

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

**APPLICATION FOR SURFACE COMMINGLING  
SUBMITTED BY EOG RESOURCES, INC**

**ORDER NO. PLC-1106**

**ORDER**

The Director of the New Mexico Oil Conservation Division (“OCD”), having considered the application and the recommendation of the OCD Engineering Bureau, issues the following Order.

**FINDINGS OF FACT**

1. EOG Resources, Inc (“Applicant”) submitted a complete application to surface commingle the oil and gas production from the pools and leases described in Exhibit A (“Application”).
2. Applicant included a complete list of the wells currently dedicated to each pool and lease.
3. Applicant proposed a method to allocate the oil and gas production to the pools, leases, and wells to be commingled.
4. Applicant stated that it intends to keep the oil and gas production from one or more group(s) of wells identified in Exhibit B segregated from the oil and gas production from all other wells prior to measuring that production with an allocation meter.
5. Applicant certified the commingling of oil and gas production from the pools, leases, and wells will not in reasonable probability reduce the value of the oil and gas production to less than if it had remained segregated.
6. Applicant in the notice for the Application stated that it sought authorization to prospectively include additional pools and leases in accordance with 19.15.12.10(C)(4)(g) NMAC.
7. Applicant stated that it sought authorization to surface commingle and off-lease measure, as applicable, oil and gas production from wells which have not yet been approved to be drilled, but will produce from a pool and lease as described in Exhibit A.
8. Applicant provided notice of the Application to all persons owning an interest in the oil and gas production to be commingled, including the owners of royalty and overriding royalty interests, regardless of whether they have a right or option to take their interests in kind, and those persons either submitted a written waiver or did not file an objection to the Application.
9. Applicant provided notice of the Application to the Bureau of Land Management (“BLM”) or New Mexico State Land Office (“NMSLO”), as applicable.

### **CONCLUSIONS OF LAW**

10. OCD has jurisdiction to issue this Order pursuant to the Oil and Gas Act, NMSA 1978, §§ 70-2-6, 70-2-11, 70-2-12, 70-2-16, and 70-2-17, 19.15.12. NMAC, and 19.15.23. NMAC.
11. Applicant satisfied the notice requirements for the Application in accordance with 19.15.12.10(A)(2) NMAC, 19.15.12.10(C)(4)(c) NMAC, and 19.15.12.10(C)(4)(e) NMAC, as applicable.
12. Applicant satisfied the notice requirements for the Application in accordance with 19.15.23.9(A)(5) NMAC and 19.15.23.9(A)(6) NMAC, as applicable.
13. Applicant's proposed method of allocation, as modified herein, complies with 19.15.12.10(B)(1) NMAC or 19.15.12.10(C)(1) NMAC, as applicable.
14. Commingling of oil and gas production from state, federal, or tribal leases shall not commence until approved by the BLM or NMSLO, as applicable, in accordance with 19.15.12.10(B)(3) NMAC and 19.15.12.10(C)(4)(h) NMAC.
15. Applicant satisfied the notice requirements for the subsequent addition of pools, leases, and wells in the notice for the Application, in accordance with 19.15.12.10(C)(4)(g) NMAC. Subsequent additions of pools, leases, and wells within Applicant's defined parameters, as modified herein, will not, in reasonable probability, reduce the commingled production's value or otherwise adversely affect the interest owners in the production to be added.
16. By granting the Application with the conditions specified below, this Order prevents waste and protects correlative rights, public health, and the environment.

### **ORDER**

1. Applicant is authorized to surface commingle oil and gas production from the pools and leases as described in Exhibit A.

Applicant is authorized to surface commingle oil and gas production from the wells included in Exhibit A provided that they produce from a pool and lease described in Exhibit A.

Applicant is authorized to store and measure oil and gas production off-lease, as applicable, from the pools and leases as described in Exhibit A at a central tank battery or gas title transfer meter described in Exhibit A.

Applicant is authorized to surface commingle oil and gas production from wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A.

Applicant is authorized to store and measure oil and gas production off-lease, as applicable, from wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A at a central tank battery or gas title transfer meter described in Exhibit A.

