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|--|---|--|
| Well Name: POKER LAKE UNIT 23 DTD | Well Location: T24S / R30E / SEC 23 / NWNE / 32.207469 / -103.848705 | County or Parish/State: EDDY / NM |
| Well Number: 441H | Type of Well: CONVENTIONAL GAS WELL | Allottee or Tribe Name: |
| Lease Number: NMNM030452 | Unit or CA Name: POKER LAKE UNIT | Unit or CA Number: NMNM71016X |
| US Well Number: 3001555910 | Operator: XTO PERMIAN OPERATING LLC | |

Notice of Intent

Sundry ID: 2830667

Type of Submission: Notice of Intent

Type of Action: APD Change

Date Sundry Submitted: 01/09/2025

Time Sundry Submitted: 11:27

Date proposed operation will begin: 01/17/2025

Procedure Description: POKER LAKE UNIT 23 DTD 441H APD ID# 10400098055 SUNDRY LANGUAGE XTO Permian Operating, LLC. respectfully requests approval to make the below listed changes to the approved APD – 1. Casing to be changed from a 4-string slim hole design to a 3-string slim hole design 2. Associated changes required in the cement program & the mud circulation system as per the newly proposed casing design No changes requested to the SHL/BHL/take points, proposed MD/TVD and formation (pool). There will be no new surface disturbance. See attached drilling program for the updated casing design, cement program & mud circulation system. Attachments: Drilling Program, Spec documents for Non-API Casing Strings, MBS, Break Test Variance, Wild Well Control Plan.

NOI Attachments

Procedure Description

Sundry_Attachments___Poker_Lake_Unit_23_DTD_441H_20250109112621.pdf

Well Name: POKER LAKE UNIT 23
DTD

Well Location: T24S / R30E / SEC 23 /
NWNE / 32.207469 / -103.848705

County or Parish/State: EDDY /
NM

Well Number: 441H

Type of Well: CONVENTIONAL GAS
WELL

Allottee or Tribe Name:

Lease Number: NMNM030452

Unit or CA Name: POKER LAKE UNIT

Unit or CA Number:
NMNM71016X

US Well Number: 3001555910

Operator: XTO PERMIAN OPERATING
LLC

Conditions of Approval

Additional

Poker_Lake_Unit_23_DTD__441H_COA_20250323163649.pdf

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: SRINIVAS LAGHUVARAPU

Signed on: JAN 09, 2025 11:26 AM

Name: XTO PERMIAN OPERATING LLC

Title: REGULATORY ANALYST

Street Address: 22777 SPRINGWOODS VILLAGE PARKWAY

City: SPRING

State: TX

Phone: (720) 539-1673

Email address: SRINIVAS.N.LAGHUVARAPU@EXXONMOBIL.COM

Field

Representative Name:

Street Address:

City:

State:

Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Name: CHRISTOPHER WALLS

BLM POC Title: Petroleum Engineer

BLM POC Phone: 5752342234

BLM POC Email Address: cwalls@blm.gov

Disposition: Approved

Disposition Date: 04/01/2025

Signature: Chris Walls

| | | |
|--|--|---|
| Form 3160-5 (June 2019) | UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT | FORM APPROVED OMB No. 1004-0137 Expires: October 31, 2021 |
| SUNDRY NOTICES AND REPORTS ON WELLS <i>Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.</i> | | 5. Lease Serial No. NMNM030452 |
| | | 6. If Indian, Allottee or Tribe Name |

| | | |
|--|---|---|
| SUBMIT IN TRIPLICATE - Other instructions on page 2 | | 7. If Unit of CA/Agreement, Name and/or No. POKER LAKE UNIT/NMNM71016X |
| 1. Type of Well <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other | | 8. Well Name and No. POKER LAKE UNIT 23 DTD/441H |
| 2. Name of Operator XTO PERMIAN OPERATING LLC | | 9. API Well No. 3001555910 |
| 3a. Address 6401 HOLIDAY HILL ROAD BLDG 5, MIDLAND, | 3b. Phone No. (include area code) (432) 683-2277 | 10. Field and Pool or Exploratory Area Purple Sage/WOLFCAMP (GAS) |
| 4. Location of Well (Footage, Sec., T.,R.,M., or Survey Description) SEC 23/T24S/R30E/NMP | | 11. Country or Parish, State EDDY/NM |

| | | | | |
|--|--|---|--|---|
| 12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA | | | | |
| TYPE OF SUBMISSION | TYPE OF ACTION | | | |
| <input checked="" type="checkbox"/> Notice of Intent | <input type="checkbox"/> Acidize | <input type="checkbox"/> Deepen | <input type="checkbox"/> Production (Start/Resume) | <input type="checkbox"/> Water Shut-Off |
| <input type="checkbox"/> Subsequent Report | <input type="checkbox"/> Alter Casing | <input type="checkbox"/> Hydraulic Fracturing | <input type="checkbox"/> Reclamation | <input type="checkbox"/> Well Integrity |
| <input type="checkbox"/> Final Abandonment Notice | <input type="checkbox"/> Casing Repair | <input type="checkbox"/> New Construction | <input type="checkbox"/> Recomplete | <input type="checkbox"/> Other |
| | <input checked="" type="checkbox"/> Change Plans | <input type="checkbox"/> Plug and Abandon | <input type="checkbox"/> Temporarily Abandon | |
| | <input type="checkbox"/> Convert to Injection | <input type="checkbox"/> Plug Back | <input type="checkbox"/> Water Disposal | |

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleat horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be perfonned or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompleation in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has detennined that the site is ready for final inspection.)

POKER LAKE UNIT 23 DTD 441H
APD ID# 10400098055
SUNDRY LANGUAGE

XTO Permian Operating, LLC. respectfully requests approval to make the below listed changes to the approved APD

1. Casing to be changed from a 4-string slim hole design to a 3-string slim hole design
2. Associated changes required in the cement program & the mud circulation system as per the newly proposed casing design

No changes requested to the SHL/BHL/take points, proposed MD/TVD and formation (pool). There will be no new surface disturbance.

See attached drilling program for the updated casing design, cement program & mud circulation system.

