

EOG Resources, Inc. P.O. Box 2267 Midland, TX 79702 (432) 686-3600

October 9, 2018

State of New Mexico
Oil Conservation Division – District 1
1625 N. French Drive
Hobbs, New Mexico 88240

Re: Request for exception to Rule 107 J
Tubingless Completion
PHILLY 31 FEDERAL COM # 701H 30-025-44762



EOG Resources, Inc. requests an exception to NMOCD Rule 107 J regarding required production tubing. EOG requests a tubingless completion for the well listed above to allow greater flowback after frac stimulation.

The plan is to install production tubing as soon as flow decreases, which should occur within 6 months.

Thank you for your consideration of this request. If additional information is needed, please contact me at 432 686-3658.

Sincerely,

EOG Resources, Inc.

Kay Maddox Regulatory Analysi