

DHC - 5558

Revised March 23, 2017

ID NO. 544435

RECEIVED: 01/20/26	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: SAN JUAN 28-6 UNIT 128M **API:** 30-039-27845
Pool: BASIN FRUITLAND COAL, SOUTH BLANCO PICTURED CLIFFS **Pool Code:** 71629,72439

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.

DAWN NASH-DEAL

Print or Type Name

Dawnnash Deal

Signature

01/17/2026
Date

346-237-2143
Phone Number

e-mail Address

District I
1625 N. French Drive, Hobbs, NM 88240

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-107A
Revised August 1, 2011

District II
811 S. First St., Artesia, NM 88210

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

APPLICATION TYPE
 Single Well
 Establish Pre-Approved Pools
EXISTING WELLBORE
 Yes No

District III
1000 Rio Brazos Road, Aztec, NM 87410

District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

APPLICATION FOR DOWNHOLE COMMINGLING

Hilcorp Energy Company 382 Road 3100, Aztec, NM 87410
Operator Address

SAN JUAN 28-6 UNIT **128M** **L, 17, 28N, 06W** **RIO ARRIBA**
Lease Well No. Unit Letter-Section-Township-Range County

OGRID No. 372171 Property Code 318710 API No. 30-039-27845 Lease Type: Federal State Fee

DATA ELEMENT	UPPER ZONE	Blanco P.C. South INTERMEDIATE ZONE	INTERMEDIATE ZONE	LOWER ZONE
Pool Name	BASIN FRUITLAND COAL	SOUTH BLANCO PICTURED CLIFFS	BLANCO MESAVERDE (PRORATED GAS)	BASIN DAKOTA (PRORATED GAS)
Pool Code	71629	72439	72319	71599
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	~3,193'-3,448'	~3,448'-3,544'	4,427'-5,979'	7,705'-7,884'
Method of Production (Flowing or Artificial Lift)	ARTIFICIAL LIFT	ARTIFICIAL LIFT	ARTIFICIAL LIFT	ARTIFICIAL LIFT
Bottomhole Pressure (Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone)	261 BHP	230 BHP	417 BHP	1179 BHP
Oil Gravity or Gas BTU (Degree API or Gas BTU)	1159 BTU	1215 BTU	1275 BTU	1140 BTU
Producing, Shut-In or New Zone	NEW ZONE	NEW ZONE	PRODUCING	PRODUCING
Date and Oil/Gas/Water Rates of Last Production. (Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data.)	Date: Rates: Oil: Gas: Water:	Date: Rates: Oil: Gas: Water:	Date: 11/1/2025 Rates: Oil: 0 BBL Gas: 2,708 MCF Water: 0 BBL	Date: 11/1/2025 Rates: Oil: 0 BBL Gas: 1,216 MCF Water: 0 BBL
Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)	Oil Gas %	Oil Gas %	Oil Gas %	Oil Gas %

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones? Yes No
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail? Yes No

Are all produced fluids from all commingled zones compatible with each other? Yes No

Will commingling decrease the value of production? Yes No

If this well is on, or communitized with, state or federal lands, has either the Commissioner of Public Lands or the United States Bureau of Land Management been notified in writing of this application? Yes No

NMOCDC Reference Case No. applicable to this well: PER R-10696 HILCORP IS EXEMPT FROM PROVIDING NOTICE TO OWNERS (EXCLUDING SLO/BLM, WHERE APPLICABLE).

Attachments:

- C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
- Production curve for each zone for at least one year. (If not available, attach explanation.)
- For zones with no production history, estimated production rates and supporting data.
- Data to support allocation method or formula.
- Notification list of working, royalty and overriding royalty interests for uncommon interest cases.
- Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Dawn Nash Deal TITLE Operations/Regulatory Technician DATE 01/19/2026

TYPE OR PRINT NAME Dawn Nash Deal TELEPHONE NO. (346) 237-2143

E-MAIL ADDRESS Dnash@hilcorp.com

District I
PO Box 1980, Hobbs, NM 88241-1980

State of New Mexico
Energy, Minerals & Natural Resources Department

Form C-102
Revised February 21, 1994

District II
PO Drawer DD, Artesia, NM 88211-0719

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

District III
1000 Rio Brazos Rd., Aztec, NM 87410

AMENDED REPORT

District IV
PO Box 2088, Santa Fe, NM 87504-2088

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number 30-039 27845		*Pool Code 71599/72319	*Pool Name Basin Dakota/Blanco Mesaverde
*Property Code 7462	*Property Name SAN JUAN 28-6 UNIT		*Well Number 128M
*OGRID No. 14538	*Operator Name BURLINGTON RESOURCES OIL & GAS COMPANY, LP		*Elevation 6628'

