

RECEIVED: 08/31/18	REVIEWER: LRL	TYPE: NSL	APP NO: pLEL1824951541
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

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

**ADMINISTRATIVE APPLICATION CHECKLIST**

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

**Applicant:** COG Operating LLC **OGRID Number:** 229137  
**Well Name:** Snap Back Fee #603H **API:** \_\_\_\_\_  
**Pool:** WC-025 G09 S243532M; Wolfbone **Pool Code:** 98098

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

**1) TYPE OF APPLICATION:** Check those which apply for [A]

A. Location – Spacing Unit – Simultaneous Dedication

☒ NSL      ☐ NSP (PROJECT AREA)      ☐ NSP (PRORATION UNIT)      ☐ SD

B. Check one only for [ I ] or [ II ]

[ I ] Commingling – Storage – Measurement

☐ DHC    ☐ CTB    ☐ PLC    ☐ PC    ☐ OLS    ☐ OLM

[ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery

☐ WFX    ☐ PMX    ☐ SWD    ☐ IPI    ☐ EOR    ☐ PPR
**2) NOTIFICATION REQUIRED TO:** Check those which apply.

- A. ☒ Offset operators or lease holders  
 B. ☒ Royalty, overriding royalty owners, revenue owners  
 C. ☐ Application requires published notice  
 D. ☐ Notification and/or concurrent approval by SLO  
 E. ☐ Notification and/or concurrent approval by BLM  
 F. ☐ Surface owner  
 G. ☒ For all of the above, proof of notification or publication is attached, and/or,  
 H. ☐ No notice required

**FOR OCD ONLY**

- ☐ Notice Complete  
☐ Application  
 Content  
 Complete

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

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

Debora L. Wilbourn

Print or Type Name

Signature

08/31/2018

Date

575-513-1282

Phone Number

dwilbourn@concho.com

e-mail Address

August 31, 2018

Oil Conservation Division  
Attention: Mr. Leonard Lowe  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FSL 2430' FEL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

Dear Mr. Lowe:

COG Operating LLC (COG) respectfully requests administrative approval of a Non-standard Horizontal Spacing Unit for its Snap Back Fee #603H well. The completed interval of this well will not meet the requirement for being 330' from the outer boundary of the spacing unit. Attached is Form C-102 showing the Horizontal Spacing Unit for this well.

COG is seeking approval of the Non-standard Horizontal Spacing Unit in order to maximize recovery of reserves. The New Mexico Oil Conservation Division's approval of the non-standard completed interval for the Snap Back Fee #603H well will allow for efficient recovery of reserves, thereby preventing waste and improving well performance. (Please see attached Engineering Statement for more detailed information.)

The affected offset tract is the SW/4 of Sec. 18 and NW/4 of Sec. 19-T24S-R35E. COG Operating LLC is the operator of the offsetting acreage, therefore the working interest owners under COG's acreage have been notified by Certified Mail of the proposed Non-standard Horizontal Spacing Unit. The notice letter advises said working interest owners that in the event they have an objection to COG's application, they must file a written letter with the Division within twenty (20) days from the date the Division receives this application.

Thank you for your consideration of this application. Should you have questions or require further information, please contact me at 575-748-6958 or by email at [dwilbourn@concho.com](mailto:dwilbourn@concho.com).