Continued on page 3 additional information

| | |
|--|-----------------------------|
| 14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed) SRINIVAS LAGHUVARAPU / Ph: (720) 539-1673 | Title REGULATORY ANALYST |
| Signature (Electronic Submission) | Date 01/09/2025 |

| | | |
|---|-----------------------------|--------------------|
| THE SPACE FOR FEDERAL OR STATE OFFICE USE | | |
| Approved by CHRISTOPHER WALLS / Ph: (575) 234-2234 / Approved | Title Petroleum Engineer | Date 04/01/2025 |
| Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon. | Office CARLSBAD | |

Title 18 U.S.C Section 1001 and Title 43 U.S.C Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c) and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

Additional Information

Additional Remarks

Attachments: Drilling Program, Spec documents for Non-API Casing Strings, MBS, Break Test Variance, Wild Well Control Plan.

Location of Well

0. SHL: NWNW / 1152 FNL / 1771 FEL / TWSP: 24S / RANGE: 30E / SECTION: 23 / LAT: 32.207469 / LONG: -103.848705 (TVD: 0 feet, MD: 0 feet)

PPP: NENW / 100 FNL / 1475 FWL / TWSP: 24S / RANGE: 30E / SECTION: 23 / LAT: 32.210347 / LONG: -103.855509 (TVD: 12214 feet, MD: 13100 feet)

PPP: NENW / 0 FSL / 1490 FWL / TWSP: 24S / RANGE: 30E / SECTION: 26 / LAT: 32.196133 / LONG: -103.855484 (TVD: 12214 feet, MD: 18400 feet)

BHL: SENW / 2627 FNL / 1475 FWL / TWSP: 24S / RANGE: 30E / SECTION: 35 / LAT: 32.174413 / LONG: -103.855444 (TVD: 12214 feet, MD: 25426 feet)

CONFIDENTIAL

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

| | |
|------------------------------|-----------------------------|
| OPERATOR'S NAME: | XTO |
| LEASE NO.: | NMNM030452 |
| LOCATION: | Sec. 23, T.24 S, R 30 E |
| COUNTY: | Eddy County, New Mexico ▼ |
| WELL NAME & NO.: | Poker Lake Unit 23 DTD 441H |
| SURFACE HOLE FOOTAGE: | 1152'/N & 1771'/E |
| BOTTOM HOLE FOOTAGE: | 2627'/N & 1475'/W |

*Changes approved through engineering via **Sundry 2830667** on 3-23-2023. Any previous COAs not addressed within the updated COAs still apply.*

COA

| H ₂ S | <input checked="" type="radio"/> No | | <input type="radio"/> Yes | |
|----------------------------|---|---|--|--|
| Potash / WIPP | <input type="radio"/> None | <input checked="" type="radio"/> Secretary | <input type="radio"/> R-111-Q | <input type="radio"/> Open Annulus <input type="radio"/> WIPP |
| | Choose an option (including blank option.) | | | |
| Cave / Karst | <input checked="" type="radio"/> Low | <input type="radio"/> Medium | <input type="radio"/> High | <input type="radio"/> Critical |
| Wellhead | <input type="radio"/> Conventional | <input checked="" type="radio"/> Multibowl | <input type="radio"/> Both | <input type="radio"/> Diverter |
| Cementing | <input checked="" type="checkbox"/> Primary Squeeze | <input type="checkbox"/> Cont. Squeeze | <input checked="" type="checkbox"/> EchoMeter | <input type="checkbox"/> DV Tool |
| Special Req | <input type="checkbox"/> Capitan Reef | <input type="checkbox"/> Water Disposal | <input type="checkbox"/> COM | <input checked="" type="checkbox"/> Unit |
| Waste Prev. | <input type="radio"/> Self-Certification | <input type="radio"/> Waste Min. Plan | <input checked="" type="radio"/> APD Submitted prior to 06/10/2024 | |
| Additional Language | <input checked="" type="checkbox"/> Flex Hose | <input type="checkbox"/> Casing Clearance | <input type="checkbox"/> Pilot Hole | <input checked="" type="checkbox"/> Break Testing |
| | <input type="checkbox"/> Four-String | <input checked="" type="checkbox"/> Offline Cementing | <input type="checkbox"/> Fluid-Filled | |

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 43 CFR 3176 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

APD is within the R-111-Q defined boundary. Operator must follow all procedures and requirements listed within the updated order.

B. CASING

1. The 9-5/8 inch surface casing shall be set at approximately **780** feet (a minimum of **70 feet (Eddy County)** into the Rustler Anhydrite, above the salt, and below usable fresh water) 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 **8 hours** 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.
2. The minimum required fill of cement behind the 9-5/8 inch intermediate casing is:
Operator has proposed to cement in two stages by conventionally cementing the first stage and performing a bradenhead squeeze on the second stage, contingent upon no returns to surface.
 - a. **First stage:** Operator will cement with intent to reach the top of the **Brushy Canyon at 7634'**.
 - b. **Second stage:** Operator will perform bradenhead squeeze and top-out. Cement to surface. If cement does not reach surface, the appropriate BLM office shall be notified.

Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst, or potash.

Operator has proposed to pump down **Surface X Intermediate 1** annulus after primary cementing stage. **Operator must run Echo-meter to verify Cement Slurry/Fluid top in the annulus OR operator shall run a CBL from TD of the Surface casing to tieback requirements listed above after the second stage BH to verify TOC.** Submit results to the BLM. No displacement fluid/wash out shall be utilized at the top of the cement slurry between second stage BH and top out. Operator must use a limited flush fluid volume of 1 bbl following backside cementing procedures.

If cement does not reach surface, the next 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 **500 feet** into previous casing string. Operator shall provide method of verification.

C. PRESSURE CONTROL

1. Variance approved to use flex line from BOP to choke manifold. Manufacturer's specification to be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no hard bends).
 2. Operator has proposed a multi-bowl wellhead assembly. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be **5000 (5M)** 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 43 CFR 3172 must be followed.

