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Hydrogen Sulfide (H <sub>2</sub> S) monitors will be installed prior to drilling out the surface shoe. If H <sub>2</sub> S is detected in concentrations greater than 100 ppm, the operator will comply with the provisions of Onshore Oil and Gas Order #6. If Hydrogen Sulfide is encountered, measured values and formations will be provided to the BLM. |                                |
| N                                                                                                                                                                                                                                                                                                                                                            | H <sub>2</sub> S is present    |
| Y                                                                                                                                                                                                                                                                                                                                                            | H <sub>2</sub> S Plan attached |

Total estimated cuttings volume: 1097.3 bbls.

**Spur Energy Partners LLC – Ghost 16-15 State Com 70H****9. Other facets of operation**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Yes/No</b> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| Will more than one drilling rig be used for drilling operations? If yes, describe. Spur Energy Partners LLC. requests the option to contract a Surface Rig to drill, set surface/intermediate casing, and cement for this well. If the timing between rigs is such that Spur Energy Partners LLC. would not be able to preset surface, the Primary Rig will MIRU and drill the well in its entirety per the APD. Please see the attached document for information on the spudder rig. | Yes           |

## Attachments

- ☒ Directional Plan  
☒ H2S Contingency Plan  
☒ Akita 57 Attachments  
☒ BOP Schematics  
☒ Transcend Spudder Rig Attachments

**10. Company Personnel**

| <b>Name</b>        | <b>Title</b>                     | <b>Office Phone</b> | <b>Mobile Phone</b> |
|--------------------|----------------------------------|---------------------|---------------------|
| Christopher Hollis | Drilling Manager                 | 832-930-8629        | 713-380-7754        |
| Johnny Nabors      | Senior Vice President Operations | 832-930-8502        | 281-904-8811        |

## Pecos District

### Application for Permit to Drill

### Conditions of Approval

#### Geology Concerns

|            |                                          |                                          |                                        |
|------------|------------------------------------------|------------------------------------------|----------------------------------------|
| Potash     | <input checked="" type="checkbox"/> None | <input type="checkbox"/> Secretary       | <input type="checkbox"/> R-111-P       |
| Cave/Karst | <input type="checkbox"/> Medium          | <input checked="" type="checkbox"/> High | <input type="checkbox"/> Critical      |
| H2S        | <input checked="" type="checkbox"/> None | <input type="checkbox"/> Below 100 PPM   | <input type="checkbox"/> Above 100 PPM |
| Other      | <input type="checkbox"/> 4 String Area   | <input type="checkbox"/> Capitan Reef    | <input type="checkbox"/> SWD Well      |

Note: The geology of the area where the well is being drilled determines the COAs that apply, not the above table.

#### Additional Engineering Requirements

Surface casing must be set at: 450 feet

Intermediate casing must be set at: 2,135 feet

#### General Requirements

1. Changes to the approved APD casing program need prior approval.
2. The Bureau of Land Management (BLM) will be notified in advance for a representative to witness:
  - a. Well spudding (minimum of 24 hours notice)
  - b. Setting and/or cementing of all casing strings (minimum of 4 hours notice)
  - c. BOPE tests (minimum of 4 hours notice)

#### Eddy County

620 East Greene Street, Carlsbad, NM 88220

(575) 361-2822

BLM\_NM\_CFO\_DrillingNotifications@BLM.GOV

#### Lea County

414 West Taylor, Hobbs, NM 88240

(575) 689-5981

3. The initial wellhead installed on the well will remain on the well with spools used as needed.
4. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.

- a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig:
    - i. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
  - b. When the operator proposes to set surface casing with a Spudder Rig:
    - i. Notify the BLM when moving in and removing the Spudder Rig.
    - ii. Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
    - iii. BOP/BOPE test to be conducted per 43 CFR 3172.6 as soon as 2nd Rig is rigged up on well.
5. Floor controls are required for 3M or greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller, and will always be operational during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table or the area immediately above the substructure on which the draw works are located (this does not include the doghouse or stairway area).
6. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well – vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

### **Pressure Control**

1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in 43 CFR 3172.6 and API STD 53 Sec. 5.3.
2. 5M or higher systems require an HCR valve, remote kill line, and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
3. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
  - a. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE, and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
  - b. The results of the test shall be reported to the appropriate BLM office.
  - c. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.

- d. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
  - e. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per 43 CFR 3172.6(b)(9).
  - f. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead when specified), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).
  - g. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the plug. However, no tests shall commence until the cement has had a minimum of 24 hours setup time.
  - h. The tests shall be done by an independent service company utilizing a test plug, not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to 43 CFR 3172 with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for water basin (8 hours) or potash (24 hours) or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
4. If the operator has proposed using a 5,000 (5M) Annular on a 10M BOP:
- a. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be 10,000 (10M) psi.
5. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
- a. Wellhead shall be installed by manufacturer's representatives (submit documentation with subsequent sundry).

