

DATE IN 5/22/12 SUSPENSE 6-7 ENGINEER DB LOGGED IN 5/22/12 TYPE NSL APP NO. 121435 ~~121435~~

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -

1220 South St. Francis Drive, Santa Fe, NM 87505



Oxy USA 11096

ROO

State #8

ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Application Acronyms:

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
[DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
[PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
[WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
[SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
[EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication
☒ NSL ☐ NSP ☐ SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

- [D] Other: Specify _____

C-21-175-78E
2012 MAY 22 2:03
RECEIVED

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☐ Does Not Apply

- [A] ☒ Working, Royalty or Overriding Royalty Interest Owners
[B] ☐ Offset Operators, Leaseholders or Surface Owner
[C] ☐ Application is One Which Requires Published Legal Notice
[D] ☐ Notification and/or Concurrent Approval by BLM or SLO
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
[E] ☐ For all of the above, Proof of Notification or Publication is Attached, and/or,
[F] ☒ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Jennifer Duarte

Print or Type Name

Jennifer Duarte
Signature

Regulatory Analyst

Title

5-17-2012

Date

Jennifer.duarte@oxy.com
e-mail Address



OXY USA WTP Limited Partnership
A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.513.6640 Fax: 713.985.8849
Jennifer_duarte@oxy.com

May 17, 2012

Re: Application for Administrative Approval
for Non-Standard Location
Roo 22 State #8
30-015-39654
SL: 408' FNL & 1510' FWL
C, Sec 21, T17S, R28E
Eddy County, New Mexico

Dear Mr. David Brooks:


OXY USA WTP Limited Partnership ("OXY") respectfully request approval under rule 104 (F) of this application for the subject non-standard well location on the Roo 22 State #8. This well encroaches other wells that have the same working interest partners. In the attached documentation, you will find our notifications and the waivers that we have received back. It has been over 21 days since notifications were sent out and we ask that you proceed with approval of the Non-Standard location.

Please review the attached application and its supporting documentation for determination of approval. If you have any questions or should you need any further information, please do not hesitate to contact me.

Thank you in advance for your time.

Very Truly Yours,

OXY USA WTP Limited Partnership


Jennifer Duarte
Regulatory Analyst

District I
1425 N. French Dr., Hobbs, NM 88240
Phone:(505) 593-6161 Fax:(505) 593-6720
District II
811 S. First St., Artesia, NM 88210
Phone:(505) 746-1263 Fax:(505) 746-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6176 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

Form C-161
August 1, 2011
Permit 140414

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address OXY USA WTP LIMITED PARTNERSHIP PO Box 4294 Houston, TX 77210		2. OGRID Number 192463
		3. API Number 30-015-39654
4. Property Code 309603	5. Property Name ROO 22 STATE	6. Well No. 008

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
C	22	17S	28E	C	408	N	1510	W	EDDY

8. Pool Information

EMPIRE; GLORIETA-YESO	96210
-----------------------	-------

Additional Well Information

9. Work Type New Well	10. Well Type OIL	11. Cable-Rotary	12. Lease Type State	13. Ground Level Elevation 5545
14. Multiple N	15. Proposed Depth 5200	16. Formation Yeso Formation	17. Contractor	18. Spud Date 12/20/2011
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

19. Proposed Casing and Cement Program

Type	Hole Size	Casing Type	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	12.25	9.625	36	400	250	
Prod	8.75	5.5	17	5200	2080	

Casing/Cement Program: Additional Comments

Additional information will be sent with C-144 CLEZ

Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
DoubleRam	3000	3000	

I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify that the drilling pit will be constructed according to NMOCD guidelines, a general permit, or an (attached) alternative OCD-approved plan.	OIL CONSERVATION DIVISION	
	Approved By: Randy Dade	
	Title: District Supervisor	
	Approved Date: 11/21/2011	Expiration Date: 11/21/2013
	Conditions of Approval Attached	

Printed Name: Electronically filed by KAREN M SINARD
Title:
Email Address: karen_sinard@oxy.com
Date: 11/17/2011
Phone: 713-366-5485

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-102
Revised October 12, 2005
Submit to Appropriate District Office
State Lease-4 Copies
Fee Lease-3 Copies

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number 30-05-	Pool Code 96210	Pool Name Empire Glorietta Yeso
Property Code 30A603	Property Name R00 22 STATE	Well Number 8
Order No. 192463	Operator Name OXY USA WTP Limited Partnership	Elevation 3544.9'

Surface Location									
UL or lot no.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
C	22	17 SOUTH	28 EAST, N.M.P.M.	408'	NORTH	1510'	WEST	EDDY	

Bottom Hole Location If Different From Surface									
UL or lot no.	Section	Township	Range	Lot No.	Feet from the	North/South line	Feet from the	East/West line	County
Dedicated Acres 40		Joint or Int'l N		Consolidation Code		Order No.			

