# State of New Mexico Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham

Governor

Melanie A. Kenderdine

Cabinet Secretary

**Ben Shelton** 

Deputy Secretary

**Erin Taylor** 

Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division



Deana M. Bennett <u>deana.bennett@modrall.com</u>

Administrative Order NSP - 2288

# ADMINISTRATIVE NON-STANDARD HORIZONTAL SPACING UNIT

# Coterra Energy Operating Co. [OGRID 215099]

Canyonlands 2 State Com Well No. 351H [30-025-54748]

Canyonlands 2 State Com Well No. 001H [30-025-44724]

HSU: Section 2, T24S R34E, Lea County, New Mexico

Reference is made to your application received on May 5<sup>th</sup>, 2025.

You have requested approval of a non-standard horizontal spacing unit to be included in your proposed horizontal spacing unit, as follows:

# **Proposed Increased Horizontal Spacing Unit:**

| Description | Acres  | Pool                          | <b>Pool Code</b> |
|-------------|--------|-------------------------------|------------------|
| Section 02  | 640.16 | Red Hills; Bone Spring, North | 96434            |

You have requested an exception pursuant to Rule 19.15.16.15(A)(3) NMAC, to approve a non-standard horizontal spacing unit consisting of the entire area described above as the horizontal spacing unit. The proposed horizontal spacing unit does not consist of a quarter - quarter section or equivalent in sections, as required by Rule 19.15.16.15(B)(1) NMAC.

NSP - 2288 Coterra Energy Operating Co. Page 2 of 2

We understand that you are seeking this exception for an allowance to create a non-standard horizontal spacing unit, comprised of the Proposed Horizontal Spacing Unit referenced above within Lea County, New Mexico.

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in Paragraph (8) Subsection A of 19.15.2.7 NMAC, in all adjoining units which are to be being included.

You have requested this non-standard horizontal spacing unit to allow for efficient development, to minimize surface disturbance, to promote effective well spacing and to protect the correlative rights within the Bone Spring formation. Thereby, preventing waste underlying all of Section 02, within the referenced Horizontal Spacing Unit.

Pursuant to the authority conferred by Division Rule 19.15.16.15(B)(5) NMAC, the above-described **non-standard horizontal spacing unit is hereby approved**. Further, the Applicant may add additional wells to the non-standard spacing unit, the well(s) must be in the same <u>horizontal spacing unit</u> and <u>pool/formation</u>. The new well's APD shall reference this NSP order number on Form C-102 with an adjacent letter stating this request.

# **General Provisions**

The above approvals are subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 19.15.5.9 NMAC.

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

Date: 7/3/2025

Albert Chang Albert C.S. Chang, PE

Division Director

AC/lrl

| ID NO. | 458694 |  |
|--------|--------|--|
|        |        |  |

NSP - 2288

Revised March 23, 2017

| 10 110. 430074 |           | 1101 2200                    |                |  |
|----------------|-----------|------------------------------|----------------|--|
| 05/05/25       | REVIEWER: | TYPE:                        | APP NO:        |  |
|                | •         | ABOVE THIS TABLE FOR OCD DIV | ISION USE ONLY |  |

| NEW MEXICO OIL CON  | SERVATION DIVISION                                |
|---|---|
| - Geological & Engine   | eering Bureau –                                   |
| 1220 South St. Francis Drive,   | Santa Fe, NM 87505                                |
| ADMINISTRATIVE APPL   | ICATION CHECKLIST                                 |
| THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE  | APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND |
| REGULATIONS WHICH REQUIRE PROCESSING  | G AT THE DIVISION LEVEL IN SANTA FE               |
| Amalia and Cotarra Energy Operating Co  | OCRID Number: 215000                              |
| Applicant: Coterra Energy Operating Co.  Well Name: Canyonlands 2 State Com   | OGRID Number: 215099  API: Various                |
| Pool: Red Hills; Bone Spring, North   | Pool Code: 96434                                  |
| FOOI. Iced Times, Bothe Spring, North   | rool code.  |
| SUBMIT ACCURATE AND COMPLETE INFORMATION  | REQUIRED TO PROCESS THE TYPE OF APPLICATION       |
| INDICATE  |   |
| 1) TVPF OF APPLICATIONS Characteristics are subject as a subject and the second state of the second state | f[A]  |
| <ol> <li>TYPE OF APPLICATION: Check those which apply</li> <li>A. Location – Spacing Unit – Simultaneous Ded</li> </ol>   |   |
|   | NSP (PRORATION UNIT)                              |
|   | PRORATION UNIT)                                   |
| B. Check one only for [I] or [II]   |   |
| [1] Commingling – Storage – Measurement   |   |
| □DHC □CTB □PLC □PC  | □ols □olm   |
| [ II ] Injection – Disposal – Pressure Increase   | – Enhanced Oil Recovery                           |
| □ WFX □ PMX □ SWD □ IPI   | □ EOR □ PPR                                       |
|   | FOR OCD ONLY                                      |
| 2) NOTIFICATION REQUIRED TO: Check those which  | apply. Notice Complete                            |
| A. Offset operators or lease holders  |   |
| <ul><li>B.  Royalty, overriding royalty owners, reven</li><li>C. Application requires published notice</li></ul>  | ,           |
| D. Notification and/or concurrent approva   | Lby SLO   |
| E. Notification and/or concurrent approval  |   |
| F. Surface owner  | by beivi  |
| G. For all of the above, proof of notification  | or publication is attached, and/or,               |
| H. No notice required   |   |
|   |   |
| 3) <b>CERTIFICATION:</b> I hereby certify that the informat   |   |
| administrative approval is accurate and comple  |   |
| understand that <b>no action</b> will be taken on this a  | pplication until the required intormation and     |
| notifications are submitted to the Division.  |   |
| Note: Statement must be completed by an individ   | dual with managerial and/or supervisory capacity. |
|   |   |
|   | 05/05/2025  |
| Deana M. Bennett  | Date  |
| Print or Type Name  |   |
| A A   | 505-848-1834                                      |
| 11.   | Phone Number                                      |
|   |   |
| france of Office  | deana.bennett@modrall.com                         |
| Signature   | e-mail Address                                    |

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VIA ELECTRONIC FILING

May 5, 2025

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

Deana M. Bennett 505.848.1834 Deana.bennett@modrall.com

RE: Application of Coterra Energy Operating Co. for administrative approval of a 640.16-acre, more or less, nonstandard spacing unit in the Bone Spring formation comprised of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico.