- b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
  - c. Manufacturer representative shall install the test plug for the initial BOP test.
  - d. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172 must be followed.
  - e. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed, and another wellhead installed.
6. If a variance is approved for break testing the BOPE, the following requirements apply:
- a. BOPE break testing is only approved for a BOP rated at 5M or less.
  - b. Approval is only for the intermediate hole sections, so long as those sections do not go deeper than the Bone Springs formation.
  - c. The Annular Preventer must be tested to a minimum of 70% of BOPE working pressure and shall be higher than the MASP.
  - d. A full BOP test shall be performed every 21 days (at a minimum).
  - e. A full BOP test is required prior to drilling the first intermediate hole section (if applicable). If any subsequent intermediate hole interval is deeper than the first, a full BOP test shall be required (a maximum 200 foot difference in true vertical depth (TVD) is allowed).
  - f. BOPE break testing is not permitted for drilling the production hole section.
  - g. While in transfer, the BOP shall be secured by the hydraulic carrier or cradle.
  - h. If any repairs or replacements of the BOPE is required, the BOPE shall be tested as required by 43 CFR 3172.
  - i. Pressure tests shall be performed on any BOPE components that have been disconnected. A low pressure (250-300 psi) and a high pressure (BOP max pressure rating) test are required.
  - j. If a testing plug is used, pressure shall be maintained for at least 10 minutes. If there is any bleed off in pressure, the test shall be considered to have failed.
  - k. If no testing plug is used, pressure shall be maintained for at least 30 minutes. If there is a decline in pressure of more than 10 percent, the test shall be considered to have failed.
  - l. The appropriate Bureau of Land Management (BLM) office shall be notified a minimum of 4 hours before testing occurs.
  - m. Any well control event while drilling require notification to the BLM Petroleum Engineer (575-706-2779) prior to the commencement of any BOPE Break Testing operations.
  - n. If break testing is not used, then a full BOPE test shall be conducted.
7. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply:
- a. The flex line must meet the requirements of API 16C.

- b. Check condition of flexible line from BOP to choke manifold (replace if exterior is damaged or if line fails test).
- c. Line is to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements.
- d. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating.
- e. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, shall be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.

### **Casing and Cement**

1. Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.).
2. On any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. The formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
3. Provide compressive strengths (including hours to reach required 500 pounds compressive strength) prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
4. The surface casing shall be set at a minimum of 25 feet into the Rustler Anhydrite and 80 feet above the salt and cemented to the surface.
  - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
  - b. Wait on cement (WOC) time for a primary cement job will be a minimum of 8 hours (or 24 hours in the Potash Area) or 500 pounds compressive strength, whichever is greater. (This is to include the lead cement)
  - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
  - d. If cement falls back, remedial cementing will be done prior to drilling out that string.

5. Intermediate casing must be kept fluid filled to meet BLM minimum collapse requirement.
6. Intermediate casing must be cemented to surface. For medium/high cave/karst, potash, and Capitan Reef, wait on cement (WOC) time for a primary cement job is to include the lead cement slurry.
7. The production cement should tie-back at least 200 feet (500 feet in Secretary Potash, surface in R-111-P potash) into previous casing string. Operator shall provide method of verification.
8. Production liner cement should tie-back at least 100 feet into previous casing string. Operator shall provide verification of cement top.
9. In WIPP Areas, cement must come to surface on the first three casing strings.
10. If cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
11. No pea gravel permitted for remedial cement or fall back remedial cement without prior authorization from a BLM petroleum engineer.
12. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.
13. DV tools:
  - a. First stage to DV tool (The DV tool may be cancelled if cement circulates to surface on the first stage):
    - i. Cement to circulate. If cement does not circulate off the DV tool, contact the appropriate BLM office before proceeding with second stage cement job.
  - b. Second stage above DV tool:
    - i. For intermediate casing, cement to surface.
    - ii. For production casing, cement should tie-back at least 200 feet (500 feet in Secretary Potash, surface in R-111-P potash) into previous casing string. Operator shall provide method of verification.
    - iii. If cement does not circulate, contact the appropriate BLM office.

## 14. Potash Areas:

- a. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry.
- b. After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met:
  - i. Cement reaches a minimum compressive strength of 500 psi for all cement blends
  - ii. Until cement has been in place at least 24 hours.
- c. WOC time will be recorded in the driller's log.
- d. Whenever a casing string is cemented in the R-111-P potash area, the NMOCD requirements shall be followed.
- e. In R111 Potash Areas, if cement does not circulate to surface on the first two salt protection casing strings, the cement on the 3rd casing salt string must come to surface.
- f. In Secretary Potash Areas, if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.

## 15. Wait on cement (WOC) for Water Basin:

- a. After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met:
  - i. Cement reaches a minimum compressive strength of 500 psi at the shoe
  - ii. Until cement has been in place at least 8 hours.
- b. WOC time will be recorded in the driller's log.

## 16. Medium/High/Critical Cave/Karst Areas:

- a. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry.
- b. In Critical Cave/Karst Areas cement must come to surface on the first three casing strings.
- c. In Medium and High Cave/Karst Areas, if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.
- d. In Critical Cave/Karst Areas, if cement does not circulate to surface on the first three casing strings, the cement on the 4th casing string must come to surface.

**Drilling Mud**

1. Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation and shall be used until production casing is run and cemented.

**Waste Material and Fluids**

1. All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion operations shall be safely contained and

disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area.

2. Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

### **Special Requirements**

1. Communitization Agreement
  - a. The operator will submit a Communitization Agreement to the Santa Fe Office (301 Dinosaur Trail, Santa Fe, NM 87508), at least 90 days before the anticipated date of first production from a well subject to a spacing order issued by the New Mexico Oil Conservation Division.
  - b. The Communitization Agreement will include the signatures of all working interest owners in all Federal and Indian leases subject to the Communitization Agreement (i.e., operating rights owners and lessees of record), or certification that the operator has obtained the written signatures of all such owners and will make those signatures available to the BLM immediately upon request.
    - i. The operator will submit an as-drilled survey well plat of the well completion, but are not limited to, those specified in 43 CFR 3171 and 3172.
    - ii. If the operator does not comply with this condition of approval, the BLM may take enforcement actions that include, but are not limited to, those specified in 43 CFR 3163.1.
  - c. In addition, the well sign shall include the surface and bottom hole lease numbers.
    - i. When the Communitization Agreement number is known, it shall also be on the sign.
2. Unit Wells
  - a. The well sign for a unit well shall include the unit number in addition to the surface and bottom hole lease numbers. This also applies to participating area numbers.
    - i. If a participating area has not been established, the operator can use the general unit designation, but will replace the unit number with the participating area number when the sign is replaced.
  - b. Commercial Well Determination
    - i. A commercial well determination shall be submitted after production has been established for at least six months (this is not necessary for secondary recovery unit wells).
3. Hydrogen Sulfide (H<sub>2</sub>S)
  - a. If H<sub>2</sub>S is encountered, provide measured values and formations to the BLM.
  - b. An H<sub>2</sub>S area must meet 43 CFR 3176 requirements, which includes equipment and personnel/public protection items.

- c. An H2S Drilling Plan shall be activated 500 feet prior to drilling into any formation designated as having H2S.
  - d. Hydrogen Sulfide monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet 43 CFR 3176 requirements, which includes equipment and personnel/public protection items.
4. Capitan Reef
- a. If lost circulation (50% or greater) occurs below the Base of the Salt, the operator shall do the following (Use this for 3 string wells in the Capitan Reef, if it is a 4 string well ensure fresh water based mud is used across the Capitan interval):
    - i. Switch to fresh water mud to protect the Capitan Reef and use fresh water mud until setting the intermediate casing. The appropriate BLM office is to be notified for a PET to witness the switch to fresh water.
    - ii. Daily drilling reports from the Base of the Salt to the setting of the intermediate casing are to be submitted to the BLM CFO engineering staff via e-mail by 0800 hours each morning. Any lost circulation encountered is to be recorded on these drilling reports.
    - iii. The daily drilling report should show mud volume per shift/tour.
    - iv. Failure to submit these reports will result in an Incidence of Non-Compliance being issued for failure to comply with the Conditions of Approval.
    - v. If not already planned, the operator shall run a caliper survey for the intermediate well bore and submit to the appropriate BLM office.
5. Salt Water Disposal Wells
- a. The operator shall supply the BLM with a copy of a mudlog over the permitted disposal interval and estimated in situ water salinity based on open-hole logs.
  - b. If hydrocarbons are encountered while drilling, the operator shall notify the BLM.
  - c. The operator shall provide to the BLM a summary of formation depth picks based on mudlog and geophysical logs along with a copy of the mudlog and open-hole logs from total depth to top of Devonian.
  - d. An NOI sundry with the completion procedure for this well shall be submitted and approved prior to commencing completion work. The procedure will be reviewed to verify that the completion proposal will allow the operator to:
    - i. Properly evaluate the injection zone utilizing open-hole logs, swab testing and/or any other method to confirm that hydrocarbons cannot be produced in paying quantities. This evaluation shall be reviewed by the BLM prior to injection commencing.
    - ii. Restrict the injection fluid to the approved formation.
    - iii. If a step rate test will be run, an NOI sundry shall be submitted to the BLM for approval.

- e. If off-lease water will be disposed in this well, the operator shall provide proof of right-of-way approval.
6. WIPP Requirements
- a. If the proposed surface well or bottom hole is located within 330 feet of the WIPP Land Withdrawal Area boundary:
    - i. Daily drilling reports, logs, and deviation survey information are required to be submitted to the Bureau of Land Management Engineering Department and the U.S. Department of Energy (per requirements of the Joint Powers Agreement) until a total vertical depth of 7,000 feet is reached. These reports will have at a minimum the rate of penetration and a clearly marked section showing the deviation for each 500-foot interval. Operator may be required to do more frequent deviation surveys based on the daily information submitted and may be required to take other corrective measures.
    - ii. Information will also be provided to the New Mexico Oil Conservation Division after drilling activities have been completed.
    - iii. Upon completion of the well, the operator shall submit a complete directional survey.
    - iv. Any future entry into the well for purposes of completing additional drilling will require supplemental information.
  - b. Required information shall be emailed to OilGasReports@wipp.ws.
    - i. Attached files must not be greater than 20 MB.
    - ii. Call WIPP Tech Support at 575-234-7422, during the hours of 7:00am to 4:30pm, if there are any issues sending to this address.



