Form 3160-3 (June 2015) UNITED STATES DEPARTMENT OF THE I BUREAU OF LAND MANA APPLICATION FOR PERMIT TO D	NTEF AGEN	MENT			FORM , OMB No Expires: Ja 5. Lease Serial No. 6. If Indian, Allotee	o. 1004-0 nuary 31	137 , 2018
1a. Type of work: DRILL	EENTI	ER			7. If Unit or CA Agr	eement,]	Name and No.
	ther ingle Z	one	Multiple Zone		8. Lease Name and Y	Well No.	
2. Name of Operator					9. API Well No.		
3a. Address	3b. P	hone N	o. (include area code	e)	10. Field and Pool, o	or Explor	atory
4. Location of Well <i>(Report location clearly and in accordance w</i> At surface At proposed prod. zone	with an	y State	requirements.*)		11. Sec., T. R. M. or	Blk. and	Survey or Area
14. Distance in miles and direction from nearest town or post off	ice*				12. County or Parish	1	13. State
15. Distance from proposed* location to nearest property or lease line, ft. (Also to nearest drig. unit line, if any)	16. N	lo of ac	res in lease	17. Spaci	ng Unit dedicated to th	his well	<u> </u>
 18. Distance from proposed location* to nearest well, drilling, completed, applied for, on this lease, ft. 	19. P	roposed	l Depth	20. BLM	/BIA Bond No. in file		
21. Elevations (Show whether DF, KDB, RT, GL, etc.)	22. A	pproxii	nate date work will	start*	23. Estimated durati	on	
	24.	Attacl	nments				
The following, completed in accordance with the requirements of (as applicable)	f Onsho	ore Oil a	and Gas Order No. 1	, and the I	Hydraulic Fracturing r	ule per 43	3 CFR 3162.3-3
 Well plat certified by a registered surveyor. A Drilling Plan. A Surface Use Plan (if the location is on National Forest Syste SUPO must be filed with the appropriate Forest Service Office 		ds, the	Item 20 above). 5. Operator certific	ation.	ns unless covered by ar rmation and/or plans as	-	
25. Signature		Name	(Printed/Typed)			Date	
Title							
Approved by (Signature)		Name	(Printed/Typed)			Date	
Title		Office					
Application approval does not warrant or certify that the applicar applicant to conduct operations thereon. Conditions of approval, if any, are attached.	nt holds	s legal c	r equitable title to th	nose rights	in the subject lease where	hich wou	ld entitle the
Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, n of the United States any false, fictitious or fraudulent statements						iny depar	tment or agency



1220 S. St. Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3460 Fax: (505) 476-3462

District 1State of New Mexico1625 N. French Dr., Hobbs, NM 88240State of New MexicoPhone: (575) 393-6161 Fax: (575) 393-0720Energy, Minerals & Natural Resources DepartmentDistrict IIOIL CONSERVATION DIVISIONPhone: (575) 748-1283 Fax: (575) 748-97201220 South St. Francis Dr.District III1220 South St. Francis Dr.Yohne: (505) 334-6178 Fax: (505) 334-6170Santa Fe, NM 87505

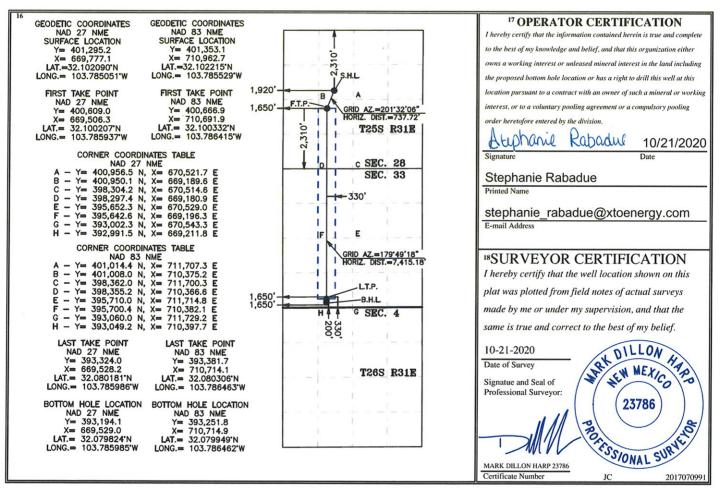
Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1	API Numbe	r		² Pool Code			³ Pool Na	me					
	30-015-		98220		Purple Sage; Wolfcamp (Gas)								
⁴ Property C	Code				⁵ Property	⁶ Well Number							
					UNIT 28 BS				703H				
⁷ OGRID N					⁸ Operator	· Name				⁹ Elevation			
373075				XTC	PERMIAN OP	PERATING, LLC.			1	3,335'			
¹⁰ Surface Location													
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	e North/South line	Feet from the	East/West line		County			
F	28	25 S	31 E		2,310	NORTH	1,920	WE	EDDY /EST				
			¹¹ Bo	ttom Hole	e Location I	f Different From	n Surface						
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	e North/South line	Feet from the	East	t/West line	County			
Ν	33	25 S	31 E		200	SOUTH	1,650	WE	WEST EDDY				
¹² Dedicated Acres 480	¹³ Joint o	r Infill ¹⁴ C	Consolidation	Code ¹⁵ Ord	ler No.								
400													

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



Intent As Drilled		
API #		
Operator Name:	Property Name:	Well Number

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
Latitu	de				Longitude				NAD

First Take Point (FTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
Latitu	de				Longitude				NAD

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Feet	From N/S	Feet	From E/W	County
Latitu	de				Longituc	le			NAD

Is this well the defining well for the Horizontal Spacing Unit?	

Is this well an infill well?

If infill is yes please provide API if available, Operator Name and well number for Defining well for Horizontal Spacing Unit.

API #		
Operator Name:	Property Name:	Well Number

KZ 06/29/2018

Additional Operator Remarks

Location of Well

0. SHL: SENW / 2310 FNL / 1920 FWL / TWSP: 25S / RANGE: 31E / SECTION: 28 / LAT: 32.102215 / LONG: -103.785529 (TVD: 7900 feet, MD: 7900 feet) PPP: NESW / 2310 FSL / 1650 FWL / TWSP: 25S / RANGE: 31E / SECTION: 28 / LAT: 32.100332 / LONG: -103.786415 (TVD: 12655 feet, MD: 13000 feet) BHL: SESW / 200 FSL / 1650 FWL / TWSP: 25S / RANGE: 31E / SECTION: 33 / LAT: 32.079949 / LONG: -103.786462 (TVD: 12655 feet, MD: 20409 feet)

BLM Point of Contact

Name: Priscilla Perez Title: Legal Instruments Examiner Phone: (575) 234-5934 Email: pperez@blm.gov

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME:	XTO Permian Operating, LLC
LEASE NO.:	NMLC-0006214A
WELL NAME & NO.:	Poker Lake Unit 28 BS 703H
SURFACE HOLE FOOTAGE:	2310' FNL & 1920' FWL
BOTTOM HOLE FOOTAGE	0200' FSL & 1650' FWL Sec. 33, T.25 S., R.31 E.
LOCATION:	Section 28, T.25 S., R.31 E., NMPM
COUNTY:	Eddy County, New Mexico

COA

H2S	C Yes	💽 No	
Potash	• None	C Secretary	© R-111-P
Cave/Karst Potential	C Low	Medium	C High
Cave/Karst Potential	Critical		
Variance	C None	• Flex Hose	C Other
Wellhead	C Conventional	Multibowl	C Both
Other	□4 String Area	Capitan Reef	□ WIPP
Other	Fluid Filled	Cement Squeeze	Pilot Hole
Special Requirements	□ Water Disposal	COM	✓ Unit

Medium Cave/Karst

Possibility of water flows in the Salado and Castile.

Possibility of lost circulation in the Red Beds, Rustler, and Delaware. Abnormal pressure may be encountered in the 3rd Bone Spring and all subsequent formations.

A. HYDROGEN SULFIDE

Hydrogen Sulfide (H2S) monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet Onshore Order 6 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

B. CASING

- 1. The **11-3/4** inch surface casing shall be set at approximately **1220** feet (a minimum of 70 feet (Eddy County) into the Rustler Anhydrite and above the salt) and cemented to the surface.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
 - b. Wait on cement (WOC) time for a primary cement job will be a minimum of <u>8</u> <u>hours</u> or 500 pounds compressive strength, whichever is greater. (This is to include the lead cement)
 - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
 - d. If cement falls back, remedial cementing will be done prior to drilling out that string.

Intermediate casing must be kept fluid filled to meet BLM minimum collapse requirement.

- 2. The minimum required fill of cement behind the **8-5/8** inch intermediate casing is:
 - Cement to surface. If cement does not circulate see B.1.a, c-d above. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst.
 - In <u>Medium Cave/Karst Areas</u> if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.
- 3. The minimum required fill of cement behind the 5-1/2 inch production casing is:
 - Cement should tie-back at least **200 feet** into previous casing string. Operator shall provide method of verification.

C. PRESSURE CONTROL

- Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the surface casing. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be 10,000 (10M) psi. Variance approved to use a 5M annular. The annular must be tested to 70% working pressure (3500 psi.)
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
 - e. Whenever any seal subject to test pressure is broken, all the tests in OOGO2.III.A.2.i must be followed.

BOP Break Testing Variance

- Shell testing is not approved for any portion of the hole with a MASP of 5000 psi or greater.
- While in transfer between wells, the BOPE shall be secured by the hydraulic carrier or cradle.
- Any well control event while drilling require notification to the BLM Petroleum Engineer prior to the commencement of any BOP Break Testing operations.
- A full BOP test is required prior to drilling the first deep intermediate hole section. If any subsequent hole interval is deeper than the first, a full BOP test will be required.

D. SPECIAL REQUIREMENT (S)

Unit Wells

The well sign for a unit well shall include the unit number in addition to the surface and bottom hole lease numbers. This also applies to participating area numbers. If a participating area has not been established, the operator can use the general unit designation, but will replace the unit number with the participating area number when the sign is replaced.

Commercial Well Determination

A commercial well determination shall be submitted after production has been established for at least six months.

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GENERAL REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)
 - Eddy County Call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220, (575) 361-2822
- 1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - Notify the BLM when moving in and removing the Spudder Rig.
 - Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - BOP/BOPE test to be conducted per Onshore Oil and Gas Order No. 2 as soon as 2nd Rig is rigged up on well.
- 2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the dog house or stairway area.
- 3. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

A. CASING

- 1. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.
- <u>Wait on cement (WOC) for Water Basin:</u> After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least <u>8 hours</u>. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing intergrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 3. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
- 4. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
- 5. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
- 6. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.

B. PRESSURE CONTROL

- 1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in Onshore Oil and Gas Order No. 2 and API RP 53 Sec. 17.
- 2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.
- 3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
- 5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - a. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead when specified), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).
 - b. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to Onshore Order 2 with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for water basin (8 hours) or potash (24 hours) or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).

- c. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- d. The results of the test shall be reported to the appropriate BLM office.
- e. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- f. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- g. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per Onshore Order No. 2.

C. DRILLING MUD

Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation, and shall be used until production casing is run and cemented.

D. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area.

Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

JAM 12072020

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Approval Date: 12/09/2020

AFMSS

U.S. Department of the Interior BUREAU OF LAND MANAGEMENT Page 13 of 53



Well Type: CONVENTIONAL GAS WELL

Well Work Type: Drill

Section 1 - Geologic Formations

Formation ID	Formation Name	Elevation	True Vertical Depth	Measured Depth	Lithologies	Mineral Resources	Producing Formation
1097186	QUATERNARY	3335			ALLUVIUM	USEABLE WATER	N
1097186	QUATERNART	3335	0	0	ALLOVIOM	USEABLE WATER	IN
1097187	RUSTLER	2451	884	884	SANDSTONE	USEABLE WATER	N
1097188	TOP SALT	2087	1248	1248	SALT	OTHER : Salt	N
1097189	BASE OF SALT	-649	3984	3984	SALT	NONE	N
1097190	DELAWARE	-863	4198	4198	SANDSTONE, SILTSTONE	NATURAL GAS, OIL, USEABLE WATER	Y
1097191	BONE SPRING	-4805	8140	8140	LIMESTONE, SANDSTONE	NATURAL GAS, OIL, USEABLE WATER	Y
1097192	WOLFCAMP	-8168	11503	11503	LIMESTONE, SANDSTONE, SILTSTONE	NATURAL GAS, OIL, USEABLE WATER	Y

Section 2 - Blowout Prevention

Pressure Rating (PSI): 10M

Rating Depth: 12655

Equipment: Once the permanent WH is installed on the 11-3/4" casing, the blow out preventer equipment (BOP) will consist of a 13-5/8 minimum 5M Hydril and a 13-5/8 minimum 10M 3-Ram BOP. In any instance where 10M BOP is required by BLM, XTO requests a variance to utilize 5M annular with 10M ram preventers (a common BOP configuration, which allows use of 10M rams in unlikely event that pressures exceed 5M). Also a variance is requested to test the 5M annular to 70% of working pressure at 3500 psi.

Requesting Variance? YES

Variance request: A variance is requested to allow use of a flex hose as the choke line from the BOP to the Choke Manifold. If this hose is used, a copy of the manufacturer's certification and pressure test chart will be kept on the rig. Attached is an example of a certification and pressure test chart. The manufacturer does not require anchors. A variance is requested to ONLY test broken pressure seals on the BOP equipment when moving from wellhead to wellhead which is in compliance with API Standard 53. API standard 53 states, that for pad drilling operation, moving from one wellhead to another within 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken. Based on discussions with the BLM on February 27th 2020, we will request permission to ONLY retest broken pressure seals if the following conditions are met: 1. After a full BOP test is conducted on the first well on the pad (First well will be the deepest Intermediate) 2. When skidding to drill an intermediate section does not penetrate into the Wolfcamp 3. Full BOP test will be required prior to drilling the production hole. Permanent Wellhead – Multibowl System A. Starting Head: 13-5/8" 10M top flange x 11-3/4" SOW bottom B. Tubing Head: 13-5/8" 10M bottom flange x 7-1/16" 15M top flange · Wellhead will be installed by manufacturer's representatives. • Manufacturer will monitor welding process to ensure appropriate temperature of seal. • Operator will test the 7-5/8" casing per BLM Onshore Order 2 • Wellhead Manufacturer representative will not be present for BOP test plug installation

Well Name: POKER LAKE UNIT 28 BS

Well Number: 703H

Testing Procedure: All BOP testing will be done by an independent service company. Annular pressure tests will be limited to 70% of the working pressure. When nippling up on the 11-3/4", 5M bradenhead and flange, the BOP test will be limited to 5000 psi. All BOP tests will include a low pressure test as per BLM regulations. The 5M BOP diagrams are attached. Blind rams will be functioned tested each trip, pipe rams will be functioned tested each day.

Choke Diagram Attachment:

PLU_28_BS_10MCM_20201124061644.pdf

BOP Diagram Attachment:

PLU_28_BS_5M10MBOP_20201124061650.pdf

Section 3 - Casing

Casing ID	String Type	Hole Size	Csg Size	Condition	Standard	Tapered String	Top Set MD	Bottom Set MD	Top Set TVD	Bottom Set TVD	Top Set MSL	Bottom Set MSL	Calculated casing length MD	Grade	Weight	Joint Type	Collapse SF	Burst SF	Joint SF Type	Joint SF	Body SF Type	Body SF
1	SURFACE	14.7 5	11.75	NEW	API	N	0	1220	0	1220	-4571	-5791	1220	J-55	47	BUTT	2.38	1.17	DRY	8.32	DRY	8.32
	INTERMED IATE	10.6 25	8.625	NEW	API	N	0	10600	0	10600	3329	- 15171	10600	HCL -80	32	BUTT	1.43	1.09	DRY	2.16	DRY	2.16
	PRODUCTI ON	7.87 5	5.5	NEW	API	N	0	20409	0	12655	3329	- 17226	20409	P- 110	20	BUTT	1.47	1.18	DRY	2.27	DRY	2.27

Casing Attachments

Casing ID: 1

String Type: SURFACE

Inspection Document:

Spec Document:

Tapered String Spec:

Casing Design Assumptions and Worksheet(s):

PLU_28_BS_703H_Csg_20201023105317.pdf

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Operator Name: XTO PERMIAN OPERATING LLC

Well Name: POKER LAKE UNIT 28 BS

Well Number: 703H

Casing Attachments

Casing ID: 2 String Type: INTERMEDIATE

Inspection Document:

Spec Document:

Tapered String Spec:

Casing Design Assumptions and Worksheet(s):

PLU_28_BS_703H_Csg_20201023105239.pdf

Casing ID: 3 String Type: PRODUCTION

Inspection Document:

Spec Document:

Tapered String Spec:

Casing Design Assumptions and Worksheet(s):

PLU_28_BS_703H_Csg_20201023105303.pdf

Section	4 - Co	emen	t								
String Type	Lead/Tail	Stage Tool Depth	Top MD	Bottom MD	Quantity(sx)	Yield	Density	Cu Ft	Excess%	Cement type	Additives
SURFACE	Lead		0	1220	610	1.88	12.8	7808	100	Halc-C	2% CaCL

INTERMEDIATE	Lead	1270	0	1270	80	1.35	14.8	108	100	Halcem-C	2% CaCl
--------------	------	------	---	------	----	------	------	-----	-----	----------	---------

INTERMEDIATE	Lead	1270	1270	1060	1840	1.88	12.8	3459.	100	Halcem-C	2% CaCl
				0				2			

											-
String Type	Lead/Tail	Stage Tool Depth	Top MD	Bottom MD	Quantity(sx)	Yield	Density	Cu Ft	%sseox3	Cement type	Additives
INTERMEDIATE	Tail		1270	1060 0	310	1.33	14.8	19.68	100	Halcem-C	2% CaCl
PRODUCTION	Lead		1030 0	2040 9	1840	1.88	11.5	3459. 2	100	Halcem-C	2% CaCl
PRODUCTION	Tail		1030 0	2040 9	1840	1.35	13.2	2484	100	Versacem	None

Well Number: 703H

Section 5 - Circulating Medium

Mud System Type: Closed

Will an air or gas system be Used? NO

Description of the equipment for the circulating system in accordance with Onshore Order #2:

Diagram of the equipment for the circulating system in accordance with Onshore Order #2:

Describe what will be on location to control well or mitigate other conditions: The necessary mud products for weight addition and fluid loss control will be on location at all times.

Describe the mud monitoring system utilized: Spud with fresh water/native mud and set 11-3/4" surface casing, isolating the fresh water aquifer. Drill out from under 11-3/4 surface casing with a brine/oil direct emulsion mud system. Use fibrous materials as needed to control seepage and lost circulation. Pump viscous sweeps as needed for hole cleaning. Pump speed will be recorded on a daily drilling report after mudding up. A Pason or Totco will be used to detect changes in loss or gain of mud volume. A mud test will be performed every 24 hours to determine: density, viscosity, strength, filtration and pH as necessary. Use available solids controls equipment to help keep mud weight down after mud up. Rig up solids control equipment to operate as a closed loop system.

Circulating Medium Table

Top Depth	Bottom Depth	Mud Type	Min Weight (Ibs/gal)	Max Weight (Ibs/gal)	Density (Ibs/cu ft)	Gel Strength (lbs/100 sqft)	НА	Viscosity (CP)	Salinity (ppm)	Filtration (cc)	Additional Characteristics
0	1220	SPUD MUD	8.4	8.8							
1220	1060 0	OTHER : Brine / Cut Brine / Direct Emulsion	8.4	9.7							
1060 0	1265 5	OTHER : Cut Brine / WBM / OBM	10.8	11.8							

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Operator Name: XTO PERMIAN OPERATING LLC

Well Name: POKER LAKE UNIT 28 BS

Well Number: 703H

Section 6 - Test, Logging, Coring

List of production tests including testing procedures, equipment and safety measures:

Mud Logger: Mud Logging Unit (2 man) below intermediate casing. Open hole logging will not be done on this well.

List of open and cased hole logs run in the well:

CEMENT BOND LOG, DIRECTIONAL SURVEY,

Coring operation description for the well:

No Coring Operations for Well

Section 7 - Pressure

Anticipated Bottom Hole Pressure: 7107

Anticipated Surface Pressure: 4322

Anticipated Bottom Hole Temperature(F): 180

Anticipated abnormal pressures, temperatures, or potential geologic hazards? NO

Describe:

Contingency Plans geoharzards description:

Contingency Plans geohazards attachment:

Hydrogen Sulfide drilling operations plan required? YES

Hydrogen sulfide drilling operations plan:

PLU_28_BS_H2S_Plan_20201023083416.pdf PLU_28_BS_H2S_Dia_P2_20201023105456.pdf

Section 8 - Other Information

Proposed horizontal/directional/multi-lateral plan submission:

PLU_28_BS_703H_DD_20201023105512.pdf

Other proposed operations facets description:

Other proposed operations facets attachment:

Other Variance attachment:

PLU_28_BS_BOP_BTV_20201023083537.pdf

PLU_28_BS_FH_20201023091054.pdf

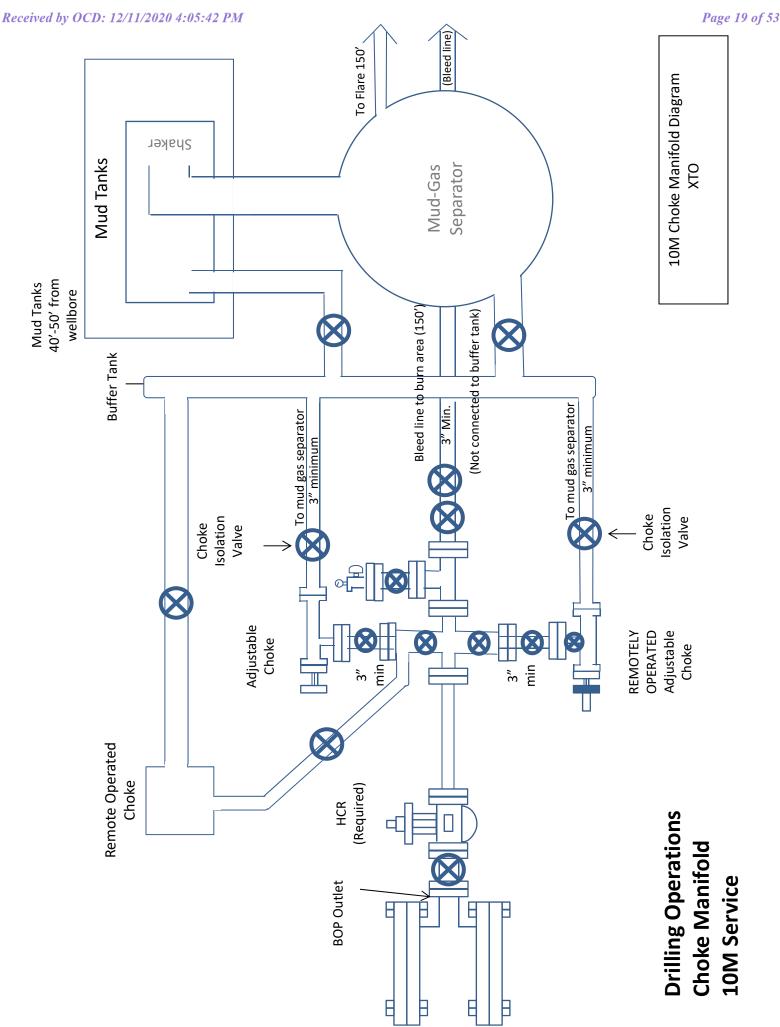
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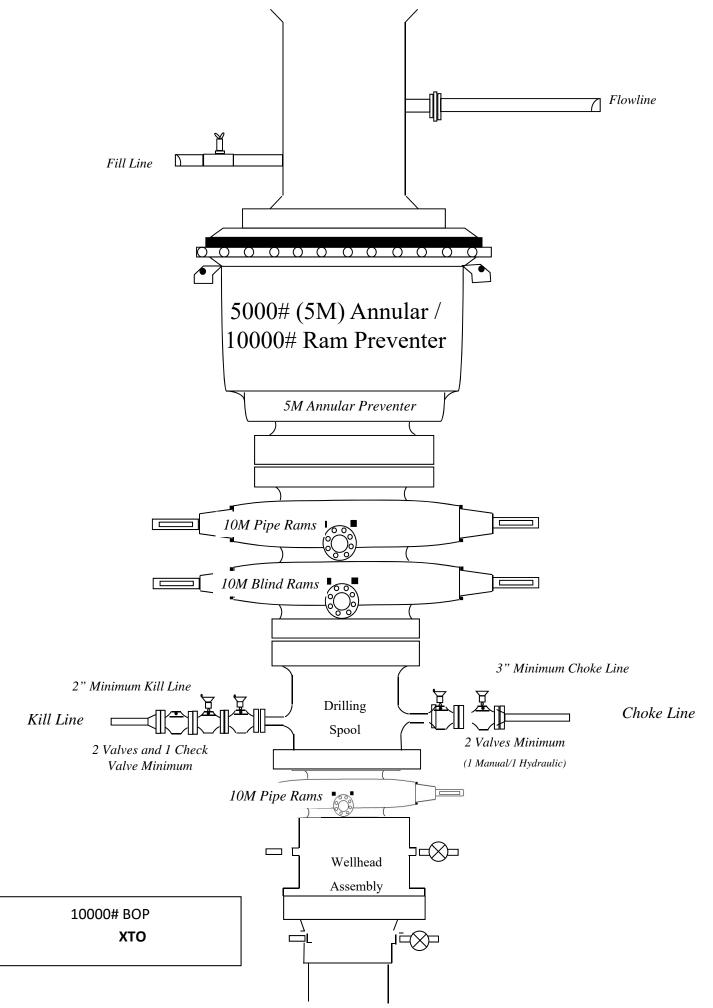
PLU_28_BS_OCV_20201023083553.pdf