Dear Acting Director Razatos /OCD Engineering Bureau:

Coterra Energy Operating Co. ("Coterra"), OGRID number 215099, respectfully requests administrative approval of a 640.16-acre, more or less, nonstandard spacing unit ("NSU") comprised of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico.

The new well proposed to be dedicated to this NSU are:

| Well Name                    | API Number |
|------------------------------|------------|
| Canyonlands 2 State Com 351H | Pending    |

Coterra also requests that the following existing well<sup>1</sup> be included in the NSU approved order:

| Well Name                  | API Number   |
|----------------------------|--------------|
| Canvonlands 2 State Com 1H | 30-025-44724 |

C-102s for all of the Wells (new and existing) are attached hereto as **Exhibit A**. The pool underlying the proposed non-standard spacing unit is the Red Hills; Bone Spring, North pool (Code 96434), which follows the statewide spacing rules. Each Well will comply with the statewide setback requirements for the non-standard spacing unit.

Modrall Sperling Roehl Harris & Sisk P.A.

500 Fourth Street NW Suite 1000 Albuquerque, New Mexico 87102

PO Box 2168 Albuquerque, New Mexico 87103-2168

Tel: 505.848.1800 www.modrall.com

<sup>&</sup>lt;sup>1</sup> The existing well is currently dedicated to a 160-acre horizontal spacing unit. Coterra's goal is to combine the existing unit with the remaining acreage in Section 2 to create a single approximately 640.16-acre, more or less, spacing unit.

Page 2

Coterra is requesting this NSU for several reasons. First, approval of the NSU will allow for full and efficient development of this acreage and will minimize surface disturbance by allowing Coterra to consolidate facilities and commingle production from wells in the proposed NSU. Second, Coterra is requesting approval of this NSU to match a Communitization Agreement that has been preliminarily approved by the State Land Office. Third, Coterra is requesting approval of this NSU to promote effective well spacing by removing the setback requirements from the center line and the quarter-quarter lines to allow for more efficient spacing.

A tract map is attached hereto as **Exhibit B**, which identifies the approximate Well locations. Also included in Exhibit B is a list of the Wells to be initially dedicated to this NSU.

**Exhibit C** is a letter from reservoir engineer explaining the need for a non-standard unit and the benefits associated with a non-standard, as opposed to a standard, unit. Exhibit C includes attachments that compare and contrast the standard versus non-standard unit scenario.

Coterra is providing notice to all affected parties in the tracts that adjoin the proposed non-standard spacing unit and to the State Land Office and the Bureau of Land Management. Proof of mailing notice of the application (including a copy of the application) to affected persons entitled to notice is attached hereto as **Exhibit D**. Also included in Exhibit D is a map identifying the affected tracts and ownership for notice purposes.

Your attention to this matter is appreciated.

Sincerely, Wlaw UBanet

Deana M. Bennett

Attorney for Coterra Energy

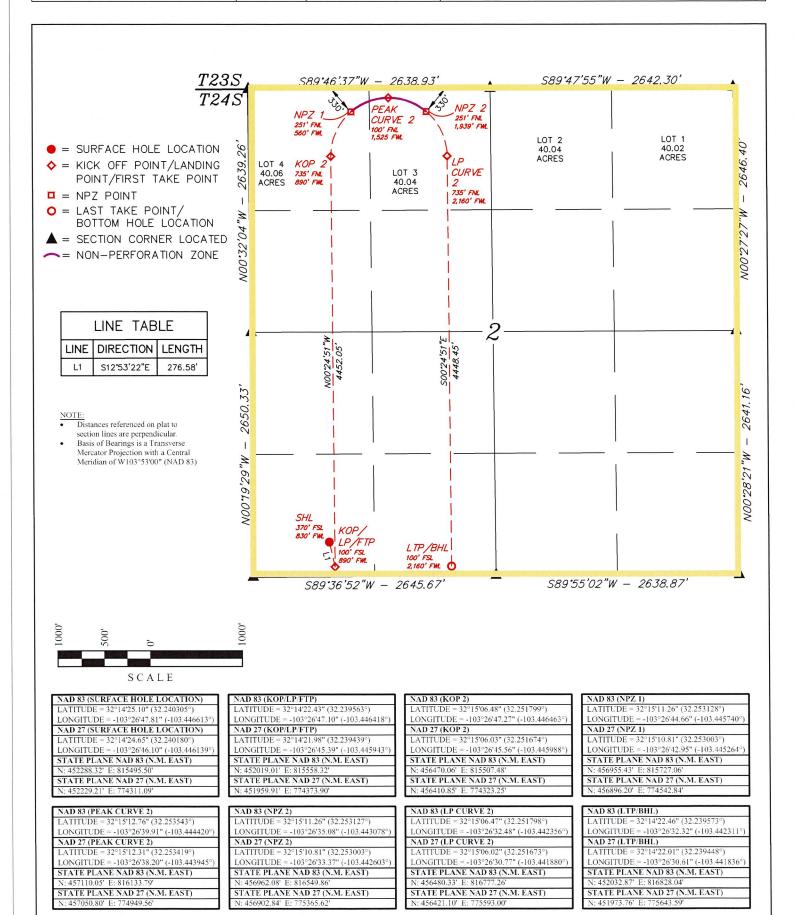
Operating Co.