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. **(This is not necessary for secondary recovery unit wells)**

BOPE Break Testing Variance

- BOPE Break Testing is ONLY permitted for intervals utilizing a 5M BOPE or less. **(Annular preventer must be tested to a minimum of 70% of BOPE working pressure and shall be higher than the MASP.)**
- BOPE Break Testing is NOT permitted to drilling the production hole section.
- Variance only pertains to the intermediate hole-sections and no deeper than the Bone Springs formation.
- 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 **(575-706-2779)** prior to the commencement of any BOPE Break Testing operations.
- A full BOPE test is required prior to drilling the first deep intermediate hole section. If any subsequent hole interval is deeper than the first, a full BOPE test will be required. (200' TVD tolerance between intermediate shoes is allowable).
- The BLM is to be contacted **(575-361-2822 Eddy County)** 4 hours prior to BOPE tests.
- As a minimum, a full BOPE test shall be performed at 21-day intervals.
- In the event any repairs or replacement of the BOPE is required, the BOPE shall test as per **43 CFR 3172**.
- If in the event break testing is not utilized, then a full BOPE test would be conducted.

Offline Cementing

Contact the BLM prior to the commencement of any offline cementing procedure.

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)

Contact Eddy County Petroleum Engineering Inspection Staff:

Email or call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220;
BLM_NM_CFO_DrillingNotifications@BLM.GOV; (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
 - i. Notify the BLM when moving in and removing the Spudder Rig.
 - ii. 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.
 - iii. BOP/BOPE test to be conducted per **43 CFR 3172** 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. For intervals in which cement to surface is required, cement to surface should be verified with a visual check and density or pH check to differentiate cement from spacer and drilling mud. The results should be documented in the driller's log and daily reports.

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.

2. Wait on cement (WOC) for Potash Areas: 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 for all cement blends of both lead and tail cement, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
3. Wait on cement (WOC) for Water Basin: 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 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
4. 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.
5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
6. 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.
7. 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.
8. Whenever a casing string is cemented in the R-111-Q potash area, the NMOCD requirements shall be followed.

B. PRESSURE CONTROL

1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in **43 CFR 3172**.
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.
4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
 - i. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - ii. 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.
 - iii. Manufacturer representative shall install the test plug for the initial BOP test.
 - iv. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172.6(b)(9) must be followed.
 - v. 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.
5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - i. 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 cement), 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).
 - ii. In potash areas, 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. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the cement plug. The BOPE test can be initiated after bumping the cement plug with the casing valve

open. (only applies to single stage cement jobs, prior to the cement setting up.)

- iii. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to **43 CFR 3172** 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 8 hours or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- iv. 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.
- v. The results of the test shall be reported to the appropriate BLM office.
- vi. 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.
- vii. 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.
- viii. 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 **43 CFR 3172**.

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.

Approved by Zota Stevens on 3/23/2025
575-234-5998 / zstevens@blm.gov

DRILLING PLAN: BLM COMPLIANCE
(Supplement to BLM 3160-3)

XTO Energy Inc.
PLU 23 DTD 441H
Projected TD: 25426' MD / 12214' TVD
SHL: 1152' FNL & 1771' FEL , Section 23, T24S, R30E
BHL: 2627' FNL & 1475' FWL , Section 35, T24S, R30E
Eddy County, NM

1. Geologic Name of Surface Formation

| |
|---------------|
| A. Quaternary |
|---------------|

2. Estimated Tops of Geological Markers & Depths of Anticipated Fresh Water, Oil or Gas

| Formation | Well Depth | Water/Oil/Gas |
|-----------------------|------------|---------------|
| Rustler | 1314' | Water |
| Salado | 1710' | Water |
| Base of Salt | 3910' | Water |
| Delaware | 4104' | Water |
| Cherry Canyon | 5027' | Water/Oil/Gas |
| Brushy Canyon | 6610' | Water/Oil/Gas |
| basal brushy canyon | 7634' | Water/Oil/Gas |
| Avalon Shale | 8053' | Water/Oil/Gas |
| 1st Bone Spring Lime | 8670' | Water/Oil/Gas |
| 2nd Bone Spring Shale | 9174' | Water/Oil/Gas |
| 2nd Bone Spring Lime | 9272' | Water/Oil/Gas |
| 3rd Bone Spring Lime | 10039' | Water/Oil/Gas |
| 3rd Bone Spring Shale | 10406' | Water/Oil/Gas |
| Wolfcamp | 11216' | Water/Oil/Gas |
| Wolfcamp X | 11236' | Water/Oil/Gas |
| Wolfcamp Y | 11323' | Water/Oil/Gas |
| Wolfcamp A | 11373' | Water/Oil/Gas |
| Wolfcamp B | 11778' | Water/Oil/Gas |
| Wolfcamp C | 11981' | Water/Oil/Gas |
| Wolfcamp D | 12184' | Water/Oil/Gas |
| Wolfcamp D Landing | 12214' | Water/Oil/Gas |
| Wolfcamp E | 12243' | Water/Oil/Gas |

Section 2 Summary:

*** Deepest Expected Groundwater Depth: 40' (per NM State Engineers Office).

No other formations are expected to give up oil, gas or fresh water in measurable quantities.
Surface fresh water sands will be protected by setting 9-5/8" inch casing at 1685' and circulating cement back to surface.

3. Casing Design

Primary Design:

| Hole Size | MD | Casing TVD | OD Csg | Weight | Grade | Collar | New/Used | SF Burst | SF Collapse | SF Tension |
|-----------|-------------|------------|--------|--------|----------|-------------------|----------|----------|-------------|------------|
| 12.25 | 0' – 1685' | 1669' | 9-5/8" | 40 | J55 | BTC | New | 7.64 | 3.52 | 4.35 |
| 8.75 | 0' – 11745' | 11001' | 7-5/8" | 29.7 | P110-ICY | Tenaris Wedge 511 | New | 2.54 | 2.89 | 2.71 |
| 6.75 | 0' – 25426' | 12214' | 5-1/2" | 20 | P110-ICY | Tenaris Wedge 441 | New | 1.18 | 2.32 | 1.87 |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | | | | | | | | | | |

Section 3 Summary:

XTO will keep casing fluid filled to meet BLM's collapse requirement.
The planned kick off point is located at: 11945' MD / 11498' TVD.

Wellhead:
A multi-bowl wellhead system will be utilized.The well design chosen is:3-String Slim Non-Potash

Wellhead will be installed by manufacturer’s representatives.

Manufacturer will monitor welding process to ensure appropriate temperature of seal.

