

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Erin Taylor**  
Acting Cabinet Secretary

**Ben Shelton**  
Deputy Secretary

**Albert C.S. Chang**  
Division Director  
Oil Conservation Division



**ADMINISTRATIVE NON-STANDARD LOCATION**

Melissa Guidry  
[melissa\\_guidry@oxy.com](mailto:melissa_guidry@oxy.com)

**Administrative Order NSL – 9324**

**OXY USA INC. [OGRID 16696]  
Top Spot 12 13 Federal Com Well No. 13H  
API No. 30-015-56985**

Reference is made to your application received on April 7<sup>th</sup>, 2026.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	520 FSL & 1225 FEL	P	13	22S	31E	Eddy
First Take Point	100 FSL & 1372 FEL	O	13	22S	31E	Eddy
Last Take Point	100 FNL & 1372 FEL	B	12	22S	31E	Eddy
Terminus	20 FNL & 1372 FEL	B	12	22S	31E	Eddy

**Proposed Horizontal Spacing Unit**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
W/2 E/2 Section 13	320	Bilbrey Basin; Bone Spring	5695
W/2 E/2 Section 12			

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(1)(a) NMAC governs this proposed well and provides that the operator dedicate a horizontal well at a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter - quarter section or equivalent.

1220 South St. Francis Drive, 3<sup>rd</sup> Floor • Santa Fe, New Mexico 87505  
Phone (505) 476-3441 • [www.emnrd.state.nm.us/oed](http://www.emnrd.state.nm.us/oed)

Administrative Order NSL – 9324

OXY USA INC.

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19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 330 feet for an **oil** well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal well shall be no closer than 100 feet for a well within the horizontal plane, to any outer boundary of the horizontal spacing unit.

The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(5)(a) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of Take Points referenced above, within the described Horizontal Spacing Unit.

This well's completed interval is as close as 52 feet to the eastern edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 13, encroachment to the E/2 E/2

Section 12, encroachment to the E/2 E/2

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in 19.15.2.7(A)(8) NMAC, in all adjoining units towards which the proposed location encroaches.

It is understood that the request for a non-standard location is to allow efficient spacing of horizontal wells within the Bonespring formation and prevent waste underlying the W/2 E/2 Section 13 and W/2 E/2 Section 12.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per 19.15.15.13 (B) NMAC, **Division approves this unorthodox location.**

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as the Division deems necessary.



**Albert C.S. Chang**  
Division Director  
AC/lrl

**Date:** 5-18-26

Revised March 23, 2017

ID NO. 572399

NSL - 9324

RECEIVED: <b>04/07/26</b>	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** OXY USA INC **OGRID Number:** 16696  
**Well Name:** TOP SPOT 12\_13 FEDERAL COM 13H **API:** 30-015-56985  
**Pool:** BILBREY BASIN; BONE SPRING **Pool Code:** 5695

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]  
 A. Location - Spacing Unit - Simultaneous Dedication  
 NSL       NSP (PROJECT AREA)       NSP (PRORATION UNIT)       SD
- B. Check one only for [ I ] or [ II ]  
 [ I ] Commingling - Storage - Measurement  
 DHC    CTB    PLC    PC    OLS    OLM  
 [ II ] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
 WFX    PMX    SWD    IPI    EOR    PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.  
 A.  Offset operators or lease holders  
 B.  Royalty, overriding royalty owners, revenue owners  
 C.  Application requires published notice  
 D.  Notification and/or concurrent approval by SLO  
 E.  Notification and/or concurrent approval by BLM  
 F.  Surface owner  
 G.  For all of the above, proof of notification or publication is attached, and/or,  
 H.  No notice required

<u>FOR OCD ONLY</u>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Melissa Guidry

