From:	Lowe, Leonard, EMNRD
То:	Jaclyn M. McLean
Subject:	RE: [EXTERNAL] RE: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool
Date:	Friday, June 6, 2025 4:18:00 PM
Attachments:	image001.png image002.png
Importance:	High

Jaclyn M. McLean,

I will need to cancel and reject these NSL applications at this time. Permian Resources Operating, LLC was lacking public notice at the take point(s). These applications have been an obstacle to maneuver within the status of review for all other NSL applications pending.

Permian Resources Operating, LLC can resubmit these applications once all concerns of public notice are addressed.

#### Leonard R. Lowe

Engineering Bureau OCD/EMNRD 5400 Oakland Ave. Albuquerque, N.M 87113 Cell/Office Phone: 505-584-8351 E-mail: Leonard.Lowe@emnrd.nm.gov

From: Jaclyn M. McLean <jmclean@hardymclean.com>
Sent: Wednesday, May 28, 2025 4:51 PM
To: Lowe, Leonard, EMNRD <Leonard.Lowe@emnrd.nm.gov>
Subject: RE: [EXTERNAL] RE: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool

I haven't heard back from the client on those.



Jaclyn M. McLean Managing Partner

Phone: 505-372-6375 Email: <u>imclean@hardymclean.com</u> Web <u>www.hardymclean.com</u> 125 Lincoln Avenue, Suite 223, Santa Fe, NM 87501



This message (including attachments) constitutes a confidential attorney-client or is otherwise a confidential communication from the law firm, Hardy McLean LLC, that is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521, and is intended solely for the use of the individual(s) or entity to whom it is addressed. It is not intended for transmission to, or receipt by, any unauthorized person. If you are not the intended recipient or received these documents by mistake or error, please do not read it and immediately notify us by collect telephone call to (505) 230-4410 for instructions on its destruction or return. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, action or reliance upon the contents of the documents is strictly prohibited.

From: Lowe, Leonard, EMNRD <Leonard.Lowe@emnrd.nm.gov>
Sent: Wednesday, May 28, 2025 4:47 PM
To: Jaclyn M. McLean <<u>imclean@hardymclean.com</u>>
Subject: RE: [EXTERNAL] RE: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool

What about the Taipan wells? They are in the same lack of Public Notice scenario as the Ocotillo wells.

Leonard R. Lowe Petroleum Engineer Engineering Bureau Oil Conservation Division - ABQ Energy Minerals and Natural Resources Department 5400 Oakland Ave., Albuquerque, New Mexico 87113 Cell/Office Phone: 505-584-8351 E-mail: Leonard.Lowe@emnrd.nm.gov

From: Lowe, Leonard, EMNRD
Sent: Friday, May 23, 2025 10:43 AM
To: Jaclyn M. McLean <<u>imclean@hardymclean.com</u>
Subject: RE: [EXTERNAL] RE: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool

It appears that the lack of notice is for all of your NSL applications for the Taipan wells.

Taipan 21 Federal Com Well No. 201H
Taipan 21 Federal Com Well No. 202H
Taipan 21 Federal Com Well No. 203H
Taipan 21 Federal Com Well No. 204H

### Leonard R. Lowe

Petroleum Engineer Engineering Bureau Oil Conservation Division - ABQ Energy Minerals and Natural Resources Department 5400 Oakland Ave., Albuquerque, New Mexico 87113 Cell/Office Phone: 505-584-8351 E-mail: Leonard.Lowe@emnrd.nm.gov

From: Jaclyn M. McLean <<u>imclean@hardymclean.com</u>>
Sent: Friday, May 23, 2025 10:36 AM
To: Lowe, Leonard, EMNRD <<u>Leonard.Lowe@emnrd.nm.gov</u>>
Subject: [EXTERNAL] RE: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Leonard, let me check with Permian Resources. Thanks!



Jaclyn M. McLean Managing Partner Phone: 505-372-6375 Email: jmclean@hardymclean.com Web www.hardymclean.com 125 Lincoln Avenue, Suite 223, Santa Fe, NM 87501



This message (including attachments) constitutes a confidential attorney-client or is otherwise a confidential communication from the law firm, Hardy McLean LLC, that is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521, and is intended solely for the use of the individual(s) or entity to whom it is addressed. It is not intended for transmission to, or receipt by, any unauthorized person. If you are not the intended recipient or received these documents by mistake or error, please do not read it and immediately notify us by collect telephone call to (505) 230-4410 for instructions on its destruction or return. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, action or reliance upon the contents of the documents is strictly prohibited.