2. This Order supersedes Order PLC-465-A, PLC-524 and CTB-759.
3. The allocation of oil and gas production to wells not included in Exhibit A but that produce from a pool and lease as described in Exhibit A shall be determined in the same manner as to wells identified in Exhibit A that produce from that pool and lease, provided that if more than one allocation method is being used or if there are no wells identified in Exhibit A that produce from the pool and lease, then allocation of oil and gas production to each well not included in Exhibit A shall be determined by OCD prior to commingling production from it with the production from another well.
4. The allocation of oil and gas production to each group of wells identified in Exhibit B shall be determined by separating and metering the production from each group as described by Train in Exhibit B prior to commingling that production with production from any other well.
5. The allocation of oil and gas production shall be based on the production life of each well as measured for three periods:

- a. The initial production period shall be measured from the first production until the earlier of either the peak production rate or thirty (30) days after the first production.

During the initial production period, the oil and gas production for each well identified in Exhibit B shall be allocated using a production curve calculated from a minimum of ten (10) well tests per month, except that any day in which a well test cannot achieve an accurate result due to a temporary change in oil and gas production shall not be included in the computation of time determining the well test schedule. The production curve shall be calculated by interpolating daily production for each day using the known daily production obtained by well tests and shall use a method of interpolation that is at minimum as accurate as maintaining a constant rate of change for each day's production between the known daily production values.

- b. The plateau period shall be measured from the end of the initial production period to the peak decline rate.

During the plateau period, the oil and gas production for each well identified in Exhibit A shall be allocated using a minimum of three (3) well tests per month.

- c. The decline period shall be measured from the end of the plateau period until the well is plugged and abandoned.

During the decline period, the oil and gas production for each well identified in Exhibit A shall be allocated as follows:

- i. a minimum of three (3) well tests per month when the decline rate is greater than twenty-two percent (22%) per month;
- ii. a minimum of two (2) well tests per month when the decline rate is between twenty-two percent (22%) and ten percent (10%) per month; and

- iii. a minimum of one (1) well test per month when the decline rate is less than ten percent (10%) per month.

Upon OCD's request, Applicant shall submit a Form C-103 to the OCD Engineering Bureau that contains the decline rate curve and other relevant information demonstrating the production life of a well.

Applicant shall conduct a well test by separating and metering the oil and gas production from that well for either:

- a. a minimum of twenty-four (24) consecutive hours; or
- b. a combination of nonconsecutive periods that meet the following conditions:
  - i. Each period shall be a minimum of six (6) hours.
  - ii. The total duration of the nonconsecutive periods shall be a minimum of eighteen (18) hours.
  - iii. A vessel shall be allowed to reach equilibrium and a sufficient liquid retention time for accurate measurement achieved prior to beginning the well test.

The well test requirements of this Order shall be suspended for any well shut-in for a period that continues for more than fifteen (15) days until the well commences production.

The oil and gas production for each well identified in Exhibit B shall be separated and metered prior to commingling it with production from another well.

- 6. If Applicant recovers oil or gas production from produced water prior to Applicant injecting it or transferring custody of it, then that production shall be allocated to each well in the proportion that it contributed to the total produced water.
- 7. If Applicant recovers gas production using a vapor recovery unit (VRU), then that gas production shall be allocated to each well in the proportion that it contributed to the total oil production.
- 8. Applicant shall measure and market the commingled oil at a central tank battery described in Exhibit A in accordance with this Order and 19.15.18.15 NMAC or 19.15.23.8 NMAC.
- 9. Applicant shall measure and market the commingled gas at a well pad, central delivery point, central tank battery, or gas title transfer meter described in Exhibit A in accordance with this Order and 19.15.19.9 NMAC, provided however that if the gas is vented or flared, and regardless of the reason or authorization pursuant to 19.15.28.8(B) NMAC for such venting or flaring, Applicant shall measure or estimate the gas in accordance with 19.15.28.8(E) NMAC.
- 10. Applicant shall calibrate the meters used to measure or allocate oil and gas production in accordance with 19.15.12.10(C)(2) NMAC.