Print or Type Name

*Melissa Guidry*

Signature

04/07/26

Date

713-497-2481

Phone Number

melissa\_guidry@oxy.com

e-mail Address



# OXY USA Inc

5 Greenway Plaza, Suite 110  
Houston, TX 77046-0521

April 7, 2026

New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Attention: Leonard Lowe

Re: ***Application for Administrative Approval of Non-Standard Location  
Top Spot 12\_13 Federal Com 13H, API 30-015-56985 – Bilbrey Basin; Bone Spring  
Surface – 520' FSL 1225' FEL Unit P, Sec 13 T22S R31E  
First Take Point – 100' FSL 1372' FEL Unit O, Sec 13 T22S R31E  
Last Take Point – 100' FNL 1372' FEL Unit B, Sec 12 T22S R31E  
Bottom Hole – 20' FNL 1372' FEL Unit B, Sec 12 T22S R31E  
Eddy County, New Mexico***

Dear Mr. Lowe,

OXY USA Inc. respectfully requests administrative approval of a non-standard location for the Top Spot 12\_13 Federal Com 13H well. The #13H well is proposed to be completed in the Bilbrey Basin; Bone Spring pool. This will be a horizontal well in a pool with no special rules for setback, so the setback requirements under Rule 19.15.15.9 (A) and 19.15.16.15 (B) will apply. The proposed producing interval is projected as follows:

Surface – 520' FSL 1225' FEL Unit P, Sec 13 T22S R31E  
First Take Point – 100' FSL 1372' FEL Unit O, Sec 13 T2SS R31E  
Last Take Point – 100' FNL 1372' FEL Unit B, Sec 12 T22S R31E  
Bottom Hole – 20' FNL 1372' FEL Unit B, Sec 12 T22S R31E

The adjoining units which the completed interval, unorthodox location, encroaches are located to the East in T24S R35E:

Section 12 - Units A, H, I, and P  
Section 13 - Units A, H, I, and P

Approval of the unorthodox location will allow for efficient spacing of horizontal wells in the Bone Spring formation and thereby prevent waste.

To support this request, the following information has been submitted for your review:

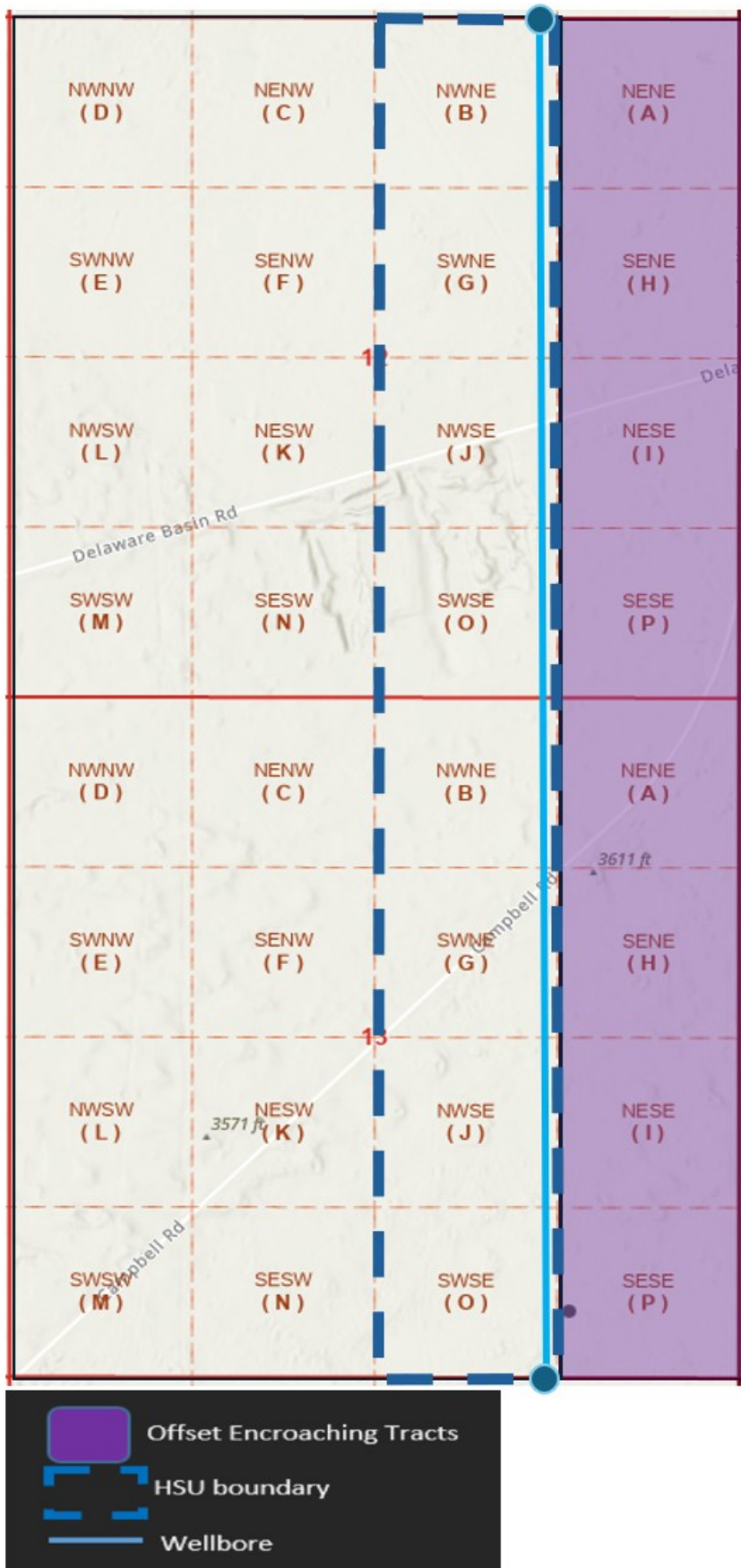
1. C-102 Plat for the proposed well
2. List of affected offset parties in each adjoining spacing unit in the same pool or formation located closer to the unorthodox well location than the minimum distance prescribed by applicable rule or order, copies of the signed certified return receipts will be furnished upon request
3. Statement from Oxy Development Area Engineer