Sincerely,

Debora L. Wilbourn  
Regulatory Analyst

Enclosure  
cc: OCD Hobbs

Certificate No. CHAD HARCROW		17777
W.O. # 18-760	DRAWN BY: AM	





Secs. 17, 20-T24S-R35E  
Lea County, NM

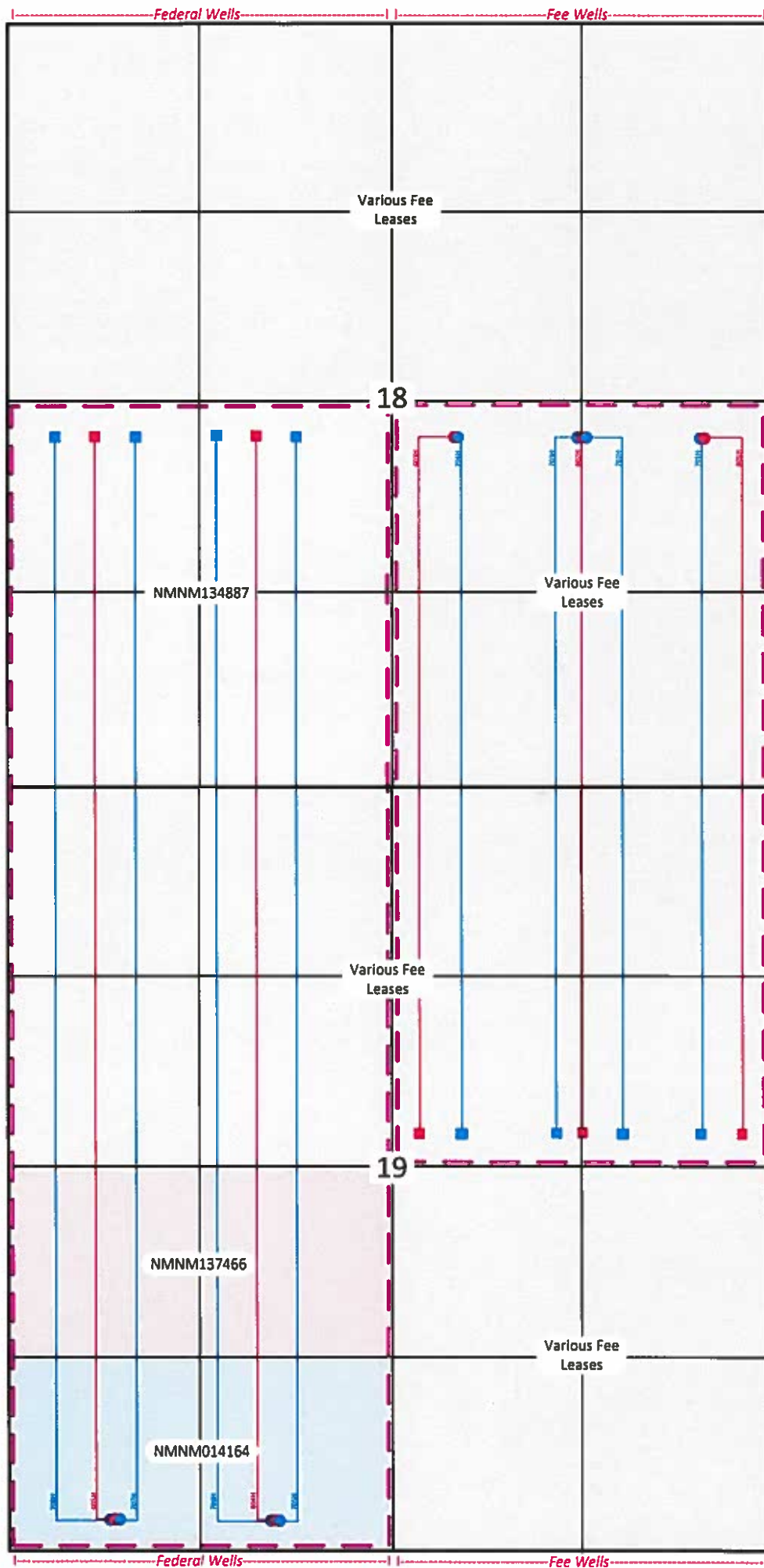


## Updated 09/18/18



Map Scale 1:36,111





**Snap Back Fed Corn Wells  
&  
Snap Back Fee Wells**  
Secs. 18, 19-T24S-R35E  
Lea County, NM

- Proposed WCA Shale SHL
- Proposed WCA Shale BHL
- Proposed WCA Sand SHL
- Proposed WCA Sand BHL

Proposed WC CA/Pooled Unit

## **Snap Back Fee 601H and 603H – NSL Applications Engineering Statement**

The Snap Back Fee 601H and 603H wells are part of a development project in which COG Operating LLC (COG) will test reduced spacing in the Wolfbone interval. There are a total of 9 wells in the SE/4 of Sec. 18 and NE/4 of Sec. 19, T24S-R35E, that will be testing this reduced spacing.

