

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



Jacob Everhart
Jeverhart@bwenergylaw.com

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL – 9330

**XTO Permian Operating, LLC [OGRID 373075]
Big Eddy Unit DI 9 Arrow Federal Com Well No. 108H
API No. 30-015-Pending**

Reference is made to your application received on April 15th, 2026.

Proposed Location

	Footages	Unit/Lot	Sec.	Twsp	Range	County
Surface	174 FSL & 713 FEL	P	21	21S	30E	Eddy
First Take Point	990 FNL & 100 FWL	D	27	21S	30E	Eddy
Last Take Point	990 FNL & 330 FEL	A	25	21S	30E	Eddy
Terminus	990 FNL & 280 FEL	A	25	21S	30E	Eddy

Proposed Horizontal Units

Description	Acres	Pool	Pool Code
Section 27	1920	Golden Lane; Wolfcamp (GAS)	77620
Section 26			
Section 25			

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)(3)(a) NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal gas well 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 section or equivalent.

Administrative Order NSL - 9330
XTO Permian Operating, LLC
Page 2 of 2

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 660 feet for a **gas** 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 330 feet for a **gas** in 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 First and Last Take Points referenced above within the described Horizontal Spacing Unit.

This well's completed interval is as close as 100 feet to the western edge of the horizontal spacing unit. Encroachment will impact the following tracts:

Section 28, encroachment to the NE/4

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.

Division understands you are seeking this unorthodox location as your preferred well spacing plan for horizontal well and to maximize the productive lateral within the Wolfcamp formation underlying Section 27, Section 26 and Section 25. While protecting the correlative rights of all affected parties and preventing waste.

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 Division deems necessary.



Albert C.S. Chang
Division Director
AC/lrl

Date: 5-18-26

ID NO. 576037

NSL - 9330

Revised March 23, 2017

RECEIVED: 04/15/26	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: XTO Permian Operating, LLC **OGRID Number:** 373075
Well Name: Big Eddy Unit DI 9 Arrow Fed Com 108H **API:** 30-015-Pending
Pool: Golden Lane; Wolfcamp (Gas) **Pool Code:** 77620

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

FOR OCD ONLY	
<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.

Jacob L. Everhart

Print or Type Name

Signature

4/15/2026
Date

(505) 999 - 0401
Phone Number

Jeverhart@bwenergylaw.com
e-mail Address

BEATTY & WOZNIAK, P.C.

ATTORNEYS AT LAW

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OFFICE LOCATIONS

COLORADO

NEW MEXICO

WYOMING

MIGUEL A. SUAZO
ALSO ADMITTED IN TX, CO

JACOB L. EVERHART
ALSO ADMITTED IN CO, ND, & UT

April 15, 2026

VIA ONLINE FILING

Albert Chang
Division Director
Oil Conservation Division
Energy, Minerals and Natural Resource Department
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

ATTN: Leonard Lowe

RE: Application of XTO Permian Operating, LLC, for Administrative Approval of Unorthodox Well Location (NSL)

Big Eddy Unit DI 9 Arrow Fed Com 108H (API No. 30-015-*Pending*)
SHL – 174 FSL, 713 FEL, Unit P, Section 21, T21S, R30E
BHL – 990 FNL, 280 FEL, Unit A, Section 25, T21S, R30E
FTP – 990 FNL, 100 FWL, Unit D, Section 27, T21S, R30E
LTP – 990 FNL, 330 FEL, Unit A, Section 25, T21S, R30E
Golden Lane; Wolfcamp (Gas) [Pool Code: 77620]
Eddy County, New Mexico

Dear Mr. Chang,

XTO Permian Operating, LLC (“XTO”), (OGRID No. 373075), pursuant to Division rules 19.15.16.15(C)(6), 19.15.15.13, and 19.15.4.12(A)(2) NMAC, seeks administrative approval of an unorthodox well location (“NSL”) for its Big Eddy Unit DI 9 Arrow Fed Com 108H well (the “108H Well”).

