

NSL Initial Application

RECEIVED: 06/23/21	REVIEWER: LRL	TYPE: NSL	APP NO: pLEL2117636265
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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: EOG Resources, Inc. **OGRID Number:** 7377
Well Name: Ruthless 11 Fed Com #512H well **API:** 30-025-47725
Pool: WC-025 G-08 S253235G; Lower Bone Spring Pool **Pool Code:** 97903

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

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
 A. Location – Spacing Unit – Simultaneous Dedication
 NSL NSP (PROJECT AREA) NSP (PRORATION UNIT) SD
- B. Check one only for [I] or [II]
 [I] Commingling – Storage – Measurement
 DHC CTB PLC PC OLS OLM
 [II] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
 A. Offset operators or lease holders
 B. Royalty, overriding royalty owners, revenue owners
 C. Application requires published notice
 D. Notification and/or concurrent approval by SLO
 E. Notification and/or concurrent approval by BLM
 F. Surface owner
 G. For all of the above, proof of notification or publication is attached, and/or,
 H. No notice required

FOR OCD ONLY	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

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

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

Kaitlyn A. Luck
Date

Print or Type Name

Signature

6/23/2021
Date

505-954-7286
Phone Number

kaluck@hollandhart.com
e-mail Address



Kaitlyn A. Luck
Phone (505) 954-7286
kaluck@hollandhart.com

June 23, 2021

VIA ONLINE FILING

Adrienne Sandoval
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com #512H well in the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

Dear Ms. Sandoval:

EOG Resources, Inc. (OGRID No. 7377) seeks administrative approval of an unorthodox well location for its **Ruthless 11 Fed Com #512H well** (API No. 30-025-47725) to be completed within the WC-025 G-08 S253235G; Lower Bone Spring Pool [97903], underlying the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

This well is drilled and is to be completed as follows:

- the surface location is located 491 feet from the north line and 2,592 feet from the east line (Unit B) of Section 11,
- the bottom hole location is located 100 feet from the south line and 2,625 feet from the east line (Unit O) of Section 14,
- the first take point is located 100 feet from the north line and 2,590 feet from the east line (Unit B) of Section 11, and
- the last take point is located 100 feet from the south line and 2,625 feet from the east line (Unit O) of Section 14.

Since this acreage is governed by the Division’s statewide rules, the completed interval for this well will be unorthodox because it is closer than the standard offsets to the western boundary of the spacing unit and encroaches on the E/2 W/2 of Section 11 and 14. Approval of the unorthodox completed interval will allow EOG to use their preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

T 505.988.4421 F 505.983.6043
110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849
Mail to: P.O. Box 2208, Santa Fe, NM 87504-2208
www.hollandhart.com

Alaska	Montana	Utah
Colorado	Nevada	Washington, D.C.
Idaho	New Mexico	Wyoming

Exhibit A is a Form C-102 showing the completed interval of the proposed **Ruthless 11 Fed Com #512H well** encroaches on the spacing unit/tracts to the west in the E/2 W/2 of said Sections 11 and 14.

Exhibit B is a plat for Sections 11 and 14 that shows the proposed **Ruthless 11 Fed Com #512H well** in relation to adjoining spacing unit/tracts to the west.

Ownership is diverse between the subject spacing unit and the affected spacing unit/tracts to the west. **Exhibit C** is a list of the “affected parties” to this application and proof that a copy of this application with all attachments has been sent by certified mail to each affected party advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

Exhibit D is a statement from a petroleum engineer providing justification for the needed exception.

Your attention to this matter is appreciated.

Sincerely,



Kaitlyn A. Luck
ATTORNEY FOR EOG RESOURCES, INC.