Approval of NSLs for the Snap Back Fee 601H and 603H wells will provide adequate spacing for the planned spacing test and will allow economic recovery along with the co-development of the other wells in the section. By testing the viability of simultaneous development on reduced spacing within a single interval, COG is attempting to maximize recoverable resources from the interval and minimize waste created should we not simultaneously develop these targets.

**Snap Back Fee 603H  
Owner Notification List**

<b>Tracts</b>	<b>Working Interest Owners</b>	<b>Certified Receipt No.</b>	<b>Received</b>
<b>1</b>	Chevron U.S.A. Inc. P. O. Box 2100 Houston, TX 77252	7017 3040 0000 2540 3617	
<b>1</b>	Crown Oil Partners VI, LLC P. O. Box 50820 Midland, TX 79710	7017 3040 0000 2540 3648	
<b>1</b>	Crump Energy Partners III, LLC P. O. Box 50820 Midland, TX 79710	7017 3040 0000 2540 3662	
<b>1</b>	Ozark Royalty Company 3652 Northwood Drive Memphis, TN 38111	7017 3040 0000 2540 3686	
<b>1</b>	Tap Rock Resources, LLC 602 Park Point Dr. Golden, CO 80401	7017 3040 0000 2540 3709	



August 31, 2018

**Certified Mail – Return Receipt Request**  
**7017 3040 0000 2540 3617**

Chevron U.S.A., Inc.  
P. O. Box 2100  
Houston, TX 77252

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FNL 2430' FWL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

Gentlemen:

Attached is a copy of COG Operating LLC (COG)'s Application for a Non-standard Horizontal Spacing Unit for the Snap Back Fee #603H well, the SHL of which is located in Sec. 18-T24S-R35E, Lea County, New Mexico. You are being provided a copy of this Application per OCD's requirement to notify the operators/working interest owners of the affected offset acreage. If you have any objection to this Application, notification should be given to OCD within 20 days of receipt of this letter.

COG is seeking approval of the non-standard unit in order to allow for the efficient recovery of reserves, thereby preventing waste.

If you have any questions regarding this application, please contact Matt Solomon at (432) 685-4352 or Sean Johnson at (432) 818-2230 or by email at [msolomon@concho.com](mailto:msolomon@concho.com) or [sjohnson@concho.com](mailto:sjohnson@concho.com).

Sincerely,

A handwritten signature in blue ink that reads "Debora L. Wilbourn".

Debora L. Wilbourn  
Regulatory Analyst

Enclosures

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CORPORATE ADDRESS

ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701  
P 432.683.7443 | F 432.683.7441

ARTESIA WEST OFFICE

2208 MAIN STREET | ARTESIA, NEW MEXICO 88210  
P 575.748.6940 | F 575.746.2096





August 31, 2018

**Certified Mail – Return Receipt Request**  
**7017 3040 0000 2540 3648**

Crown Oil Partners VI, LLC  
P. O. Box 50820  
Midland, TX 79710

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FNL 2430' FWL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

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A handwritten signature in blue ink that reads "Debora L. Wilbourn".

Debora L. Wilbourn  
Regulatory Analyst

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ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701  
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**ARTESIA WEST OFFICE**

2208 MAIN STREET | ARTESIA, NEW MEXICO 88210  
P 575.748.6940 | F 575.746.2096



August 31, 2018

**Certified Mail – Return Receipt Request**  
**7017 3040 0000 2540 3662**

Crump Energy Partners III, LLC  
P. O. Box 50820  
Midland, TX 79710

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FNL 2430' FWL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

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Sincerely,

A handwritten signature in blue ink that reads "Debora L. Wilbourn".

