

State of New Mexico  
Energy, Minerals and Natural Resources Department

**Michelle Lujan Grisham**  
Governor

**Erin Taylor**  
Acting Cabinet Secretary

**Ben Shelton**  
Deputy Secretary

**Albert C.S. Chang**  
Division Director  
Oil Conservation Division



Carson Rice  
[carice@hilcorp.com](mailto:carice@hilcorp.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL - 9221**

**Hilcorp Energy Company [OGRID 372171]  
Rhoda Abrams Well No. 2P  
API No. 30-045-38519**

Reference is made to your application received on December 9<sup>th</sup>, 2025.

**Proposed Location; Directional Well**

	<u>Footages</u>	<u>Unit/Lot</u>	<u>Sec.</u>	<u>Twsp</u>	<u>Range</u>	<u>County</u>
Surface	1539 FSL & 1823 FEL	J	05	30N	11W	San Juan
Terminus	1956 FSL & 2324 FEL	J	05	30N	11W	San Juan

**Proposed Unit**

<u>Description</u>	<u>Acres</u>	<u>Pool</u>	<u>Pool Code</u>
S/2 Section 05	318.83	Basin Dakota	71599

This directional well was completed into an unorthodox location described above in the referenced pool or formation. Special pool rule R-10987-B-2 governs this well to provide for 320-acre spacing units with setbacks no closer than 660 feet, nor closer than 10 feet to any interior quarter – quarter section line.

Administrative Order NSL - 9221  
Hilcorp Energy Company  
Page 2 of 2

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The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(6) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of the perforated zone referenced above within the proposed spacing unit.

This well's completed interval is as close as 655 feet to the northern edge of the spacing unit. Encroachment will impact the following tracts.

Section 05, encroachment to the N/2

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in 19.15.2.7(A)(8) NMAC, in all adjoining units towards which the proposed location encroaches.

Division understands you are requesting this unorthodox location to maximize recovery of oil and gas reserves and minimize surface disturbance. This will prevent waste within the Dakota formation underlying the S/2 of Section 05.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per 19.15.15.13 (B) NMAC, **Division approves this unorthodox location.**

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as Division deems necessary.



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**Albert C.S. Chang**  
Division Director  
AC/lrl

**Date:** 2/1/2026

Revised March 23, 2017

ID NO. 533839

NSL - 9221

RECEIVED: <b>12/10/25</b>	REVIEWER:	TYPE:	APP NO:
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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:** Hilcorp Energy Company **OGRID Number:** 372171  
**Well Name:** Rhoda Abrams 2P **API:** TBD  
**Pool:** Basin Dakota **Pool Code:** 71599

**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

<u>FOR OCD ONLY</u>	
<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.

Carson Rice

Print or Type Name

Signature

11/25/2025  
Date

713-757-7108  
Phone Number

carice@hilcorp.com  
e-mail Address



December 8, 2025

NEW MEXICO OIL CONSERVATION DIVISION  
1220 SOUTH ST. FRANCIS DRIVE  
SANTA FE, NEW MEXICO 87505  
ATTN: MR. LEONARD LOWE

Re: Unorthodox Well Location Application – San Juan Basin, New Mexico

Dear Mr. Lowe:

Pursuant to Division Rule 19.15.15.13, Hilcorp Energy Company hereby requests administrative approval for an unorthodox well location with the following details:

**Well Details & Relevant Proration Units:**

**Well** – Rhoda Abrams 2P (API: 30-045-TBD)  
**Type** – Directional  
**SHL** – Unit J, 1539' FSL & 1823' FEL  
**BHL** – Unit J, 655' FNL & 1956' FSL  
**Subject Proration Unit** – S/2 of Section 5, T30N, R11W  
**Affected Proration Unit** – N/2 of Section 5, T30N, R11W

**Basin Dakota Gas Pool (Code 71599) – Order R-10982-B-1)**

Rule (I.C.1) provides wells, “Drilled on a GPU shall be located not closer than 660’ to the outer boundary of the GPU and not closer than 10’ to any interior quarter or quarter-quarter section line or subdivision inner boundary”. The subject wellbore, however, is situated approximately 655 feet from the north line boundary of the S/2 spacing unit. Thus, the Basin Dakota completion contemplated herein becomes unorthodox by default.