Reason for the Request: The 108H Well will be completed in the Golden Lane; Wolfcamp (Gas) pool [Pool Code: 77620] which adheres to statewide rules for spacing and setbacks. As such, the completed interval(s) must be located 660 feet from the exterior boundary of the applicable spacing unit. Additionally, the first and last take point must not be closer than 330 feet, in the horizontal plane, to any outer boundary of the horizontal spacing unit. Here, the FTP is located closer than

330 feet to the outer boundary of the spacing unit. So, an NSL approval is warranted.

The horizontal spacing unit is 1,920-acres and is comprised of all of Sections 25, 26, and 27, Township 21 South, Range 30 East, N.M.P.M., Eddy County, NM. The spacing unit is located partially within the Big Eddy Federal Unit and also partially within the James Ranch Federal Unit. XTO is the unit operator of both federal units. As you are aware, NM OCD and BLM policy only allows for federal unit operators to drill and operate wells that traverse the boundaries of federal exploratory units. So, XTO is best positioned to drill and operate the 108H well in question, even if unorthodox due to the setbacks.

Approval of the unorthodox location will allow XTO to use its preferred well spacing plan for horizontal wells and to maximize the productive laterals, which will prevent waste and protect correlative rights.

Notice is provided under 19.15.15.13(C) and 19.15.4.12.A.(2)(a) NMAC to 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.*

The acreage included in the NSL will be subject to the following leases:

- E0-5230-007
- NMNM130866
- NMNM085912

In addition to the reasons stated above, XTO seeks administrative approval of an NSL to develop the acreage as a single development area and to maximize the productive lateral. Doing so allows XTO to efficiently locate surface facilities, such as well pad locations and centralized tank batteries, reduce disturbance impacts, reduce emissions and leak points, consolidate roadways, reduce traffic, consolidate pipeline(s), and promotes effective well spacing, thereby ensuring the promotion of conservation, the prevention of waste, and the protection of correlative rights. Division rules 19.15.16.7.P and 19.15.16.15.B(8) NMAC encourage oil and gas development, where possible, in enlarged areas of common ownership to minimize surface disturbance and to promote efficient well spacing. Further, Division rule 19.15.16.15.C.(6) NMAC authorizes administrative approval of such a request.

Please find the below listed Exhibits included in this application:

Exhibit 1 is a statement from XTO Commercial & Land Advisor, Andrea Smith Bosworth, CPL.

Exhibit 2 is the Well Location and Acreage Dedication Plat (C-102) for the well within the proposed NSL application and includes the SHL, FTP, LTP, and BHL.

Exhibit 3 includes: (1) a lease map showing the proposed Non-Standard Location and the adjoining tracts identifying the notification area, and (2) a map showing the entirety of the Big Eddy Federal Unit, the James Ranch Federal Unit, and the wells approximate location

in relation to the federal unit.

Exhibit 4 includes a list of affected persons under 19.15.15.13(B) and 19.15.4.12.A.(2)(a) who were sent a copy of this application, proof of publication, 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.

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

Very truly yours,

BEATTY & WOZNIAK, P.C.

A handwritten signature in blue ink, appearing to read "Miguel Suazo".

Miguel Suazo
msuazo@bwenergylaw.com

Jacob L. Everhart
jeverhart@bwenergylaw.com

*Attorney(s) for XTO Permian Operating,
LLC*

Exhibit 1



Land Dept. Loc. 115
22777 Springwoods Village Pkwy
Spring TX 77389-1425
346-335-5864 - Direct Phone
corie.a.mathews@ExxonMobil.com

April 15, 2026

Landman Statement

I have reviewed the ownership of the oil and gas leasehold in the proposed 1,920-acre, more or less, Non-Standard Horizontal Spacing Unit ("NSHSU") underlying all of Sections 25, 26, and 27, Township 21 South, Range 30 East, N.M.P.M. Eddy County, NM, for purposes of the administrative NSL approval for XTO's **BEU DI 9 Arrow Fed Com 108H well**. As of the date of this letter, the affected parties are:

See Attached EXHIBIT "4"

XTO is seeking approval of the non-standard well location to eliminate the need for separate production facilities and additional administrative approvals. Approval of the NSL will allow for efficient surface facility placement, reduced surface disturbance, and the consolidation of roads, storage tanks, and pipelines. These measures support effective well spacing, conservation of the resource, enhanced recoveries and economics, and waste prevention, while also helping to minimize environmental impacts such as emissions from multiple tank batteries and associated facilities. The Oil Conservation Division's rules encourage such developments to maximize efficiency and reduce surface disturbance in areas of common ownership.

Sincerely,

XTO Permian Operating, LLC.

A handwritten signature in blue ink that reads "Andrea Bosworth".

Andrea Smith Bosworth, CPL
Commercial & Land Advisor – Delaware NM

Exhibit 2

WELL LOCATION INFORMATION

API Number 30-015-	Pool Code 77620	Pool Name GOLDEN LANE; WOLFCAMP (GAS)
Property Code	Property Name BIG EDDY UNIT DI 9 ARROW FED COM	Well Number 108H
OGRID No. 373075	Operator Name XTO PERMIAN OPERATING, LLC.	Ground Level Elevation 3152'
Surface Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input 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	Longitude	County
P	21	21S	30E		174 FSL	713 FEL	32.457997	-103.879226	EDDY

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	25	21S	30E		990 FNL	280 FEL	32.454721	-103.826463	EDDY

Dedicated Acres 1,920.00	Infill or Defining Well DEFINING	Defining Well API	Overlapping Spacing Unit (Y/N) N	Consolidation Code C
Order Numbers:			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	28	21S	30E		991 FNL	714 FEL	32.454794	-103.879231	EDDY

First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
D	27	21S	30E		990 FNL	100 FWL	32.454791	-103.876592	EDDY

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
A	25	21S	30E		990 FNL	330 FEL	32.454722	-103.826625	EDDY

Unitized Area or Area of Uniform Interest	Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3152'
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OPERATOR CERTIFICATIONS

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.