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 Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

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

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number		² Pool Code		³ Pool Name		
⁴ Property Code		⁵ Property Name RUTHLESS 11 FED COM			⁶ Well Number 512H	
⁷ OGRID No.		⁸ Operator Name EOG RESOURCES, INC.			⁹ Elevation 3507'	

¹⁰Surface Location

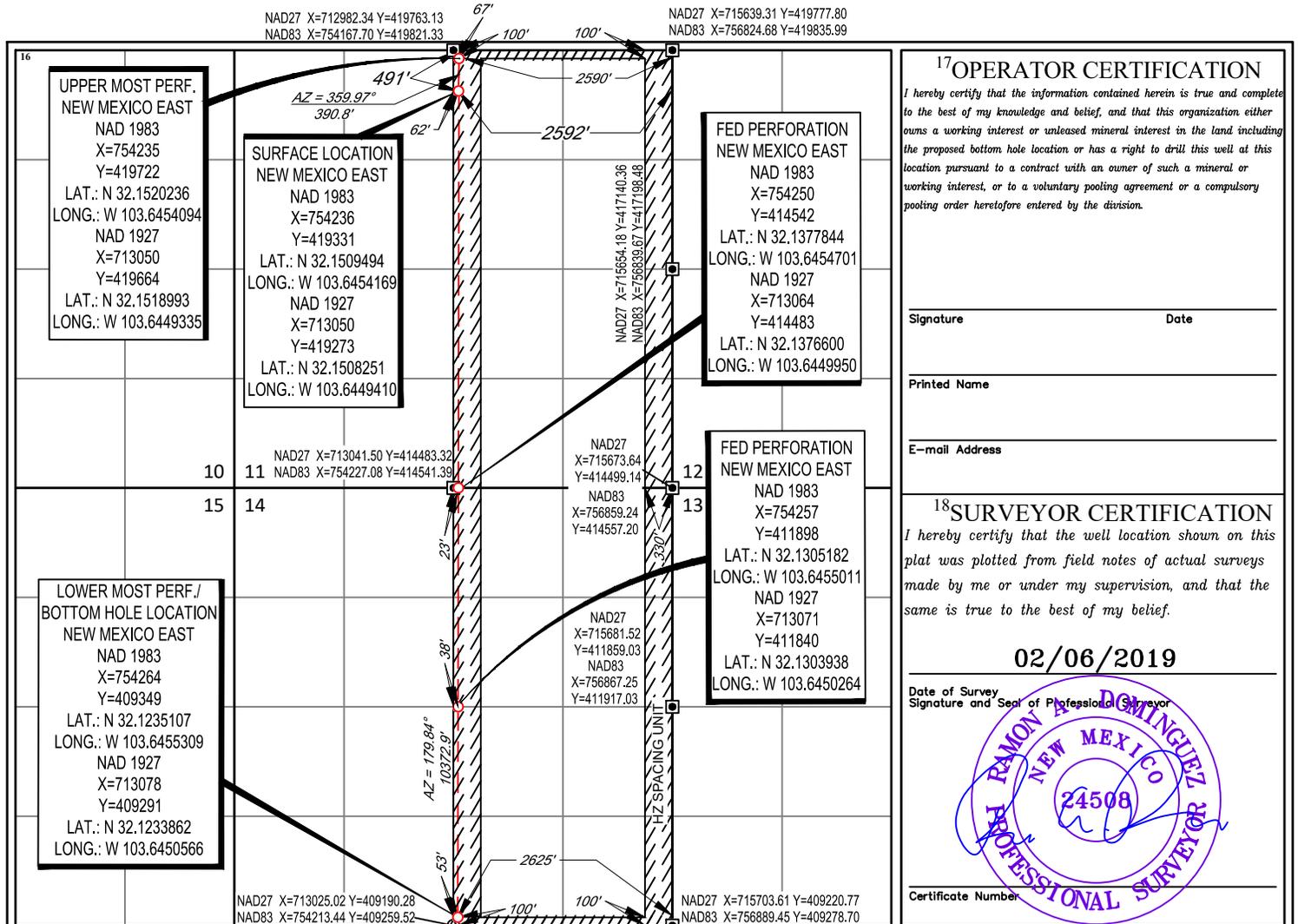
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
B	11	25-S	32-E	-	491'	NORTH	2592'	EAST	LEA

¹¹Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	14	25-S	32-E	-	100'	SOUTH	2625'	EAST	LEA

¹² Dedicated Acres 640.00	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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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.