Pursuant to Paragraph (2) of Subsection A of 19.15.4.12 NMAC, the affected spacing unit encroached upon by this unorthodox location (shaded in red on the map enclosed) is the N/2 of Section 5, T30N, R11W; and contains a Federal lease. **Hilcorp owns 100% working interest in and operates the Rhoda Abrams 2M (30-045-34406) and the Rhoda Abrams 2N (30-045-35090) the two (2) Dakota completions in the affected spacing unit.**

To Support this request, the following information is hereby submitted for your review:

1. Administrative Application Checklist
2. C-102
3. Unorthodox Location Plat pursuant to Paragraph (2) of Subsection A of 19.15.4.12 NMAC
4. Proof of notification to BLM for federal minerals in affected spacing unit

This unorthodox location is necessary to maximize recovery of oil and gas reserves and minimize surface disturbance. For questions, please contact me at the email/number below.

Sincerely,

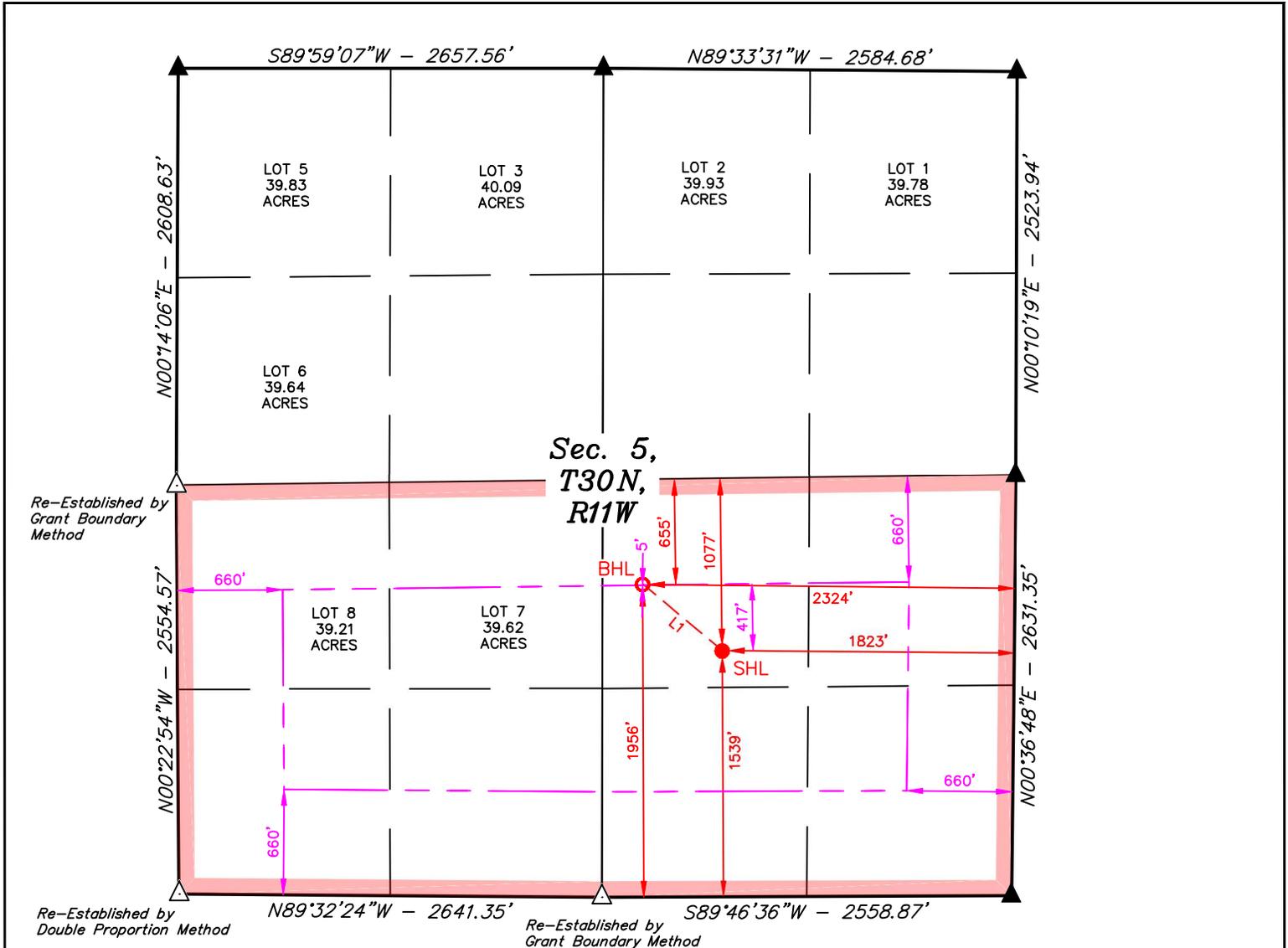
HILCORP SAN JUAN, L.P.  
By: HILCORP ENERGY COMPANY,  
Its General Partner

A handwritten signature in blue ink, appearing to read 'Carson Rice'.