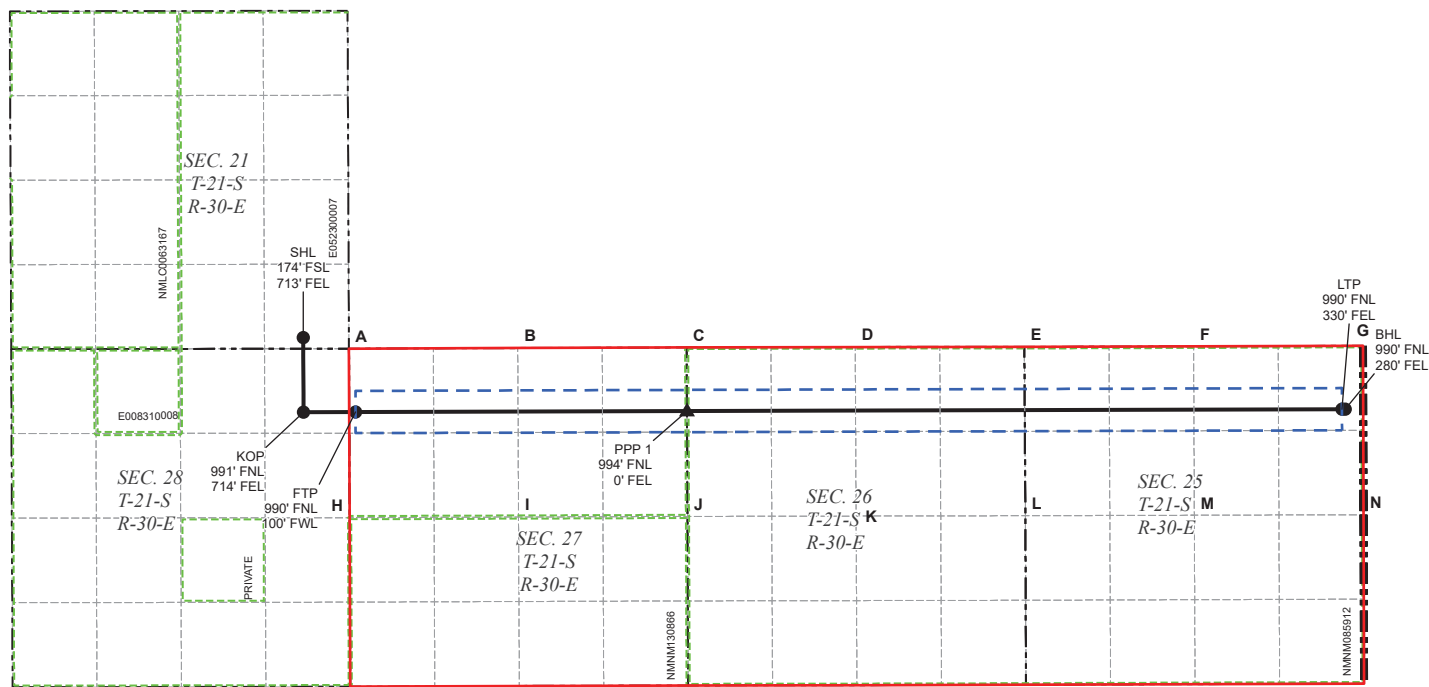
Signature _____ Date _____

SURVEYOR CERTIFICATIONS

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 belief.




Signature and Seal of Professional Surveyor



LEGEND

- SECTION LINE
- 330' BUFFER
- ▲ PPP
- TOWNSHIP LINE
- MINERAL LEASE
- WELL
- DEDICATED ACREAGE
- WELLBORE

WELL COORDINATE TABLE

WELL	NAD 83 NME X	NAD 83 NME Y	NAD 83 LAT	NAD 83 LON	NAD 27 NME X	NAD 27 NME Y	NAD 27 LAT	NAD 27 LON
SHL	681,401.6	530,648.0	32.457997	-103.879226	640,220.9	530,586.8	32.457875	-103.878728
KOP	681,405.0	529,483.1	32.454794	-103.879231	640,224.3	529,421.8	32.454672	-103.878734
FTP	682,219.1	529,485.4	32.454791	-103.876592	641,038.3	529,424.1	32.454669	-103.876095
LTP	697,631.8	529,529.6	32.454722	-103.826625	656,451.1	529,468.5	32.454600	-103.826128
BHL	697,681.8	529,529.7	32.454721	-103.826463	656,501.1	529,468.6	32.454599	-103.825966
PPP 1	687,396.9	529,500.2	32.454770	-103.859806	646,216.2	529,439.0	32.454648	-103.859309

CORNER COORDINATE TABLE

CORNER	NAD 83 NME X	NAD 83 NME Y	NAD 27 NME X	NAD 27 NME Y
A	682,115.4	530,475.0	640,934.7	530,413.8
B	684,752.9	530,484.6	643,572.3	530,423.4
C	687,392.6	530,494.0	646,212.0	530,432.8
D	690,026.0	530,500.9	648,845.3	530,439.7
E	692,668.2	530,502.8	651,487.6	530,441.6
F	695,313.3	530,511.8	654,132.6	530,450.6
G	697,958.3	530,520.7	656,777.6	530,459.5
H	682,125.2	527,834.6	640,944.4	527,773.4
I	684,765.1	527,844.4	643,584.4	527,783.2
J	687,403.9	527,854.1	646,223.2	527,793.0
K	690,039.5	527,859.3	648,858.8	527,798.2