District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
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811 S. First St., Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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State of New Mexico
Energy, Minerals & Natural Resources
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OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
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FORM C-102

Revised August 1, 2011

Submit one copy to appropriate

District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number	² Pool Code	³ Pool Name
⁴ Property Code	⁵ Property Name RUTHLESS 11 FED COM	
⁷ OGRID No.	⁸ Operator Name EOG RESOURCES, INC.	⁶ Well Number 512H
⁹ Elevation 3507'		

¹⁰Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
B	11	25-S	32-E	-	491'	NORTH	2592'	EAST	LEA

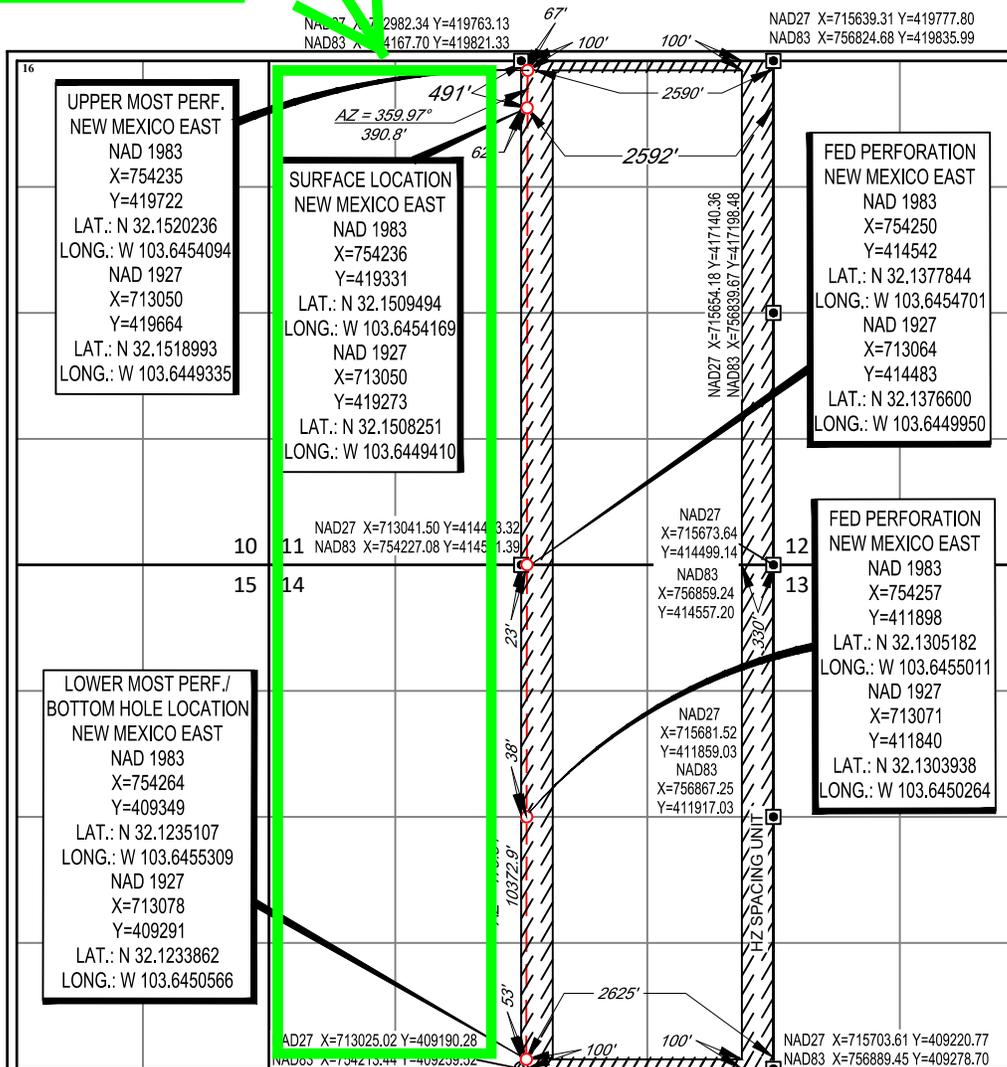
¹¹Bottom Hole Location If Different From Surface

Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
25-S	32-E	-	100'	SOUTH	2625'	EAST	LEA

¹⁴Infill ¹⁵Consolidation Code ¹⁶Order No.