11. Applicant shall install and utilize vessels that are appropriately designed to ensure sufficient separation of the fluids and to accurately measure oil and gas production.
12. If the commingling of oil and gas production from any pool, lease, or well reduces the value of the commingled oil and gas production to less than if it had remained segregated, no later than sixty (60) days after the decrease in value has occurred Applicant shall submit a new surface commingling application to OCD to amend this Order to remove the pool, lease, or well whose oil and gas production caused the decrease in value. If Applicant fails to submit a new application, this Order shall terminate on the following day, and if OCD denies the application, this Order shall terminate on the date of such action.
13. Applicant may submit an application to amend this Order to add pools, leases, and subsequently drilled wells with spacing units adjacent to or within the tracts commingled by this Order by submitting a Form C-107-B in accordance with 19.15.12.10(C)(4)(g) NMAC, provided the pools, leases, and subsequently drilled wells are within the identified parameters included in the Application.
14. If a well is not included in Exhibit A but produces from a pool and lease as described in Exhibit A, then Applicant shall submit Forms C-102 and C-103 to the OCD Engineering Bureau after the well has been approved to be drilled and prior to off-lease measuring or commingling oil or gas production from it with the production from another well. The Form C-103 shall reference this Order and identify the well, proposed method to determine the allocation of oil and gas production to it, and the location(s) that commingling of its production will occur.
15. Applicant shall not commence commingling oil or gas production from state, federal, or tribal leases until approved by the BLM or NMSLO, as applicable.
16. If OCD determines that Applicant has failed to comply with any provision of this Order, OCD may take any action authorized by the Oil and Gas Act or the New Mexico Administrative Code (NMAC).
17. OCD retains jurisdiction of this matter and reserves the right to modify or revoke this Order as it deems necessary.

**STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION**



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**ALBERT C. S. CHANG  
DIRECTOR**

**DATE:** 3/27/26

State of New Mexico  
Energy, Minerals and Natural Resources Department

## Exhibit A

Order: PLC-1106

Operator: EOG Resources, Inc (7377)

Central Tank Battery: Neptune 10 State Com Central Tank Battery

Central Tank Battery Location: UL K, Section 10, Township 24 South, Range 33 East

Central Tank Battery: Neptune 10 State Com East Central Tank Battery

Central Tank Battery Location: UL H, Section 10, Township 24 South, Range 33 East

Gas Title Transfer Meter Location: UL K, Section 10, Township 24 South, Range 33 East

### Pools

Pool Name	Pool Code
TRIPLE X;BONE SPRING	59900
WC-025 G-09 S243310P;UPPER WOLFCAMP	98135

### Leases as defined in 19.15.12.7(C) NMAC

Lease	UL or Q/Q	S-T-R
CA Bone Spring SLO 203494 PUN 1349252	E2E2	10-24S-33E
CA Bone Spring SLO 203495 PUN 1349268	W2E2	10-24S-33E
CA Bone Spring SLO 203586 PUN 1356043	E2W2	03-24S-33E
	E2W2	10-24S-33E
CA Bone Spring SLO 203587 PUN 1356054	W2W2	03-24S-33E
	W2W2	10-24S-33E
CA Wolfcamp SLO 203588 PUN 1356066	W2W2	03-24S-33E
	W2W2	10-24S-33E
CA Wolfcamp SLO 203716 PUN 1369318	E2W2	03-24S-33E
	E2W2	10-24S-33E
CA Bone Spring SLO 203928 PUN 1377388	W2	03-24S-33E
	W2	10-24S-33E
CA Bone Spring SLO 204110 PUN 1385286	W2E2	03-24S-33E
	W2E2	10-24S-33E
CA Bone Spring SLO 204111 PUN 1385290	E2E2	03-24S-33E
	E2E2	10-24S-33E
CA Wolfcamp SLO 204964 PUN 1404965	E2	03-24S-33E
	E2	10-24S-33E

### Wells

Well API	Well Name	UL or Q/Q	S-T-R	Pool
30-025-42322	NEPTUNE 10 STATE COM #501H	E2E2	10-24S-33E	59900
30-025-42323	NEPTUNE 10 STATE COM #502H	W2E2	10-24S-33E	59900
30-025-43454	NEPTUNE 10 STATE COM #503H	E2W2	03-24S-33E	59900
		E2W2	10-24S-33E	
30-025-43455	NEPTUNE 10 STATE COM #504H	E2W2	03-24S-33E	59900
		E2W2	10-24S-33E	
30-025-43456	NEPTUNE 10 STATE COM #505H	W2W2	03-24S-33E	59900
		W2W2	10-24S-33E	