Exhibit 3



JAMES RANCH UNIT EDDY COUNTY, NEW MEXICO

Date: 9/3/2025

Land GIS Dept: O:\Arcview\Projects\Kelli\ Project_APRXs\Delaware Federal Unit PODs\Delaware Federal Unit PODs.aprx Name: JRU OVERALL LEASE MAP

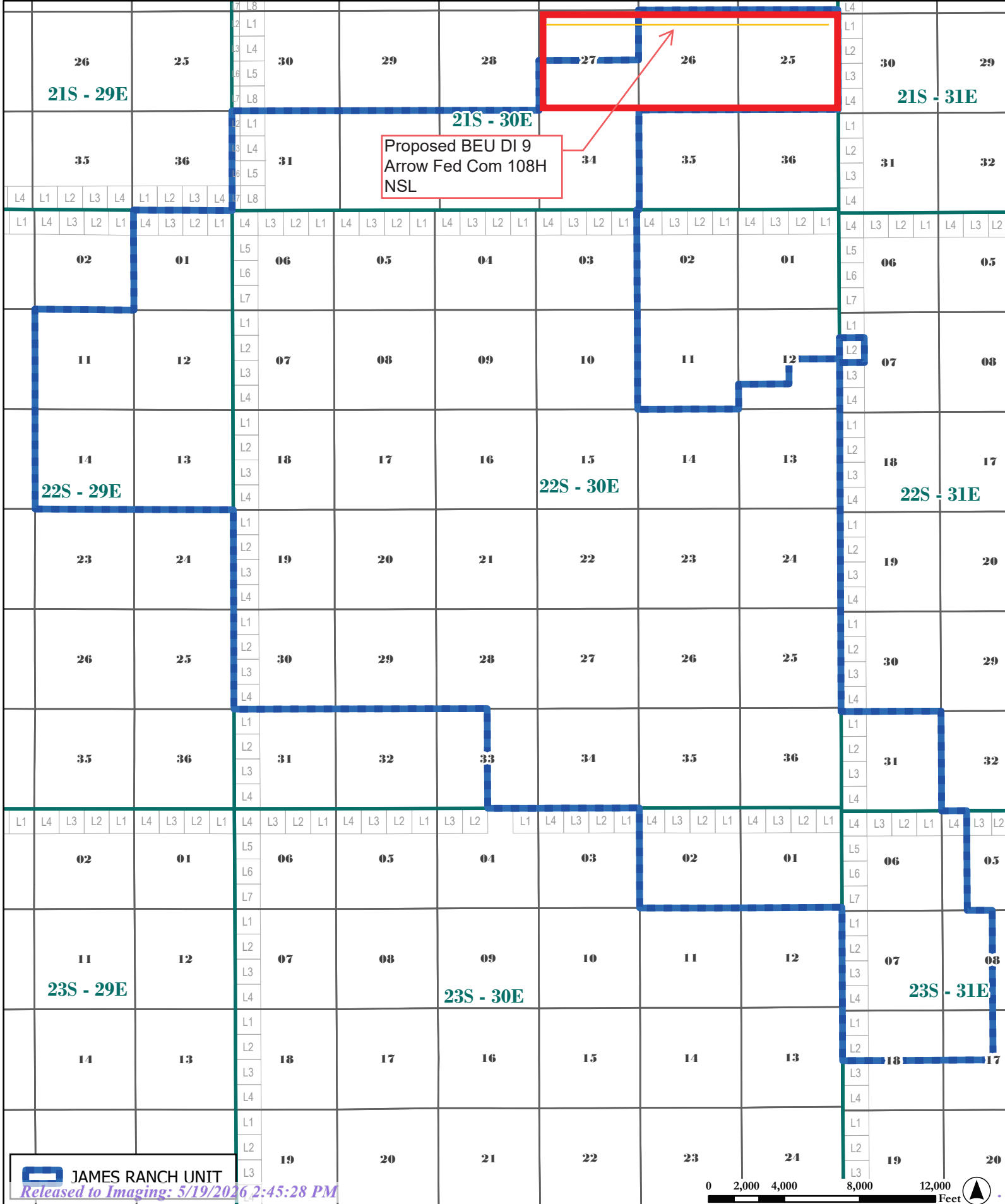


Exhibit 4

Big Eddy Unit DI 9 Arrow Fed Com	Tracking Info
XTO Permian Operating, LLC	Self Waive
State of New Mexico Commissioner of Public Lands 310 Old Santa Fe Trail Santa Fe, New Mexico 87501	9589 0710 5270 2981 1393 63
Bureau of Land Management New Mexico State Office 301 Dinosaur Trail Santa Fe, New Mexico 87508	9589 0710 5270 2981 1393 56

BEATTY & WOZNIAK, P.C.

ATTORNEYS AT LAW

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DENVER, COLORADO 80202
TELEPHONE 303-407-4499
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OFFICE LOCATIONS

COLORADO

NEW MEXICO

WYOMING

MIGUEL A. SUAZO
ALSO ADMITTED IN TX, CO

JACOB L. EVERHART
ALSO ADMITTED IN CO, ND, & UT

April 15, 2026

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

RE: **Application of XTO Permian Operating, LLC, for Administrative Approval of Unorthodox Well Location (NSL)**

Big Eddy Unit DI 9 Arrow Fed Com 108H (API No. 30-015-*Pending*)
SHL – 174 FSL, 713 FEL, Unit P, Section 21, T21S, R30E
BHL – 990 FNL, 280 FEL, Unit A, Section 25, T21S, R30E
FTP – 990 FNL, 100 FWL, Unit D, Section 27, T21S, R30E
LTP – 990 FNL, 330 FEL, Unit A, Section 25, T21S, R30E
Golden Lane; Wolfcamp (Gas) [Pool Code: 77620]
Eddy County, New Mexico

To Whom It May Concern,

Enclosed is a copy of the above-referenced application filed with the New Mexico Oil Conservation Division (the “Division”) on this date. Any objections that you have to these applications 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 the twenty-day period, the application may be approved administratively by the Division.