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.

	<p>OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>Signature: <i>[Signature]</i> Date: 10/14/11</p> <p>Printed Name: David Stewart-Rog. Advisor</p>
	<p>SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes and actual survey made by me or under my supervision and that the same is true and correct to the best of my belief.</p> <p>Date of Survey: SEPTEMBER 28, 2011</p> <p>Signature: <i>[Signature]</i> Seal of Professional Surveyor: 15079</p> <p>Certificate Number: 15079</p> <p>NO. 110928M - e (K)</p>

Permit Comments

Operator: OXY USA WTP LIMITED PARTNERSHIP, 192463

Well: ROO 22 STATE #008

API: 30-015-39654

Created By	Comment	Comment Date
CSHAPARD	Land s/E	11/21/2011

Permit Conditions of Approval

Operator: OXY USA WTP LIMITED PARTNERSHIP , 192463

Well: ROO 22 STATE #008

API: 30-015-39654

OCD Reviewer	Condition
CSHAPARD	Will require administrative order for non-standard location
CSHAPARD	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

Barnett, Colin D

From: Barnett, Colin D
Sent: Friday, April 13, 2012 3:50 PM
To: Larry Wyont; Ricky Haikin; bobmun@xcane.com; davidjandrews@sbcglobal.net; Sheila Shipp; Sean Johnson; Scarborough, Lee; sueanncraddock; Larry Risley
Subject: Roo State 22 #8 NSL



Scanned from a
Xerox multifunc...

Ladies and Gentlemen,

Good afternoon. We've recently learned that one of our Roo wells require a NSL approval. In order to speed up this approval process would you please execute the attached at your earliest convenience and return to my attention?

Thank you.

Colin D. Barnett, RPL
Landman
Occidental Permian Ltd.
Direct: 713.350.4933
Mobile: 713.501.7982
Fax: 713.985.8849
Colin_Barnett@Oxy.com



OXY USA Inc.

A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046

P.O. Box 4294, Houston, Texas 77210-4294

Direct: 713.350.4933 Fax: 713.985.8849

Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver

Roo 22 State #8

SL: 408' FNL & 1510' FWL

Section 22: NENW

Township 17 South, Range 28 East

Eddy County, New Mexico

Dear Partners:

It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Colin D. Barnett
Landman

_____, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: _____

Name: _____

Its: _____

Date: _____

WORKING INTEREST PARTNERS

✓ McCombs Energy LLC
5599 San Felipe, Ste. 1200
Houston, Texas 77056

✓ Voyager Gas Corporation
C/o CCEC Operating Co Agent
6630 Cypresswood Dr. #200
Spring, Texas 77379

Andrews Oil LP
C/o DJA LLC General Partner
Suite 300-A
1015 Bee Cave Woods Drive
Austin, Texas 78746

✓ COG Operating LLC
550 W. Texas Ave, Suite 100
Midland, Texas 79701
Attention: Lisa Eggemeyer

✓ ZPZ Delaware I LLC
303 Veterans Airpark Lane, Suite 3000
Midland, Texas 79705
(432) 818-1000
(432) 818-1190 Fax

✓ Chisos, Ltd.
670 Dona Ana Rd SW
Deming, NM 88030

✓ Cross Border Resources, Inc.
22610 US Hwy 281 North, Suite 218
San Antonio, Texas 78258



OXY USA Inc.

A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046

P.O. Box 4294, Houston, Texas 77210-4294

Direct: 713.350.4933 Fax: 713.885.8849

Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:

It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Colin D. Barnett
Landman

COG Operating LLC, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: COG Operating LLC
Name: David Evans
Its: New Mexico Land Lead

Date: 5-8-12



OXY USA Inc.
A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.350.4933 Fax: 713.885.8849
Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:


It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.


Colin D. Barnett
Landman

MCCOMBS ENERGY
LARRY WYONT
VICE PRESIDENT

_____, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: _____

Name: _____

Its: _____

Date: _____

4-13-12

MCCOMBS ENERGY
LARRY WYONT
VICE PRESIDENT



OXY USA Inc.
A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.350.4933 Fax: 713.985.8849
Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:


It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

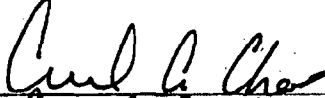
Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.


Colin D. Barnett
Landman

VORACEK GAS CORPORATION, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: 
Name: CARL A. CHASE
Its: VP

Date: APRIL 16, 2012



OXY USA Inc.