30-025-44124	NEPTUNE 10 STATE COM #601H	W2W2 W2W2	03-24S-33E 10-24S-33E	59900
30-025-43457	NEPTUNE 10 STATE COM #701H	W2W2 W2W2	03-24S-33E 10-24S-33E	98135
30-025-43805	NEPTUNE 10 STATE COM #702H	W2W2 W2W2	03-24S-33E 10-24S-33E	98135
30-025-43806	NEPTUNE 10 STATE COM #703H	W2W2 W2W2	03-24S-33E 10-24S-33E	98135
30-025-44468	NEPTUNE 10 STATE COM #101H	E2E2 E2E2	03-24S-33E 10-24S-33E	59900
30-025-44464	NEPTUNE 10 STATE COM #102H	W2E2 W2E2	03-24S-33E 10-24S-33E	59900
30-025-45634	NEPTUNE 10 STATE COM #201H	W2 W2	03-24S-33E 10-24S-33E	59900
30-025-45635	NEPTUNE 10 STATE COM #202H	W2 W2	03-24S-33E 10-24S-33E	59900
30-025-46733	NEPTUNE 10 STATE COM #203H	W2 W2	03-24S-33E 10-24S-33E	59900
30-025-46734	NEPTUNE 10 STATE COM #204H	W2E2 W2E2	03-24S-33E 10-24S-33E	59900
30-025-46735	NEPTUNE 10 STATE COM #205H	E2E2 E2E2	03-24S-33E 10-24S-33E	59900
30-025-44469	NEPTUNE 10 STATE COM #206H	E2E2 E2E2	03-24S-33E 10-24S-33E	59900
30-025-45636	NEPTUNE 10 STATE COM #301H	W2 W2	03-24S-33E 10-24S-33E	59900
30-025-45637	NEPTUNE 10 STATE COM #302H	W2 W2	03-24S-33E 10-24S-33E	59900
30-025-46736	NEPTUNE 10 STATE COM #303H	E2E2 E2E2	03-24S-33E 10-24S-33E	59900
30-025-44467	NEPTUNE 10 STATE COM #401H	W2E2 W2E2	03-24S-33E 10-24S-33E	59900
30-025-44125	NEPTUNE 10 STATE COM #602H	E2W2 E2W2	03-24S-33E 10-24S-33E	59900
30-025-43807	NEPTUNE 10 STATE COM #704H	E2W2 E2W2	03-24S-33E 10-24S-33E	98135
30-025-43808	NEPTUNE 10 STATE COM #705H	E2W2 E2W2	03-24S-33E 10-24S-33E	98135
30-025-52983	NEPTUNE 10 STATE COM #706H	E2 E2	03-24S-33E 10-24S-33E	98135
30-025-92984	NEPTUNE 10 STATE COM #707H	E2 E2	03-24S-33E 10-24S-33E	98135
30-025-52985	NEPTUNE 10 STATE COM #708H	E2 E2	03-24S-33E 10-24S-33E	98135
30-025-52986	NEPTUNE 10 STATE COM #741H	E2 E2	03-24S-33E 10-24S-33E	98135
30-025-52987	NEPTUNE 10 STATE COM #751H	E2 E2	03-24S-33E 10-24S-33E	98135

State of New Mexico  
Energy, Minerals and Natural Resources Department

## Exhibit B

Order: PLC-1106  
Operator: EOG Resources, Inc (7377)