PLU_28_BS_Spudder_20201023083559.pdf

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ing Design									
Hole Size	Depth	OD Csg	Weight	Collar	Grade	New/Used	SF Burst	SF Collapse	SF Tensio
14-3/4"	0' – 1220'	11-3/4"	47	BTC	J-55	New	1.17	2.38	8.32
10-5/8"	0' – 10600'	8-5/8"	32	BTC	HCL-80	New	1.09	1.43	2.16
7-7/8"	0' – 20409'	5-1/2"	20	BTC	P-110	New	1.18	1.47	2.14
	s to not utilize cer se analyzed usi			d lateral sed on regional e	perience.				
•		-		ight plus the late	•	ied by a frid	tion fa	ctor of 0.	35
· Test on Casir	ng will be limited t	o 70% burst	of the casin	g or 1500 psi, whic	hever is less				

ing Design									
Hole Size	Depth	OD Csg	Weight	Collar	Grade	New/Used	SF Burst	SF Collapse	SF Tension
14-3/4"	0' – 1220'	11-3/4"	47	BTC	J-55	New	1.17	2.38	8.32
10-5/8"	0' – 10600'	8-5/8"	32	BTC	HCL-80	New	1.09	1.43	2.16
7-7/8"	0' - 20409'	5-1/2"	20	BTC	P-110	New	1.18	1.47	2.14
	s to not utilize cer se analvzed usi			d lateral sed on regional e	perience.				
•		-		-	ral weight multipli	ed by a frid	tion fa	ctor of 0.3	35
· Test on Casi	ng will be limited t	o 70% burst	of the casin	g or 1500 psi, whic	hever is less				

ing Design									
Hole Size	Depth	OD Csg	Weight	Collar	Grade	New/Used	SF Burst	SF Collapse	SF Tensio
14-3/4"	0' – 1220'	11-3/4"	47	BTC	J-55	New	1.17	2.38	8.32
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7-7/8"	0' – 20409'	5-1/2"	20	BTC	P-110	New	1.18	1.47	2.14
	s to not utilize cer se analyzed usi			d lateral sed on regional e:	perience.				
•		-		ight plus the late	•	ied by a frid	tion fa	ctor of 0.	35
· Test on Casir	ng will be limited t	o 70% burst	of the casin	g or 1500 psi, whic	hever is less				



HYDROGEN SULFIDE (H2S) CONTINGENCY PLAN

Assumed 100 ppm ROE = 3000'

100 ppm H2S concentration shall trigger activation of this plan.

Emergency Procedures

In the event of a release of gas containing H₂S, the first responder(s) must

- Isolate the area and prevent entry by other persons into the 100 ppm ROE.
- Evacuate any public places encompassed by the 100 ppm ROE.
- Be equipped with H₂S monitors and air packs in order to control the release.
- Use the "buddy system" to ensure no injuries occur during the response
- Take precautions to avoid personal injury during this operation.
- Contact operator and/or local officials to aid in operation. See list of phone numbers attached.
 - Have received training in the
 - o Detection of H₂S, and
 - o Measures for protection against the gas,
 - o Equipment used for protection and emergency response.

Ignition of Gas source

Should control of the well be considered lost and ignition considered, take care to protect against exposure to Sulfur Dioxide (SO₂). Intentional ignition must be coordinated with the NMOCD and local officials. Additionally, the NM State Police may become involved. NM State Police shall be the Incident Command on scene of any major release. Take care to protect downwind whenever this is an ignition of the gas.

Characteristics of H₂S and SO₂

Common Name	Chemical Formula	Specific Gravity	Threshold Limit	Hazardous Limit	Lethal Concentration
Hydrogen Sulfide	H ₂ S	1.189 Air = I	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO ₂	2.21 Air = I	2 ppm	N/A	1000 ppm

Contacting Authorities

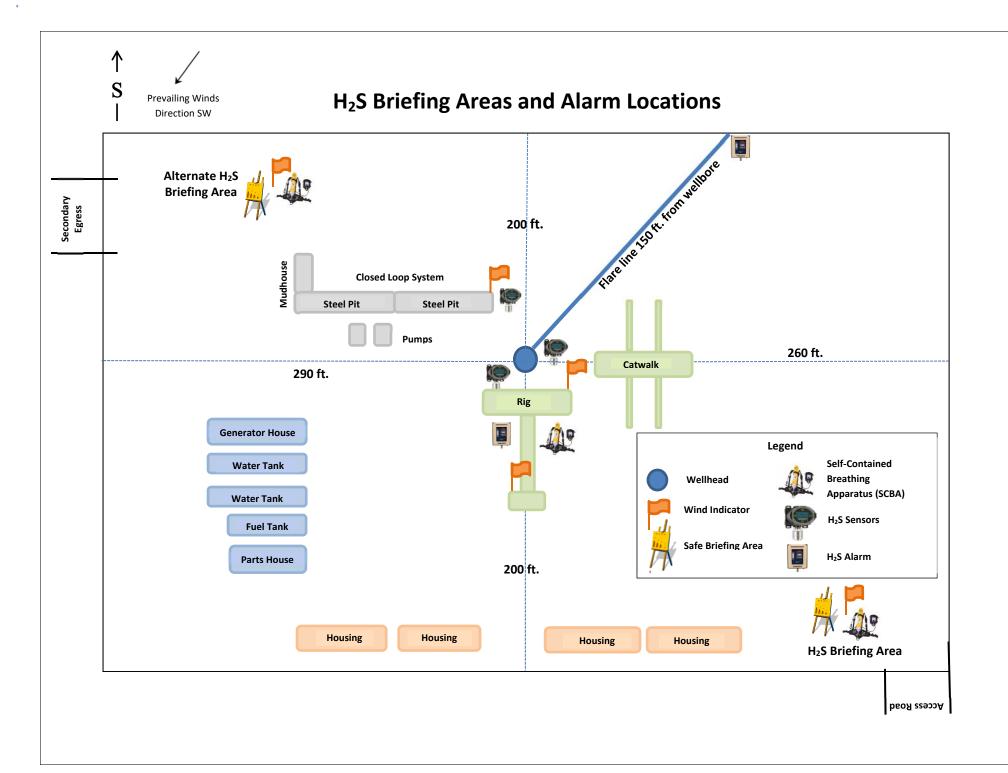
All XTO location personnel must liaison with local and state agencies to ensure a proper response to a major release. Additionally, the OCD must be notified of the release as soon as possible but no later than 4 hours. Agencies will ask for information such as type and volume of release, wind direction, location of release, etc. Be prepared with all information available including directions to site. The following call list of essential and potential responders has been prepared for use during a release. (Operator Name)'s response must be in coordination with the State of New Mexico's "Hazardous Materials Emergency Response Plan" (HMER).

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CARLSBAD OFFICE – EDDY & LEA COUNTIES

3104 E. Greene St., Carlsbad, NM 88220	
Carlsbad, NM	575-887-7329
XTO PERSONNEL:	
Kendall Decker, Drilling Manager	903-521-6477
Milton Turman, Drilling Superintendent	817-524-5107
Jeff Raines, Construction Foreman	432-557-3159
Toady Sanders, EH & S Manager	903-520-1601
Wes McSpadden, Production Foreman	575-441-1147
SHERIFF DEPARTMENTS:	
Eddy County	575-887-7551
Lea County	575-396-3611
·	
NEW MEXICO STATE POLICE:	575-392-5588
FIRE DEPARTMENTS:	911
Carlsbad	575-885-2111
Eunice	575-394-2111
Hobbs	575-397-9308
Jal	575-395-2221
Lovington	575-396-2359
HOSPITALS:	911
Carlsbad Medical Emergency	575-885-2111
Eunice Medical Emergency	575-394-2112
Hobbs Medical Emergency	575-397-9308
Jal Medical Emergency	575-395-2221
Lovington Medical Emergency	575-396-2359
AGENT NOTIFICATIONS:	
For Lea County:	
Bureau of Land Management – Hobbs	575-393-3612
New Mexico Oil Conservation Division – Hobbs	575-393-6161
	575 575 0101
For Eddy County:	
Bureau of Land Management - Carlsbad	575-234-5972
New Mexico Oil Conservation Division - Artesia	575-748-1283





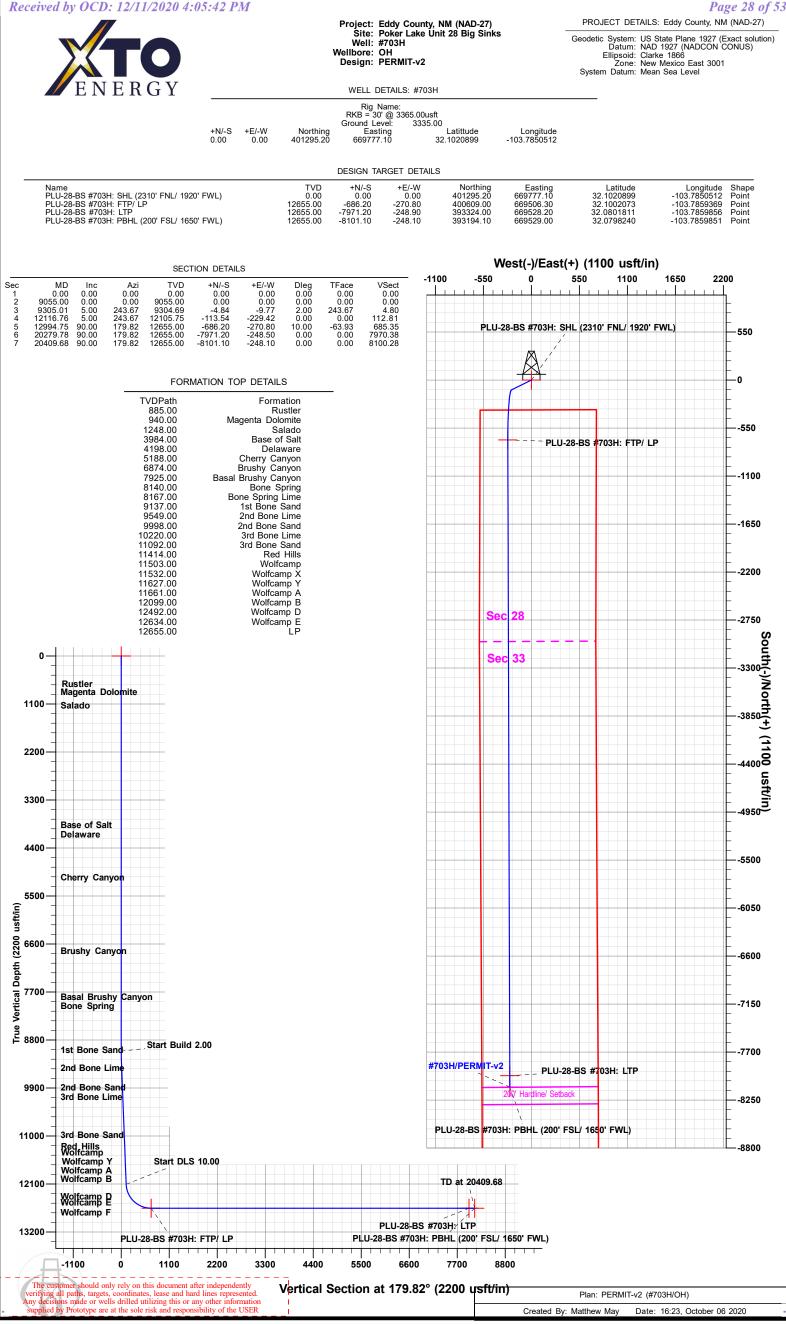
XTO Energy Eddy County, NM (NAD-27) Poker Lake Unit 28 Big Sinks #703H