Sincerely,

*Melissa Guidry*

Melissa Guidry  
Sr. Regulatory Advisor  
[Melissa.Guidry@oxy.com](mailto:Melissa.Guidry@oxy.com)

OXY USA Inc.  
Top Spot 12\_13 Federal Com 13H  
Sections 12\_13 Township 22 South, Range 31 East, N.M.P.M.  
Eddy, New Mexico



<b>C-102</b>  Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department <b>OIL CONSERVATION DIVISION</b>	Revised July 9, 2024
		Submittal Type: <input type="checkbox"/> Initial Submittal <input checked="" type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled

**WELL LOCATION INFORMATION**

API Number 30-015-56985	Pool Code 5695	Pool Name <b>BILBREY BASIN; BONE SPRING</b>
Property Code 335970	Property Name TOP SPOT 12_13 FED COM	Well Number 13H
OGRID No. 16696	Operator Name OXY USA INC.	Ground Level Elevation 3583.5'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude (NAD 83)	Longitude (NAD 83)	County
P	13	22S	31E		520 SOUTH	1225 EAST	32.385676°	-103.726915°	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude (NAD 83)	Longitude (NAD 83)	County
B	12	22S	31E		20 NORTH	1372 EAST	32.413220°	-103.727380°	EDDY

Dedicated Acres 320	Infill or Defining Well <b>INFILL</b>	Defining Well API <b>24H - 30-015-47954</b>	Overlapping Spacing Unit (Y/N) <b>N</b>	Consolidation Code <b>C</b>
Order Numbers. N/A		Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude (NAD 83)	Longitude (NAD 83)	County
O	13	22S	31E		50 SOUTH	1372 EAST	32.384385°	-103.727391°	EDDY


First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude (NAD 83)	Longitude (NAD 83)	County
O	13	22S	31E		100 SOUTH	1372 EAST	32.384523°	-103.727391°	EDDY

Last Take Point (LTP)