A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046

P.O. Box 4294, Houston, Texas 77210-4294

Direct: 713.350.4933 Fax: 713.985.8849

Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver

Roo 22 State #8

SL: 408' FNL & 1510' FWL

Section 22: NENW

Township 17 South, Range 28 East

Eddy County, New Mexico

Apache Corp.

APR 16 2012

Permian Land Dept.

Dear Partners:

It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Colin D. Barnett

Landman

ZPZ Delaware LLC

, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: Timothy R. Custer

Name: Timothy R. Custer

Its: Attorney-in-Fact

Date: 4/19/12



OXY USA Inc.

A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046

P.O. Box 4294, Houston, Texas 77210-4294

Direct: 713.350.4933 Fax: 713.985.8849

Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:

It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Colin D. Barnett
Landman

Cross Border Resources, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: Lawrence J. Rialley
Name: Lawrence J. Rialley
Its: President

Date: 4/16/2012



OXY USA Inc.

A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.350.4933 Fax: 713.985.8849
Colin_barnett@oxy.com

April 13, 2012

Re: NSL Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:

It has come to the attention of OXY USA Inc. ("OXY") that the referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Colin D. Barnett
Landman

Chisoso, LTD., hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: Sue Ann Craddock Date: 04/23/2012
Name: _____
Its: Sue Ann Craddock
President

Brooks, David K., EMNRD

From: Brooks, David K., EMNRD
Sent: Wednesday, May 30, 2012 3:32 PM
To: 'Jennifer_duarte@oxy.com'
Subject: ROO 22 State #8 - NSL application

Dear Ms. Duarte

I need to call your attention to certain issues with respect the referenced application.

First, the 20-day notification period for NSL applications begins from the date OCD receives the application. See Rule 19.15.15.13.D NMAC.

Second, the form of the notices you have sent, as evidenced by the letters attached to your application, does not comply with the requirements of 19.15.15.13.D NMAC, because it does not contain the required admonition that the application may be granted if no protest is received by OCD within the 20-day period. This defect does not affect the validity of the waivers you have attached. However, it seems there is one party on your notice list for whom you have not furnished a waiver – Andrews Oil LP. If notice to this party is necessary, you will need to send a new notice containing the required admonition, and the 20-day period will begin to run from the date that notice is sent.

Finally, I am not sure you have noticed all of the requisite parties. Notice is required to the Division-designated operators of the offsetting spacing units toward which the proposed location encroaches, or, if there is no Division-designated operator, or the Applicant is the operator, to working interest owners. In this case, the units which the proposed location encroaches include, in addition to Unit D of Section 22, Unit M of Section 17. This encroachment occurs because the proposed location is closer (447 feet by my calculation) to the common corner that would be the closest possible standard location in Unit D of Section 22 (that would be 467 feet based on 330-foot set-backs from each line). Division files show no wells completed in the Yeso in Unit M of Section 17, and you do not indicate if you have considered ownership of this unit in compiling your notice list. If not, notice to the working interest owners in the Yeso in Unit M of Section 17 will be required.

We will await receiving your response before proceeding with consideration of this application.

Sincerely

David K. Brooks
Legal Examiner

Brooks, David K., EMNRD

From: Jennifer_Duarte@oxy.com
Sent: Tuesday, June 05, 2012 9:15 AM
To: Brooks, David K., EMNRD
Subject: RE: Piglet 21 State #1; NSL Application
Attachments: Piglet#1 NSL.pdf; Piglet#4 NSL.pdf; Roo #8 NSL.pdf

Mr. Brooks,

We have redone the notices on the Piglet #1, #4 & Roo #8 and a copy of the notices are attached along with proof of mailing. We are having to do some research on the Piglet #6 and will send you that information as soon as we can. In the mean time, can we proceed with the 3 that are attached? Please let me know if there is anything else that is needed for you to proceed with the approval process. Thank you very much!

Thank you,
Jennifer Duarte

Regulatory Analyst

Occidental Permian Ltd. / Oxy USA WTP LP / Oxy USA Inc.

Phone: 713/513-6640, Fax: 713/985-8781

From: Brooks, David K., EMNRD [<mailto:david.brooks@state.nm.us>]
Sent: Thursday, May 31, 2012 10:06 AM
To: Duarte, Jennifer A
Subject: Piglet 21 State #1; NSL Application

Dear Ms. Duarte

This is a CORRECTION to my email regarding this well sent late yesterday.

Apparently it was too late in the afternoon for me. In addition to misspelling "Piglet", I erroneously stated that the proposed location encroaches diagonally toward Unit P of Section 22. Of course, it actually encroaches toward Unit M of Section 22.