OH

Plan: PERMIT-v2

Standard Planning Report

06 October, 2020



State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

AMENDED REPORT

Page 29 of 53

WELL LOCATION AND ACREAGE DEDICATION PLAT

1	API Number 30-015-	r		² Pool Code ³ Pool Name							
⁴ Property C	Code				⁵ Property I	Name			6 1	Well Number	
			POKER LAKE UNIT 28 BS 703H								
⁷ OGRID N	No.		⁸ Operator Name ⁹ Elevation								
373075	5		XTO PERMIAN OPERATION, LLC. 3,335'								
			¹⁰ Surface Location								
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East	t/West line	County	
F	28	25 S	31 E		2,310	NORTH	1,920	WE	ST	EDDY	
			11 Bo	ttom Hol	e Location If	Different From	n Surface				
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East	t/West line	County	
Ν	33	25 S	31 E		200	SOUTH	1,650	WE	ST	EDDY	
¹² Dedicated Acres	¹³ Joint o	r Infill ¹⁴	Consolidation	ation Code ¹⁵ Order No.							

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

16 GEODETIC COORDINATES NAD 83 NME GEODETIC COORDINATE NAD 83 NME GEODETIC COORDINATE NAD 83 NME SURFACE LOCATION SURFACE LOCATION SURFACE LOCATION Y = 401,353.1 Y = 401,353.1 X = 710,962.7 X = 710,962.7 LAT.=32.102215'N LAT.=32.102215'N LONG.= 103.785529'W FIRST TAKE POINT FIRST TAKE POINT NAD 27 NME NAD 83 NME Y = 400,609.0 Y = 400,666.9 X = 669,506.3 X = 710,691.9 LAT.= 32.100207'N LAT.= 32.100332'N LONG.= 103.785937'W LONG.=	W 1,920' B A 1,650' F.T.P. B A A GRID AZ.=201'32'06" HORIZ. DIST.=737.72' C TZ5S R31E	¹⁷ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.
$\begin{array}{c} \mbox{CORNER COORDINATES TABLE} \\ \mbox{NAD 27 NME} \\ \mbox{A} - Y = 400,956.5 N, X = 670,521.7 E \\ \mbox{B} - Y = 400,950.1 N, X = 669,189.6 E \\ \mbox{C} - Y = 398,304.2 N, X = 670,514.6 E \\ \mbox{D} - Y = 398,297.4 N, X = 669,180.9 E \\ \mbox{E} - Y = 395,652.3 N, X = 670,529.0 E \\ \mbox{F} - Y = 395,642.6 N, X = 669,196.3 E \\ \mbox{G} - Y = 393,002.3 N, X = 670,543.3 E \\ \mbox{H} - Y = 392,991.5 N, X = 669,211.8 E \\ \mbox{CORNER COORDINATES TABLE} \\ \mbox{NAD 83 NME} \\ \mbox{A} - Y = 401,014.4 N, X = 711,707.3 E \\ \mbox{B} - Y = 398,355.2 N, X = 710,366.6 E \\ \end{array}$	E I E GRID AZ.=179'49'18" HORIZ. DIST.=7,415.18' L.T.P.	Signature Date Printed Name
$ \begin{array}{cccccccccccccccccccccccccccccccccccc$	1,650'	made by me or under my supervision, and that the same is true and correct to the best of my belief. 10-2-2020 Date of Survey Signatue and Seal of Professional Surveyor: MARK DILLON HARP 23786 DILLON HARP 2378 DILLON HARP 2378 DILLON HARP 2378 DILLON HARP 2378 DILLON HA
		Certificate Number JC 2017070991

Received by OCD: 12/11/2020 4:05:42 PM



Planning Report

Database:	EDM	5000.1.13 Si	nale User Dh		Local Co	ordinate R	oforonco:	Well #703H			
Company:		Energy	ngie osei bb			Local Co-ordinate Reference: TVD Reference:			RKB = 30' @ 3365.00usft		
• •		County, NM	(NAD 27)						RKB = 30' @ 3365.000sft		
Project:									3365.00USII		
Site:		r Lake Unit 2	o big Siriks			North Reference: Grid					
Vell:	#703	Н			Survey 0	Calculation I	Method:	Minimum Curv	/ature		
Nellbore:	ОН										
Design:	PER	MIT-v2									
Project	Eddy	County, NM (NAD-27)								
Map System: Geo Datum: Map Zone:	NAD 19	US State Plane 1927 (Exact solution) NAD 1927 (NADCON CONUS) New Mexico East 3001				atum:	Ν	<i>l</i> lean Sea Leve			
Site	Poker	Lake Unit 28	Big Sinks								
Site Position:			- Nortl	nina:	401.3	295.70 usft	Latitude:			32.102089	
From:		n		-		897.10 usft	Longitude			-103.784663	
Position Unce		Map Easting: intv: 0.00 usft Slot Radius:			000,0	13-3/16 "	Grid Conv			0.29	
r osition once	situnity.							0.23			
Well	#703H										
Well Position	+N/-S	-0.5	50 usft N	orthing:		401,295.20 usft Latitude:				32.102089	
	+E/-W	-				669,777.10	usft Lo	ongitude:		-103.785051	
Position Unce	artainty				vation:	,		round Level:		3,335.00 us	
FUSILION UNCE	entannty	0.0			valion.	0.00	usit G	Iounu Levei.		5,555.00 us	
Wellbore	ОН										
Magnetics	Мо	del Name	Samp	e Date	Declina	ation	Dip	Angle	Field \$	Strength	
					(°)			(°)	nT)		
		IGRF2015		10/06/20	6.69			59.87		47,505	
Design	PERM	1IT-v2									
Audit Notes:											
Version:			Pha	se:	PLAN	Ti	e On Depth		0.00		
Vertical Section	on:	D	epth From (1	VD)	+N/-S	+E	E/-W	Dir	ection		
			· (usft) `	,	(usft)	(u	ısft)		(°)		
			0.00		0.00	•	.00	17	79.82		
Plan Sections	3										
Measured			Vertical			Dogleg	Build	Turn			
	Inclination (°)	Azimuth (°)	Depth (usft)	+N/-S (usft)	+E/-W (usft)	Rate (°/100usft)	Rate (°/100usft)	Rate	TFO (°)	Target	
0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00		
9,055.00	0.00	0.01	9,055.00	0.00	0.00	0.00	0.00	0.00	0.01		
9,305.01	5.00	243.67	9,304.69	-4.84	-9.77	2.00	2.00	0.00	243.67		
12,116.76	5.00	243.67	12,105.75	-113.54	-229.42	0.00	0.00	0.00	0.00		
12,994.75	90.00	179.82	12,655.00	-686.20	-270.80	10.00				PLU-28-BS #703F	
20,279.78	90.00	179.82	12,655.00	-7,971.20	-248.50	0.00				PLU-28-BS #703F	
20,409.68	90.00	179.82	12,655.00	-8,101.10	-248.10	0.00	0.00	0.00	0.00	PLU-28-BS #703F	

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Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well #703H RKB = 30' @ 3365.00usft
Project:	Eddy County, NM (NAD-27)	MD Reference:	RKB = 30' @ 3365.00usft
Site:	Poker Lake Unit 28 Big Sinks	North Reference:	Grid
Well:	#703H	Survey Calculation Method:	Minimum Curvature
Wellbore:	ОН	-	
Design:	PERMIT-v2		

Planned Survey

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100usft)	Build Rate (°/100usft)	Turn Rate (°/100usft)
0.00 100.00 200.00 300.00 400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 100.00 200.00 300.00 400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
500.00 600.00 700.00 800.00 900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	500.00 600.00 700.00 800.00 900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
1,000.00 1,100.00 1,200.00 1,300.00 1,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	1,000.00 1,100.00 1,200.00 1,300.00 1,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
1,500.00 1,600.00 1,700.00 1,800.00 1,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	1,500.00 1,600.00 1,700.00 1,800.00 1,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
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4,500.00 4,600.00 4,700.00 4,800.00 4,900.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	4,500.00 4,600.00 4,700.00 4,800.00 4,900.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
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Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well#703H RKB = 30' @ 3365.00usft
Project:	Eddy County, NM (NAD-27)	MD Reference:	RKB = 30' @ 3365.00usft
Site:	Poker Lake Unit 28 Big Sinks	North Reference:	Grid
Well:	#703H	Survey Calculation Method:	Minimum Curvature
Wellbore:	ОН		
Design:	PERMIT-v2		

Planned Survey

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100usft)	Build Rate (°/100usft)	Turn Rate (°/100usft)
5,400.00	0.00	0.00	5,400.00	0.00	0.00	0.00	0.00	0.00	0.00
5,500.00 5,600.00 5,700.00 5,800.00 5,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	5,500.00 5,600.00 5,700.00 5,800.00 5,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
6,000.00 6,100.00 6,200.00 6,300.00 6,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	6,000.00 6,100.00 6,200.00 6,300.00 6,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
6,500.00 6,600.00 6,700.00 6,800.00 6,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	6,500.00 6,600.00 6,700.00 6,800.00 6,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
7,000.00 7,100.00 7,200.00 7,300.00 7,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	7,000.00 7,100.00 7,200.00 7,300.00 7,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
7,500.00 7,600.00 7,700.00 7,800.00 7,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	7,500.00 7,600.00 7,700.00 7,800.00 7,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
8,000.00 8,100.00 8,200.00 8,300.00 8,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	8,000.00 8,100.00 8,200.00 8,300.00 8,400.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
8,500.00 8,600.00 8,700.00 8,800.00 8,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	8,500.00 8,600.00 8,700.00 8,800.00 8,900.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
9,000.00 9,055.00 9,100.00 9,200.00 9,305.01	0.00 0.00 0.90 2.90 5.00	0.00 0.01 243.67 243.67 243.67	9,000.00 9,055.00 9,100.00 9,199.94 9,304.69	0.00 0.00 -0.16 -1.63 -4.84	0.00 0.00 -0.32 -3.29 -9.77	0.00 0.00 0.16 1.62 4.80	0.00 0.00 2.00 2.00 2.00	0.00 0.00 2.00 2.00 2.00	0.00 0.00 0.00 0.00 0.00
9,400.00 9,500.00 9,600.00 9,700.00 9,800.00	5.00 5.00 5.00 5.00 5.00 5.00	243.67 243.67 243.67 243.67 243.67	9,399.32 9,498.94 9,598.56 9,698.18 9,797.80	-8.51 -12.37 -16.24 -20.11 -23.97	-17.19 -25.00 -32.81 -40.63 -48.44	8.45 12.30 16.14 19.98 23.82	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
9,900.00 10,000.00 10,100.00 10,200.00 10,300.00	5.00 5.00 5.00 5.00 5.00 5.00	243.67 243.67 243.67 243.67 243.67	9,897.42 9,997.04 10,096.66 10,196.28 10,295.90	-27.84 -31.70 -35.57 -39.44 -43.30	-56.25 -64.06 -71.87 -79.69 -87.50	27.66 31.50 35.34 39.18 43.03	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00
10,400.00 10,500.00 10,600.00	5.00 5.00 5.00	243.67 243.67 243.67	10,395.52 10,495.14 10,594.75	-47.17 -51.03 -54.90	-95.31 -103.12 -110.93	46.87 50.71 54.55	0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00