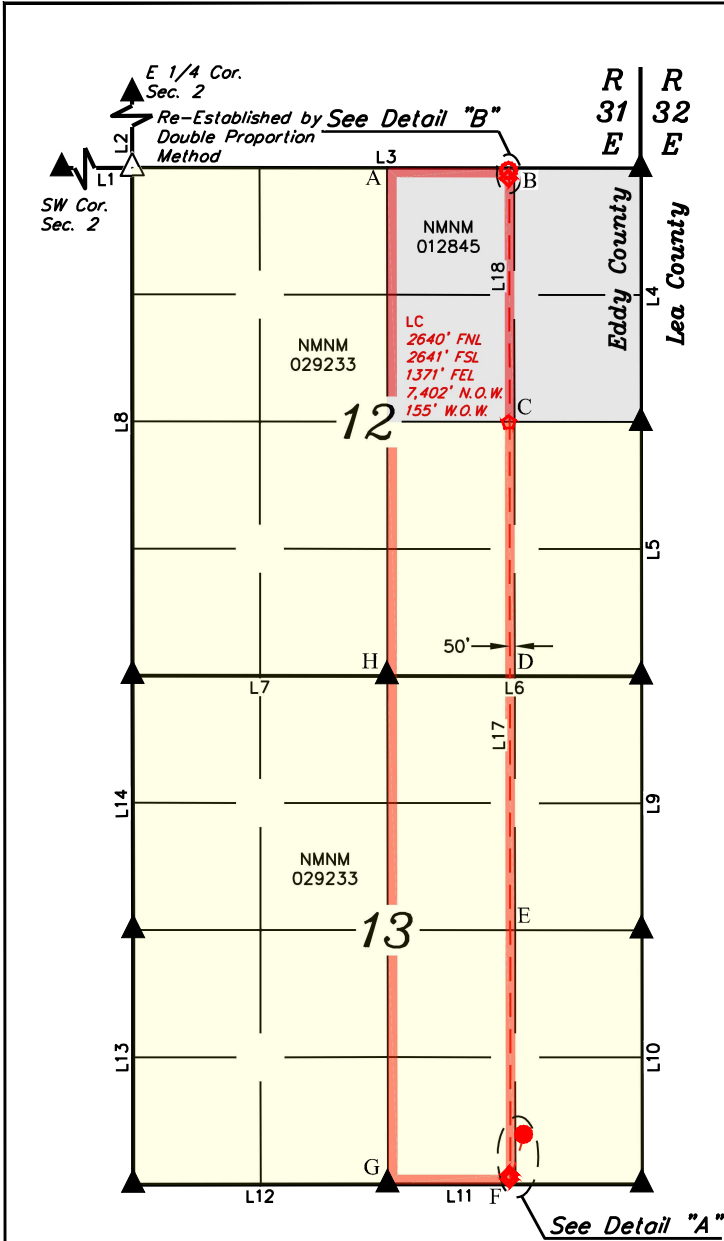
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude (NAD 83)	Longitude (NAD 83)	County
B	12	22S	31E		100 NORTH	1372 EAST	32.413000°	-103.727380°	EDDY

Unitized Area or Area of Uniform Interest <b>N</b>	Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: <b>3583.5'</b>
-------------------------------------------------------	----------------------------------------------------------------------------------------------------	----------------------------------------

<p><b>OPERATOR CERTIFICATIONS</b></p> <p><i>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.</i></p> <p><i>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></p> <p><b>Melissa Guidry</b>      09/10/25</p>	<p><b>SURVEYOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the well location shown on this plat was plotted from the 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 belief.</i></p> <div style="text-align: center;">  </div>
Signature <b>Melissa Guidry</b>	Signature and Seal of Professional Surveyor
Date 09/10/25	23782      June 25, 2025
Printed Name <b>melissa_guidry@oxy.com</b>	Certificate Number      Date of Survey
Email Address	

Note: No allowable will be assigned to this completion until all interest have been consolidated or a non-standard unit has been approved by the division.

Property Name TOP SPOT 12_13 FED COM	Well Number 13H	Drawn By T.I.R. 08-26-24	Revised By REV. 3 T.J.S. 07-17-25 (WELLBORE PATH UPDATE)
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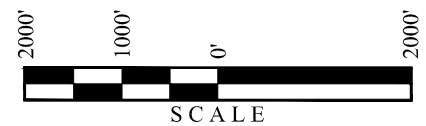


- NOTE:
- Distances referenced on plat to section lines are perpendicular.
  - Basis of Bearings is a Transverse Mercator Projection with a Central Meridian of W103°53'00" (NAD 83)
  - Colored areas within section lines represent federal oil & gas leases.