Carson Rice  
Sr. Landman  
713-757-7108  
[carice@hilcorp.com](mailto:carice@hilcorp.com)



Property Name RHODA ABRAMS	Well Number 2P	Drawn By C.D. 11-20-25	Revised By REV. 2 C.D. 12-09-25 (TYPO CORRECTIONS)
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NAD 83 (SURFACE HOLE LOCATION)	
LATITUDE = 36°50'17.93" (36.838315°)	
LONGITUDE = -108°00'40.73" (-108.011314°)	
NAD 27 (SURFACE HOLE LOCATION)	
LATITUDE = 36°50'17.92" (36.838311°)	
LONGITUDE = -108°00'38.48" (-108.010690°)	
STATE PLANE NAD 83 (N.M. WEST)	
N: 2124517.71' E: 2671010.14'	
STATE PLANE NAD 27 (N.M. WEST)	
N: 2124454.26' E: 448099.80'	

NAD 83 (BOTTOM HOLE LOCATION)	
LATITUDE = 36°50'22.04" (36.839454°)	
LONGITUDE = -108°00'46.85" (-108.013014°)	
NAD 27 (BOTTOM HOLE LOCATION)	
LATITUDE = 36°50'22.02" (36.839451°)	
LONGITUDE = -108°00'44.61" (-108.012390°)	
STATE PLANE NAD 83 (N.M. WEST)	
N: 2124933.47' E: 2670513.22'	
STATE PLANE NAD 27 (N.M. WEST)	
N: 2124870.01' E: 447602.89'	

LINE TABLE		
LINE	DIRECTION	LENGTH
L1	N50°04'54"W	647.90'