| Via OCD P   | ectronically   | <b>y</b>  |   |   | CONICEDIAL   | ION DIVISION  | ment              |                    |                    |               |
|---|--|---|---|---|--|---|-------------------|--------------------|--------------------|---------------|
|   | ermitting  |   |   | OIL   | CONSERVAL  | ION DIVISION  |                   |                    | ☐ Initial Submitt  | al            |
|   | Para F   |   |   |   |  |   |                   | Submittal<br>Type: | ☐ Amended Rep      | ort           |
|   |  |   |   |   |  |   |                   | Type.              | ☐ As Drilled       |               |
|   |  |   |   |   | WELL LOCATI  | ON INFORMATION  |                   | V 7                |                    |               |
| API Numl  | lber   |   | Pool Code   | 96434   |  | Pool Name   | Red Hills; Bor    | ne Spring, N       | North              |               |
| Property (  | Code   |   | Property N  | ame   | CANYONLAN  | NDS 2 STATE COM   |                   |                    | Well Number        | H             |
| OGRID N   | No.<br>215099  |   | Operator N  | lame  |  | ENERGY OPERATIN   | IG CO             |                    | Ground Level Ele   | evation       |
| Surface O   |  | State  Fee  | I<br>  Tribal □ Fe  | deral   | COTEIGE  | Mineral Owner:  |                   | ☐ Tribal ☐         |                    | 2.3           |
|   |  |   |   |   | Surfac   | ce Location   |                   |                    |                    |               |
| UL  | Section  | Township  | Range   | Lot   | Ft. from N/S   | Ft. from E/W  | Latitude (N.      | AD 83) I           | Longitude (NAD 83) | County        |
| М   | 2  | 24S   | 34E   |   | 370 SOUTH  | 830 WEST  | 32.2403           |                    | -103.446613°       | LEA           |
|   |  |   | 1   |   | Bottom 1   | Hole Location   |                   |                    |                    |               |
| UL  | Section  | Township  | Range   | Lot   | Ft. from N/S   | Ft. from E/W  | Latitude (N       | ,                  | Longitude (NAD 83) | County        |
| N   | 2  | 24S   | 34E   |   | 100 SOUTH  | 2,160 WEST  | 32.2395           | 573°               | -103.442311°       | LEA           |
| Dedicated   | d Acres  | Infill or Defi  | ning Well   | Definin   | g Well API   | Overlapping Spacin  | g Unit (Y/N)      | Consolida          | ation Code         |               |
| 640.16  |  | min or Bon  | ming Wen  | Beimin  | ,  | o veriapping spacin   | g Ome (1711)      | Consona            | ation code         | * *           |
| Order Nu  | ımbers.  |   |   |   |  | Well setbacks are ur  | nder Common       | Ownership:         | : □Yes □No         |               |
|   | 2 IL U   | ×   |   |   | Kick Of  | f Point (KOP)   |                   |                    |                    |               |
| UL  | Section  | Township  | Range   | Lot   | Ft. from N/S   | Ft. from E/W  | Latitude (N       |                    | Longitude (NAD 83) | 100 100 100   |
| M   | 2  | 24S   | 34E   |   | 100 SOUTH  | 890 WEST  | 32.2395           | 563°               | -103.446418°       | LEA           |
|   |  | 7   | _   | -   |  | ce Point (FTP)  |                   |                    |                    |               |
|   | Section  | Township  | Range   | Lot   | Ft. from N/S   | Ft. from E/W  | Latitude (N       |                    | Longitude (NAD 83) | County<br>LEA |
| М   | 2  | 24S   | 34E   | 1   | 100 SOUTH  | 890 WEST  | 32.239            | 003                | -103.446418°       | LEA           |
| UL T  | Section  | Toumshin  | LBanas  | Lot   | Ft. from N/S   | Ft. from E/W  | Latitude (N       | AD 92)             | Longitude (NAD 83) | County        |
| N   | 2  | Township<br>24S   | Range<br>34E  | Lot   | 100 SOUTH  | 2,160 WEST  | 32.239:           |                    | -103.442311°       | LEA           |
| Unitized  | Area or Ar   | ea of Uniform   | Interest  | Spacing   | g Unit Type □ Horizo   | ontal □ Vertical  | Grou              | nd Floor El        | evation:           |               |
|   |  |   |   |   | ,  |   |                   |                    |                    |               |
| OPERAT  | TOR CERT   | TFICATIONS  |   |   |  | SURVEYOR CERTIF   | ICATIONS          |                    |                    |               |
| my knowled<br>organization<br>including to<br>location put<br>interest, or<br>entered by<br>If this well<br>consent of<br>in each tra | edge and beli<br>on either ow<br>the proposed<br>ursuant to a<br>r to a volunto<br>the division<br>l is a horizon<br>at least one<br>act (in the tai | ef, and, if the we<br>ns a working inte<br>bottom hole loca<br>contract with an a<br>ry pooling agree<br>tal well, I further<br>lessee or owner o | Ill is a vertical of rest or unleased tion or has a ricowner of a work ament or a comporter that this of a working intation) in which | or directiona.  I mineral int ght to drill to king interest vulsory pooli s organizatio erest or unle any part of t | erest in the land his well at this or unleased mineral ng order heretofore  n has received the ased mineral interest he well's completed | I hereby certify that the w<br>surveys made by me or un<br>my belief. |                   |                    |                    |               |
| Signature   |  |   | Date  |   |  | Signature and Seal of Profe   | essional Surveyor |                    | ONAL               |               |
| Shelly Bo   | owen   |   | 1-11  |   | 12 1 20 20 20 20 20  | 23782   | January 02        | 2, 2025            |                    |               |
| D : 137   | ame  |   |   |   |  | Certificate Number  | Date of Surv      | rey                |                    |               |
| Printed Na  |  |   |   |   |  |   |                   |                    |                    |               |
|   | wen@cote   | rra.com   |   |   | w  |   |                   |                    |                    |               |