### Wells

Well API	Well Name	UL or Q/Q	S-T-R	Train	Allocation Method
30-025-43807	NEPTUNE 10 STATE COM #704H	E2W2	03-24S-33E	A1	Meter
		E2W2	10-24S-33E		
30-025-43808	NEPTUNE 10 STATE COM #705H	E2W2	03-24S-33E	A1	Meter
		E2W2	10-24S-33E		
30-025-44124	NEPTUNE 10 STATE COM #601H	W2W2	03-24S-33E	A1	Meter
		W2W2	10-24S-33E		
30-025-44125	NEPTUNE 10 STATE COM #602H	E2W2	03-24S-33E	A1	Meter
		E2W2	10-24S-33E		
30-025-45634	NEPTUNE 10 STATE COM #201H	W2	03-24S-33E	A1	Meter
		W2	10-24S-33E		
30-025-45635	NEPTUNE 10 STATE COM #202H	W2	03-24S-33E	A1	Meter
		W2	10-24S-33E		
30-025-45636	NEPTUNE 10 STATE COM #301H	W2	03-24S-33E	A1	Meter
		W2	10-24S-33E		
30-025-45637	NEPTUNE 10 STATE COM #302H	W2	03-24S-33E	A1	Meter
		W2	10-24S-33E		
30-025-44468	NEPTUNE 10 STATE COM #101H	E2E2	03-24S-33E	A1	Meter
		E2E2	10-24S-33E		
30-025-44464	NEPTUNE 10 STATE COM #102H	W2E2	03-24S-33E	A1	Meter
		W2E2	10-24S-33E		
30-025-46733	NEPTUNE 10 STATE COM #203H	W2	03-24S-33E	A1	Meter
		W2	10-24S-33E		
30-025-46734	NEPTUNE 10 STATE COM #204H	W2E2	03-24S-33E	A1	Meter
		W2E2	10-24S-33E		
30-025-46735	NEPTUNE 10 STATE COM #205H	E2E2	03-24S-33E	A1	Meter
		E2E2	10-24S-33E		
30-025-44469	NEPTUNE 10 STATE COM #206H	E2E2	03-24S-33E	A1	Meter
		E2E2	10-24S-33E		
30-025-46736	NEPTUNE 10 STATE COM #303H	E2E2	03-24S-33E	A1	Meter
		E2E2	10-24S-33E		
30-025-44467	NEPTUNE 10 STATE COM #401H	W2E2	03-24S-33E	A1	Meter
		W2E2	10-24S-33E		
30-025-52983	NEPTUNE 10 STATE COM #706H	E2	03-24S-33E	A1	Meter
		E2	10-24S-33E		
30-025-92984	NEPTUNE 10 STATE COM #707H	E2	03-24S-33E	A1	Meter
		E2	10-24S-33E		
30-025-52985	NEPTUNE 10 STATE COM #708H	E2	03-24S-33E	A1	Meter
		E2	10-24S-33E		
30-025-52986	NEPTUNE 10 STATE COM #741H	E2	03-24S-33E	A1	Meter
		E2	10-24S-33E		
30-025-52987	NEPTUNE 10 STATE COM #751H	E2	03-24S-33E	A1	Meter
		E2	10-24S-33E		
30-025-42322	NEPTUNE 10 STATE COM #501H	E2E2	10-24S-33E	B1	Well Test
30-025-42323	NEPTUNE 10 STATE COM #502H	W2E2	10-24S-33E	B1	Well Test

30-025-43454	NEPTUNE 10 STATE COM #503H	E2W2 E2W2	03-24S-33E 10-24S-33E	B1	Well Test
30-025-43455	NEPTUNE 10 STATE COM #504H	E2W2 E2W2	03-24S-33E 10-24S-33E	B1	Well Test
30-025-43456	NEPTUNE 10 STATE COM #505H	W2W2 W2W2	03-24S-33E 10-24S-33E	B1	Well Test
30-025-43457	NEPTUNE 10 STATE COM #701H	W2W2 W2W2	03-24S-33E 10-24S-33E	B1	Well Test
30-025-43805	NEPTUNE 10 STATE COM #702H	W2W2 W2W2	03-24S-33E 10-24S-33E	B1	Well Test
30-025-43806	NEPTUNE 10 STATE COM #703H	W2W2 W2W2	03-24S-33E 10-24S-33E	B1	Well Test

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 569194

**CONDITIONS**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID: 7377
	Action Number: 569194
	Action Type: [IM-SD] Admin Order Support Doc (ENG) (IM-AAO)

**CONDITIONS**

Created By	Condition	Condition Date
sarah.clelland	None	3/31/2026