¹⁰ Surface Location

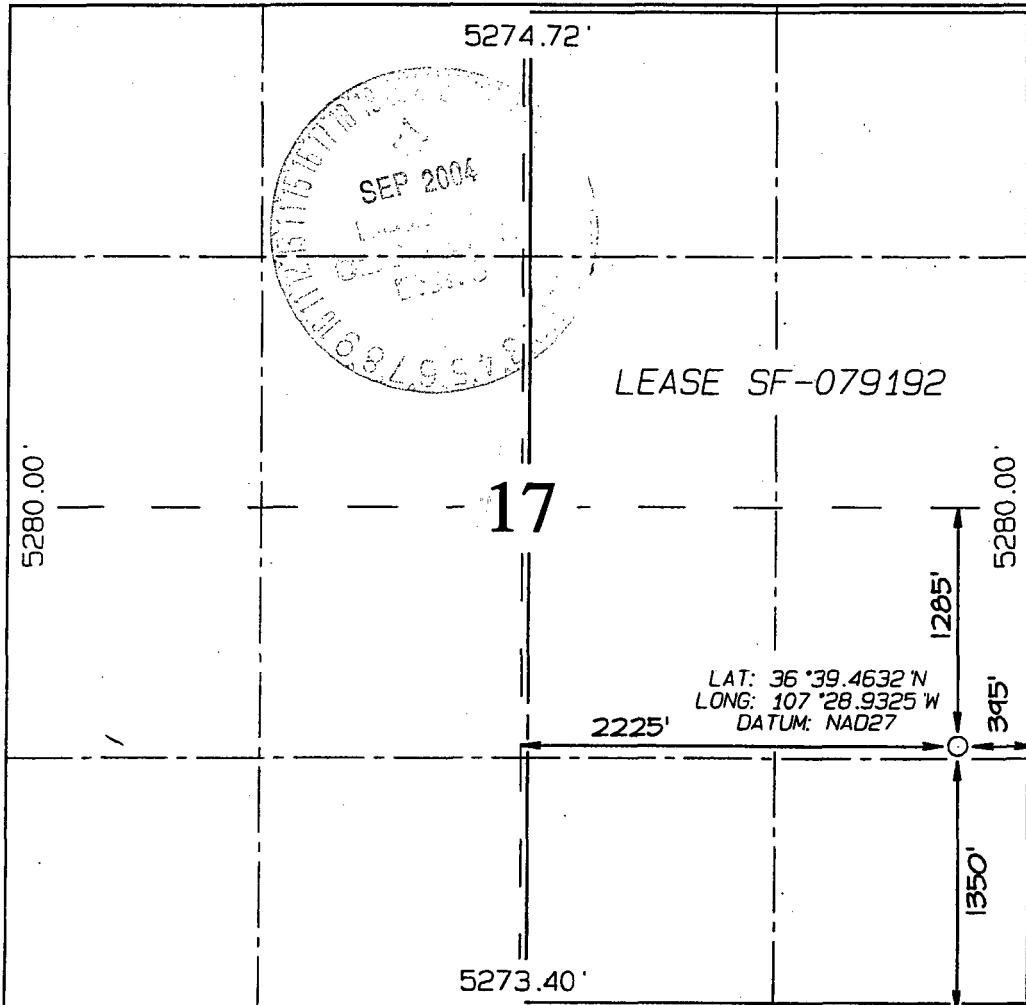
UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County
I	17	28N	6W		1350	SOUTH	395	EAST	RIO ARRIBA

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Ion	Feet from the	North/South line	Feet from the	East/West line	County

¹² Dedicated Acres DK E/2 320 MV E/2 320	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



¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief

Joni Clark
Signature
Joni Clark
Printed Name
Regulatory Specialist
Title

2-26-04
Date

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 and correct to the best of my belief.

Survey Date: NOVEMBER 18, 2003

Signature and Seal of Professional Surveyor



JASON C. EDWARDS
Certificate Number 15269

Water Compatibility in the San Juan Basin

- The San Juan basin has productive siliciclastic reservoirs (Pictured Cliffs, Blanco Mesaverde, Basin Dakota, etc.) and a productive coalbed methane reservoir (Basin Fruitland Coal).
 - These siliciclastic and coalbed methane reservoirs are commingled extensively throughout the basin in many different combinations with no observed damage from clay swelling due to differing formation waters.
 - The samples below all show fresh water with low TDS.
 - Data taken from standalone completions in the zone of interest within a 2 mile radius of the well. A farther radius is used if there is not enough data for a proper statistical analysis.