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Sheet 1 of 2

Property Name
CANYONLANDS 2 STATE COM
Well Number
Drawn By
N.R. 01-08-25
Revised By
REV. 1 T.I.R. 02-27-25 (WELLBORE CHANGES & ADD NPZ)



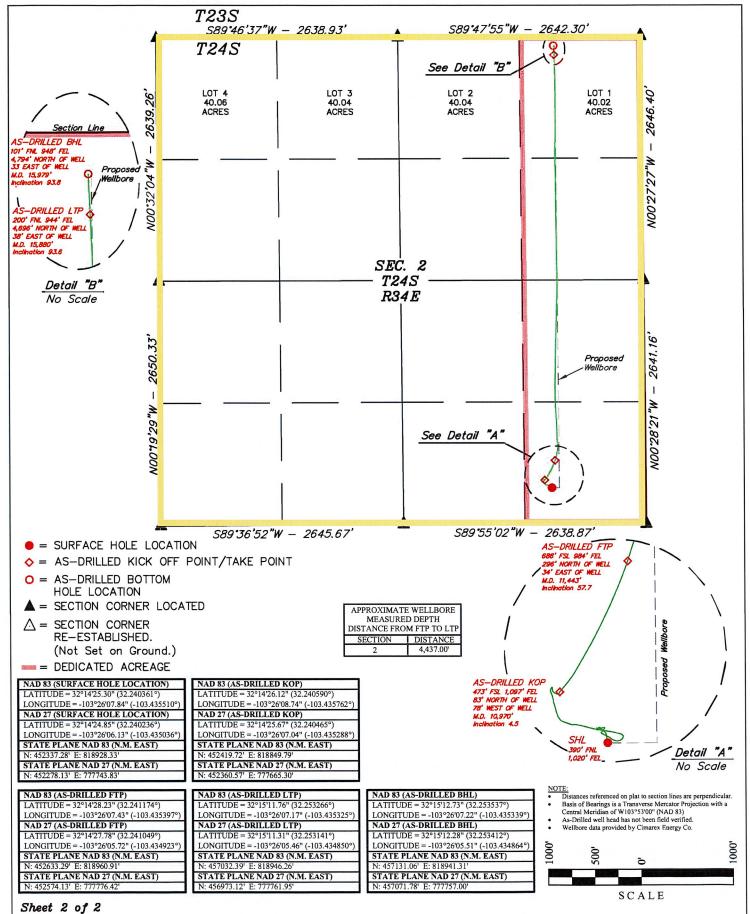
Sheet 2 of 2

| <u>C-102</u>   |                | Ene                | ergy. Mir      | State of Ne<br>nerals & Natur | ew Mexico<br>ral Resources Departm   | nent                   |            | Revis                              | ed July 9, 2024 |
|--|----------------|--------------------|----------------|-------------------------------|--|------------------------|------------|------------------------------------|-----------------|
| Submit Electronically  |                |                    |                |                               | TION DIVISION  |                        |            | ☐ Initial Submitt                  | al .            |
| Via OCD Permitting   | e = 1          |                    |                |                               |  |                        | Submitta   |                                    |                 |
|  | 4 - J          |                    |                |                               |  |                        | Type:      | ☐ As Drilled                       | OIT             |
|  |                |                    |                | WELL LOCA                     | TION INFORMATION   |                        |            |                                    |                 |
| API Number 30-025-44724  |                | Pool Code          | 96434          |                               | Pool Name  | Red Hills; I           | Rone Spri  | ng North                           |                 |
| Property Code  |                | Property Na        |                |                               |  | Red IIIIs, I           | Johe Spin  | Well Number                        |                 |
| 321280   |                | 0                  |                | CANYONI                       | LANDS 2 STATE COM  |                        |            | 1H                                 | ·               |
| OGRID No.<br>215099  |                | Operator Na        | ime            | COTERRA E                     | NERGY OPERATING CO.  |                        |            | Ground Level Ele<br>3426           |                 |
| Surface Owner:   State   | □ Fee □        | Tribal 🗆 Fed       | eral           |                               | Mineral Owner:   | State  Fee [           | ☐ Tribal [ | ☐ Federal                          |                 |
|  |                |                    |                | Sur                           | face Location  |                        |            |                                    |                 |
|  | vnship         | Range              | Lot            | Ft. from N/S                  | Ft. from E/W   | Latitude (N.           |            | Longitude (NAD 83)                 |                 |
| P 2  | 24S            | 34E                |                | 390 SOUTH                     | 1020 EAST  | 32.2403                | 361°       | -103.435510°                       | LEA             |
|  |                |                    | Γ.             | 7                             | m Hole Location  | I                      | 4 D 02)    | I ' I OVAD 02)                     | C               |
| The second secon | vnship<br>24S  | Range<br>34E       | Lot            | Ft. from N/S<br>101 NORTH     | Ft. from E/W<br>4 948 EAST   | 22.2535                | ,          | Longitude (NAD 83)<br>-103.435339° | LEA             |
|  |                |                    | l              | <u> </u>                      |  |                        |            |                                    |                 |
| Dedicated Acres Infil  | ll or Defin    | ning Well          | Defining       | g Well API                    | Overlapping Spacing  | Unit (Y/N)             | Consolid   | lation Code                        |                 |
| 640.16   |                |                    |                |                               |  |                        |            |                                    |                 |
| Order Numbers.   |                |                    |                |                               | Well setbacks are und  | der Common             | Ownership  | o: □Yes □No                        |                 |
|  |                |                    |                | Kick                          | Off Point (KOP)  |                        |            |                                    |                 |
|  | wnship         | Range              | Lot            | Ft. from N/S                  | Ft. from E/W   | Latitude (N            |            | Longitude (NAD 83)                 | 100             |
| P 2  | 24S            | 34E                |                | 473 SOUTH                     |  | 32.2405                | 590°       | -103.435762°                       | LEA             |
| III Godina Too   | 1.             | D                  | Lot            | First 7                       | Ft. from E/W   | I stitude OI           | AD 92)     | Longitude (NAD 83)                 | County          |
|  | wnship<br>24S  | Range<br>34E       | Lot            | 686 SOUTH                     | The state of the s | Latitude (N<br>32.241) |            | -103.435397°                       | LEA             |
|  | į.             | <u> </u>           | L              | Last T                        | Take Point (LTP)   | L                      |            |                                    |                 |