From: Lowe, Leonard, EMNRD <Leonard.Lowe@emnrd.nm.gov>
Sent: Friday, May 23, 2025 10:28 AM
To: Jaclyn M. McLean <jmclean@hardymclean.com>
Subject: NSL - Taipan 21 Federal Com Well No. 204H - Public Notice - Gas Pool
Importance: High

J.M.

Action ID NO. 454443

The subject Well's NSL application shows that notice was not properly done.

The Pool (**BURTON FLAT; WOLFCAMP, NORTH (GAS) [73520]**) for this NSL has the following specifics, S.B. = 660 feet (perpendicular to the well bore) & 330 feet (within the linear plane), Spacing = 320 acres (Building Blocks = 160 acres)

Public notice for HSU Pool requirements of 320 acres shall provide public notice to the encroaching tracts of 160 acres.

The application appears to show a lack of complete public notice.

Can you verify if all the encroaching tracts have been properly noticed?

# 19.15.4.12 NOTICE REQUIREMENTS FOR SPECIFIC ADJUDICATIONS:(2) Unorthodox well locations.

(a) If the proposed well location is unorthodox by being located closer to the spacing unit's outer boundary than 19.15.15 NMAC, 19.15.16 NMAC or applicable special pool orders

permit, the applicant shall notify the affected persons in each adjoining spacing unit in the same pool or formation located closer to the unorthodox well location than the minimum distance prescribed by the applicable rule or order. If an adjoining tract is not included in a spacing unit in the same pool or formation in which the well may be completed, then for such tract the applicant shall notify affected persons in the same pool or formation in any adjoining quarter-quarter section (if the proposed well will be completed in a pool where the standard spacing unit is 40 acres), or any adjoining quarter section (if the proposed well will be completed in a pool where the standard spacing unit is greater than 40 acres), that is located closer to the unorthodox well location than the minimum setback distance prescribed by the applicable rule or order.

QTR SECTION = 160 acres.

#### Leonard R. Lowe

Petroleum Engineer Engineering Bureau Oil Conservation Division - ABQ Energy Minerals and Natural Resources Department 5400 Oakland Ave., Albuquerque, New Mexico 87113 Cell/Office Phone: 505-584-8351 E-mail: Leonard.Lowe@emnrd.nm.gov *Received by OCD: 6/6/2025 4:57:18 PM* 

NSL - 8955

•

ID NO. 454443		105L = 00000		
RECEIVED: 04/22/25	REVIEWER:	TYPE:	APP NO:	
		ABOVE THIS TABLE FOR OCD DIVISI	ON USE ONLY	
1.		OIL CONSERVA I & Engineering I ncis Drive, Santa	Bureau -	
	ΛΠΛΙΙΝΙΙΥΠΛ	TIVE APPLICATIO		
	T IS MANDATORY FOR ALL A REGULATIONS WHICH REQU	DMINISTRATIVE APPLICATION	ONS FOR EXCEPTIONS TO D	VIVISION RULES AND
pplicant: Permian Resource	es Operating, LLC		OGRID	Number: <u>372165</u>
ell Name: Taipan 21 Fed	Com 204H		API: <u>30-01</u>	15pending
DOI: Burton Flat, Wolfcamp, N	North (Gas)		Pool Co	de: 73520
SUBMIT ACCURATE AN ) TYPE OF APPLICATIO A. Location – Space INSL		INDICATED BELOV nich apply for [A] neous Dedication		
DHC [II] Injection – WFX NOTIFICATION REQU A. Offset opera B. Royalty, ove C. Application D. Notification	IRED TO: Check the erriding royalty own and/or concurrent	PC OL: Increase – Enhar D IPI EO ose which apply. ers ners, revenue own notice t approval by SLO	ers	FOR OCD ONLY Notice Complete Application Content Complete
G.■ For all of the H. ■ No notice re				
administrative appro understand that <b>no</b> notifications are sub	oval is <b>accurate</b> an <b>action</b> will be take mitted to the Divisi	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require	ledge. I also ed information and
administrative appro understand that <b>no</b> notifications are sub	oval is <b>accurate</b> an <b>action</b> will be take	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require anagerial and/or superv	ledge. I also ed information and
administrative appro understand that <b>no</b> a notifications are sub Note: State	oval is <b>accurate</b> an <b>action</b> will be take mitted to the Divisi	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require	ledge. I also ed information and
administrative appro understand that <b>no</b> a notifications are sub Note: State aclyn M. McLean	oval is <b>accurate</b> an <b>action</b> will be take mitted to the Divisi	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require anagerial and/or superv 4/22/2025	ledge. I also ed information and
administrative appro understand that <b>no</b> notifications are sub Note: State aclyn M. McLean	oval is <b>accurate</b> an <b>action</b> will be take mitted to the Divisi	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require anagerial and/or superv 4/22/2025	ledge. I also ed information and
administrative appro understand that <b>no</b> notifications are sub	oval is <b>accurate</b> an <b>action</b> will be take mitted to the Divisi	d <b>complete</b> to the n on this applicati on.	e best of my know on until the require anagerial and/or superv 4/22/2025 Date 505-230-4410	ledge. I also ed information and isory capacity.