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Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well #703H RKB = 30' @ 3365.00usft
Project:	Eddy County, NM (NAD-27)	MD Reference:	RKB = 30' @ 3365.00usft
Site:	Poker Lake Unit 28 Big Sinks	North Reference:	Grid
Well:	#703H	Survey Calculation Method:	Minimum Curvature
Wellbore:	ОН		
Design:	PERMIT-v2		

Planned Survey

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100usft)	Build Rate (°/100usft)	Turn Rate (°/100usft)
10,700.00 10,800.00	5.00 5.00	243.67 243.67	10,694.37 10,793.99	-58.76 -62.63	-118.74 -126.56	58.39 62.23	0.00 0.00	0.00 0.00	0.00 0.00
10,900.00 11,000.00 11,100.00 11,200.00 11,200.00	5.00 5.00 5.00 5.00 5.00 5.00	243.67 243.67 243.67 243.67 243.67 243.67	10,893.61 10,993.23 11,092.85 11,192.47 11,292.09	-66.50 -70.36 -74.23 -78.09 -81.96	-134.37 -142.18 -149.99 -157.80 -165.61	66.07 69.92 73.76 77.60 81.44	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
11,400.00 11,500.00 11,600.00 11,700.00 11,800.00	5.00 5.00 5.00 5.00 5.00 5.00	243.67 243.67 243.67 243.67 243.67 243.67	11,391.71 11,491.33 11,590.95 11,690.57 11,790.19	-85.83 -89.69 -93.56 -97.42 -101.29	-173.43 -181.24 -189.05 -196.86 -204.67	85.28 89.12 92.96 96.81 100.65	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
11,900.00 12,000.00 12,100.00 12,116.76 12,150.00	5.00 5.00 5.00 5.00 7.12	243.67 243.67 243.67 243.67 218.81	11,889.81 11,989.43 12,089.05 12,105.75 12,138.80	-105.16 -109.02 -112.89 -113.54 -115.78	-212.48 -220.30 -228.11 -229.42 -232.01	104.49 108.33 112.17 112.81 115.05	0.00 0.00 0.00 0.00 10.00	0.00 0.00 0.00 0.00 6.36	0.00 0.00 0.00 0.00 -74.80
12,200.00 12,250.00 12,300.00 12,350.00 12,400.00	11.43 16.15 20.99 25.89 30.82	202.67 195.56 191.64 189.14 187.39	12,188.14 12,236.69 12,284.08 12,329.94 12,373.93	-122.77 -134.05 -149.53 -169.09 -192.59	-235.86 -239.64 -243.31 -246.85 -250.24	122.03 133.30 148.76 168.31 191.80	10.00 10.00 10.00 10.00 10.00	8.64 9.43 9.69 9.80 9.86	-32.27 -14.22 -7.86 -5.00 -3.50
12,450.00 12,500.00 12,550.00 12,600.00 12,650.00	35.77 40.73 45.70 50.67 55.65	186.08 185.06 184.22 183.51 182.90	12,415.70 12,454.96 12,491.39 12,524.71 12,554.68	-219.84 -250.64 -284.75 -321.92 -361.86	-253.43 -256.42 -259.18 -261.68 -263.91	219.04 249.83 283.94 321.10 361.03	10.00 10.00 10.00 10.00 10.00	9.90 9.92 9.93 9.94 9.95	-2.61 -2.05 -1.67 -1.41 -1.22
12,700.00 12,750.00 12,800.00 12,850.00 12,900.00	60.62 65.61 70.59 75.57 80.55	182.36 181.87 181.41 180.98 180.57	12,581.07 12,603.68 12,622.32 12,636.87 12,647.21	-404.27 -448.82 -495.18 -542.99 -591.88	-265.86 -267.50 -268.82 -269.81 -270.48	403.43 447.98 494.33 542.14 591.03	10.00 10.00 10.00 10.00 10.00	9.96 9.96 9.96 9.97 9.97	-1.09 -0.99 -0.91 -0.86 -0.82
12,950.00 12,994.75 13,000.00 13,100.00 13,200.00	85.54 90.00 90.00 90.00 90.00	180.18 179.82 179.82 179.82 179.82 179.82	12,653.26 12,655.00 12,655.00 12,655.00 12,655.00	-641.50 -686.20 -691.45 -791.45 -891.45	-270.80 -270.80 -270.78 -270.48 -270.17	640.65 685.35 690.60 790.60 890.60	10.00 10.00 0.00 0.00 0.00	9.97 9.97 0.00 0.00 0.00	-0.80 -0.78 0.00 0.00 0.00
13,300.00 13,400.00 13,500.00 13,600.00 13,700.00	90.00 90.00 90.00 90.00 90.00	179.82 179.82 179.82 179.82 179.82 179.82	12,655.00 12,655.00 12,655.00 12,655.00 12,655.00	-991.45 -1,091.45 -1,191.45 -1,291.45 -1,391.45	-269.87 -269.56 -269.25 -268.95 -268.64	990.60 1,090.60 1,190.60 1,290.60 1,390.60	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
13,800.00 13,900.00 14,000.00 14,100.00 14,200.00	90.00 90.00 90.00 90.00 90.00	179.82 179.82 179.82 179.82 179.82 179.82	12,655.00 12,655.00 12,655.00 12,655.00 12,655.00	-1,491.45 -1,591.45 -1,691.45 -1,791.45 -1,791.45	-268.33 -268.03 -267.72 -267.42 -267.11	1,490.60 1,590.60 1,690.60 1,790.60 1,890.60	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
14,300.00 14,400.00 14,500.00 14,600.00 14,700.00	90.00 90.00 90.00 90.00 90.00	179.82 179.82 179.82 179.82 179.82 179.82	12,655.00 12,655.00 12,655.00 12,655.00 12,655.00	-1,991.45 -2,091.45 -2,191.45 -2,291.45 -2,391.45	-266.80 -266.50 -266.19 -265.89 -265.58	1,990.60 2,090.60 2,190.60 2,290.60 2,390.60	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00
14,800.00 14,900.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-2,491.45 -2,591.45	-265.27 -264.97	2,490.60 2,590.60	0.00 0.00	0.00 0.00	0.00 0.00

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Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well#703H RKB = 30' @ 3365.00usft
Project:	Eddy County, NM (NAD-27)	MD Reference:	RKB = 30' @ 3365.00usft
Site:	Poker Lake Unit 28 Big Sinks	North Reference:	Grid
Well:	#703H	Survey Calculation Method:	Minimum Curvature
Wellbore:	ОН		
Design:	PERMIT-v2		

Planned Survey

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100usft)	Build Rate (°/100usft)	Turn Rate (°/100usft)
15,000.00	90.00	179.82	12,655.00	-2,691.44	-264.66	2,690.60	0.00	0.00	0.00
15,100.00	90.00	179.82	12,655.00	-2,791.44	-264.36	2,790.60	0.00	0.00	0.00
15,200.00	90.00	179.82	12,655.00	-2,891.44	-264.05	2,890.60	0.00	0.00	0.00
15,300.00	90.00	179.82	12,655.00	-2,991.44	-263.74	2,990.60	0.00	0.00	0.00
15,400.00	90.00	179.82	12,655.00	-3,091.44	-263.44	3,090.60	0.00	0.00	0.00
15,500.00	90.00	179.82	12,655.00	-3,191.44	-263.13	3,190.60	0.00	0.00	0.00
15,600.00 15,700.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-3,291.44 -3,391.44	-262.82 -262.52	3,290.60 3,390.60	0.00 0.00	0.00 0.00	0.00 0.00
,						,			
15,800.00 15,900.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-3,491.44 -3.591.44	-262.21 -261.91	3,490.60 3,590.60	0.00 0.00	0.00 0.00	0.00 0.00
16,000.00	90.00	179.82	12,655.00	-3,691.44	-261.60	3,690.60	0.00	0.00	0.00
16,100.00	90.00	179.82	12,655.00	-3,791.44	-261.29	3,790.60	0.00	0.00	0.00
16,200.00	90.00	179.82	12,655.00	-3,891.44	-260.99	3,890.60	0.00	0.00	0.00
16,300.00	90.00	179.82	12,655.00	-3,991.44	-260.68	3,990.60	0.00	0.00	0.00
16,400.00	90.00	179.82	12,655.00	-4,091.44	-260.38	4,090.60	0.00	0.00	0.00
16,500.00	90.00	179.82	12,655.00	-4,191.44	-260.07	4,190.60	0.00	0.00	0.00
16,600.00	90.00	179.82	12,655.00	-4,291.44	-259.76	4,290.60	0.00	0.00	0.00
16,700.00	90.00	179.82	12,655.00	-4,391.44	-259.46	4,390.60	0.00	0.00	0.00
16,800.00	90.00	179.82	12,655.00	-4,491.44	-259.15	4,490.60	0.00	0.00	0.00
16,900.00	90.00 90.00	179.82 179.82	12,655.00	-4,591.44 -4,691.44	-258.84 -258.54	4,590.60	0.00 0.00	0.00 0.00	0.00 0.00
17,000.00 17,100.00	90.00	179.82	12,655.00 12,655.00	-4,691.44 -4,791.44	-258.54 -258.23	4,690.60 4,790.60	0.00	0.00	0.00
17,200.00	90.00	179.82	12,655.00	-4,891.43	-257.93	4,890.60	0.00	0.00	0.00
17,300.00	90.00	179.82	12,655.00	-4,991.43	-257.62	4,990.60	0.00	0.00	0.00
17,400.00	90.00	179.82	12,655.00	-5,091.43	-257.31	4,990.00 5,090.60	0.00	0.00	0.00
17,500.00	90.00	179.82	12,655.00	-5,191.43	-257.01	5,190.60	0.00	0.00	0.00
17,600.00	90.00	179.82	12,655.00	-5,291.43	-256.70	5,290.60	0.00	0.00	0.00
17,700.00	90.00	179.82	12,655.00	-5,391.43	-256.40	5,390.60	0.00	0.00	0.00
17,800.00	90.00	179.82	12,655.00	-5,491.43	-256.09	5,490.60	0.00	0.00	0.00
17,900.00	90.00	179.82	12,655.00	-5,591.43	-255.78	5,590.60	0.00	0.00	0.00
18,000.00	90.00	179.82	12,655.00	-5,691.43	-255.48	5,690.60	0.00	0.00	0.00 0.00
18,100.00 18,200.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-5,791.43 -5,891.43	-255.17 -254.86	5,790.60 5,890.60	0.00 0.00	0.00 0.00	0.00
-									
18,300.00 18,400.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-5,991.43 -6,091.43	-254.56 -254.25	5,990.60 6,090.60	0.00 0.00	0.00 0.00	0.00 0.00
18,500.00	90.00	179.82	12,655.00	-6,191.43	-253.95	6,190.60	0.00	0.00	0.00
18,600.00	90.00	179.82	12,655.00	-6,291.43	-253.64	6,290.60	0.00	0.00	0.00
18,700.00	90.00	179.82	12,655.00	-6,391.43	-253.33	6,390.60	0.00	0.00	0.00
18,800.00	90.00	179.82	12,655.00	-6,491.43	-253.03	6,490.60	0.00	0.00	0.00
18,900.00	90.00	179.82	12,655.00	-6,591.43	-252.72	6,590.60	0.00	0.00	0.00
19,000.00	90.00	179.82	12,655.00	-6,691.43	-252.42	6,690.60	0.00	0.00	0.00
19,100.00 19,200.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-6,791.43 -6,891.43	-252.11 -251.80	6,790.60 6,890.60	0.00 0.00	0.00 0.00	0.00 0.00
19,300.00 19,400.00	90.00 90.00	179.82 179.82	12,655.00 12,655.00	-6,991.42 -7,091.42	-251.50 -251.19	6,990.60 7,090.60	0.00 0.00	0.00 0.00	0.00 0.00
19,400.00	90.00 90.00	179.82	12,655.00	-7,091.42 -7,191.42	-251.19 -250.88	7,090.60	0.00	0.00	0.00
19,600.00	90.00	179.82	12,655.00	-7,291.42	-250.58	7,290.60	0.00	0.00	0.00
19,700.00	90.00	179.82	12,655.00	-7,391.42	-250.27	7,390.60	0.00	0.00	0.00
19,800.00	90.00	179.82	12,655.00	-7,491.42	-249.97	7,490.60	0.00	0.00	0.00
19,900.00	90.00	179.82	12,655.00	-7,591.42	-249.66	7,590.60	0.00	0.00	0.00
20,000.00	90.00	179.82	12,655.00	-7,691.42	-249.35	7,690.60	0.00	0.00	0.00
20,100.00	90.00	179.82	12,655.00	-7,791.42	-249.05	7,790.60	0.00	0.00	0.00
20,200.00	90.00	179.82	12,655.00	-7,891.42	-248.74	7,890.60	0.00	0.00	0.00
20,279.78	90.00	179.82	12,655.00	-7,971.20	-248.50	7,970.38	0.00	0.00	0.00
10/06/20 A.27.30PM				Page 6				001	IDASS 5000 1 Puild 7