4. Cement Program

| Primary Cementing | | | | | | | | |
|--------------------|--------------------|-----------|---------------|------------------|-------------------|---------------------------|--|----------------------------------|
| Casing | Slurry Type | No. Sacks | Density (ppg) | Yield (ft3/sack) | TOC (ft) | Casing Setting Depth (MD) | Excess (%) | Slurry Description |
| Surface 1 | Lead | 411 | 12.4 | 2.11 | 0 | 1685 | 100% | Surface Class C Lead Cement |
| Surface 1 | Tail | 141 | 14.8 | 1.33 | 1385 | 1685 | 100% | Surface Class C Tail Cement |
| Intermediate 1 | Lead | | | | | | | |
| Intermediate 1 | Tail | 385 | 14.8 | 1.45 | 7634 | 11745 | 35% | Intermediate Class C Tail Cement |
| Production 1 | Lead | | | | | | | |
| Production 1 | Tail | 1069 | 13.2 | 1.44 | 11245 | 25426 | 30% | Production Class C Tail Cement |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| Remedial Cementing | | | | | | | | |
| Casing | Slurry Type | No. Sacks | Density (ppg) | Yield (ft3/sack) | Cemented Interval | Excess (%) | Slurry Description | |
| Intermediate 1 | Bradenhead Squeeze | 794 | 14.8 | 1.45 | 0 - 7634' | 50% | Intermediate Class C Bradenhead Squeeze Cement | |
| | | | | | | | | |

Section 4 Summary:
*Bradenhead Squeeze 2nd Stage Offline

5. Pressure Control Equipment

Section 5 Summary:
Once the permanent WH is installed on the casing, the blow out preventer equipment (BOP) will consist of a minimum 5M Hydril and a minimum 10M triple Ram BOP.

All BOP testing will be done by an independent service company. Operator will Test as per 43CFR-3172

Requested Variances**4A) Offline Cementing Variance**

XOM requests the option to offline cement and remediate (if needed) surface and intermediate casing strings where batch drilling is approved and if unplanned remediation is needed. XOM will ensure well is static with no pressure on the csg annulus, as with all other casing strings where batch drilling operations occur before moving off the rig. Offline cement operations will then be conducted after the rig is moved off the current well to the next well in the batch sequence. The TA cap will also be installed when applicable per wellhead manufacturer's procedure and pressure inside the casing will be monitored via the valve on the TA cap as per standard batch drilling ops.

5A) Break Test Variance

A break testing variance is requested to ONLY test broken pressure seals on the BOP equipment when moving from wellhead to wellhead for the intermediate hole sections which is in compliance with API Standard 53. The maximum anticipated surface hole pressure at the deepest intermediate casing point is less than 4800psi.

5B) Flex Hose Variance

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.

5C) 5M Annular Variance

XOM requests a variance to use a 5000 psi annular BOP with a 10,000 psi BOP stack. The component and compatibility tables attached along with the general well control plans demonstrate how the 5000 psi annular BOP will be protected from pressures that exceed its rated working pressure (RWP). The pressure at which the control of the wellbore is transferred from the annular preventer to another available preventer will not exceed 3500 psi (70% of the RWP of the 5000 psi annular BOP).

8A) Open Hole Logging Variance

Open hole logging will not be done on this well.

10A) Spudder Rig Variance

XOM requests the option to utilize a spudder rig (Atlas Copco RD20 or Equivalent) to set and cement surface casing.

10B) Batch Drilling Variance

XOM requests a variance to be able to batch drill this well. In doing so, XOM will set casing and ensure that the well is cemented properly (unless approval is given for offline cementing) and the well is static. XOM will contact the BLM to skid the rig to drill the remaining wells on the pad. Once surface and intermediate strings are all completed, XOM will begin drilling the production hole on each of the wells.

6. Proposed Mud Circulation System

| INTERVAL | Hole Size | Mud Type | MW | Viscosity | Fluid Loss | Comments |
|-----------------|-----------|---------------------|-----------|-----------|------------|---|
| | | | (ppg) | (sec/qt) | (cc) | |
| 0' – 1685' | 12.25" | FW/Native | 8.3 – 8.7 | 35-40 | NC | Fresh Water or Native Water |
| 1685' – 11745' | 8.75" | BDE/OBM or FW/Brine | 9.5 – 10 | 30-32 | NC | Fluid type will be based upon on well conditions. A fully saturated system will be used across the salt interval. |
| 11745' – 25426' | 6.75" | OBM | 9.5 – 13 | 50-60 | NC – 20 | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

Section 6 Summary:

The necessary mud products for weight addition and fluid loss control will be on location at all times.

Spud with fresh water/native mud. Drill out from under surface casing with a fully saturated brine while drilling through the salt formation. 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. An EDR (Electronic Drilling Recorder) 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.

7. Auxiliary Well Control and Monitoring Equipment**Section 7 Summary:**

A Kelly cock will be in the drill string at all times.

A full opening drill pipe stabbing valve having appropriate connections will be on the rig floor at all times.

H2S monitors will be on location when drilling below the 9-5/8" casing.

8. Logging, Coring and Testing Program**Section 8 Summary:**

Open hole logging will not be done on this well.

9. Abnormal Pressures and Temperatures / Potential Hazards**Section 9 Summary:**

The estimated bottom hole temperature of 185F to 205F. No H2S is expected but monitors will be in place to detect any H2S occurrences. Should these circumstances be encountered the operator and drilling contractor are prepared to take all necessary steps to ensure safety of all personnel and environment. Lost circulation is possible throughout the well.

10. Anticipated Starting Date and Duration of Operations**Section 10 Summary:**

Anticipated spud date will be after BLM approval. Move in operations and drilling is expected to take 40 days.