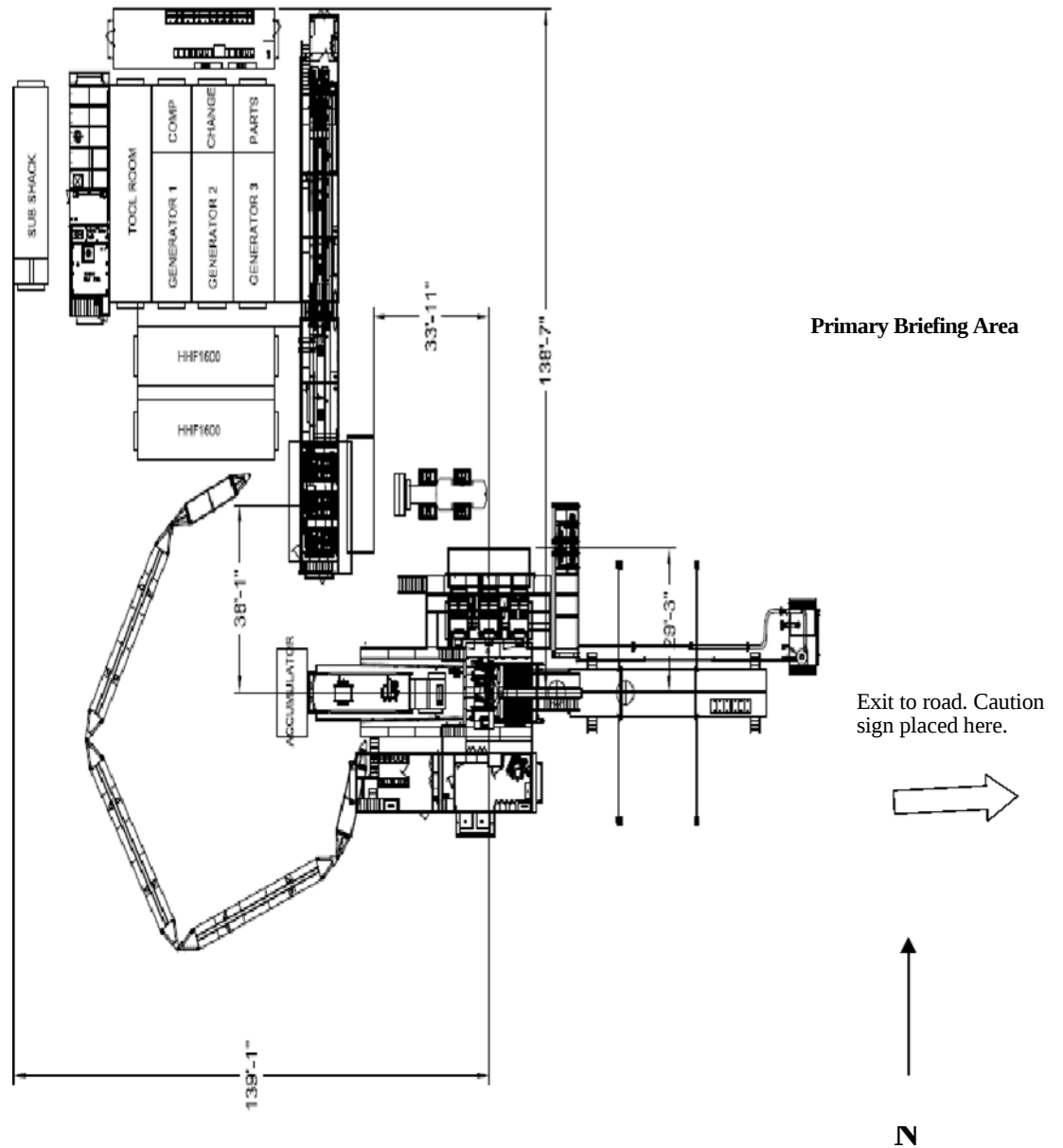
## **Permian Drilling Hydrogen Sulfide Drilling Operations Plan Ghost 16 15 State Com Development**

Open drill site. No homes or buildings are near the proposed location.

### **1. Escape**

Personnel shall escape upwind of wellbore in the event of an emergency gas release. Escape can take place through the lease road on the Southeast side of the location. Personnel need to move to a safe distance and block the entrance to location. If the primary route is not an option due to the wind direction, then a secondary egress route should be taken.