Offset spacing unit: EOG is the operator. Notice provided to affected parties

igned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



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.

Signature _____ Date _____

Printed Name _____

E-mail Address _____

18 SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true to the best of my belief.

02/06/2019

Date of Survey _____
Signature and Seal of Professional Surveyor

RAMON A. DOMINGUEZ
NEW MEXICO
24508
PROFESSIONAL SURVEYOR

Certificate Number _____



P.O. Box 2267, Midland, Texas 79702
Phone: (432) 686-3600 Fax: (432) 686-3773

June 18, 2021

Certification of Ownership

I have reviewed the ownership of the oil and gas leasehold in Sections 11 & 14 -25S-32E, Lea County, New Mexico, for purposes of the unorthodox location for EOG's Ruthless 11 Fed Com #512H well located in the W/2E/2 of Sections 11&14-25S-32E. As of the date of this letter, the affected parties are:

1. EOG RESOURCES INC
5509 CHAMPIONS DR.
MIDLAND, TX 79706
2. BUREAU OF LAND MANAGEMENT
301 DINOSAUR TR.
SANTA FE, NM 87508
3. MCCLELLAN OIL CORPORATION
P O BOX 730
ROSWELL,NM 88202-0730
4. DAVID PETROLEUM CORPORATION
116 WEST FIRST STREET
ROSWELL,NM 88201-0000
5. TOLES COMPANY
P O BOX 1300
ROSWELL,NM 88202-1300
6. XTO ENERGY INC. AN EXXONMOBIL SUBSIDIARY
22777 SPRINGWOODS VILLAGE PKWAY, #115
SPRING, TX 77389
7. SHARBRO ENERGY LLC
P O BOX 840
ARTESIA,NM 88211-0840
8. CARLYSLE EXPLORATION INC
P O BOX 136181
FORT WORTH,TX 76136-0000
9. FORTIS MINERALS II
PO BOX 470788
FORT WORTH, TX 76147

EXHIBIT C



P.O. Box 2267, Midland, Texas 79702
Phone: (432) 686-3600 Fax: (432) 686-3773

10. JAMES CARSON, AS HIS SEPARATE PROPERTY
PO BOX 1761
LOWELL, AR 72745
11. JAMI HARL, AS HIS SEPARATE PROPERTY
2485 E 54TH ST
TULSA, OK 74105
12. TERRY OWEN, AS HIS SEPARATE PROPERTY
13011 ROYAL GEORGE AVE
ODESSA, FL 33556
13. PEGASUS RESOURCES, LLC
PO BOX 733980
DALLAS, TX 75373
14. MCMULLEN MINERALS, LLC
PO BOX 470857
FT WORTH, TX 76147
15. MERIH ENERGY, LLC
PO BOX 1874
MIDLAND, TX 79702
16. MONTEGO CAPITAL FUND 3 LTD
PO BOX 2640
MIDLAND, TX 79702
17. PD III EXPLORATION LTD
PO BOX 271
MIDLAND, TX 79702
18. JST TROSCHINETZ CORPORATION PROFIT SHARING
PO BOX 60874
SAN ANGELO, TX 76906
19. EM THOMPSON CORPORATION PROFIT SHARING PLAN
PO BOX 52132
MIDLAND, TX 79710
20. TD MINERALS LLC
8111 WESTCHESTER, SUITE 900
DALLAS, TX 75225



P.O. Box 2267, Midland, Texas 79702
Phone: (432) 686-3600 Fax: (432) 686-3773

21. PONY OIL OPERATING LLC
3100 MONTICELLO AVE SUITE 500
DALLAS, TX 75205
22. MERPEL, LLC
3100 MONTICELLO AVE SUITE 500
DALLAS, TX 75205
23. ANNAMARIE DUNCAN
29 POLO CLUB CIRCLE
DENVER, CO 80209
24. CIMAREX
600 N. MARIENFELD ST., SUITE 600
MIDLAND, TX 79701

Sincerely,

EOG Resources, Inc.