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Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well #703H RKB = 30' @ 3365.00usft
Project:	Eddy County, NM (NAD-27)	MD Reference:	RKB = 30' @ 3365.00usft
Site:	Poker Lake Unit 28 Big Sinks	North Reference:	Grid
Well:	#703H	Survey Calculation Method:	Minimum Curvature
Wellbore:	ОН		
Design:	PERMIT-v2		

Planned Survey

Measured Depth (usft)	Inclination (°)	Azimuth (°)	Vertical Depth (usft)	+N/-S (usft)	+E/-W (usft)	Vertical Section (usft)	Dogleg Rate (°/100usft)	Build Rate (°/100usft)	Turn Rate (°/100usft)
20,300.00	90.00	179.82	12,655.00	-7,991.42	-248.44	7,990.60	0.00	0.00	0.00
20,409.68	90.00	179.82	12,655.00	-8,101.10	-248.10	8,100.28	0.00	0.00	0.00

Design	Targets
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Target Name - hit/miss target D - Shape	Dip Angle (°)	Dip Dir. (°)	TVD (usft)	+N/-S (usft)	+E/-W (usft)	Northing (usft)	Easting (usft)	Latitude	Longitude
PLU-28-BS #703H: SI - plan hits target cer - Point	0.00 nter	0.01	0.00	0.00	0.00	401,295.20	669,777.10	32.1020899	-103.7850512
PLU-28-BS #703H: L1 - plan misses target - Point	0.00 center by		12,655.00 20279.78u	-7,971.20 sft MD (1265	-248.90 5.00 TVD, -7	393,324.00 7971.20 N, -248.5	669,528.20 50 E)	32.0801811	-103.7859856
PLU-28-BS #703H: F - plan hits target cer - Point	0.00 nter	0.00	12,655.00	-686.20	-270.80	400,609.00	669,506.30	32.1002074	-103.7859369
PLU-28-BS #703H: PI - plan hits target cer - Point	0.00 nter	0.00	12,655.00	-8,101.10	-248.10	393,194.10	669,529.00	32.0798240	-103.7859851

Received by OCD: 12/11/2020 4:05:42 PM



Planning Report

Database: Company:	EDM 5000.1.13 Single User Db XTO Energy	Local Co-ordinate Reference: TVD Reference:	Well #703H RKB = 30' @ 3365.00usft
Project: Site:	Eddy County, NM (NAD-27) Poker Lake Unit 28 Big Sinks	MD Reference:	RKB = 30' @ 3365.00usft
Well:	#703H	North Reference: Survey Calculation Method:	Grid Minimum Curvature
Wellbore:	ОН	•	
Design:	PERMIT-v2		

Formations

Measured Depth (usft)	Vertical Depth (usft)	Name	Lithology	Dip (°)	Dip Direction (°)
885.00	885.00	Rustler			
940.00	940.00	Magenta Dolomite			
1,248.00	1,248.00	Salado			
3,984.00	3,984.00	Base of Salt			
4,198.00	4,198.00	Delaware			
5,188.00	5,188.00				
6,874.00	6,874.00	Brushy Canyon			
7,925.00	7,925.00	Basal Brushy Canyon			
8,140.00	8,140.00	Bone Spring			
8,167.00	8,167.00	Bone Spring Lime			
9,137.01	9,137.00	1st Bone Sand			
9,550.25	9,549.00	2nd Bone Lime			
10,000.97	9,998.00	2nd Bone Sand			
10,223.81	10,220.00	3rd Bone Lime			
11,099.15	11,092.00	3rd Bone Sand			
11,422.38	11,414.00	Red Hills			
11,511.72	11,503.00	Wolfcamp			
11,540.83	11,532.00	Wolfcamp X			
11,636.19	11,627.00	Wolfcamp Y			
11,670.32	11,661.00	Wolfcamp A			
12,109.99	12,099.00	Wolfcamp B			
12,550.88	12,492.00	Wolfcamp D			
12,838.90	12,634.00	Wolfcamp E			
12,994.75	12,655.00	LP			

Subject: Request for a Variance Allowing break Testing of the Blowout Preventer Equipment (BOPE)

XTO Energy requests a variance to ONLY test broken pressure seals on the BOPE and function test BOP when skidding a drilling rig between multiple wells on a pad.

Background

Onshore Oil and Gas Order (OOGO) No. 2, Drilling Operations, Sections III.A.2.i.iv.B states that the BOP test must be performed whenever any seal subject to test pressure is broken. The current interpretation of the Bureau of Land Management (BLM) requires a complete BOP test and not just a test of the affected component. OOGO No. 2, Section I.D.2 states, "Some situation may exist either on a well-by-well basis or field-wide basis whereby it is commonly accepted practice to vary a particular minimum standard(s) established in this order. This situation can be resolved by requesting a variance...". XTO Energy feels the break testing the BOPE is such a situation. Therefore, as per OOGO No. 2, Section IV., XTO Energy submits this request for the variance.

Supporting Documentation

OOGO No. 2 became effective on December 19, 1988 and has remained the standard for regulating BLM onshore drilling operations for over 30 years. During this time there have been significant changes in drilling technology. BLM continues to use the variance request process to allow for the use of modern technology and acceptable engineering practices that have arisen since OOGO No. 2 was originally released. The XTO Energy drilling rig fleet has many modern upgrades that allow the intact BOP stack to be moved between well slots on a multi-well pad, as well as, wellhead designs that incorporate quick connects facilitating release of the BOP from the wellhead without breaking any BOP stack components apart. These technologies have been used extensively offshore, and other regulators, API, and many operators around the world have endorsed break testing as safe and reliable.



Figure 1: Winch System attached to BOP Stack



Figure 2: BOP Winch System

American Petroleum Institute (API) standards, specification and recommended practices are considered the industry standard and are consistently utilized and referenced by the industry. OOGO No. 2 recognizes API recommended Practices (RP) 53 in its original development. API Standard 53, *Well Control Equipment Systems for Drilling Wells* (Fifth Edition, December 2018, Annex C, Table C.4) recognizes break testing as an acceptable practice. Specifically, API Standard 53, Section 5.3.7.1 states "A pressure test of the pressure containing component shall be performed following the disconnection or repair, limited to the affected component." See Table C.4 below for reference.

	Pressure Test-Low	Pressure Test-	-High Pressure ^{ac}
Component to be Pressure Tested	Pressure Test—Low Pressure ^{ac} psig (MPa)	Change Out of Component, Elastomer, or Ring Gasket	No Change Out of Component, Elastomer, or Ring Gasket
Annular preventer ^b	250 to 350 (1.72 to 2.41)	RWP of annular preventer	MASP or 70% annular RWP, whichever is lower.
Fixed pipe, variable bore, blind, and BSR preventers ^{bd}	250 to 350 (1.72 to 2.41)	RWP of ram preventer or wellhead system, whichever is lower	ITP
Choke and kill line and BOP side outlet valves below ram preventers (both sides)	250 to 350 (1.72 to 2.41)	RWP of side outlet valve or wellhead system, whichever is lower	ITP
Choke manifold—upstream of chokes ^e	250 to 350 (1.72 to 2.41)	RWP of ram preventers or wellhead system, whichever is lower	ITP
Choke manifold—downstream of chokes ^e	250 to 350 (1.72 to 2.41)	RWP of valve(s), line(s), or M whichever is lower	ASP for the well program,
Kelly, kelly valves, drill pipe safety valves, IBOPs	250 to 350 (1.72 to 2.41)	MASP for the well program	
	during the evaluation period. The p	ressure shall not decrease below the allest OD drill pipe to be used in well	
	from one wellhead to another within when the integrity of a pressure sea	n the 21 days, pressure testing is req	uired for pressure-containing an

The Bureau of Safety and Environmental Enforcement (BSEE), Department of Interior, has also utilized the API standards, specification and best practices in the development of its offshore oil and gas regulations and incorporates them by reference within its regulations.

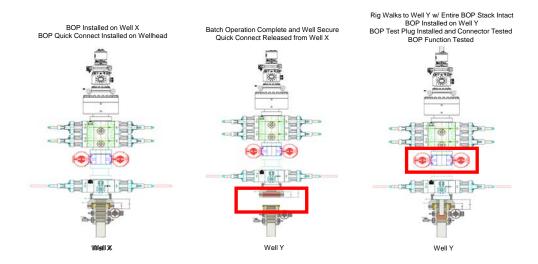
Break testing has been approved by the BLM in the past with other operators based on the detailed information provided in this document.

XTO Energy feels break testing and our current procedures meet the intent of OOGO No. 2 and often exceed it. There has been no evidence that break testing results in more components failing than seen on full BOP tests. XTO Energy's internal standards requires complete BOPE tests more often than that of OOGO No. 2 (Every 21 days). In addition to function testing the annular, pipe rams and blind rams after each BOP nipple up, XTO Energy performs a choke drill with the rig crew prior to drilling out every casing shoe. This is additional training for the rig crew that exceeds the requirements of the OOGO No.2.

Procedures

- XTO Energy will use this document for our break testing plan for New Mexico Delaware basin. The summary below will be referenced in the APD or Sundry Notice and receive approval prior to implementing this variance.
- 2. XTO Energy will perform BOP break testing on multi-wells pads where multiple intermediate sections can be drilled and cased within the 21-day BOP test window.
 - a. A full BOP test will be conducted on the first well on the pad.
 - b. The first intermediate hole section drilled on the pad will be the deepest. All of the remaining hole sections will be the same depth or shallower.
 - i. Our Lower WC targets set the intermediate casing shoe no deeper than the Wolfcamp B.
 - ii. Our Upper WC targets set the intermediate casing shoe shallower than the Wolfcamp B.
 - c. A Full BOP test will be required if the intermediate hole section being drilled has a MASP over 5M.
 - d. A full BOP test will be required prior to drilling any production hole.
- 3. After performing a complete BOP test on the first well, the intermediate hole section will be drilled and cased, two breaks would be made on the BOP equipment.
 - a. Between the HCV valve and choke line connection
 - b. Between the BOP quick connect and the wellhead
- 4. The BOP is then lifted and removed from the wellhead by a hydraulic system.
- 5. After skidding to the next well, the BOP is moved to the wellhead by the same hydraulic system and installed.
- 6. The connections mentioned in 3a and 3b will then be reconnected.
- 7. Install test plug into the wellhead using test joint or drill pipe.
- 8. A shell test is performed against the upper pipe rams testing the two breaks.
- 9. The shell test will consist of a 250 psi low test and a high test to the value submitted in the APD or Sundry (e.g. 5,000 psi or 10,000psi).
- 10. Function test will be performed on the following components: lower pipe rams, blind rams, and annular.