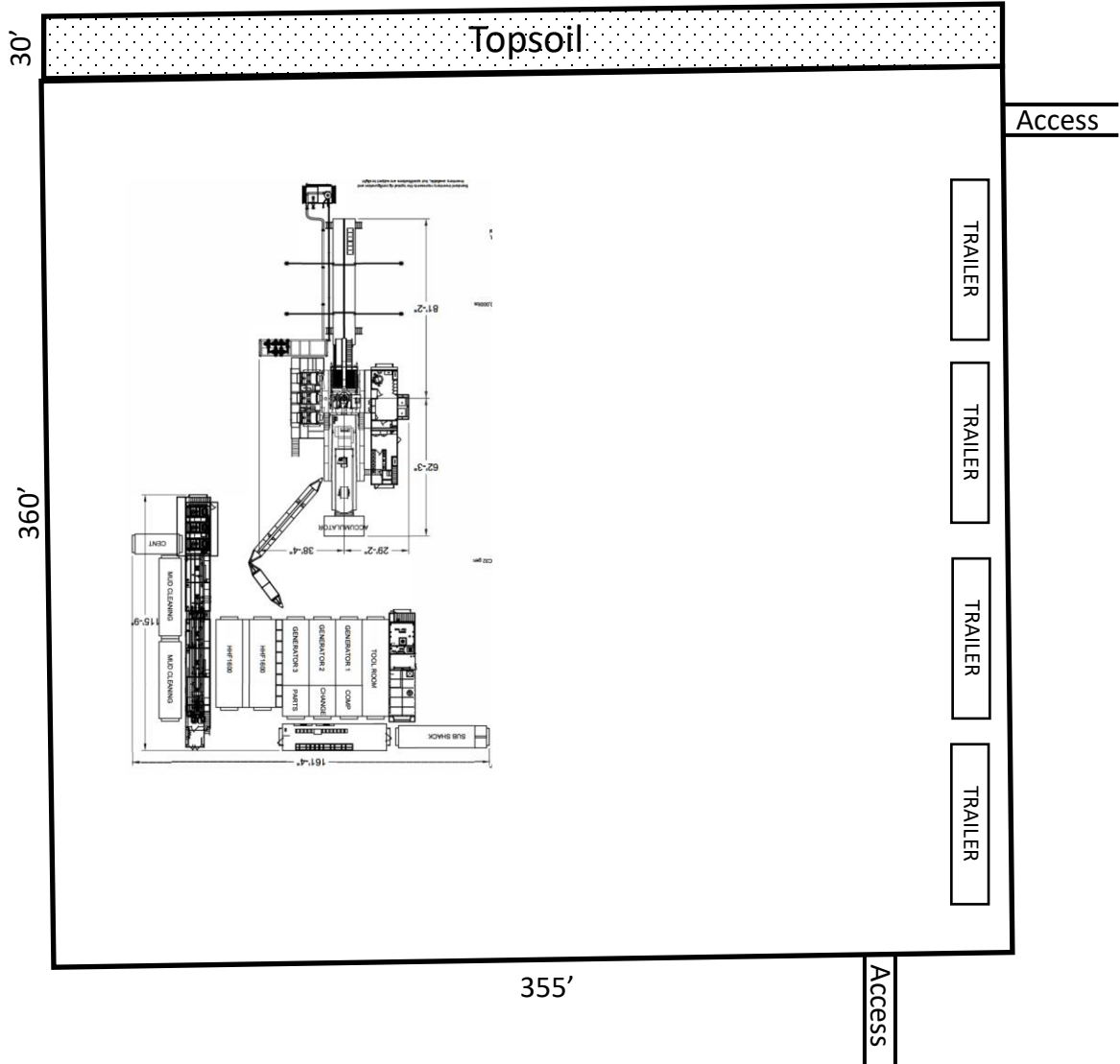
Secondary Briefing Area



WIND: Prevailing winds are from the Southwest

Secondary Egress

Spur Energy Partners, LLC  
Ghost 16 15 State Com  
North Pad  
Rig Diagram



\* Not to scale



# RIG # 57<sub>1,150 HP Double Mast Drilling Rig</sub>

## SUBSTRUCTURE

One Piece Step Down  
Floor Height: 18' 9" (on 4' pony sub moving system)  
Clear Height (beneath rotary beams): 15' 5"  
Rotary Capacity: 400,000 lbf  
Max Pipe Setback: 400,000 lbf

Note: All floor heights above are based on the substructure sitting on 6" mats & 4' pony sub moving system

## MAST

106' telescoping, Drill Line: 1-1/8"  
Static Hook Load: 440,000 lbf  
Racking Capacity: 18,000' of 4" DP, 12,500' of 5" DP

## DRAWWORKS

TSM 850 425,000lbs w/ 10 Lines  
Input Power: 1,150 hp AC traction motor  
Main Brake: 1,150 hp AC traction motor (Dynamic)  
Aux Parking Brake: Eaton brake & drum / band brake system

## TOP DRIVE

Tesco EXI 600 AC 350 Ton: Max speed 220 rpm,  
Continuous Drill Torque: 30,000 ft-lbs  
Max Torque (Make / Break): 45,000 ft-lbs  
600 hp AC induction motor & drive system with PLC  
250 Ton 5 x 36" Becket Block Assembly

## IRON ROUGHNECK

NOV ST-90C Conn Range: 4 1/4" to 8 1/2"  
Spin Speed: 75 rpm nominal on 5" drill pipe  
Spin Torque: 1,750 ft-lbs  
Maximum Make-up torque: 60,000 ft-lbs  
Maximum Break-out torque: 80,000 ft-lbs

## ROTARY TABLE

National 27 1/2" 500 Ton with hydraulic drive to position tools only  
27 1/2" Diameter opening

## POWER SYSTEM

VFD, MCC, Eaton Drives, Current Power Systems Controls, three Caterpillar C32 gen sets, 1220 BHP.

## MUD PUMP #1

HHF1600 Triplex Rated Power: 1600 hp  
Stroke: 12"  
Input Power: 1500 hp AC traction motor  
Pressure Rating: 5000 psi

## MUD PUMP #2

HHF1600 Triplex Rated Power: 1600 hp  
Stroke: 12"  
Input Power: 1500 hp AC traction motor  
Pressure Rating: 5000 psi

## MUD TANKS

Two Tank system w/ 1200 bbls total capacity  
Shakers: Three MI Swaco Mongoose 4 panel dual motion  
Mud Gas Separator: MI Swaco 4' OD x 12' tall  
Pill Tank: 54 bbls

## MUD SYSTEM

5000 psi Max Pressure  
5" Main plumbing and standpipe

## SCALPING TANK

Main Tank: 186 bbls capacity  
Trip Tank: 24 bbls capacity  
Shakers: Three NOV Venom shakers dual motion

## BOP (NACE)

11" x 5000 psi WP Spherical Annular  
11" x 5000 psi WP Double Ram  
11" x 5000 psi WP Single Ram (Optional)

## MANIFOLD

3-1/8" 5,000 psi c/w two 3 1/8" manual chokes

## ACCUMULATOR

CTI: 160 gal 6 station 3000 psi, c/w N2 Backup & electric triplex pump

## CATWALK

Ja-co Power Catwalk, tubular max length 47' 6", max OD 13 5/8", max weight 10,000lbs

## TUBULARS

Drill Pipe: Supplied as needed, per availability  
Drill Collars & heavywate: Supplied as needed, per availability