TenarisHydril Wedge 511



| Coupling | Pipe Body |
|----------------------|----------------------|
| Grade: P110-4CY | Grade: P110-4CY |
| Body: White | 1st Band: White |
| 1st Band: Pale Green | 2nd Band: Pale Green |
| 2nd Band: - | 3rd Band: Pale Green |
| 3rd Band: - | 4th Band: - |
| | 5th Band: - |
| | 6th Band: - |

| | | | | | |
|----------------------|-----------|-----------------|--------------|-------|----------|
| Outside Diameter | 7.625 in. | Wall Thickness | 0,375 in. | Grade | P110-4CY |
| Min. Wall Thickness | 90,00 % | Pipe Body Drift | API Standard | Type | Casing |
| Connection OD Option | REGULAR | | | | |

Pipe Body Data

| Geometry | | Performance | |
|----------------|-------------|------------------------------|---------------|
| Nominal OD | 7.625 in. | Wall Thickness | 0.375 in. |
| Nominal Weight | 29.70 lb/ft | Plain End Weight | 29.06 lb/ft |
| Drift | 6.750 in. | OD Tolerance | API |
| Nominal ID | 6.875 in. | | |
| | | Body Yield Strength | 1068 x1000 lb |
| | | Min. Internal Yield Pressure | 11,070 psi |
| | | SMYS | 125,000 psi |
| | | Collapse Pressure | 7360 psi |

Connection Data

| Geometry | | Performance | | Make-Up Torques | |
|----------------------|-----------|----------------------------|----------------|-------------------------|--------------|
| Connection OD | 7.625 in. | Tension Efficiency | 61.10 % | Minimum | 5900 ft-lb |
| Connection ID | 6.787 in. | Joint Yield Strength | 653 x1000 lb | Optimum | 7100 ft-lb |
| Make-up Loss | 3.704 in. | Internal Pressure Capacity | 11,070 psi | Maximum | 10,300 ft-lb |
| Threads per inch | 3.28 | Compression Efficiency | 73.80 % | | |
| Connection OD Option | Regular | Compression Strength | 788 x1000 lb | Operation Limit Torques | |
| | | Max. Allowable Bending | 45.83 °/100 ft | Operating Torque | 55,000 ft-lb |
| | | External Pressure Capacity | 7360 psi | Yield Torque | 82,000 ft-lb |

Notes

For the latest performance data, always visit our website: www.tenaris.com
For further information on concepts indicated in this datasheet, download the Datasheet Manual from www.tenaris.com

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TenarisHydril Wedge 441®



| Coupling | Pipe Body |
|----------------------|----------------------|
| Grade: P110-4CY | Grade: P110-4CY |
| Body: White | 1st Band: White |
| 1st Band: Pale Green | 2nd Band: Pale Green |
| 2nd Band: - | 3rd Band: Pale Green |
| 3rd Band: - | 4th Band: - |
| | 5th Band: - |
| | 6th Band: - |

| | | | | | |
|----------------------|-----------|-----------------|--------------|-------|----------|
| Outside Diameter | 5.500 in. | Wall Thickness | 0.361 in. | Grade | P110-4CY |
| Min. Wall Thickness | 87.50 % | Pipe Body Drift | API Standard | Type | Casing |
| Connection OD Option | REGULAR | | | | |

Pipe Body Data

| Geometry | | Performance | |
|----------------|-------------|------------------------------|--------------|
| Nominal OD | 5.500 in. | Wall Thickness | 0.361 in. |
| Nominal Weight | 20.00 lb/ft | Plain End Weight | 19.83 lb/ft |
| Drift | 4.653 in. | OD Tolerance | API |
| Nominal ID | 4.778 in. | | |
| | | Body Yield Strength | 729 x1000 lb |
| | | Min. Internal Yield Pressure | 14,360 psi |
| | | SMYS | 125,000 psi |
| | | Collapse Pressure | 12,300 psi |

Connection Data

| Geometry | | Performance | | Make-Up Torques | |
|----------------------|-----------|----------------------------|----------------|-------------------------|--------------|
| Connection OD | 5.852 in. | Tension Efficiency | 81.50 % | Minimum | 15,000 ft-lb |
| Coupling Length | 8.714 in. | Joint Yield Strength | 594 x1000 lb | Optimum | 16,000 ft-lb |
| Connection ID | 4.778 in. | Internal Pressure Capacity | 14,360 psi | Maximum | 19,200 ft-lb |
| Make-up Loss | 3.780 in. | Compression Efficiency | 81.50 % | | |
| Threads per inch | 3.40 | Compression Strength | 594 x1000 lb | Operation Limit Torques | |
| Connection OD Option | Regular | Max. Allowable Bending | 84,76 °/100 ft | Operating Torque | 36,000 ft-lb |
| | | External Pressure Capacity | 12,300 psi | Yield Torque | 42,000 ft-lb |
| | | | | Buck-On | |
| | | | | Minimum | 19,200 ft-lb |
| | | | | Maximum | 20,700 ft-lb |

Notes

This connection is fully interchangeable with:
Wedge 441® - 5.5 in. - 0.304 (17.00) in. (lb/ft)
Wedge 461® - 5.5 in. - 0.304 (17.00) / 0.361 (20.00) / 0.415 (23.00) in. (lb/ft)
Connections with Dopeless® Technology are fully compatible with the same connection in its doped version

For the latest performance data, always visit our website: www.tenaris.com
For further information on concepts indicated in this datasheet, download the Datasheet Manual from www.tenaris.com

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20" x 9-5/8" x 7-5/8" x 5-1/2" MBU-T-CFL-R-DBLO Wellhead
 With 11" 10M x 7-1/16" 15M CTH-DBLHPS Tubing Head
 And 9-5/8", 7-5/8" & 5-1/2" Pin Bottom Mandrel Casing Hangers

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 CFR Title 43 Part 3170, 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. CFR Title 43 Part 3170 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 CFR Title 43 Part 3170, XTO Energy submits this request for the variance.

Supporting Documentation

CFR Title 43 Part 3170 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 CFR Title 43 Part 3170 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.