- 11. For a multi-well pad the same two breaks on the BOP would be made and on the next wells and steps 4 through 10 would be repeated.
- 12. A second break test would only be done if the intermediate hole section being drilled could not be completed within the 21 day BOP test window.



Note: Picture below highlights BOP components that will be tested during batch operations

Summary

A variance is requested to **ONLY** test broken pressure seals on the BOP equipment when moving from wellhead to wellhead which is in compliance with API Standard 53. API Standard 53 states, that for pad drilling operation, moving from one wellhead to another within 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken.

The BOP will be secured by a hydraulic carrier or cradle. The BLM will be contacted if a Well Control event occurs prior to the commencement of a BOPE Break Testing operation.

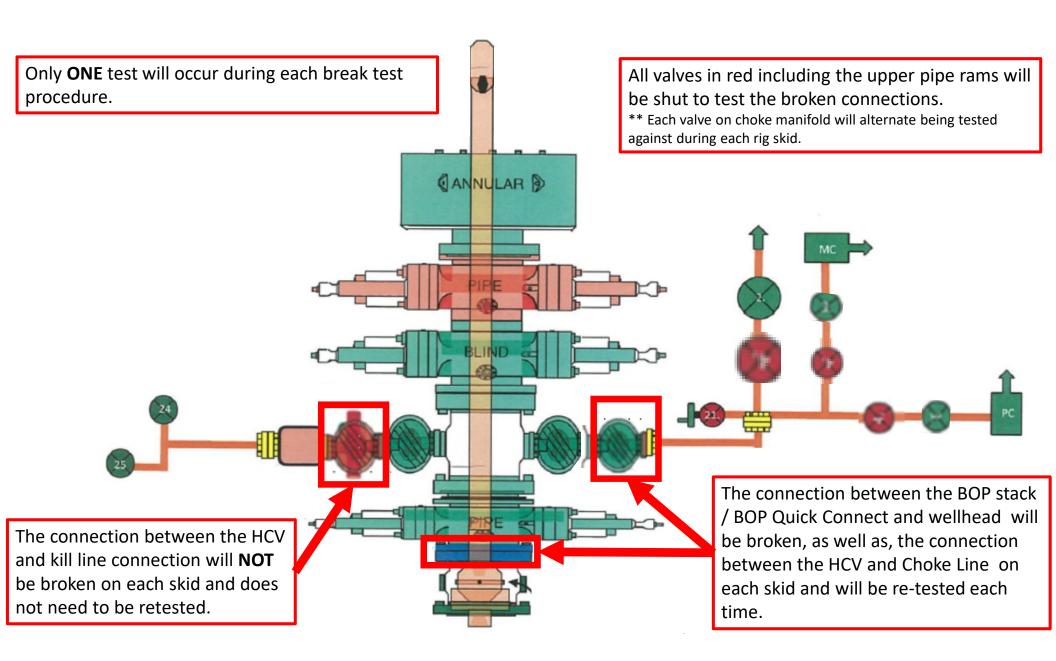
Based on discussions with the BLM on February 27th 2020 and the supporting documentation submitted to the BLM, we will request permission to ONLY retest broken pressure seals if the following conditions are met:

1. After a full BOP test is conducted on the first well on the pad.

2. The first intermediate hole section drilled on the pad will be the deepest. All of the remaining hole sections will be the same depth or shallower.

3. Full BOP test will be required if the intermediate hole section being drilled has a MASP over 5M.

4. Full BOP test will be required prior to drilling the production hole.





GATES E & S NORTH AMERICA, INC DU-TEX 134 44TH STREET CORPUS CHRISTI, TEXAS 78405

PHONE: 361-887-9807 FAX: 361-887-0812 EMAIL: crpe&s@gates.com WEB: www.gates.com

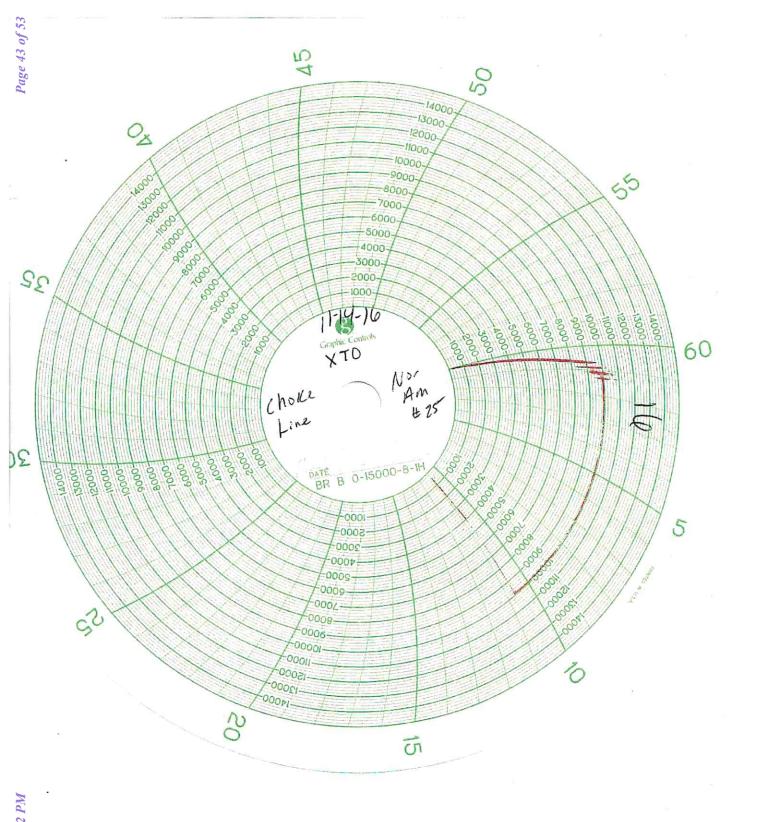
GRADE D PRESSURE TEST CERTIFICATE

Customer :	AUSTIN DISTRIBUTING	Test Date:	6/0/2014		
Customer Ref. :	PENDING	Hose Serial No.:	6/8/2014		
Invoice No. :	201709		D-060814-1		
		Created By:	NORMA		
Product Description:		FD3.042.0R41/16.5KFLGE/E	LE		
		FD3.042.0R41/16.5KFLGE/E	LE		
	4 1/16 in.5K FLG				
Product Description:	4 1/16 in.5K FLG 4774-6001	FD3.042.0R41/16.5KFLGE/E End Fitting 2 : Assembly Code :	4 1/16 in.5K FLG L33090011513D-060814-1		

Gates E & S North America, Inc. certifies that the following hose assembly has been tested to the Gates Oilfield Roughneck Agreement/Specification requirements and passed the 15 minute hydrostatic test per API Spec 7K/Q1, Fifth Edition, June 2010, Test pressure 9.6.7 and per Table 9 to 7,500 psi in accordance with this product number. Hose burst pressure 9.6.7.2 exceeds the minimum of 2.5 times the working pressure per Table 9.

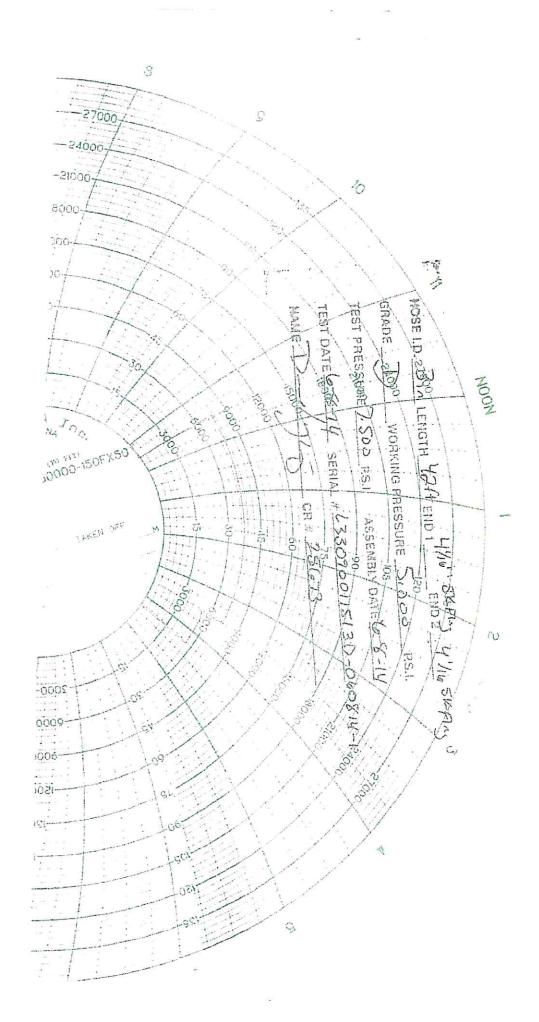
	/		
Y:	// QUALITY	Technical Supervisor :	PROPUSITION
	AAL 6/8/20147	Date :	PRODUCTION
ure :	White the	Signature :	6/8/2014

Form PTC - 01 Rev.0 2

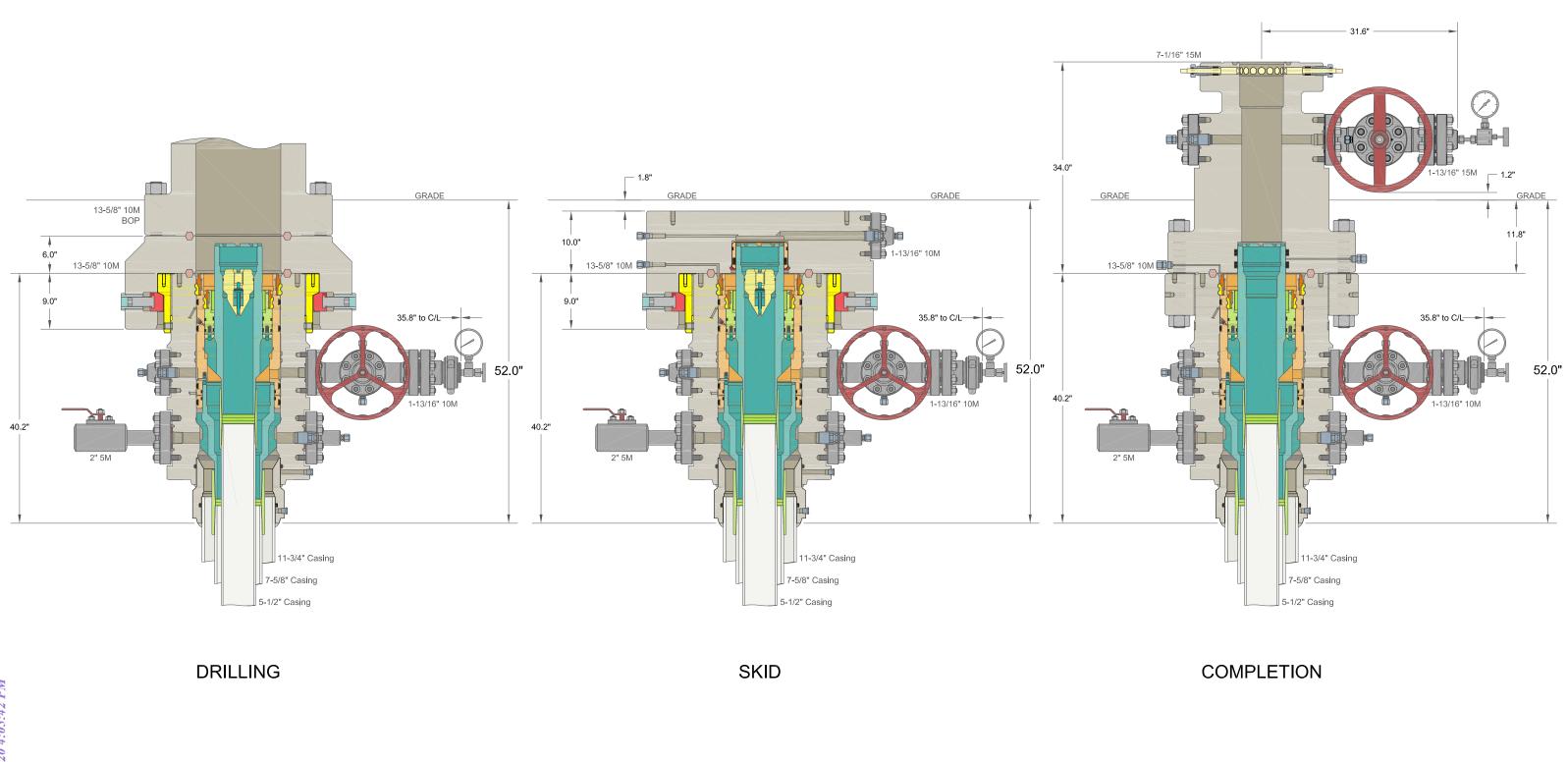


<u>_____</u>*









FORMATION CONTAINED HEREIN IS THE PROPERTY OF CACTUS WELLHEAD, LLC. REPRODUCTION, SCLOSURE, OR USE THEREOF IS PERMISSIBLE ONLY AS PROVIDED BY CONTRACT OR AS EXPRESSLY UTHORIZED BY CACTUS WELLHEAD, LLC.