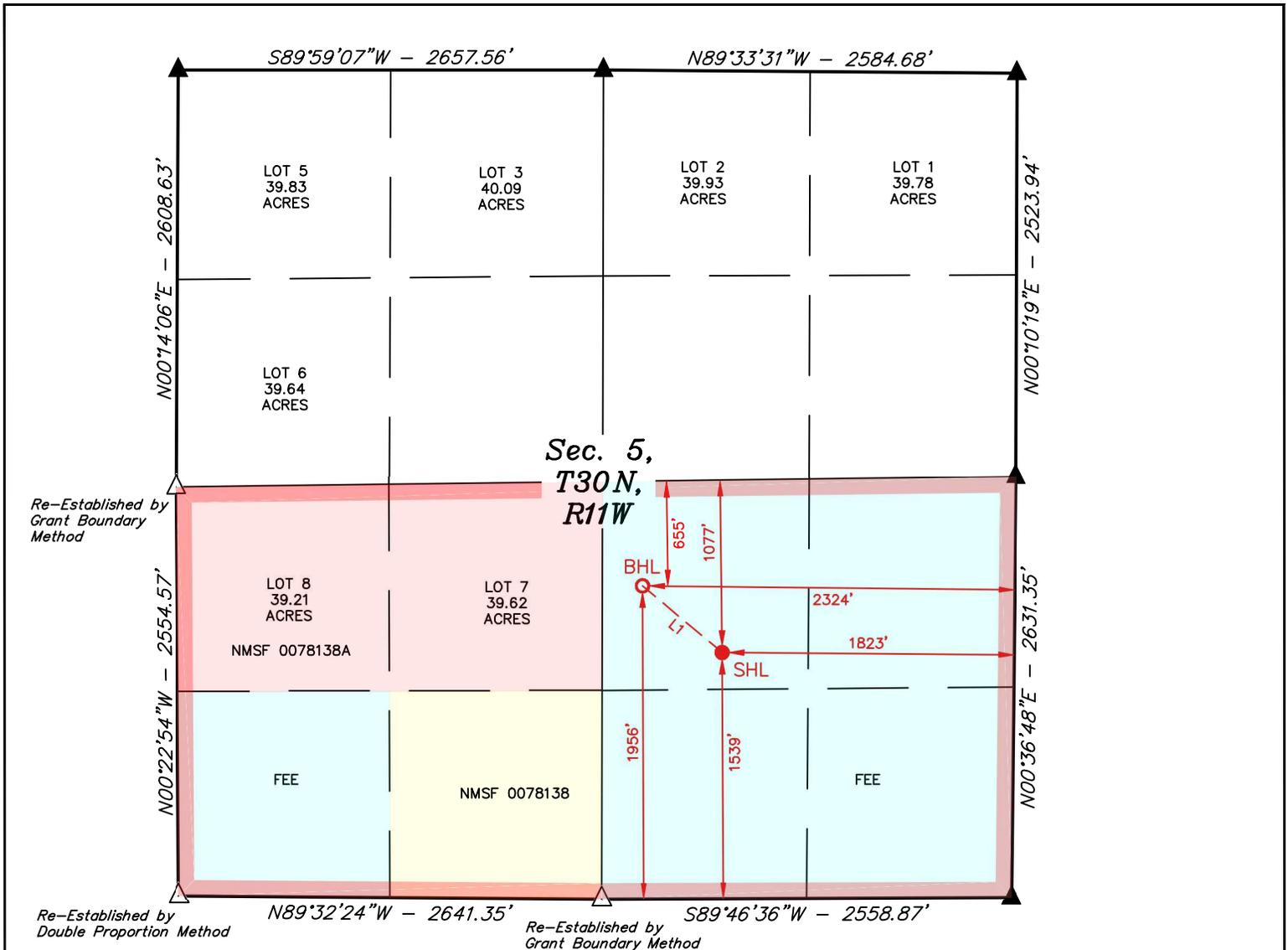
SCALE

- = SURFACE HOLE LOCATION
- = BOTTOM HOLE LOCATION
- ▲ = SECTION CORNER LOCATED
- △ = SECTION CORNER RE-ESTABLISHED. (Not Set on Ground.)
- = DESIGNATED SPACING UNIT
- = SETBACK BOUNDARY

**NOTE:**

- Distances referenced on plat to section lines are perpendicular.
- Bearings, Distances, Coordinates and Areas are based on the New Mexico Coordinate System of 1983, West Zone, in U.S. Feet.
- Section breakdown information for this plat may be obtained from Uintah Engineering & Land Survey.