April 22, 2025

# VIA ONLINE FILING

Gerasimos Razatos Acting Division Director Oil Conservation Division Energy, Minerals and Natural Resources Department 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

### Re: Permian Resources Operating, LLC Request for Administrative Approval of Unorthodox Well Location

Taipan 21 Fed Com 204H S/2 S/2 of Sections 21 and 22, Township 20 South, Range 28 East, Eddy County, New Mexico Burton Flat, Wolfcamp, North (Gas) Pool (Code 73520)

Dear Mr. Razatos,

In accordance with Division Rules 19.15.16.15(C)(6) and 19.15.15.13 NMAC, Permian Resources Operating, LLC ("Permian Resources") (OGRID No. 372165) seeks administrative approval of an unorthodox well location for the Taipan 21 Fed Com 204H well, in a 320 acre, more or less, non-standard horizontal spacing unit, comprised of the S/2 S/2 of Sections 21 and 22, Township 20 South, Range 28 East, Eddy County, New Mexico.

The location for the Taipan 21 Fed Com 204H well is as follows:

- <u>Surface Hole Location</u>: 1,438' FSL and 326' FEL, Section 20, Township 20 South, Range 28 East
- <u>First Take Point</u>: 990' FSL and 100' FWL, Section 21, Township 20 South, Range 28 East
- <u>Last Take Point</u>: 990' FSL and 100' FEL, Section 22, Township 20 South, Range 28 East
- <u>Bottom Hole Location</u>: 990' FSL and 10' FEL, Section 22, Township 20 South, Range 28 East

125 Lincoln Avenue, Suite 223 Santa Fe, NM 87501 505-230-4410 Writer: Jaclyn M. McLean Managing Partner jmclean@hardymclean.com

HardyMclean.com

Hardy McLean LLC April 22, 2025 Page 2

The completed interval of the well will be unorthodox because it is located less than 330' from the southern boundary of the existing 320-acre horizontal spacing unit. As explained in the engineering statement, included as **Exhibit A**, approval of the unorthodox, completed interval is necessary to allow Permian Resources to reduce stranded resources, accelerate recovery time, and improve overall productivity of the wells. This will prevent waste and protect correlative rights.

**Exhibit B** is a Form C-102 showing the location of the Taipan 21 Fed Com 204H well in relation to the offset tracts.

**Exhibit C** is a plat for Sections 21 and 22 of Township 20 South, Range 28 East, that shows the Taipan 21 Fed Com 204H well in relation to the adjoining tracts/proposed spacing units. Permian Resources is the offset operator of all adjoining tracts and spacing units.

**Exhibit D** is a list that identifies all affected persons who were sent a copy of this application and attachments by certified mail advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application, along with the date notice was sent, and a copy of the notice letter to affected persons.

Thank you for your attention to this matter. Please let me know if you require additional information.

Very truly yours,

HARDY MCLEAN LLC

<u>/s/ Jaclyn M. McLean</u> Jaclyn M. McLean

ATTORNEYS FOR PERMIAN RESOURCES OPERATING, LLC



300 N. MARIENFELD STREET, SUITE 1000 MIDLAND, TX 79701

**OFFICE** 432.695.4222 **FAX** 432.695.4063

4/10/2025

Re: Taipan 21 Fed Com #204H SHL: 1,438' FSL, 326' FEL of Section 20, T20S-R28E FTP: 990' FSL, 100' FWL of Section 21, T20S-R28E LTP: 990' FSL, 100' FEL of Section 22, T20S-R28E BHL: 990' FSL, 10' FEL of Section 22, T20S-R28E Eddy County, New Mexico

To Whom It May Concern,

To minimize unnecessary burden, prevent waste, and protect correlative rights, Permian respectfully requests approval of this non-standard location to allow the completed interval to be less than 330 feet from the northern boundary of the existing 320-acre horizontal spacing unit. Approval of this request will allow adherence to standard wellbore clearance factors from an existing saltwater disposal wellbore.

