

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

**APPLICATION OF COTERRA ENERGY  
OPERATING CO. FOR APPROVAL OF  
A NON-STANDARD UNIT  
AND COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO**

CASE NO. \_\_\_\_\_

**APPLICATION**

Coterra Energy Operating Co. ("Coterra"), OGRID Number 215099, through its undersigned attorneys, hereby submits this application to the Oil Conservation Division pursuant to the provisions of NMSA (1978), Section 70-2-17, for an order (1) approving a non-standard unit, and (2) pooling all uncommitted mineral interests within a standard 960-acre, more or less, Bone Spring spacing unit comprised of the E/2 of Sections 15, 22, and 27, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico. In support of this application, Coterra states as follows:

1. Coterra has an interest in the subject lands and has a right to drill and operate a well thereon.
2. Coterra seeks to dedicate the E/2 of Sections 15, 22, and 27, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico to form a 960-acre, more or less, Bone Spring horizontal spacing unit in the Tonto; Bone Spring Pool (pool code 59475).
3. Coterra seeks approval of the 960-acre non-standard spacing to efficiently locate surface facilities, reduce surface disturbance, consolidate roads, tanks, and pipelines, and promote effective well spacing.
4. Coterra seeks to dedicate the unit to the following wells:

- a. **Ruby Federal Com 301H, Ruby Federal Com 501H, and Ruby Federal Com 601H** wells with proposed first take points in NW/4 NE/4 (Unit B) of Section 15 and proposed last take points in the SW/4 SE/4 (Unit O) of Section 27; and
- b. **Ruby Federal Com 302H, Ruby Federal Com 303H, Ruby Federal Com 502H, Ruby Federal Com 503H, Ruby Federal Com 602H, and Ruby Federal Com 603H** wells with proposed first take points in NE/4 NE/4 (Unit A) of Section 15 and proposed last take points in the SE/4 SE/4 (Unit P) of Section 27.

5. The wells will be horizontally drilled, and the producing areas for the wells are expected to be orthodox.

6. While the completed intervals for the **Ruby Federal Com 302H, Ruby Federal Com 502H, and Ruby Federal Com 602H** wells are expected to be less than 330 feet from the adjoining tracts, thereby allowing for the inclusion of the proximity tracts within the proposed spacing unit under Rule 19.15.16.15(B)(1)(b) NMAC, Coterra is nevertheless requesting a non-standard unit to allow for future development flexibility.

7. Coterra sought, but has been unable to obtain, a voluntary agreement from all interest owners in the Bone Spring formation underlying the proposed spacing unit to participate in the drilling of the wells or to otherwise commit their interests to the wells.

8. The pooling of all interests in the Bone Spring formation underlying the proposed unit will prevent the drilling of unnecessary wells, prevent waste and protect correlative rights.

9. Approval of a non-standard spacing unit will allow Coterra to efficiently locate surface facilities for the recovery of oil and gas underlying the subject lands and reduce surface disturbance.

WHEREFORE, Coterra requests that this case is set for hearing before an Examiner of the Oil Conservation Division on May 7, 2026, and after notice and hearing as required by law, the Division enter its order:

- A. Approving the non-standard spacing unit;
- B. Pooling all uncommitted mineral interests in the Bone Spring formation underlying a horizontal spacing unit within the E/2 of Sections 15, 22, and 27, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico;
- C. Designating Coterra as operator of this unit and the wells to be drilled thereon;
- D. Authorizing Coterra to recover its costs of drilling, equipping and completing the wells;
- E. Approving actual operating charges and costs charged for supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedure; and
- F. Setting a 200% charge for the risk involved in drilling and completing the wells in the event a working interest owner elects not to participate in the wells.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS  
& SISK, P.A.

By: Deana M. Bennett  
 Earl E. DeBrine, Jr.  
 Deana M. Bennett  
 Post Office Box 2168  
 500 Fourth Street NW, Suite 1000  
 Albuquerque, New Mexico 87103-2168

Telephone: 505.848.1800  
edebrine@modrall.com  
deana.bennett@modrall.com  
*Attorneys for Applicant*

**CASE NO. \_\_\_\_: Application of Coterra Energy Operating Co. for approval of a non-standard spacing unit and compulsory pooling, Lea County, New Mexico.** Applicant seeks an order from the Division approving a non-standard spacing unit and pooling all uncommitted interests within a 960-acre, more or less, Bone Spring horizontal spacing unit comprised of the E/2 of Sections 15, 22, and 27, Township 19 South, Range 33 East, NMPM, Lea County, New Mexico Tonto; Bone Spring Pool (pool code 59475). This spacing unit will be dedicated to the following wells: **Ruby Federal Com 301H, Ruby Federal Com 501H, and Ruby Federal Com 601H** wells with proposed first take points in NW/4 NE/4 (Unit B) of Section 15 and proposed last take points in the SW/4 SE/4 (Unit O) of Section 27; and **Ruby Federal Com 302H, Ruby Federal Com 303H, Ruby Federal Com 502H, Ruby Federal Com 503H, Ruby Federal Com 602H, and Ruby Federal Com 603H** wells with proposed first take points in NE/4 NE/4 (Unit A) of Section 15 and proposed last take points in the SE/4 SE/4 (Unit P) of Section 27. The wells will be horizontally drilled, and the producing areas for the wells are expected to be orthodox. While the completed intervals for the **Ruby Federal Com 302H, Ruby Federal Com 502H, and Ruby Federal Com 602H** wells are expected to be less than 330 feet from the adjoining tracts, thereby allowing for the inclusion of the proximity tracts within the proposed spacing unit under Rule 19.15.16.15(B)(1)(b) NMAC, Coterra is nevertheless requesting a non-standard unit to allow for future development flexibility. Also to be considered will be the cost of drilling, completing, and equipping said wells, the allocation of these costs as well as the actual operating costs and charges for supervision while drilling and after completion, designation of Coterra Energy Operating Co. as operator of the wells, and a 200% charge for risk involved in drilling said wells. Said area is located approximately 14 miles southeast from Maljamar, New Mexico.