POINT	NAD 27 N.M. STATE PLANE, EAST ZONE		NAD 83 N.M. STATE PLANE, EAST ZONE	
	NORTHING	EASTING	NORTHING	EASTING
A	514547.09'	685877.72'	514607.78'	727059.77'
B	514550.25'	687198.70'	514610.95'	728380.77'
C	511911.03'	687212.16'	511971.66'	728394.30'
D	509270.21'	687226.09'	509330.77'	728408.30'
E	506629.60'	687240.39'	506690.09'	728422.68'
F	503990.44'	687255.04'	504050.86'	728437.41'
G	503984.61'	685934.52'	504045.03'	727116.88'
H	509266.21'	685905.18'	509326.77'	727087.38'

LINE	DIRECTION	LENGTH
L1	S89°48'38"W	5283.00'
L2	N00°05'15"W	2642.31'
L3	N89°53'45"W	5284.97'
L4	N00°02'49"W	2638.99'
L5	N00°04'00"W	2641.40'
L6	N89°55'57"W	2642.34'
L7	N89°57'03"W	2643.31'
L8	N00°02'58"W	5284.61'
L9	N00°03'46"W	2640.91'
L10	N00°04'43"W	2638.22'
L11	S89°59'17"W	2641.57'
L12	S89°52'27"W	2645.53'
L13	N00°00'53"W	2649.62'
L14	N00°05'42"W	2641.26'
L15	S17°17'43"W	492.29'
L16	N00°04'43"W	50.00'
L17	N00°03'50"W	7822.45'
L18	N00°03'50"W	2539.85'
L19	N00°02'49"W	80.00'

- = SURFACE HOLE LOCATION
- ◆ = KICK OFF POINT/TAKE POINTS
- ◇ = LEASE CROSSING
- = BOTTOM HOLE LOCATION
- ▲ = SECTION CORNER LOCATED
- = HORIZONTAL SPACING UNIT
- N.O.W. = NORTH OF WELL
- W.O.W. = WEST OF WELL



<b>NAD 83 (SURFACE HOLE LOCATION)</b> LATITUDE = 32°23'08.44" (32.385676°) LONGITUDE = -103°43'36.89" (-103.726915°)
<b>NAD 27 (SURFACE HOLE LOCATION)</b> LATITUDE = 32°23'07.99" (32.385554°) LONGITUDE = -103°43'35.14" (-103.726426°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 504571.18' E: 728530.28'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 504510.75' E: 687347.92'

<b>NAD 83 (KICK OFF POINT)</b> LATITUDE = 32°23'03.79" (32.384385°) LONGITUDE = -103°43'38.61" (-103.727391°)
<b>NAD 27 (KICK OFF POINT)</b> LATITUDE = 32°23'03.35" (32.384263°) LONGITUDE = -103°43'36.85" (-103.726903°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 504100.62' E: 728385.93'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 504040.20' E: 687203.56'

<b>NAD 83 (FIRST TAKE POINT)</b> LATITUDE = 32°23'04.28" (32.384523°) LONGITUDE = -103°43'38.61" (-103.727391°)
<b>NAD 27 (FIRST TAKE POINT)</b> LATITUDE = 32°23'03.84" (32.384400°) LONGITUDE = -103°43'36.85" (-103.726903°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 504150.61' E: 728385.65'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 504090.19' E: 687203.28'

<b>NAD 83 (LEASE CROSSING)</b> LATITUDE = 32°24'21.67" (32.406020°) LONGITUDE = -103°43'38.58" (-103.727383°)
<b>NAD 27 (LEASE CROSSING)</b> LATITUDE = 32°24'21.23" (32.405898°) LONGITUDE = -103°43'36.82" (-103.726893°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 511971.50' E: 728344.03'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 511910.87' E: 687161.89'