| UL Section Tov   | wnship         | Range              | Lot            | Ft. from N/S                  | Ft. from E/W   | Latitude (N            | (AD 83)    | Longitude (NAD 83)                 | County          |
| 1 2  | 24S            | 34E                |                | 200 NORTH                     | H 944 EAST   | 32.2532                | 266°       | -103.435325°                       | LEA             |
|  |                |                    |                |                               |  |                        |            |                                    |                 |
| Unitized Area or Area of I   | Uniform I      | nterest            | Spacing        | Unit Type  Hor                | rizontal   Vertical  | Grou                   | nd Floor E | levation:                          |                 |
| OPERATOR CERTIFICA   | TIONG          |                    |                |                               | SURVEYOR CERTIFIC  | CATIONS                |            |                                    |                 |
| OPERATOR CERTIFICA   |                |                    |                |                               |  |                        |            |                                    |                 |
| I hereby certify that the inform<br>my knowledge and belief, and   | d, if the well | l is a vertical or | directional    | well, that this               | I hereby certify that the well<br>surveys made by me or und  |                        |            |                                    |                 |
| organization either owns a wo<br>including the proposed bottom   | n hole locat   | ion or has a rig   | ht to drill th | is well at this               | my belief.   |                        |            | BUCH                               |                 |
| location pursuant to a contract interest, or to a voluntary poo  |                |                    |                |                               |  |                        | Q P        | MEY                                |                 |
| entered by the division.   |                |                    |                |                               |  |                        | / /:       | SEN CS                             | \               |
| If this well is a horizontal well consent of at least one lessee   | or owner of    | a working inter    | rest or unlea  | sed mineral interest          |  |                        |            | X 23/82 ) X B                      |                 |
| in each tract (in the target poo<br>interval will be located or obt  |                |                    |                |                               |  |                        | Techel     | 03-27-25 W                         | 9               |
| Signature  |                | Date               |                |                               | Signature and Seal of Profes   | sional Surveyor        |            | ONAL S                             |                 |
| Shelly Bowen   |                |                    |                |                               | 23782  | April 3, 20            | 18         |                                    |                 |
| Printed Name   |                |                    |                |                               | Certificate Number   | Date of Surv           | ey         |                                    |                 |
| shelly.bowen@coterra.com   | m              |                    | 4              |                               |  |                        |            |                                    |                 |
| Email Address  |                |                    |                |                               |  |                        |            |                                    |                 |

Property Name
CANYONLANDS 2 STATE COM

Well Number
Drawn By
D.J.S. 03-27-25

Revised By



# Operator - Coterra Energy Operating Co. (215099)

Proposed Non-Standard Horizontal Spacing Unit – Bone Spring

L1, L2, L3, L4, S2/N2, and S2 of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico, containing 640.16 acres, more or less

# CANYONLANDS 2 T24S/34E, LEA CO., NM

Tract 1: L0-7040-3 State 320.16 Acres



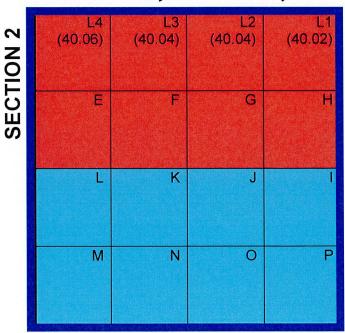


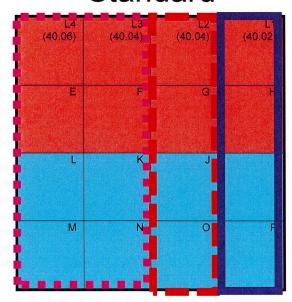


Exhibit "B1"

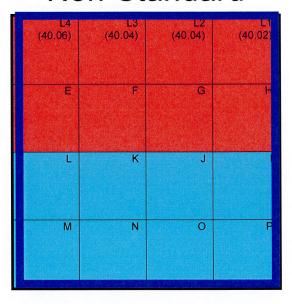
Standard Spacing Unit v. Non-Standard Spacing Unit

# CANYONLANDS 2 T24S/R34E, LEA CO., NM

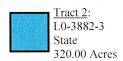
# Standard



# Non-Standard





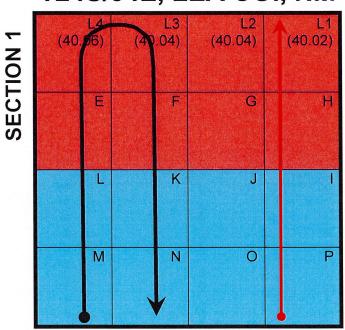


Bone Spring Development

# CANYONLANDS 2 T24S/34E, LEA CO., NM









Planned Bone Spring Development (2025)

Well List with Pool Code

RED HILLS; BONE SPRING, NORTH (Pool Code: 96434)

| Well:                        | API:         | Status:        |
|------------------------------|--------------|----------------|
| Canyonlands 2 State Com 1H   | 30-025-44724 | Producing      |
| Canyonlands 2 State Com 351H | 30-025-XXXXX | Permit Pending |

COTERRA

Coterra Energy Inc. Permian Business Unit 6001 Deauville Blvd. Suite 300N Midland, TX 79706

T 432.571.7800 coterra.com

May 5, 2025

VIA E-FILING

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

RE: Application of Coterra Energy Operating Co. for administrative approval of a 640.16-acre, more or less, nonstandard spacing unit in the Bone Spring formation comprised of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico.