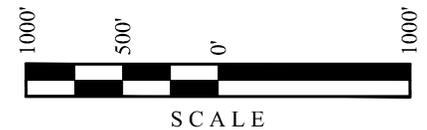
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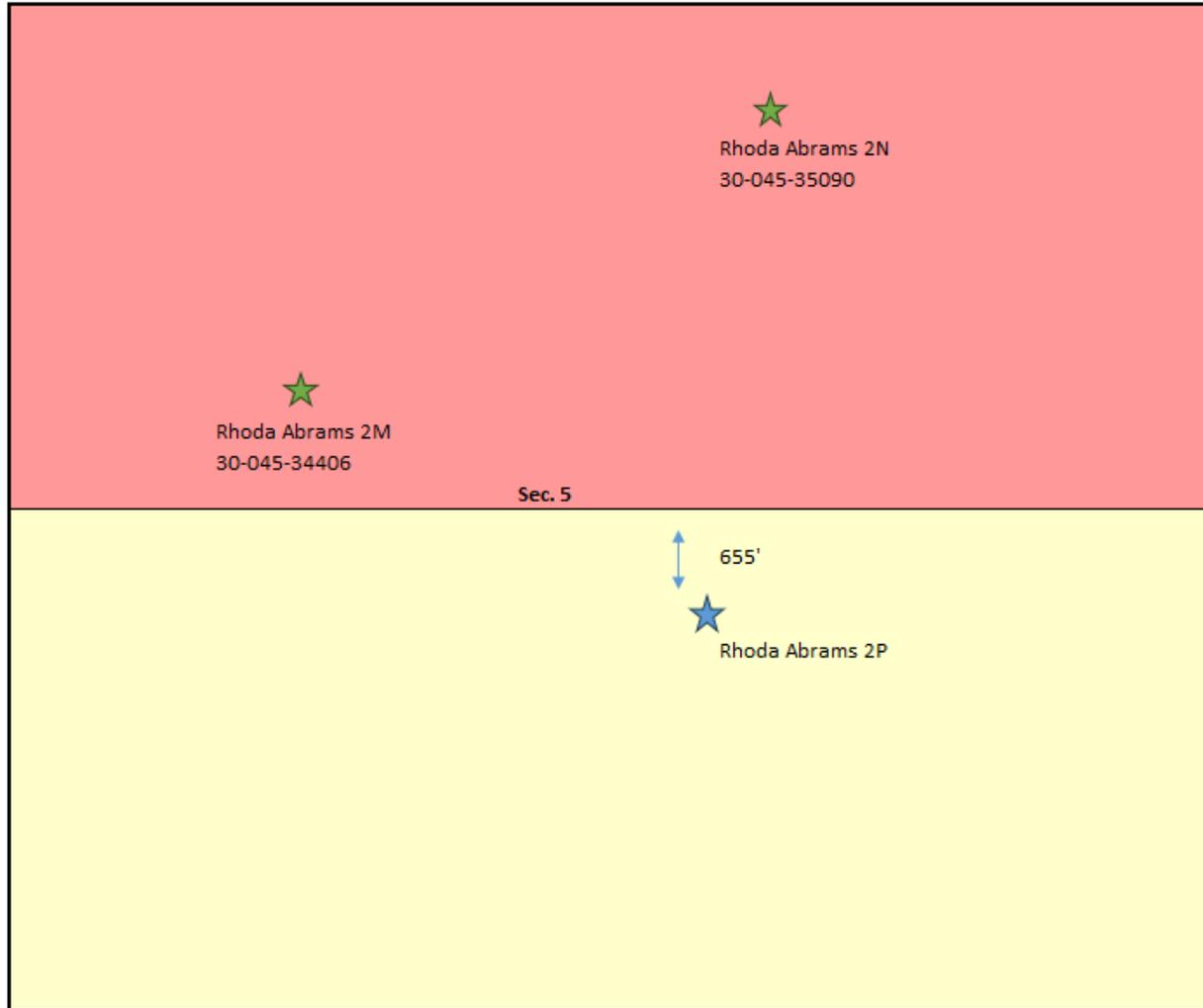


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- = DESIGNATED SPACING UNIT

**NOTE:**

- Distances referenced on plat to section lines are perpendicular.
- Bearings, Distances, Coordinates and Areas are based on the New Mexico Coordinate System of 1983, West Zone, in U.S. Feet.
- Colored areas within section lines represent oil & gas leases.
- Section breakdown information for this plat may be obtained from Uintah Engineering & Land Survey.

Unorthodox Location Plat  
Basin Dakota  
T30N-R11W



	Target Well
	Affected Well
	Affected DK Spacing N/2
	Target DK Spacing S/2



December 8, 2025

*Sent via Certified Mail*  
**9214 8969 0099 9790 1852 3101 15**

Bureau of Land Management  
6251 College Blvd A  
Farmington, NM 87402

**Re: Unorthodox Well Location Application for Basin Dakota  
Rhoda Abrams 2P (API: TBD)  
SHL – Unit J, 1539' FSL & 1823' FEL  
BHL – Unit J, 655' FNL & 1956' FSL  
Dakota Spacing Unit: S/318.83 acres in Section 5, T30N, R11W  
San Juan County, New Mexico**

To Whom it May Concern:

Pursuant to 19.15.15.13 NMAC, Hilcorp has filed an Unorthodox Location Application with the New Mexico Oil Conservation Division. The spacing unit the subject unorthodox location encroaches upon contains a federal lease. Thus, this letter serves to provide the BLM with notice as required by 19.15.4.12.A.2 NMAC.

Please refer to copies of the application materials enclosed for further details. Per 19.15.15.13 NMAC, objections shall be made in writing with the NMOCD within twenty (20) days from the date of this letter.

Should have any questions concerning this application, please feel free to call me at the number below.

Sincerely,

A handwritten signature in blue ink that reads 'Carson Rice'.

Carson Rice  
Sr. Landman  
713-757-7108  
[carice@hilcorp.com](mailto:carice@hilcorp.com)

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/oecd/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 533839

**CONDITIONS**

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 533839
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	12/11/2025