Approval of a non-standard location will maximize the wellbore's contact to undeveloped resource in this unit, reducing stranded resources, accelerating recovery time, and improving overall productivity. The request for a non-standard location is therefore in the best interests of the mineral owners as well as the operator.

Approval of the unorthodox, completed interval is necessary to allow Permian to maximize lateral length, properly place stimulation energy, and optimize pressure drawdown, which will create cost efficiencies, prevent waste, and protect correlative rights.

Sincerely,

Sam Hamilton Reservoir Engineer Permian Resources Operating, LLC

# **EXHIBIT** A

#### Received by OCD: 6/6/2025 4:57:18 PM

<u>C-102</u>

Submit Electronically Via OCD Permitting

# State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION

**EXHIBIT B** Page 9 of 14

Revised July 9, 2024

Submittal

□ Initial Submittal  $\boxtimes$  Amended Report Type: ed

F	🗆 As	Drill

WELL LOCATION DEODMATION	
WELL LOCATION INFORMATION	

API Number	Pool Code 73520	Pool Name Burton Flat, Wolfcamp,	North (gas)
Property Code	Property Name TAIPAN	21 FED COM	Well Number 204H
OGRID No.	Operator Name		Ground Level Elevation
372165	PERMIAN RESOU	RCES OPERATING, LLC	3233.58'
Surface Owner: $\Box$ State $\mathbf{X}$ Fee $\Box$	Tribal 🗆 Federal	Mineral Owner: 🗙 State 🗆 Fee 🗆 Tribal 🕵 F	Federal

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County	
Ι	20	20-S	28-E		1438' S	326' E	32.55570	-104.19251	EDDY	
	Bottom Hole Location									
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County	
р	22	20-S	28-E		990' S	10' E	32.55455	-104.15701	EDDY	

Dedicated Acres	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
320	Defining	TBD	N	TBD
Order Numbers.	TBD		Well setbacks are under Common	Ownership: 🛛 Yes 🗆 No

	Kick Off Point (KOP)									
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County	
Ι	20	20-S	28-E		1438' S	326' E	32.55570	-104.19251	EDDY	
	First Take Point (FTP)									
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County	
М	21	20-S	28-E		990' S	100' W	32.55447	-104.19113	EDDY	
	Last Take Point (LTP)									
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County	
Р	22	20-S	28-E		990' S	100' E	32.55455	-104.15730	EDDY	

Unitized Area or Area of Uniform Interest Spacing Unit Type 🔀 Horizontal 🗆 Vertica
--

Ground Floor Elevation:

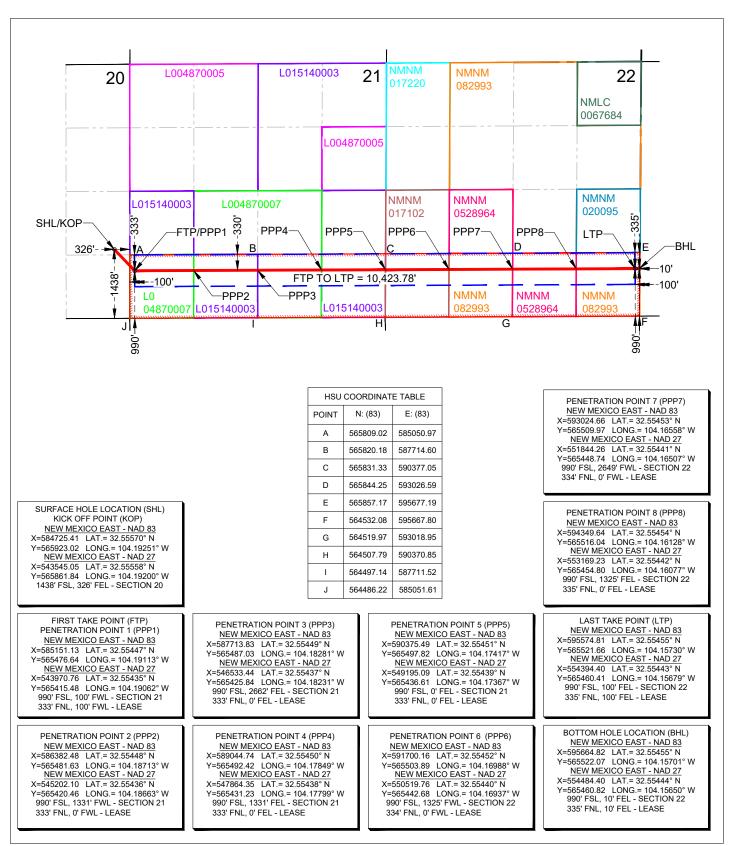
OPERATOR CERTIFICATIONS	SURVEYOR CERTIFIC	CATIONS	
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest 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. 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 hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my beliefs. <b>PRELIMINARY</b> THIS DOCUMENT SHALL NOT BE RECORDED FOR ANY PURPOSE AND SHALL NOT BE USED OR VIEWED OR RELIED UPON AS A FINAL SURVEY DOCUMENT.		
Signature Date	Signature and Seal of Profess	ional Surveyor	
Casoi Wars- 12/5/24			
Printed Name	Certificate Number	Date of Survey	
Cassie Evans			
Email Address Cassie.Evans@permianres.com			