This Application would have been filed with, and received by, the Division either on the date of this letter as referenced above, or no later than two (2) days after the date referenced above. Email correspondence for this matter can be sent to the Division at OCD.Engineer@emnrd.nm.gov. If you have any questions about this application, please contact the following:

Andrea Smith Bosworth, CPL, Commercial & Land Advisor – Delaware Basin NM
ExxonMobil
(346) 556 - 9466
Andrea.bosworth@exxonmobil.com

Very truly yours,
BEATTY & WOZNIAK, P.C.

A handwritten signature in blue ink, appearing to read "Miguel A. Suazo".

Miguel A. Suazo
msuazo@bwenergylaw.com

Jacob L. Everhart
jeverhart@bwenergylaw.com

*Attorney(s) for XTO Permian Operating,
LLC*

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/oecd/contact-us>

**State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505**

COMMENTS

Action 576037

COMMENTS

Operator: XTO PERMIAN OPERATING LLC. 3617 North Big Spring Street MIDLAND, TX 79705	OGRID: 373075
	Action Number: 576037
	Action Type: [UF-NSL] Non-Standard Location (NSL)

COMMENTS

Created By	Comment	Comment Date
llowe	This NSL order was approved with a pending API number. The owner of the NSL shall update the OCD when an API number is assigned to the pending APD by sending an e-mail to ocd.engineer@emnrd.nm.gov . TITLED: (Updating NSL-XXX with API number of the Well Name). The text of the email shall contain: NSL order number, API number and Well Name. If the Well name does not match the name on the NSL order. The order will be annulled.	5/19/2026

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 576037

CONDITIONS

Operator: XTO PERMIAN OPERATING LLC. 3617 North Big Spring Street MIDLAND, TX 79705	OGRID: 373075
	Action Number: 576037
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	4/17/2026