Dear Director Razatos/OCD Engineering Bureau:

Coterra Energy Operating Co., a subsidiary of Coterra Energy Inc., OGRID Number 215099 ("Coterra"), respectfully requests administrative approval of a 640.16-acre, more or less, non-standard spacing unit ("NSU") comprised of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico.

The new wells proposed to be dedicated to this NSU are:

| Well Name | API Number |
|-----------|------------|
|           |            |

Canyonlands 2 State Com 351H

Pending

Coterra also requests that the following existing wells<sup>1</sup> be included in the NSU approved order:

| Well Name                  | API Number   |
|----------------------------|--------------|
| Canyonlands 2 State Com 1H | 30-025-44724 |

The Wells target the Bone Spring formation and the pool underlying the proposed non-standard spacing unit is the Red Hills; Bone Spring, North pool (Code 96434).

<sup>&</sup>lt;sup>1</sup> The existing well is currently dedicated to a 160-acre horizontal spacing unit. Coterra's goal is to combine the existing unit with the remaining acreage in Section 2 to <u>create a single approximately</u> 640.16-acre, more or less, spacing unit.



If Coterra were to follow the state-wide rules, Coterra would have to have three units to have standard units. The three standard units would be a W/2 unit (dedicated to a U-turn well), a W/2E/2 unit, and an E/2E/2 unit. In this NSU application, Coterra seeks a single 640.16-acre unit.

Coterra seeks administrative approval of this non-standard spacing unit to match a Communitization Agreement for which Coterra has received preliminary approval, to provide for efficient development, and to minimize surface disturbance by consolidating facilities and commingling production from wells in the proposed non-standard spacing unit. Approval of the non-standard unit will allow Coterra to drill four additional Bone Spring U-Turn wells per half section (8 total additional Bone Spring U-Turn wells, which is the equivalent of 16 one-mile wells total). Accordingly, approval of this administrative application will allow for full development of the communitized acreage, promote efficiently located surface facilities, reduce surface disturbance, consolidate roads, tanks and pipelines; and promote effective well spacing. In addition, approval of Coterra's application promotes effective well spacing and will allow Coterra to commingle production.

Conversely, if Coterra's NSU application is not approved, Coterra will need to construct two additional CTBs, and will need additional third-party takeaway connections for oil, water, and gas. I have included as Exhibit C-1 a slide comparing and contrasting the standard (C-1B) versus non-standard (C-1A) development scenarios.

Exhibit C-2 compares and contrasts, in table format, the reduced surface acreage and the cost savings that will occur if the NSU is approved. Developing the acreage as a single, non-standard unit will result in 6.9 acres less surface disturbance than if Coterra must develop the acreage using standard units. If Coterra's NSU application is approved, that would eliminate the need to build two additional central tank batteries which reduces permitted fugitive VOC emissions, spill risk, and low-pressure flaring. In addition, total capital costs would be significantly reduced because less infrastructure would be required to operate the single, non-standard unit.

In my opinion, approval of the NSU is in the best interest of conservation, prevention of waste, and protection of correlative rights.

Thank you for your consideration. Should you have any questions please contact me at Eddie.Behm@coterra.com or (432) 571-7865.

Sincerely.

Eddie Behm

Reservoir Engineer

Coterra Energy Operating Co.

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COTERRA COTERRA

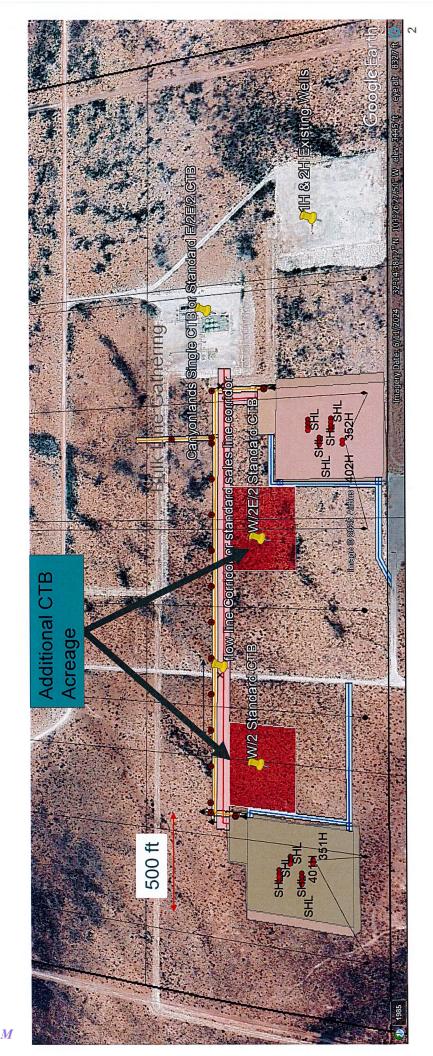
# New Surface Disturbance – Non-Standard Spacing Unit C-1A Single Existing Central Tank Battery CTB gathers W/2, W/2E/2, and E/2E/2



# COTERRA

# New Surface Disturbance – Standard Spacing Unit C-1B

Bulk line corridor used to tie back into oil, gas, and water at the existing battery Additional Construction of 1 CTB for W2 and 1 CTB for W2E2



# COTERRA

# Environmental and Capital Savings C-2

| Scenario                         | CTB Capital + CTRA pipelines (\$M) | CTB, Roads, and<br>Pipeline (Acres) |
|----------------------------------|------------------------------------|-------------------------------------|
| Non-Standard Spacing Unit (C1-A) | \$11,600                           | 16.3                                |
| Standard Spacing Unit (C1-B)     | \$21,600                           | 23.3                                |
| Savings                          | \$10,000                           | 6.9                                 |

Approval of a non-standard unit will allow consolidation of all production into a single facility and will eliminate the need to build 2 additional 440' x 350' tank batteries saving approximately 6.9 acres of disturbance.