Matthew Gray

Matthew Gray
Landman



Kaitlyn A. Luck
Phone (505) 954-7286
kaluck@hollandhart.com

June 22, 2021

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com #512H well in the E/2 of Sections 11 and 14, Township 25 South, Range 32 East, N.M.P.M., Lea County, New Mexico.

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Matthew Gray
EOG Resources, Inc.
(432) 686-3600
Matthew_Gray@eogresources.com

Sincerely,

Kaitlyn A. Luck
ATTORNEY FOR EOG RESOURCES, INC.

ParentID	Mail Date	Name	DeliveryAddress	City	ST	Zip	MailClass	TrackingNo	Well
31557	6/22/2021	Cimarex	600 N Marienfeld St Ste 600	Midland	TX	79701-4405	Certified with Return Receipt (Signature)	9414811898765802988208	70616 - EOG_Ruthless 512 NSL - notice list - -177
31557	6/22/2021	Annamarie Duncan	29 Polo Club Cir	Denver	CO	80209-3307	Certified with Return Receipt (Signature)	9414811898765802988222	70616 - EOG_Ruthless 512 NSL - notice list - -178
31557	6/22/2021	Pony Oil Operating LLC	3100 Monticello Ave Ste 500	Dallas	TX	75205-3432	Certified with Return Receipt (Signature)	9414811898765802988253	70616 - EOG_Ruthless 512 NSL - notice list - -180
31557	6/22/2021	Merpel, LLC	3100 Monticello Ave Ste 500	Dallas	TX	75205-3432	Certified with Return Receipt (Signature)	9414811898765802988260	70616 - EOG_Ruthless 512 NSL - notice list - -179
31557	6/22/2021	EM Thompson Corporation Profit Sharing Plan	PO Box 52132	Midland	TX	79710-2132	Certified with Return Receipt (Signature)	9414811898765802980578	70616 - EOG_Ruthless 512 NSL - notice list - -182
31557	6/22/2021	TD Minerals LLC	8111 Westchester Dr Ste 900	Dallas	TX	75225-6146	Certified with Return Receipt (Signature)	9414811898765802988215	70616 - EOG_Ruthless 512 NSL - notice list - -181
31557	6/22/2021	JST Troschinetz Corporation Profit Sharing	PO Box 60874	San Angelo	TX	76906-0874	Certified with Return Receipt (Signature)	9414811898765802980530	70616 - EOG_Ruthless 512 NSL - notice list - -183
31557	6/22/2021	Montego Capital Fund 3 LTD	PO Box 2640	Midland	TX	79702-2640	Certified with Return Receipt (Signature)	9414811898765802980547	70616 - EOG_Ruthless 512 NSL - notice list - -185
31557	6/22/2021	PD III Exploration LTD	PO Box 271	Midland	TX	79702-0271	Certified with Return Receipt (Signature)	9414811898765802980585	70616 - EOG_Ruthless 512 NSL - notice list - -184
31557	6/22/2021	Merih Energy, LLC	PO Box 1874	Midland	TX	79702-1874	Certified with Return Receipt (Signature)	9414811898765802980592	70616 - EOG_Ruthless 512 NSL - notice list - -186
31557	6/22/2021	McMullen Minerals, LLC	PO Box 470857	Fort Worth	TX	76147-0857	Certified with Return Receipt (Signature)	9414811898765802980561	70616 - EOG_Ruthless 512 NSL - notice list - -187
31557	6/22/2021	Pegasus Resources, LLC	PO Box 733980	Dallas	TX	75373-3980	Certified with Return Receipt (Signature)	9414811898765802980554	70616 - EOG_Ruthless 512 NSL - notice list - -188
31557	6/22/2021	Jami Harl, as his separate property	2485 E 54th St	Tulsa	OK	74105-7201	Certified with Return Receipt (Signature)	9414811898765802980431	70616 - EOG_Ruthless 512 NSL - notice list - -190
31557	6/22/2021	Terry Owen, as his separate property	13011 Royal George Ave	Odessa	FL	33556-5714	Certified with Return Receipt (Signature)	9414811898765802980479	70616 - EOG_Ruthless 512 NSL - notice list - -189
31557	6/22/2021	James Carson, as his separate property	PO Box 1761	Lowell	AR	72745-1761	Certified with Return Receipt (Signature)	9414811898765802980486	70616 - EOG_Ruthless 512 NSL - notice list - -191
31557	6/22/2021	Carlysle Exploration Inc.	PO Box 136181	Fort Worth	TX	76136-0181	Certified with Return Receipt (Signature)	9414811898765802980493	70616 - EOG_Ruthless 512 NSL - notice list - -193
31557	6/22/2021	Fortis Minerals II	PO Box 470788	Fort Worth	TX	76147-0788	Certified with Return Receipt (Signature)	9414811898765802980448	70616 - EOG_Ruthless 512 NSL - notice list - -192
31557	6/22/2021	Sharbro Energy LLC	PO Box 840	Artesia	NM	88211-0840	Certified with Return Receipt (Signature)	9414811898765802980400	70616 - EOG_Ruthless 512 NSL - notice list - -194
31557	6/22/2021	Toles Company	PO Box 1300	Roswell	NM	88202-1300	Certified with Return Receipt (Signature)	9414811898765802980462	70616 - EOG_Ruthless 512 NSL - notice list - -196
31557	6/22/2021	XTO Energy Inc. An ExxonMobil Subsidiary	22777 Springwoods Village Pkwy Unit 115	Spring	TX	77389-1425	Certified with Return Receipt (Signature)	9414811898765802980424	70616 - EOG_Ruthless 512 NSL - notice list - -195
31557	6/22/2021	David Petroleum Corporation	116 W 1st St	Roswell	NM	88203-4702	Certified with Return Receipt (Signature)	9414811898765802980417	70616 - EOG_Ruthless 512 NSL - notice list - -197