## MISC.

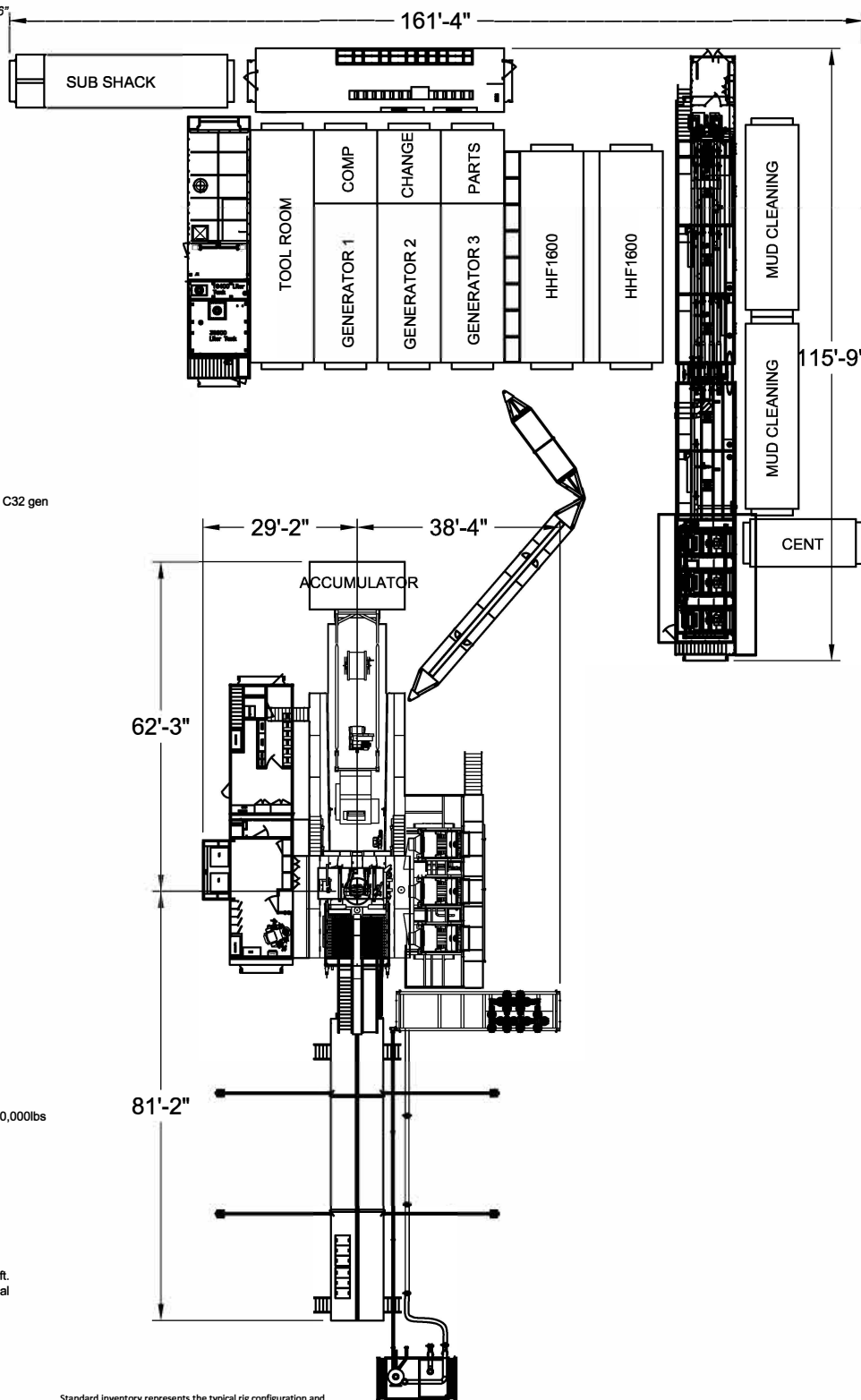
Water Tank: 409 bbls; Fuel Tank 189 bbls; Screw Compressor  
Boiler: 125 hp with Full Winterization

## MOVING SYSTEM:

Walking beam hydraulic pony sub moving system for linear motion & side shift.  
350' of Utility Suitcase style [50' lengths] connection for hydraulic and electrical supply.

## TOOL/ STORAGE/ CAMP

Parts Storage Room and Tool House Room  
Rig Manage Trailer: 14' x 44' skid mounted