Elimination of two additional tank batteries effectively cuts permitted fugitive VOC emissions, spill risk, and LP flares by 66%.

| Firm Mailing Book ID: 288233   | Contents                       | 11522.0003canyon<br>Notice                                | 11522.0003canyon<br>Notice   | 11522.0003canyon<br>Notice  | 11522.0003canyon<br>Notice  | 11522.0003canyon<br>Notice                                      | 11522.0003canyon<br>Notice   | 11522.0003canyon<br>Notice   |         |              |
|--|--------------------------------|---|--|---|---|---|--|--|---------|--------------|
| Firm Mailli  | Rest.Del.Fee                   | \$0.00  | \$0.00   | \$0.00  | \$0.00  | \$0.00  | \$0.00   | \$0.00   | 80.00   | \$72.38      |
|  | RR Fee                         | \$2.62  | \$2.62   | \$2.62  | \$2.62  | \$2.62  | \$2.62   | \$2.62   | \$18.34 | Grand Total: |
| ت  | Service Fee RR Fee             | \$4.85  | \$4.85   | \$4.85  | \$4.85  | \$4.85  | \$4.85   | \$4.85   | \$33.95 | Grand        |
| 77<br>CIFIED MAD   | Postage                        | \$2.87  | \$2.87   | \$2.87  | \$2.87  | \$2.87  | \$2.87   | \$2.87   | \$20.09 |              |
| PS Form 3877<br>Type of Mailing: CERTIFIED MAIL<br>05/05/2025  |                                |   |  |   |   |   |  |  | Totals: |              |
| F  | Name, Street, City, State, Zip | Chevron U.S.A. Inc.<br>1400 Smith St.<br>Houston TX 77002 | Mewbourne Oil Co.<br>500 West Texas Ave., Suite 1020<br>Midland TX 79701 | Civitas Permian Operating LLC 6301 Holiday Hill Rd., Suite 201 Midland TX 79707 | Paloma Permian, LLC<br>1100 Louisiana St., Suite 5100<br>Houston TX 77002 | COG Production, LLC<br>600 W. Illinois Ave.<br>Midland TX 79701 | Bureau of Land Management<br>301 Dinosaur Trail<br>Santa Fe NM 87508 | New Mexico State Land Office<br>P.O. Box 1148<br>Santa Fe NM 87504 |         |              |
| Rarlene Schuman  Modrall Sperling Roehl Harris & Sisk P.A.  500 Fourth Street, Suite 1000  Albuquerque NM 87102  Suite 1000                            | USPS Article Number            | 9314 8699 0430 0134 7791 35                               | 9314 8699 0430 0134 7791 42  | 9314 8699 0430 0134 7791 59   | 9314 8699 0430 0134 7791 66   | 9314 8699 0430 0134 7791 73                                     | 9314 8699 0430 0134 7791 80  | 9314 8699 0430 0134 7791 97  |         |              |
| See Every Schuman  Parlene Schuman  Parlene Schuman  Parlene Sperling Rochl Ha  Soft Fourth Street, Suite 10  Albuquerque NM 87102  Suite 10  Suite 10 | r. 7/1                         | 10/2025   | N 10:25  | ო<br>:22 AM   | 4   | ν.  | 9  | 7  |         |              |

| List Number of Pieces | Total Number of Pieces  | Postmaster:                |
|-----------------------|-------------------------|----------------------------|
| Listed by Sender      | Received at Post Office | Name of receiving employee |

Dated:



May 5, 2025

# VIA CERTIFIED MAIL

Deana M. Bennett 505.848.1834 dmb@modrall.com

# TO AFFECTED PARTIES

Re: Application of Coterra Energy Operating Co. for administrative approval of a 640.16-acre, more or less, nonstandard spacing unit in the Bone Spring formation comprised of Section 2, Township 24 South, Range 34 East, Lea County, New Mexico.

Dear Sir or Madam:

Enclosed is a copy of the above referenced application filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division receives the above-referenced applications. If no objection is received within this twenty-day period, the applications may be approved administratively by the Division.

If you have any questions concerning these applications, please contact:

Eddie Behm Reservoir Engineer Coterra Energy Inc. Eddie.Behm@coterra.com

Sincerely,

Deana M. Bennett

Attorney for Coterra Energy

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Operating Co.

Modrall Sperling Roehl Harris & Sisk P.A.

500 Fourth Street NW Suite 1000 Albuquerque, New Mexico 87102

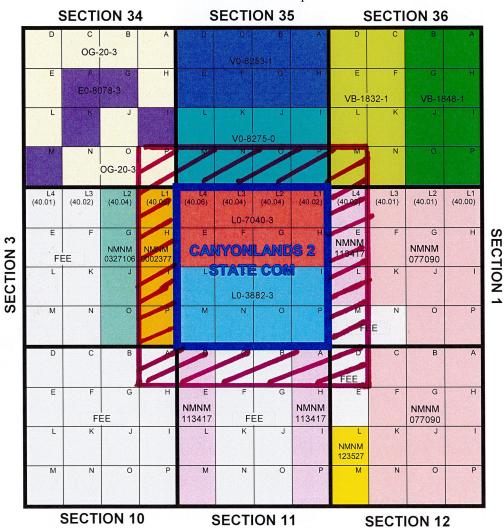
PO Box 2168 Albuquerque, New Mexico 87103-2168