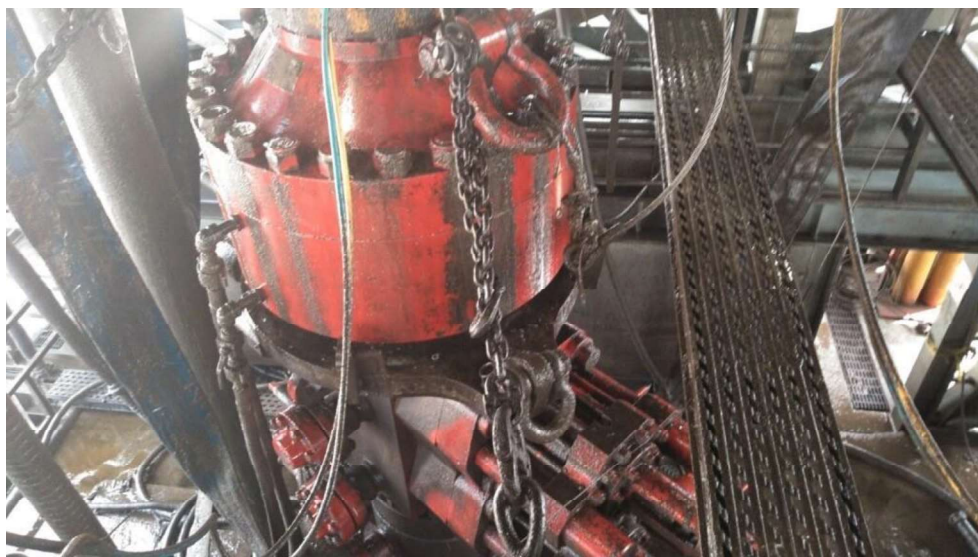


Figure 1: Winch System attached to BOP Stack

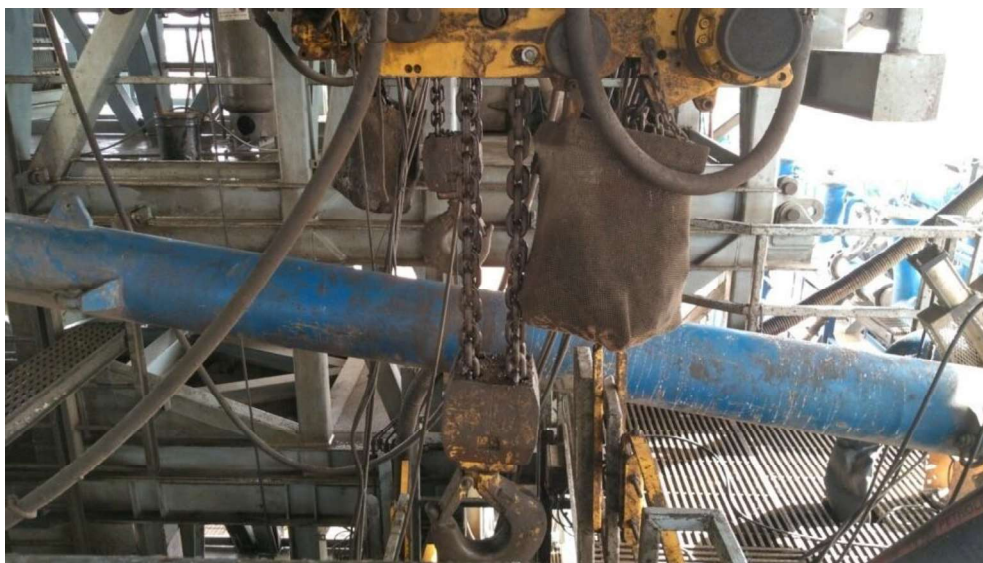


Figure 2: BOP Winch System

American Petroleum Institute (API) standards, specification and recommended practices are considered the industry standard and are consistently utilized and referenced by the industry. CFR Title 43 Part 3170 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.

| 62 API STANDARD 53 | | | |
|---|---|--|---|
| Table C.4—Initial Pressure Testing, Surface BOP Stacks | | | |
| Component to be Pressure Tested | Pressure Test—Low Pressure ^{a,c} psig (MPa) | Pressure Test—High Pressure ^{a,c} | |
| | | 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 ^{b,d} | 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 MASP for the well program, whichever is lower | |
| Kelly, kelly valves, drill pipe safety valves, IBOPs | 250 to 350 (1.72 to 2.41) | MASP for the well program | |
| ^a Pressure test evaluation periods shall be a minimum of five minutes. No visible leaks. The pressure shall remain stable during the evaluation period. The pressure shall not decrease below the intended test pressure. ^b Annular(s) and VBR(s) shall be pressure tested on the largest and smallest OD drill pipe to be used in well program. ^c For pad drilling operations, moving from one wellhead to another within the 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken. ^d For surface offshore operations, the ram BOPs shall be pressure tested with the ram locks engaged and the closing and locking pressure vented during the initial test. For land operations, the ram BOPs shall be pressure tested with the ram locks engaged and the closing and locking pressure vented at commissioning and annually. ^e Adjustable chokes are not required to be full sealing devices. Pressure testing against a closed choke is not required. | | | |

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 CFR Title 43 Part 317 0and 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 CFR Title 43 Part 3170 (Every 21 days). In addition to function testing the annular, pipe rams and blind rams after

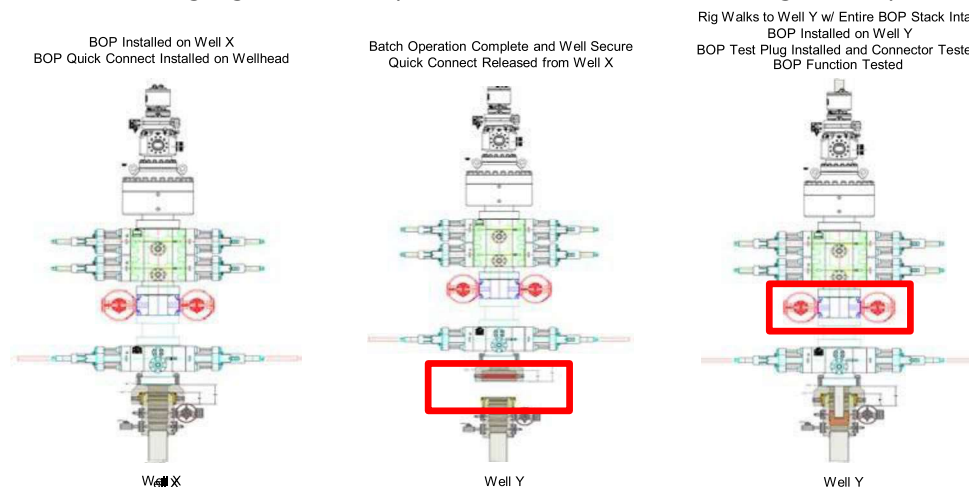
each BOP nipple up, XTO Energy performs a choke drill with the rig crew prior to drilling out every casing shoe. This is additional training for the rig crew that exceeds the requirements of the CFR Title 43 Part 3170.

