

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

**APPLICATION OF RKI EXPLORATION AND PRODUCTION,
LLC TO RE-OPEN CASE NO. 15414 TO POOL RECORD TITLE
OWNERS UNDER THE TERMS OF COMPULSORY POOLING
ORDER NO. 14104, EDDY COUNTY, NEW MEXICO.**

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CASE NO. 15414 (re-opened)

APPLICATION

RKI Exploration and Production, LLC, ("RKI") (OGRID No. 246289), through its undersigned attorneys, hereby makes application to the Oil Conservation Division to pool the interests of additional mineral owners under the terms of Division Order R-14104. In support of this application, RKI states:

1. Division Order R-14104, entered on December 21, 2015, created a 224.74-acre spacing and proration unit consisting of the W/2 W/2 of Section 28 and NW/4 NW/4 and Lot 4 of Irregular Section 33, Township 26 South, Range 30 East, NMPM, in Eddy County, New Mexico. This order further pooled the uncommitted interests in the Wolfcamp Formation (Brushy Draw; Wolfcamp Oil Pool (97136))¹ in this spacing and proration unit (the "Unit") and dedicated the Unit to the RDX Federal Com 28 Well No. 9H (API No. 30-015-43294), a horizontal well that has been drilled from a surface location 360 feet from the North line and 1345 feet from the West line (Unit C) of Section 28 to a bottom hole location 230 feet from the South line and 430 feet from the West line (Lot 4) of Irregular Section 33.

2. Since the entry of Order R-14104, RKI has been unable to obtain the signatures of the record title owners on the federal communitization agreements because the record title owners

¹ The well has since been reassigned to the Purple Sage Wolfcamp Pool (98220). However, pursuant to Paragraph 7, p. 8 of Order No. R-14262, the prior spacing unit established in Order R-14104 was retained.

are either 1) deceased and their estates are not yet probated in New Mexico; or 2) deceased and their estates have not yet filed updated paperwork with the BLM.

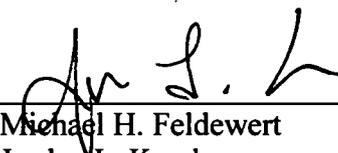
3. The pooling of these additional record owners under the terms of Division Order R-14104 will prevent waste, will protect correlative rights, and will promote administrative efficiency.

4. In order to obtain RKI's just and fair share of the oil and gas underlying the subject acreage and to promote administrative efficiency, the record title owners should be pooled pursuant to the terms of Order R-14104.

WHEREFORE, RKI Exploration and Production, LLC requests that this application be set for hearing before an Examiner of the Oil Conservation Division on September 14, 2017, and, after notice and hearing as required by law, the Division pool remaining uncommitted record title owners in the Unit pursuant to the terms of existing Division Order R-14104.

Respectfully submitted,

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**ATTORNEYS FOR RKI EXPLORATION AND
PRODUCTION, LLC**

CASE 15414 (re-opened): **Application of RKI Exploration and Production, LLC to Re-Open Case No. 15414 To Pool The Interests Of Record Title Owners Under The Terms Of Compulsory Pooling Order R-14104, Eddy County, New Mexico.** Applicant in the above-styled cause seeks to amend Division Order R-14104 to include the pooling of record title owners in the Wolfcamp formation underlying the W/2 W/2 of Section 28 and NW/4 NW/4 and Lot 4 of Irregular Section 33, Township 26 South, Range 30 East, NMPM, in Eddy County, New Mexico. Said unit is dedicated to the **RDX Federal Com 28 No. 9H Well** and is located 10.5 miles southwest of Ross Place, New Mexico.