Sincerely

David K. Brooks



OXY USA Inc.
A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.513.6680 Fax: 713.985.4927
Tiffany_Pollock@oxy.com

May 31, 2012

Re: Non-Standard Location Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:

The referenced well is at a non-standard location, encroaching upon the SWSW of Section 15, Township 17 South, Range 28 East. The standard diagonal set back is 467', and the proposed location is 447' to the common corner. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location ("NSL") and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience. Objections should be filed, in writing, with the Oil Conservation Division within 20 days from the date the division receives the application.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Tiffany C. Pollock, CPL
Landman

_____, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: _____
Name: _____
Its: _____

Date: _____

WORKING INTEREST PARTNERS

COG OPERATING LLC
SUITE 1300
550 WEST TEXAS AVENUE
MIDLAND TX 79701

RICHARD YATES
105 SOUTH 4TH STREET
ARTESIA NM 88210

MCCOMBS ENERGY LTD
5599 SAN FELIPE, SUITE 1200
HOUSTON TX 77056

ST CLAIR PAYTON YATES
ESTATE
105 SOUTH 4TH STREET
ARTESIA NM 88211- 0344

GARY GREEN
SUITE 500
508 W. WALL
MIDLAND TX 79701- 0000

MURCHISON OIL & GAS INC
1100 MIRA VISTA ROAD
PLANO TX 75093

WARREN RESOURCES INC
SUITE 400
123 WEST FIRST ST
CASPER WY 82601

PEYTON YATES
105 SOUTH 4TH STREET
ARTESIA NM 88210

WEED OIL & GAS COMPANY
LC
105 SOUTH 4TH STREET
ARTESIA NM 88210

ESTELLE H YATES
105 SOUTH 4TH STREET
ARTESIA NM 88210- 0000

YATES ENERGY
CORPORATION
P O BOX 2323
ROSWELL NM 88201

MEC PETROLEUM CORP
P O BOX 11265
MIDLAND TX 79702- 0000

YATES PETROLEUM CORP
105 SOUTH 4TH STREET
ARTESIA NM 88210- 2118

MULBERRY PARTNERS II LLP
P O BOX 1290
ARTESIA NM 88211- 0290

BALK OIL CO INC
P O BOX 5782
MIDLAND TX 79704- 0000

CHI ENERGY INC
P O BOX 1799
MIDLAND TX 79702- 0000

MARK D WILSON
C/O RIO PECOS CORP
4501 GREEN TREE BLVD
MIDLAND TX 79707

POCAHONTAS OIL CO
P O BOX 60476
MIDLAND TX 79711

HARVEY E YATES COMPANY
P O BOX 1933
ROSWELL NM 88202- 1933

JOEL M CARSON
P O BOX 1720
ARTESIA NM 88211- 1720

ABO PETROLEUM CORP
P O BOX 900
ARTESIA NM 88211- 0900

TRUST Q U/W/O PEGGY A
YATES
A. YATES DECEASED
P O BOX 900
ARTESIA NM 88211- 0900

LOS CHICOS
P O BOX 900
ARTESIA NM 88211- 0900

JOHN A YATES
P O BOX 900
ARTESIA NM 88211

MYCO INDUSTRIES INC
P O BOX 840
ARTESIA NM 88211- 0840

JALAPENO CORPORATION
P O BOX 1608
ALBUQUERQUE NM 87103- 1608

LOSEE INVESTMENTS LLC
ANN LOSEE
10919 FAROLA NORTHWEST
ALBUQUERQUE NM 87114

YATES INDUSTRIES LLC
P O BOX 1091
ARTESIA NM 88211

SHARBRO ENERGY LLC
423 W MAIN STREET
ARTESIA NM 88210



OXY USA Inc.
A subsidiary of Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110, Houston, Texas 77046
P.O. Box 4294, Houston, Texas 77210-4294
Direct: 713.513.6680 Fax: 713.985.4927
Tiffany_Pollock@oxy.com

May 31, 2012

Re: Non-Standard Location Waiver
Roo 22 State #8
SL: 408' FNL & 1510' FWL
Section 22: NENW
Township 17 South, Range 28 East
Eddy County, New Mexico

Dear Partners:

The referenced well is at a non-standard location, encroaching upon the NWNW of Section 22, Township 17 South, Range 28 East. OXY will be filing applications with the New Mexico Oil Conservation Division for approval of the non-standard location ("NSL") and therefore, OXY hereby respectfully requests that any objection to the NSL for the well be waived.

Please evidence your waiver by executing below returning one (1) copy of this letter to me at your earliest convenience. Objections should be filed, in writing, with the Oil Conservation Division within 20 days from the date the division receives the application.