Procedures

1. 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



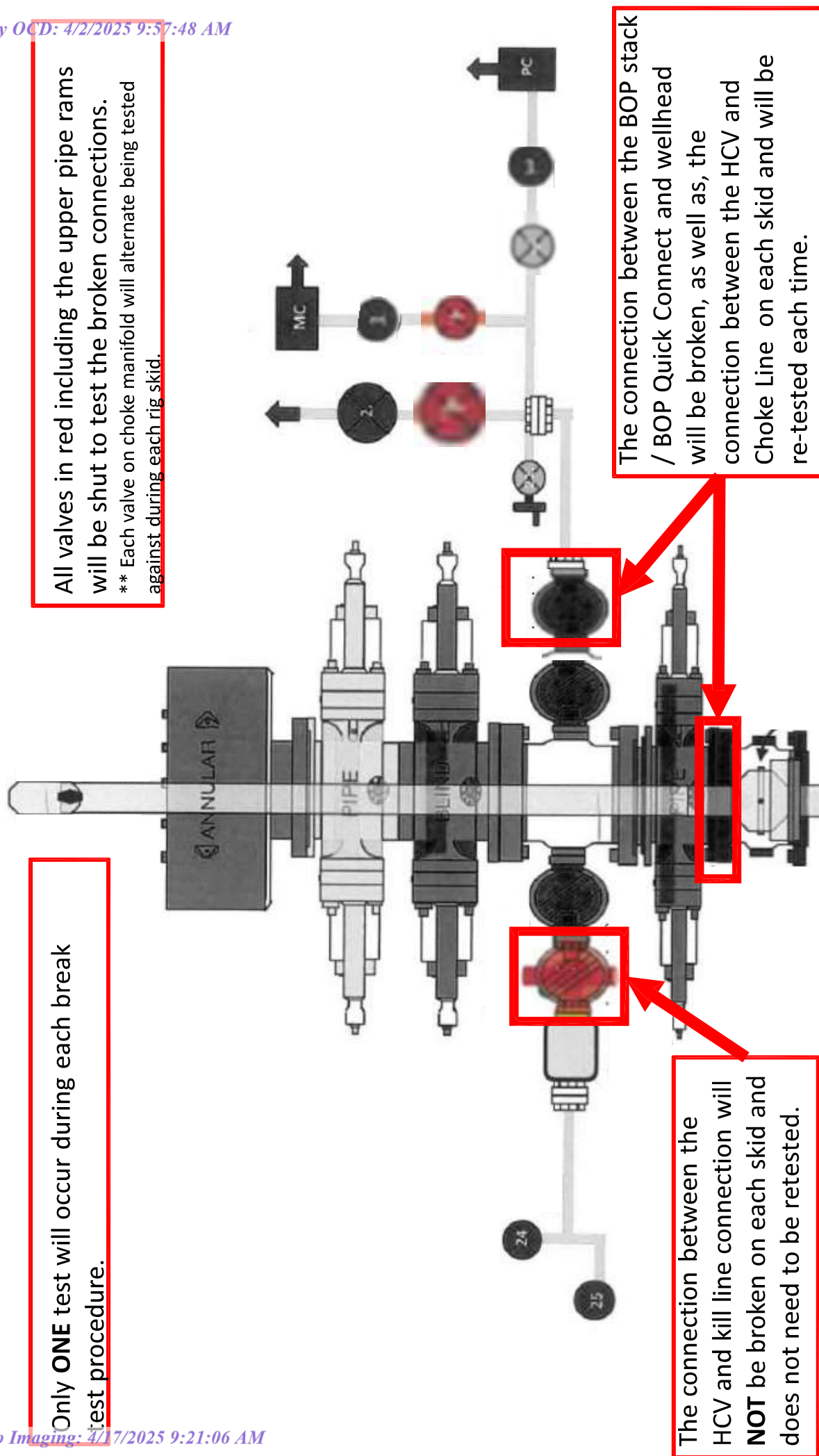
Summary

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.



10,000 PSI Annular BOP Variance Request

XTO Energy/Permian request a variance to use a 5000 psi annular BOP with a 10,000 psi BOP stack. The component and compatibility tables along with the general well control plans demonstrate how the 5000 psi annular BOP will be protected from pressures that exceed its rated working pressure (RWP). The pressure at which the control of the wellbore is transferred from the annular preventer to another available preventer will not exceed 3500 psi (70% of the RWP of the 5000 psi annular BOPL).

1. Component and Preventer Compatibility Tables

The tables below outline the tubulars and the compatible preventers in use. This table, combined with the drilling fluid, documents that two barriers to flow will be maintained at all times.

| 12-1/4" Intermediate Hole Section 10M psi Requirement | | | | | |
|--|------------------|-------------------|-----|--|------------|
| Component | OD | Primary Preventer | RWP | Alternate Preventer(s) | RWP |
| Drillpipe | 5.000" or 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| HWDP | 5.000" or 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| Jars | 6.500" | Annular | 5M | - | - |
| DCs and MWD tools | 6.500"-8.000" | Annular | 5M | - | - |
| Mud Motor | 8.000"-9.625" | Annular | 5M | - | - |
| Intermediate Casing | 9.625" | Annular | 5M | - | - |
| Open-Hole | - | Blind Rams | 10M | - | - |

| 8-3/4" Production Hole Section 10M psi Requirement | | | | | |
|---|------------------|-------------------|-----|--|------------|
| Component | OD | Primary Preventer | RWP | Alternate Preventer(s) | RWP |
| Drillpipe | 5.000" or 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| HWDP | 5.000" or 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| Jars | 6.500" | Annular | 5M | - | - |
| DCs and MWD tools | 6.500"-8.000" | Annular | 5M | - | - |
| Mud Motor | 6.750"-8.000" | Annular | 5M | - | - |
| Production Casing | 7" | Annular | 5M | - | - |
| Open-Hole | - | Blind Rams | 10M | - | - |

| 6-1/8" Lateral Hole Section 10M psi Requirement | | | | | |
|--|---------------|-------------------|-----|--|------------|
| Component | OD | Primary Preventer | RWP | Alternate Preventer(s) | RWP |
| Drillpipe | 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| HWDP | 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| DCs and MWD tools | 4.750"-5.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| Mud Motor | 4.750"-5.500" | Annular | 5M | Upper 3.5"-5.5" VBR Lower 3.5"-5.5" VBR | 10M 10M |
| Production Casing | 4.500" | Annular | 5M | Upper 3.5"-5.5" VBR Upper 3.5"-5.5" VBR | 10M 10M |
| Open-Hole | - | Blind Rams | 10M | - | - |

