



Cimarex Energy Co.

600 N. Marienfeld St. ♦ Suite 600 ♦ Midland, TX 79701 ♦ (432) 620-1938 ♦ Fax (432) 620-1940

A subsidiary of Cimarex Energy Co. • A NYSE Listed Company • "XEC"

March 29, 2019

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

Re: Request for Exception to Rule 107J
Tubingless Completion
James 19 Federal #31H – 30-025-42222
Lea County, NM

Dear Sir:

Cimarex Energy Co. respectfully requests an exception to NMOCD Rule 107J, well tubing requirements. Cimarex request a tubingless completions for our James 19 Federal #31H well to allow for greater flowback after frac stimulation.

Cimarex plans to install production tubing as soon as flow decreases, which should occur within 6 months.

Thank you for your consideration of this request. Please feel free to contact me if you need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Fatima Vasquez", with a long horizontal flourish extending to the right.

Fatima Vasquez
Regulatory Analyst
432-620-1933