30" x 11-3/4" x 7-5/8" x 5-1/2" MBU-3T-SF SOW V With 13-5/8" 10M x 7-1/16" 15M CTH-DBLHPS-S And 7-5/8" & 5-1/2" Fluted Mandrel Casing

		ALL DIMENSIO	NS APPROXIMATE
CACTUS WELLHEAD LLC	XTO ENERGY INC POKER LAKE, NM		
4" x 7-5/8" x 5-1/2" MBU-3T-SF SOW Wellhead System	DRAWN	DLE	09DEC19
/8" 10M x 7-1/16" 15M CTH-DBLHPS-SB Tubing Head	APPRV		
7-5/8" & 5-1/2" Fluted Mandrel Casing Hangers	DRAWING NO. ODE0003261		3261

XTO Permian Operating, LLC Offline Cementing Variance Request

XTO requests the option to cement the surface and intermediate casing strings offline as a prudent batch drilling efficiency of acreage development.

1. Cement Program

No changes to the cement program will take place for offline cementing.

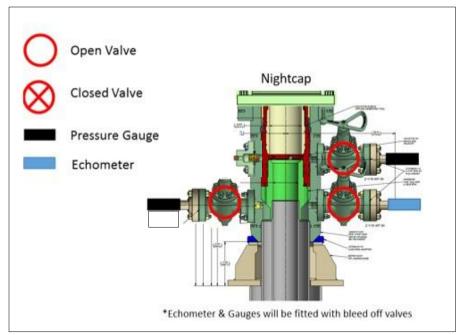
2. Offline Cementing Procedure

The operational sequence will be as follows. If a well control event occurs, the BLM will be contacted for approval prior to conducting offline cementing operations.

- 1. Run casing as per normal operations. While running casing, conduct negative pressure test and confirm integrity of the float equipment (float collar and shoe)
- 2. Land casing with mandrel
- 3. Fill pipe with kill weight fluid, do not circulate through floats and confirm well is static
- 4. Set annular packoff shown below and pressure test to confirm integrity of the seal. Pressure ratings of wellhead components and valves is 5,000 psi.
- 5. After confirmation of both annular barriers and internal barriers, nipple down BOP and install cap flange.
 - a. If any barrier fails to test, the BOP stack will not be nippled down until after the cement job is completed with cement 500ft above the highest formation capable of flow with kill weight mud above or after it has achieved 50-psi compressive strength if kill weight fluid cannot be verified.



Annular packoff with both external and internal seals

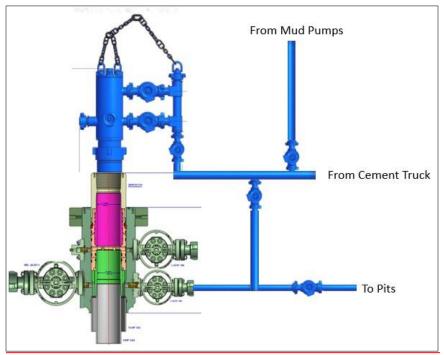


XTO Permian Operating, LLC Offline Cementing Variance Request

Wellhead diagram during skidding operations

- 6. Skid rig to next well on pad.
- 7. Confirm well is static before removing cap flange, flange will not be removed and offline cementing operations will not commence until well is under control. If well is not static, casing outlet valves will provide access to both the casing ID and annulus. Rig or third party pump truck will kill well prior to cementing or nippling up for further remediation.
 - a. Well Control Plan
 - i. The Drillers Method will be the primary well control method to regain control of the wellbore prior to cementing, if wellbore conditions do not permit the drillers method other methods of well control may be used
 - ii. Rig pumps or a 3rd party pump will be tied into the upper casing valve to pump down the casing ID
 - iii. A high pressure return line will be rigged up to lower casing valve and run to choke manifold to control annular pressure
 - iv. Once influx is circulated out of the hole, kill weight mud will be circulated
 - v. Well will be confirmed static
 - vi. Once confirmed static, cap flange will be removed to allow for offline cementing operations to commence
- 8. Install offline cement tool
- 9. Rig up cement equipment





Wellhead diagram during offline cementing operations

- 10. Circulate bottoms up with cement truck
 - a. If gas is present on bottoms up, well will be shut in and returns rerouted through gas buster to handle entrained gas
 - b. Max anticipated time before circulating with cement truck is 6 hrs
- 11. Perform cement job taking returns from the annulus wellhead valve
- 12. Confirm well is static and floats are holding after cement job
- 13. Remove cement equipment, offline cement tools and install night cap with pressure gauge for monitoring.

XTO respectfully requests approval to utilize a spudder rig to pre-set surface casing.

Description of Operations:

- 1. Spudder rig will move in to drill the surface hole and pre-set surface casing on the well.
 - a. After drilling the surface hole section, the spudder rig will run casing and cement following all of the applicable rules and regulations (OnShore Order 2, all COAs and NMOCD regulations).
 - b. The spudder rig will utilize fresh water-based mud to drill the surface hole to TD. Solids control will be handled entirely on a closed loop basis. No earth pits will be used.
- 2. The wellhead will be installed and tested as soon as the surface casing is cut off and WOC time has been reached.
- 3. A blind flange at the same pressure rating as the wellhead will be installed to seal the wellbore. Pressure will be monitored with needle valves installed on two wing valves.
 - a. A means for intervention will be maintained while the drilling rig is not over the well.
- 4. Spudder rig operations are expected to take 2-3 days per well on the pad.
- 5. The BLM will be contacted and notified 24 hours prior to commencing spudder rig operations.
- 6. Drilling Operations will begin with a larger rig and a BOP stack equal to or greater than the pressure rating that was permitted will be nippled up and tested on the wellhead before drilling operations resume on each well.
 - a. The larger rig will move back onto the location within 180 days from the point at which the wells are secured and the spudder rig is moved off location.
 - b. The BLM will be notified 24 hours before the larger rig moves back on the pre-set locations
- 7. XTO will have supervision on the rig to ensure compliance with all BLM and NMOCD regulations and to oversee operations.
- 8. Once the rig is removed, XTO will secure the wellhead area by placing a guard rail around the cellar area.

State of New Mexico Energy, Minerals and Natural Resources Department

Submit Original to Appropriate District Office

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

GAS CAPTURE PLAN

Date: 10/23/2020

 \boxtimes Original

Operator & OGRID No.: XTO Permian Operating, LLC [373075]

□ Amended - Reason for Amendment:

This Gas Capture Plan outlines actions to be taken by the Operator to reduce well/production facility flaring/venting for new completion (new drill, recomplete to new zone, re-frac) activity.

Note: Form C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule (Subsection A of 19.15.18.12 NMAC).

Well(s)/Production Facility - Name of facility: Poker Lake Unit 28 BS CTB East

The well(s) that will be located at the production facility are shown in the table below.

Well Name	API	Well Location	Footages	Expected	Flared or	Comments
		(ULSTR)		MCF/D	Vented	
Poker Lake Unit 28 BS 701H		E-28-25S-31E	2310'FNL & 600'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 703H		E-28-25S-31E	2310'FNL & 1920'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 901H		E-28-25S-31E	2310'FNL & 630'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 903H		E-28-25S-31E	2310'FNL & 1950'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 102H		E-28-25S-31E	2310'FNL & 720'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 104H		E-28-25S-31E	2310'FNL & 2040'FWL	5000	Sold	CTB Connected to P/L
Poker Lake Unit 28 BS 122H		E-28-25S-31E	2310'FNL & 690'FWL	5000	Sold	CTB Connected to P/L

Gathering System and Pipeline Notification

Well(s) will be connected to a production facility after flowback operations are complete, if gas transporter system is in place. The gas produced from production facility is dedicated to <u>Gas Transporter</u> and will be connected to <u>Gas Transporter</u> low/high pressure gathering system located in <u>Eddy</u> <u>County</u>, New Mexico. It will require <u>0</u>' of pipeline to connect the facility to low/high pressure gathering system. <u>XTO Permian Operating</u>, <u>LLC</u>. provides (periodically) to <u>XTO Energy</u>, <u>Inc</u> a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, <u>XTO Permian Operating</u>, <u>LLC</u>. and <u>XTO Energy</u> have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at <u>XTO Energy</u> Processing Plant located in Sec._1____, Twn.__25S___, Rng._30E____, Eddy_____ County, New Mexico. The actual flow of the gas will be based on compression operating parameters and gathering system pressures.

Flowback Strategy

After the fracture treatment/completion operations, well(s) will be produced to temporary production tanks and gas will be flared or vented. During flowback, the fluids and sand content will be monitored. When the produced fluids contain minimal sand, the wells will be turned to production facilities. Gas sales should start as soon as the wells start flowing through the production facilities, unless there are operational issues on Eddy system at that time. Based on current information, it is <u>XTO</u> <u>Permian Operating, LLC</u>'s belief the system can take this gas upon completion of the well(s).

Safety requirements during cleanout operations from the use of underbalanced air cleanout systems may necessitate that sand and non-pipeline quality gas be vented and/or flared rather than sold on a temporary basis.

Received by OCD: 12/11/2020 4:05:42 PM Alternatives to Reduce Flaring

•

Below are alternatives considered from a conceptual standpoint to reduce the amount of gas flared.

- Power Generation On lease
 - Only a portion of gas is consumed operating the generator, remainder of gas will be flared
 - Compressed Natural Gas On lease
 - Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal On lease
 - o Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines

COMMENTS

Action 11792

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District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720 District II

Bit S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

.

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

COMMENTS

Operator: XTO PERMIAN OPERATING LLC BUILDING 5 MIDLAND, TX7970	OGRID: 373075	Action Number: 11792	Action Type: FORM 3160-3	
Created By Comment Comment Date				
Dickford GEO Review 12/11/2020			12/11/2020	

CONDITIONS

Action 11792

District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410

Phone:(505) 334-6178 Fax:(505) 334-6170 <u>District IV</u> 1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS OF APPROVAL

Operator: BUILDING	XTO PERMIAN OPERATING LLC. 6401 HOLIDAY HILL ROAD G 5 MIDLAND, TX79707	OGRID: 373075	Action Number: 11792	Action Type: FORM 3160-3		
OCD Reviewer	Condition					
kpickford	Will require a directional survey with the C-104					
kpickford	kpickford Once the well is spud, to prevent ground water contamination through whole or partial conduits from the surface, the operator shall drill without interruption through the fresh water zone or zones and shall immediately set in cement the water protection string					
kpickford	Oil base muds are not to be used until fresh water zones are cased and cemented providing isolation from the	oil or diesel. This includes	synthetic oils. Oil based n	nud, drilling fluids and solids must be		

contained in a steel closed loop system.