Your favorable consideration and prompt reply will be appreciated.

Very Truly Yours,

OXY USA Inc.

Tiffany C. Pollock, CPL
Landman

_____, hereby waives any protest or objection to the non-standard location of the Roo 22 State #8.

By: _____
Name: _____
Its: _____

Date: _____

WORKING INTEREST PARTNERS

McCombs Energy LLC
5599 San Felipe, Ste. 1200
Houston, Texas 77056

Voyager Gas Corporation
C/o CCEC Operating Co Agent
6630 Cypresswood Dr. #200
Spring, Texas 77379

Andrews Oil LP
C/o DJA LLC General Partner
Suite 300-A
1015 Bee Cave Woods Drive
Austin, Texas 78746

COG Operating LLC
550 W. Texas Ave, Suite 100
Midland, Texas 79701
Attention: Lisa Eggemeyer

ZPZ Delaware I LLC
303 Veterans Airpark Lane, Suite 3000
Midland, Texas 79705
(432) 818-1000
(432) 818-1190 Fax

Chisos, Ltd.
670 Dona Ana Rd SW
Deming, NM 88030

Cross Border Resources, Inc.
22610 US Hwy 281 North, Suite 218
San Antonio, Texas 78258

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5599 SAN FELIPE, SUITE 1200
HOUSTON TX 77056

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PLANO TX 75093

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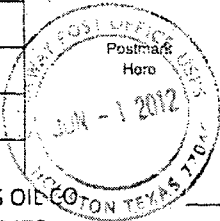
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ST CLAIR PAYTON YATES ESTATE
105 SOUTH 4TH STREET
ARTESIA NM 88211-0344

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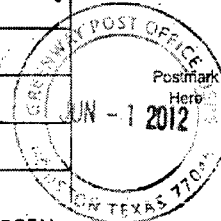
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 MIDLAND TX 79711

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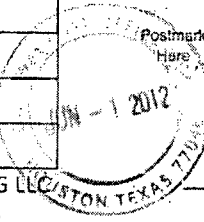
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GARY GREEN
 SUITE 500
 508 W. WALL
 MIDLAND TX 79701-0000

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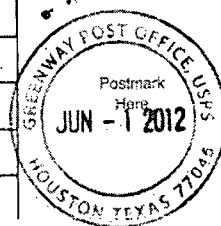
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COG OPERATING LLC
 SUITE 1300
 550 WEST TEXAS AVENUE
 MIDLAND TX 79701

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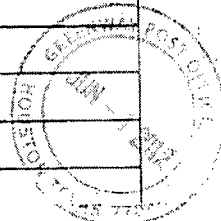
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RICHARD YATES
 105 SOUTH 4TH STREET
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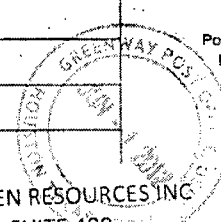
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 ROSWELL NM 88201

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WARREN RESOURCES INC
 SUITE 400
 123 WEST FIRST ST
 CASPER WY 82601

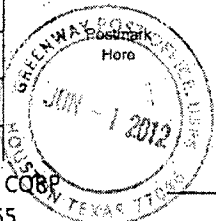
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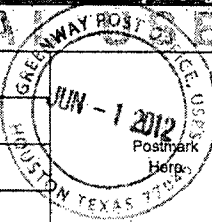
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P O BOX 11265
MIDLAND TX 79702- 0000
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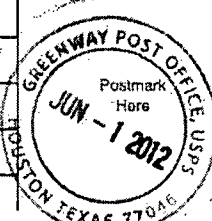
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ROSWELL NM 88202- 1933
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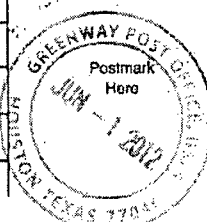
ESTELLE H YATES
105 SOUTH 4TH STREET
ARTESIA NM 88210- 0000
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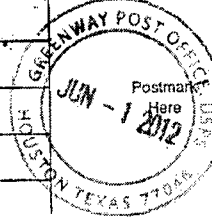
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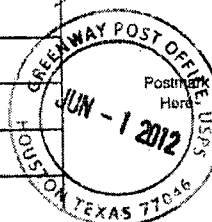
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C/O RIO PECOS CORP
4501 GREEN TREE BLVD
MIDLAND TX 79707

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Street, Apt. No., or PO Box No. Suite 300-16, 1015 Bee Cave Woods Dr
City, State, ZIP+4 Austin, TX 78746

PS Form 3800, June 2002

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