Tel: 505.848.1800 www.modrall.com

Offset Ownership

T23S/R34E, \_EA CO., NM

T24S/R34E, \_EA CO., NM



|                                       | T23S/R34E                               |  |
|---------------------------------------|---|--|
| Section 34 Working Interest Owner(s): | Chevron U.S.A. Inc. (4323)              |  |
| Section 35 Operator:                  | Mewbourne Oil Co. (14744)               |  |
| Section 36 Operator:                  | Mewbourne Oil Co. (14744)               |  |
| 5                                     | T24S/R34E                               |  |
| W2/W2 Section 1 Operator:             | Civitas Permian Operating, LLC (332195) |  |
| Section 2 Operator:                   | Coterra Energy Operating Co. (215099)   |  |
| Section 2 Working Interest Owner(s):  | Chevron U.S.A. Inc. (4323)              |  |
| Section 3 Working Interest Owner(s):  | Paloma Permian, LLC                     |  |
| Section 10 Operator:                  | COG Production, LLC (217955)            |  |
| 5                                     | Civitas Permian Operating, LLC (332195) |  |
| Section 11 Operator:                  | COG Operating LLC (229137)              |  |
|                                       | Chevron Midcontinent, L.P. (241333)     |  |
| W2/W2 Section 12 Operator:            | Civitas Permian Operating, LLC (332195) |  |
|                                       |   |  |

# Offset Ownership – Notice Table

| Offsetting Section:            | Operator:                                  | Working Interest Owner(s) – N/A if Coterra/Cimarex is NOT Operator: | Address(es):  | Notice<br>Sent: |
|--------------------------------|--|---|---|-----------------|
| Section 34,<br>T23S/R34E       | Chevron U.S.A. Inc.                        | N/A   | Chevron U.S.A. Inc.<br>1400 Smith St.<br>Houston TX 77002                               | 05/05/2025      |
| Section 35,<br>T23S/R34E       | Mewbourne Oil Co.<br>(14744)               | N/A   | Mewbourne Oil Co.<br>500 West Texas Ave, Suite 1020<br>Midland, TX 79701                | 05/05/2025      |
| Section 36,<br>T23S/R34E       | Mewbourne Oil Co.<br>(14744)               | N/A   | Mewbourne Oil Co.<br>500 West Texas Ave, Suite 1020<br>Midland, TX 79701                | 05/05/2025      |
| W2/W2 Section 1,<br>T24S/R34E  | Civitas Permian Operating,<br>LLC (332195) | N/A   | Civitas Permian Operating, LLC<br>6301 Holiday Hill Rd., Suite 201<br>Midland, TX 79707 | 05/05/2025      |
| Section 2,<br>T24S/R34E        | Coterra Energy Operating<br>Co. (215099)   | Coterra Energy Operating Co. (100%)                                 | Coterra Energy Operating Co.<br>6001 Deauville Blvd., Suite 300N<br>Midland, TX 79706   | N/A             |
| Section 3,                     | Chevron U.S.A. Inc.                        | N/A   | Chevron U.S.A. Inc.<br>1400 Smith St.<br>Houston TX 77002                               | 05/05/2025      |
| T24S/R34E                      | Paloma Permian, LLC                        | N/A   | Paloma Permian, LLC<br>1100 Louisiana St., Suite 5100<br>Houston, TX 77002              | 05/05/2025      |
| Section 10,<br>T24S/R34E       | COG Production, LLC (217955)               | N/A   | COG Production, LLC<br>600 W. Illinois Ave.<br>Midland, TX 79701                        | 05/05/2025      |
|                                | Civitas Permian Operating,<br>LLC (332195) | N/A   | Civitas Permian Operating, LLC<br>6301 Holiday Hill Rd., Suite 201<br>Midland, TX 79707 | 05/05/2025      |
| Section 11,<br>T24S/R34E       | COG Operating LLC (229137)                 | N/A   | COG Operating LLC<br>600 W. Illinois Ave.<br>Midland, TX 79701                          | 05/05/2025      |
|                                | Chevron Midcontinent,<br>L.P. (241333)     | N/A   | Chevron Midcontinent, L.P.<br>1400 Smith St.<br>Houston TX 77002                        | 05/05/2025      |
| W2/W2 Section 12,<br>T24S/R34E | Civitas Permian Operating,<br>LLC (332195) | N/A   | Civitas Permian Operating, LLC<br>6301 Holiday Hill Rd., Suite 201<br>Midland, TX 79707 | 05/05/2025      |

# Government Agency(ies) Receiving Notice:

| Offsetting Mineral Ownership:      | Address(es):  | Notice Sent: |
|------------------------------------|---|--------------|
| Federal (Sections 1, 3, and 11)    | Bureau of Land Management<br>301 Dinosaur Trail<br>Santa Fe, NM 87508 | 05/05/2025   |
| State (Sections 2, 34, 35, and 36) | New Mexico State Land Office<br>P.O. Box 1148,<br>Santa Fe, NM 87504  | 05/05/2025   |

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

Action 458694

## **CONDITIONS**

| Operator:                    | OGRID:                                |
|------------------------------|---------------------------------------|
| Coterra Energy Operating Co. | 215099                                |
| 6001 Deauville Blvd          | Action Number:                        |
| Midland, TX 79706            | 458694                                |
|                              | Action Type:                          |
|                              | [UF-NSP] Non-Standard Proration (NSP) |

## CONDITIONS

| Created<br>By |  | Condition<br>Date |
|---------------|--|-------------------|
| llowe         | Submit a C-103 X or Z to the OCD district office to add the Canyonlands 2 State Com Well No. 1H (30-025-44724) to this NSP order and HSU. Reference this NSP order within the request. | 7/10/2025         |