Debora L. Wilbourn  
Regulatory Analyst

Enclosures



August 31, 2018

**Certified Mail – Return Receipt Request**  
**7017 3040 0000 2540 3686**

Ozark Royalty Company  
3652 Northwood Drive  
Memphis, TN 38111

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FNL 2430' FWL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

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Debora L. Wilbourn  
Regulatory Analyst

Enclosures

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ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701  
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ARTESIA WEST OFFICE

2208 MAIN STREET | ARTESIA, NEW MEXICO 88210  
P 575.748.6940 | F 575.746.2096



August 31, 2018

**Certified Mail – Return Receipt Request**  
**7017 3040 0000 2540 3709**

Tap Rock Resources, LLC  
602 Park Point Drive  
Golden 80401

Re: Application for Unorthodox Well Locations  
**Snap Back Fee #603H**  
SHL: 2430' FSL 2180' FEL (Unit J), Sec. 18-T24S-R35E  
Proposed FTP: 2310' FNL 2430' FWL, Sec. 18-T24S-R35E  
BHL: 2310' FNL 2430' FEL (Unit G), Sec. 19-T24S-R35E  
Proposed LTP: 2440' FNL 2430' FEL, Sec. 19-T24S-R35E  
Lea County, NM

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Sincerely,

  
Debora L. Wilbourn  
Regulatory Analyst

Enclosures

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CORPORATE ADDRESS

ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701  
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ARTESIA WEST OFFICE

2208 MAIN STREET | ARTESIA, NEW MEXICO 88210  
P 575.748.6940 | F 575.746.2096

## Lowe, Leonard, EMNRD

---

**From:** Debora Wilbourn <DWilbourn@concho.com>  
**Sent:** Friday, August 31, 2018 5:25 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Beth Ryan; Matt Solomon  
**Subject:** Snap Back Fee 603H - NSL Application  
**Attachments:** Snap Back Fee 603H - NSL Application.pdf

Mr. Lowe,

I have attached our NSL application for the Snap Back Fee 603H well. Please let me know if you should need anything further.

Thanks,

*Debora Wilbourn*

Regulatory Analyst II  
North Delaware Basin Asset Team  
[dwilbourn@concho.com](mailto:dwilbourn@concho.com)

575.748.6958

Concho West | 2208 W Main St | Artesia, NM | 88210-3720 | 575.748.6940



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EXHIBIT “A”

Attached to and made a part of that certain Joint Operating Agreement dated June 1, 2018, by and between COG Operating LLC, as Operator and Energen Resources Corporation, et al, as Non-Operators.

I. DESCRIPTION: OF LANDS:

Township 24 South – Range 35 East, NMPM
Section 18: SW/4
Section 19: W/2
Lea County, New Mexico
Containing 481.55 acres, more or less

II. DEPTH RESTRICTIONS:

Limited to the Wolfcamp Formation.

III. PARTIES TO AGREEMENT:

COG Operating LLC  
600 W. Illinois Ave.  
Midland, TX 79701  
Attn: NM Delaware Basin Land Lead  
Phone: 432-683-7443  
Fax: 432-221-0856  
Email:

Energen Resources Corporation  
605 Richard Arrington, Jr. Blvd. North  
Birmingham, AL 35203  
Attn:  
Phone:  
Fax:  
Email:

Advance Energy Partners, LLC  
11490 Westheimer Rd. Suite 950  
Houston, TX 77077  
Phone:  
Fax:  
Email:

OXY USA Inc.  
5 Greenway Plaza, Suite 110  
Houston, TX 7704  
Phone:  
Fax:  
Email:

OneEnergy Partners Operating, LLC  
2929 Allen Parkway, Suite 200  
Houston, TX 77019  
Attn:  
Phone:  
Fax:  
Email:

EOG Y Resources, Inc.  
5309 Champions Drive  
Midland, TX 79706  
Attn:  
Phone:  
Fax:  
Email:

IV. PERCENTAGES OF INTERESTS:

COG Operating LLC	16.667013%
OXY USA, Inc.	45.257882%
Advance Energy Partners, LLC	4.741080%
Energen Resources Corporation	24.452151%
OneEnergy Partners Operating, LLC	5.537674%
EOG-Y Resources, Inc.	3.344201%
Total WI	100.000000%*



## **Lowe, Leonard, EMNRD**

---

**From:** Debora Wilbourn <DWilbourn@concho.com>  
**Sent:** Tuesday, September 18, 2018 2:38 PM  
**To:** Lowe, Leonard, EMNRD  
**Cc:** Jones, William V, EMNRD  
**Subject:** RE: NSL Application: Snap Back Fee Well No, 603H  
**Attachments:** Snap Back Fee 603H - NSL Letter to NMOCD (corrected).docx; OA - Snapback Fed Com SW Sec 18 \_W2 Sec 19 Exhibit A.docx; Snap Back Fee 603H - Offsetting Acreage Map.pdf

Mr. Lowe,

I have attached the following per your request:

1. Corrected application cover letter
2. Exhibit A from the Joint Operating Agreement (JOA) covering the SW/4 of Sec. 18 & the W/2 of Sec. 19, showing the working interest owners and their percentage interest in said tracts. All of these owners' working interests are spread percentage-wise across the entire 481.55 acres.
3. Offsetting acreage map with the Horizontal Spacing Unit and Offsetting Tract more visible.