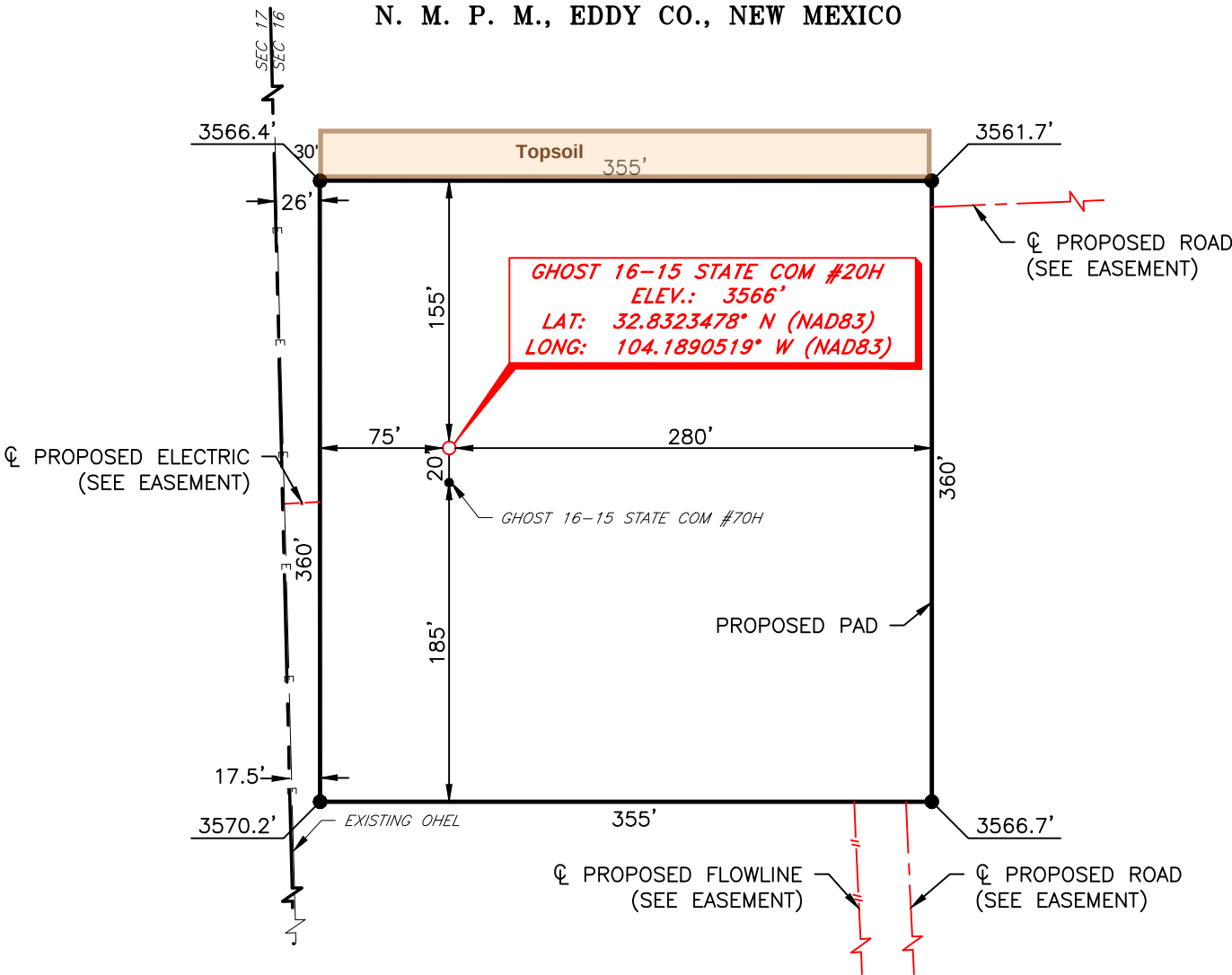


Standard inventory represents the typical rig configuration and inventory available, but specifications are subject to slight modifications from time to time due to customer requirements.

All ratings quoted herein are manufacturer specifications. AKITA's normal operating parameters are 90% of manufacturer mast ratings and 80% of mud pump manufacturer pressure rating. Operation of rig equipment beyond these parameters requires approval from AKITA field office management.

© AKITA DRILLING August, 2020

SPUR ENERGY PARTNERS LLC.  
GHOST 16-15 STATE COM #20H  
(1975' FSL & 97' FWL)  
SECTION 16, T17S, R28E  
N. M. P. M., EDDY CO., NEW MEXICO



DIRECTIONS TO LOCATION

From the intersection of U.S. Hwy 82 (Lovington Hwy) & N. M. HWY 360 (Bluestem Rd.);  
Go West on U.S. HWY 82 approx. 1.0 miles to a lease road on the right;  
Turn right and go North approx. 1.1 miles to a "Y";  
Keep right at "Y" Northeast approx. 1.5 miles to a lease road on the left;  
Turn left and go West approx. 0.5 miles to a proposed road;  
Continue West on proposed road approx. 360 feet to location on the left.

THIS IS NOT A BOUNDARY SURVEY, APPARENT PROPERTY CORNERS AND  
PROPERTY LINES ARE SHOWN FOR INFORMATION ONLY.

I, Dale E. Bell, New Mexico Professional Surveyor No. 14400, do  
hereby certify that this 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, said survey and  
plat meets the Minimum Standards for Land Surveying in the State  
of New Mexico and that it is true and correct to the best of my  
knowledge and belief.