31557	6/22/2021	Bureau of Land Management	620 E Greene St	Carlsbad	NM	88220-6292	Certified with Return Receipt (Signature)	9414811898765802980035	70616 - EOG_Ruthless 512 NSL - notice list - -199
31557	6/22/2021	McClellan Oil Corporation	PO Box 730	Roswell	NM	88202-0730	Certified with Return Receipt (Signature)	9414811898765802980073	70616 - EOG_Ruthless 512 NSL - notice list - -198
31557	6/22/2021	Bureau of Land Management	301 Dinosaur Trl	Santa Fe	NM	87508-1560	Certified with Return Receipt (Signature)	9414811898765802980080	70616 - EOG_Ruthless 512 NSL - notice list - -200



5509 Champions Dr., Midland, Texas 79706
Phone: (432) 686-3600 Fax: (432) 686-3773

June 18, 2021

Re: EOG Resources, Inc. NSL Application
Ruthless 11 Fed Com #512 (Well)
E/2 Sec. 11&14, T25S-R32E Lea
County, New Mexico

To Whom it may concern:

Considering the distance between wells in the development plan for the Bone Spring formation in Section 11&14-T25S-R32E, EOG believes the non-standard location is necessary to develop the 2nd Bone Spring resource in an economic fashion. Based on analog 2nd Bone Spring wells along with geologic analysis, EOG believes placing the well at this location maintains optimal spacing to begin development of resources in the formation. Granting the exception will allow for more total production from the section and more efficient development of the asset therefore protecting correlative rights.

Sincerely

EOG Resources, Inc.

A handwritten signature in black ink, appearing to read "G Taylor", with a horizontal line extending to the right. To the right of the signature is the date "6/18/2021".

Graham Taylor
Reservoir Engineer II

EXHIBIT D

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

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District IV
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 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
 Action 33425

CONDITIONS

Operator: EOG RESOURCES INC P.O. Box 2267 Midland, TX 79702	OGRID: 7377
	Action Number: 33425
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	6/25/2021