Please note that I was advised by our attorney that our offsetting acreage would be the entire SW/4 of Sec. 18 and the entire NW/4 of Sec. 19. This is due to the fact that the ~320 acres is being operated under the aforementioned JOA, will be communitized as one block of acreage and will be included in one ~320 acre horizontal spacing unit.

Please let me know if you need further information.

Debora

---

**From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]  
**Sent:** Tuesday, September 18, 2018 1:26 PM  
**To:** Debora Wilbourn  
**Cc:** Jones, William V, EMNRD  
**Subject:** [External] NSL Application: Snap Back Fee Well No, 603H  
**Importance:** High

\*\*\*\* External email. Use caution. \*\*\*\*

Debora Wilbourn,

The NSL Application for the above subject well for COG Operating, LLC, has not provided proper notice.

From my review of your submittal, your affected tracts are located in the following areas: Section 18, E2 SW4 & Section 19, E2 NW4.

Your application letter is full of ERRORS as well. Please perform the following:

1. Resubmit the Letter requesting an Unorthodox approval request. Correct the direction (N W) referenced for the FTP and verify the rest are correct. Correct the affected tracts referenced, UNLESS COG DID NOT PROPERLY NOTICE THE AFFECTED TRACTS, then proper notice needs to be completed.
2. I'm going to ASSUME you notified the Working Interest in the CORRECT affected tracts, though your initial letter states otherwise. So for assurance, please identify the location of all the "Owner Notification List" within your application and resubmit.

3. Please provide a clear and correct Offsetting Tract map. The one submitted does not clearly state the proposed project area and affected tracts.

I just want THREE items to be resubmitted.

If nothing is resubmitted by the COB your 20 will not start until all information stated above is received. And all proper notice is completed, if not completed at all.

Please assure all information submitted is correct prior to submitting.

**Leonard Lowe**

Engineering Bureau

**Oil Conservation Division**

**Energy Minerals and Natural Resources Department**

1220 South St. Frances

Santa Fe, New Mexico 87004

Office: 505-476-3492

Cell: 505-930-6717

Fax: 505-476-3462

E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

Website: <http://www.emnrd.state.nm.us/ocd/>

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## **Lowe, Leonard, EMNRD**

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Friday, September 21, 2018 9:30 AM  
**To:** 'Debora Wilbourn'  
**Cc:** Brown, Maxey G, EMNRD; Kautz, Paul, EMNRD; Jones, William V, EMNRD; McMillan, Michael, EMNRD; Goetze, Phillip, EMNRD; Dawson, Scott, EMNRD; 'lisa@rwbyram.com'  
**Subject:** NSL-7759 & 7760\_COG Operating LLC\_Snap Back Fee Well No. 601H & 603H\_SEC 18 24S 35E  
**Importance:** High

Debora L. Wilbourn,

The following Administrative Orders have been issued. The Orders will soon be available on the Division's web site: <http://ocdimage.emnrd.state.nm.us/Imaging/Default.aspx>

**COG Operating LLC [229137]**  
**POOL: WC-025 G-09 S243532M; Wolfbone**

**NSL-7759**  
**Snap Back Fee Well No. 601H**  
**API No. 30-025-PENDING**

**NSL-7760**  
**Snap Back Fee Well No. 603H**  
**API No. 30-025-PENDING**

**Leonard Lowe**  
Engineering Bureau  
Oil Conservation Division  
Energy Minerals and Natural Resources Department  
1220 South St. Frances  
Santa Fe, New Mexico 87004  
Office: 505-476-3492  
Cell: 505-930-6717  
Fax: 505-476-3462  
E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>