<b>NAD 83 (LAST TAKE POINT)</b> LATITUDE = 32°24'46.80" (32.413000°) LONGITUDE = -103°43'38.57" (-103.727380°)
<b>NAD 27 (LAST TAKE POINT)</b> LATITUDE = 32°24'46.36" (32.412878°) LONGITUDE = -103°43'36.80" (-103.726890°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 514510.84' E: 728330.52'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 514450.15' E: 687148.45'

<b>NAD 83 (BOTTOM HOLE LOCATION)</b> LATITUDE = 32°24'47.59" (32.413220°) LONGITUDE = -103°43'38.57" (-103.727380°)
<b>NAD 27 (BOTTOM HOLE LOCATION)</b> LATITUDE = 32°24'47.15" (32.413098°) LONGITUDE = -103°43'36.80" (-103.726890°)
<b>STATE PLANE NAD 83 (N.M. EAST)</b> N: 514590.83' E: 728330.11'
<b>STATE PLANE NAD 27 (N.M. EAST)</b> N: 514530.13' E: 687148.05'

**Application Non-Standard Location - Service List**  
**OXY USA Inc.**  
**Top Spot Federal Com 13H**

**Online Submission**  
 New Mexico Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

**Certified Mail #\_9407111898765525626204**  
 Bureau of Land Management Carlsbad  
 620 E. Greene Street  
 Carlsbad, NM 88220-6292

**Offset Tracts Section 12 (T22S-R31E) - Units A, H, I, P**  
**Offset Tracts Section 13 (T22S-R31E) - Units A, H, I, P**

Type	Affected Party	Date Letter Sent	Mail Tracking #
Working Interest	Charles Andrew Spradlin 304 Summit Ridge Dr. Glen Rose, Texas 76043	04/07/26	9407111898765525627584
Working Interest	The Long Trusts PO Box 3096 Kilgore, Texas 75663	04/07/26	9407111898765525627577
Working Interest	Chisos Ltd 3355 W Alabama Suite 1200 B Houston, Texas 77098	04/07/26	9407111898765525626259
Working Interest	Rockport Oil and Gas LLC PO Box 19567 Houston, Texas 77224-9567	04/07/26	9407111898765525626266
Working Interest	Marshall S. Baker 2711 Wesleyan Street Houston, Texas 77027	04/07/26	9407111898765525626228
Working Interest	CHEVRON USA INC. Attn: Land Department 6301 Deauville Blvd. Midland, Texas 79706	04/07/26	9407111898765525626242

Copies of this application were mailed to the individuals, companies and organizations on or before April 7, 2026.

*Melissa Guidry*

Melissa Guidry, Sr. Regulatory Advisor  
 OXY USA Inc.



# OXY USA Inc

5 Greenway Plaza, Suite 110  
Houston, TX 77046-0521

April 7, 2026

New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Attention: Leonard Lowe

Re: ***Application for Administrative Approval of Non-Standard Location – Engineering Justification  
Top Spot 12\_13 Federal Com 13H, API 30-015-56985 – Bilbrey Basin; Bone Spring  
Surface – 520’ FSL 1225’ FEL Unit P, Sec 13 T22S R31E  
First Take Point – 100’ FSL 1372’ FEL Unit O, Sec 13 T22S R31E  
Last Take Point – 100’ FNL 1372’ FEL Unit B, Sec 12 T22S R31E  
Bottom Hole – 20’ FNL 1372’ FEL Unit B, Sec 12 T22S R31E  
Eddy County, New Mexico***

Dear Mr. Lowe:

OXY USA Inc. respectfully requests administrative approval of a non-standard location on the Top Spot 12\_13 Federal Com 13H well to be drilled within 330’ of the HSU boundary. It is Oxy’s responsibility as a prudent operator to optimize the section’s well spacing and minimize reserves left in the ground. Placing the wells within the setback, allows for the optimal horizontal well spacing that has been determined to maximize the recoverable reserves while minimizing production damage to nearby wells.

Sincerely,

*Sushmitha Chakka*

Sushmitha Chakka  
Development Engineer  
[Sushmitha\\_Chakka@oxy.com](mailto:Sushmitha_Chakka@oxy.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

Action 572399

**CONDITIONS**

Operator: OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 572399
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	4/8/2026