VBR = Variable Bore Ram

2. Well Control Procedures

Below are the minimal high-level tasks prescribed to assure a proper shut-in while drilling, tripping, running casing, pipe out of the hole (open hole), and moving the BHA through the BOPs. At least one well control drill will be performed weekly per crew to demonstrate compliance with the procedure and well control plan. The well control drill will be recorded in the daily drilling log. The type of drill will be determined by the ongoing operations, but reasonable attempts will be made to vary the type of drill conducted (pit, trip, open hole, choke, etc.). This well control plan will be available for review by rig personnel in the Mewbourne Oil Company drilling supervisor's office on location and on the rig floor. All BOP equipment will be tested as per Onshore O&G Order No. 2 with the exception of the 5000 psi annular which will be tested to 70% of its RWP.

General Procedure While Drilling

1. Sound alarm (alert crew)
2. Space out drill string
3. Shut down pumps (stop pumps and rotary)
4. Shut-in well (uppermost applicable BOP, typically annular preventer, first. HCR & choke will already be in the closed position.)
5. Confirm shut-in
6. Notify toolpusher/company representative
7. Read and record the following:
 - a. SIDPP & SICP
 - b. Pit gain
 - c. Time
8. Regroup and identify forward plan

9. If pressure has built or is anticipated during the kill to reach 70% or greater of the RWP of the annular preventer, confirm spacing and close the upper variable bore rams.

General Procedure While Tripping

1. Sound alarm (alert crew)
2. Stab full-opening safety valve & close
3. Space out drill string
4. Shut-in well (uppermost applicable BOP, typically annular preventer, first. HCR & choke will already be in the closed position.)
5. Confirm shut-in
6. Notify toolpusher/company representative
7. Read and record the following:
 - a. SIDPP & SICP
 - b. Pit gain
 - c. Time
8. Regroup and identify forward plan
9. If pressure has built or is anticipated during the kill to reach 70% of the RWP of the annular preventer, confirm spacing and close the upper variable bore rams.

General Procedure While Running Production Casing

1. Sound alarm (alert crew)
2. Stab crossover and full-opening safety valve and close
3. Space out string
4. Shut-in well (uppermost applicable BOP, typically annular preventer, first. HCR & choke will already be in the closed position.)
5. Confirm shut-in
6. Notify toolpusher/company representative
7. Read and record the following:
 - a. SIDPP & SICP
 - b. Pit gain
 - c. Time
8. Regroup and identify forward plan
9. If pressure has built or is anticipated during the kill to reach 70% or greater of the RWP of the annular preventer, confirm spacing and close the upper variable bore rams.

General Procedure With No Pipe In Hole (Open Hole)

1. Sound alarm (alert crew)
2. Shut-in with blind rams (HCR & choke will already be in the closed position)
3. Confirm shut-in
4. Notify toolpusher/company representative
5. Read and record the following:
 - a. SICP
 - b. Pit gain
 - c. Time
6. Regroup and identify forward plan

General Procedures While Pulling BHA Through Stack

1. PRIOR to pulling last joint of drillpipe through stack:
 - a. Perform flow check. If flowing, continue to (b).
 - b. Sound alarm (alert crew)
 - c. Stab full-opening safety valve and close
 - d. Space out drill string with tool joint just beneath the upper variable bore rams
 - e. Shut-in using upper variable bore rams (HCR & choke will already be in the closed position)
 - f. Confirm shut-in
 - g. Notify toolpusher/company representative
 - h. Read and record the following:
 - i. SIDPP & SICP
 - ii. Pit gain
 - iii. Time
 - i. Regroup and identify forward plan
2. With BHA in the stack and compatible ram preventer and pipe combination immediately available:
 - a. Sound alarm (alert crew)
 - b. Stab crossover and full-opening safety valve and close
 - c. Space out drill string with upset just beneath the upper variable bore rams
 - d. Shut-in using upper variable bore rams (HCR & choke will already be in the closed position)
 - e. Confirm shut-in
 - f. Notify toolpusher/company representative
 - g. Read and record the following:
 - i. SIDPP & SICP

- ii. Pit gain
 - iii. Time
 - h. Regroup and identify forward plan
- 3. With BHA in the stack and NO compatible ram preventer and pipe combination immediately available:
 - a. Sound alarm (alert crew)
 - b. If possible, pull string clear of the stack and follow "Open Hole" procedure.
 - c. If impossible to pull string clear of the stack:
 - d. Stab crossover, make up one joint/stand of drillpipe and full-opening safety valve and close
 - e. Space out drill string with tooljoint just beneath the upper variable bore ram
 - f. Shut-in using upper variable bore ram (HCR & choke will already be in the closed position)
 - g. Confirm shut-in
 - h. Notify toolpusher/company representative
 - i. Read and record the following:
 - i. SIDPP & SICP
 - ii. Pit gain
 - iii. Time
 - j. Regroup and identify forward plan

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<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 447985

CONDITIONS

| | |
|--|--|
| Operator: XTO PERMIAN OPERATING LLC. 6401 HOLIDAY HILL ROAD MIDLAND, TX 79707 | OGRID: 373075 |
| | Action Number: 447985 |
| | Action Type: [C-103] NOI Change of Plans (C-103A) |

CONDITIONS

| Created By | Condition | Condition Date |
|-------------|--|----------------|
| ward.rikala | Operator must comply with all of the R-111-Q requirements. | 4/17/2025 |
| ward.rikala | Any previous COA's not addressed within the updated COA's still apply. | 4/17/2025 |