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 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.



.

# Taipan 21 Fed Com #204H S/2S/2 of Sections 21 & 22, T20S-R28E, Eddy County, New Mexico Current Operator: Permian Resources Operating, LLC

Sec. 20 20S-28E	Sec.21 20S-28E			Sec.22 20S-28E		Sec.23 20S-28E
			Taipan 21 Fe	d Com 204H		

				Notice Tracts	
				Tract 1	L0-1611-0003
Spacing Unit Tracts		Spacing Unit Tracts		Tract 2	L0-1514
	Trac	ct 1 L0-0487-0007	Notice Tracts	Tract 3	L0-0487-0007
Spacing Unit 320 Gross Acres BLM Comm: Pending	Trac	ct 2 L0-1514	480 Gross Acres	Tract 4	NMNM 017102
	Trac	ct 3 NMNM 017102	Operator:	Tract 5	NMNM 0528964
	Trac	ct 4 NMNM 082993	Permian Resources Operating, LLC	Tract 6	NMNM 082993
	Trac	ct 5 NMNM 0528964	Permian Resources Operating, LLC	Tract 7	NMNM 020095

Released to Imaging: 6/6/2025 4:58:12 PM

**EXHIBIT C** 

•

Notice List - Permian Resources Taipan 21 Fed Com Wells							
Party	Tract Legal(s)	Address	Date Notice Sent				
New Mexico State Land Office	NMSLO	310 Old Santa Fe Trail Santa Fe, NM 87501	4/22/2025				
Bureau of Land Management	BLM	301 Dinosaur Trail Santa Fe, NM 87508	4/22/2025				

# **EXHIBIT D**





April 22, 2025

### <u>VIA CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

# **TO: ALL AFFECTED PERSONS**

### Re: Permian Resources Operating, LLC Requests for Administrative Approval of Unorthodox Well Locations

Enclosed are copies of administrative applications requesting approval of unorthodox well locations for Permian Resources Operating, LLC's ("Permian Resources") Taipan 21 Fed Com 201H, Taipan 21 Fed Com 202H, Taipan 21 Fed Com 203H, and Taipan 21 Fed Com 204H wells. Administrative applications for the unorthodox well locations were filed with the New Mexico Oil Conservation Division on this date. Any objection to these applications must be filed in writing within twenty (20) days from the date this application is received by the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505. If no objection is received within this twenty-day period, these applications may be approved administratively by the Division.

If you have any questions about this application, please contact Ryan Curry, Senior Landman at Permian Resources – Ryan.Curry@permianres.com.

Sincerely,

HARDY MCLEAN LLC

<u>/s/ Jaclyn M. McLean</u> Jaclyn M. McLean

ATTORNEYS FOR PERMIAN RESOURCES OPERATING, LLC

125 Lincoln Avenue, Suite 223 Santa Fe, NM 87501 505-230-4410 Writer: Jaclyn M. McLean Managing Partner jmclean@hardymclean.com

HardyMclean.com

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

CONDITIONS

Operator:	OGRID:
Permian Resources Operating, LLC	372165
300 N. Marienfeld St Ste 1000	Action Number:
Midland, TX 79701	471746
	Action Type:
	[IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

#### CONDITIONS

Created By		Condition Date
llowe	None	6/6/2025

Page 14 of 14

Action 471746