Dale E. Bell NM PS 14400

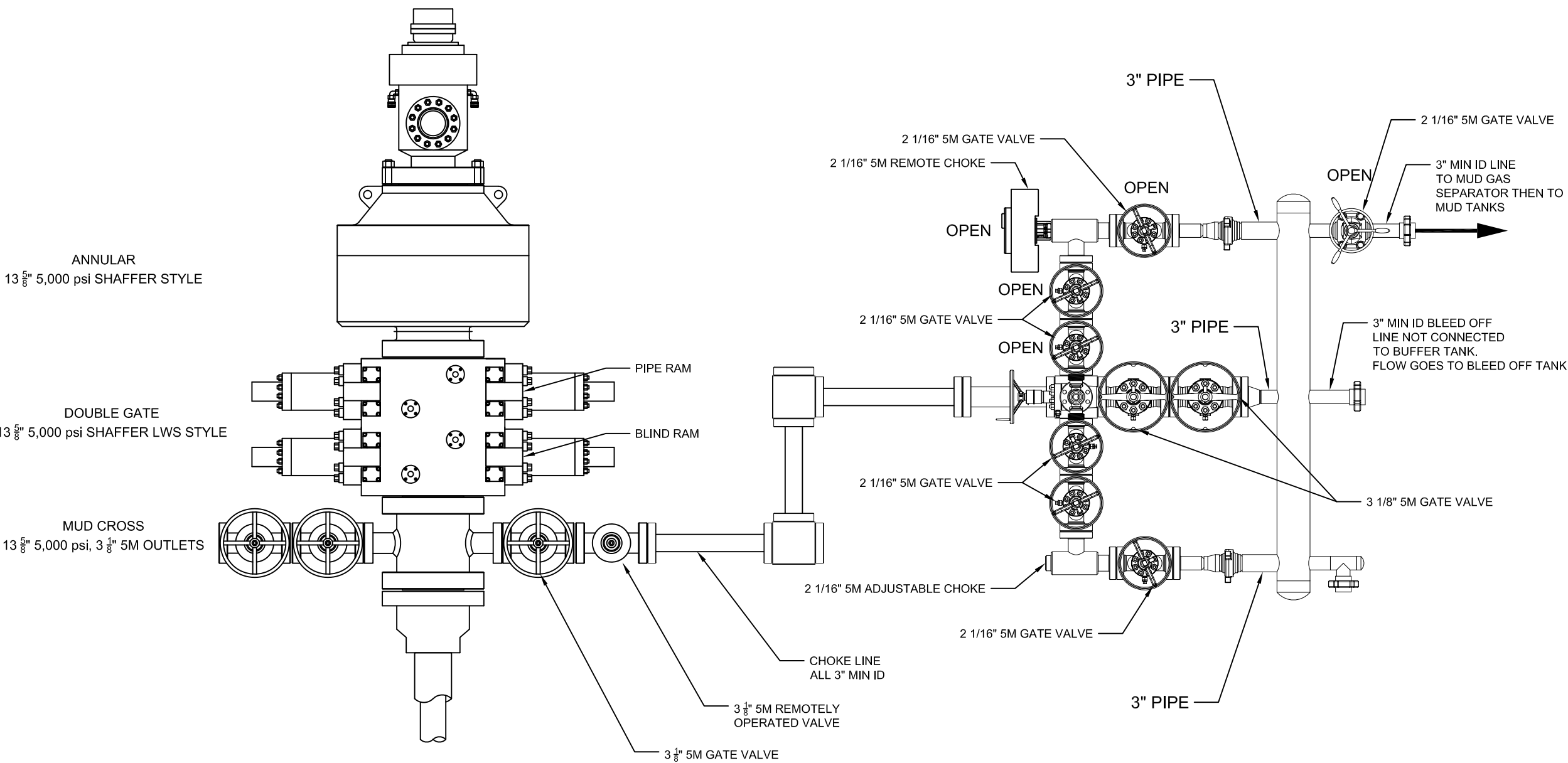


SCALE: 1" = 100'  
0 50 100  
BEARINGS ARE  
NAD 83 GRID - NM EAST  
DISTANCES ARE  
GROUND.

|           |            |      |
|-----------|------------|------|
| NO.       | REVISION   | DATE |
| JOB NO.:  | LS25020150 |      |
| DWG. NO.: | 25020150-5 |      |



|                    |
|--------------------|
| SCALE: 1" = 100'   |
| DATE: 03/25/2025   |
| SURVEYED BY: RG/HA |
| DRAWN BY: RQ       |
| APPROVED BY: DEB   |
| SHEET: 1 OF 1      |



Notes  
-  
-  
-

| No. | Revision | Date |
|-----|----------|------|
|     |          |      |



**AKITA**  
DRILLING LTD.  
2302 8th Street, Nisku Alberta  
T9E 7Z2 Tel: (780) 955-6700

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|                |          |           |                 |
|----------------|----------|-----------|-----------------|
| Date           | 5-6-2021 | Scale     | NTS             |
| Des / Chk'd By | BG       | File Name | R57 13 5M dou.. |
| Project        | R57      |           |                 |

RIG 57 BOP SCHEMATIC

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

ACKNOWLEDGMENTS  
  
Action 514058

ACKNOWLEDGMENTS

|                                                                                     |                                                                           |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| Operator:<br><br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br><br>328947                                                      |
|                                                                                     | Action Number:<br><br>514058                                              |
|                                                                                     | Action Type:<br><br>[C-101] BLM - Federal/Indian Land Lease (Form 3160-3) |

ACKNOWLEDGMENTS

|                                     |                                                                                                                            |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | I hereby certify that no additives containing PFAS chemicals will be added to the completion or recompletion of this well. |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------|

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

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

CONDITIONS

Action 514058

**CONDITIONS**

|                                                                                 |                                                                       |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                      |
|                                                                                 | Action Number:<br>514058                                              |
|                                                                                 | Action Type:<br>[C-101] BLM - Federal/Indian Land Lease (Form 3160-3) |

**CONDITIONS**

| Created By  | Condition                                                                                                                                                                                                                                                             | Condition Date |
|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| schapman01  | Cement is required to circulate on both surface and intermediate1 strings of casing.                                                                                                                                                                                  | 10/10/2025     |
| schapman01  | If cement does not circulate on any string, a Cement Bond Log (CBL) is required for that string of casing.                                                                                                                                                            | 10/10/2025     |
| ward.rikala | Notify the OCD 24 hours prior to casing & cement.                                                                                                                                                                                                                     | 10/29/2025     |
| ward.rikala | File As Drilled C-102 and a directional Survey with C-104 completion packet.                                                                                                                                                                                          | 10/29/2025     |
| ward.rikala | Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the operator shall drill without interruption through the fresh water zone or zones and shall immediately set in cement the water protection string. | 10/29/2025     |
| ward.rikala | Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the oil or diesel. This includes synthetic oils. Oil based mud, drilling fluids and solids must be contained in a steel closed loop system.                  | 10/29/2025     |