Well Name	API
SAN JUAN 28-6 UNIT 128M	3003927845

FRC Offset (3.02 MILES)		PC Offset (5.19 MILES)		MV Offset (5.97 MILES)		DK Offset (6.28 MILES)	
API	3003925112	API	3003925897	API	3003926806	API	3003927006
Property	SAN JUAN 28-7 UNIT 403	Property	SAN JUAN 29-7 UNIT 166	Property	SAN JUAN 29-7 UNIT 66B	Property	SAN JUAN 28-7 UNIT 241F
CationBarium	0	CationBarium	0.00	CationBarium	0.1	CationBarium	0.12
CationBoron	0	CationBoron	0	CationBoron	0	CationBoron	0
CationCalcium	2.2	CationCalcium	80.00	CationCalcium	3.4	CationCalcium	1.9
CationIron	5.2	CationIron	62.10	CationIron	31.4	CationIron	116
CationMagnesium	0.32	CationMagnesium	19.50	CationMagnesium	0.43	CationMagnesium	0.35
CationManganese	0.1	CationManganese	1.98	CationManganese	0.75	CationManganese	1.64
CationPhosphorus	0	CationPhosphorus	0	CationPhosphorus	0	CationPhosphorus	0
CationPotassium	0	CationPotassium	0	CationPotassium	10	CationPotassium	10
CationStrontium	0	CationStrontium	0.00	CationStrontium	1	CationStrontium	1
CationSodium	1164.2	CationSodium	762.80	CationSodium	10	CationSodium	10
CationSilica	0	CationSilica	0	CationSilica	7.38	CationSilica	10.7
CationZinc	0	CationZinc	0	CationZinc	0.5	CationZinc	0.5
CationAluminum	0	CationAluminum	0	CationAluminum	0	CationAluminum	0
CationCopper	0	CationCopper	0	CationCopper	0	CationCopper	0
CationLead	0	CationLead	0	CationLead	1.00	CationLead	1
CationLithium	0	CationLithium	0	CationLithium	0	CationLithium	0
CationNickel	0	CationNickel	0	CationNickel	0	CationNickel	0
CationCobalt	0	CationCobalt	0	CationCobalt	0	CationCobalt	0
CationChromium	0	CationChromium	0	CationChromium	0	CationChromium	0
CationSilicon	0	CationSilicon	0	CationSilicon	5.00	CationSilicon	5
CationMolybdenum	0	CationMolybdenum	0	CationMolybdenum	0	CationMolybdenum	0
AnionChloride	1700	AnionChloride	1200.00	AnionChloride	10	AnionChloride	48
AnionCarbonate	0	AnionCarbonate	0.00	AnionCarbonate	10	AnionCarbonate	10
AnionBicarbonate	183	AnionBicarbonate	427	AnionBicarbonate	72	AnionBicarbonate	137
AnionBromide	0	AnionBromide	0	AnionBromide	0	AnionBromide	0
AnionFluoride	0	AnionFluoride	0	AnionFluoride	0	AnionFluoride	0
AnionHydroxyl	0	AnionHydroxyl	0	AnionHydroxyl	10	AnionHydroxyl	10
AnionNitrate	0	AnionNitrate	0	AnionNitrate	0	AnionNitrate	0
AnionPhosphate	925.6	AnionPhosphate	0	AnionPhosphate	0	AnionPhosphate	0
AnionSulfate	10	AnionSulfate	80.00	AnionSulfate	8	AnionSulfate	3
phField	6.73	phField	0	phField	6.26	phField	5.36
phCalculated	7.01	phCalculated	6.83	phCalculated	6.70	phCalculated	5.61
TempField	0	TempField	0	TempField	72.00	TempField	60
TempLab	0	TempLab	0	TempLab	0	TempLab	0
OtherFieldAlkalinity	7991.88	OtherFieldAlkalinity	342.16	OtherFieldAlkalinity	171	OtherFieldAlkalinity	366
OtherSpecificGravity	1	OtherSpecificGravity	0	OtherSpecificGravity	1	OtherSpecificGravity	1
OtherTDS	2962	OtherTDS	2435.00	OtherTDS	370	OtherTDS	225
OtherCaCO3	12113.31	OtherCaCO3	0	OtherCaCO3	10.3	OtherCaCO3	66.2
OtherConductivity	0	OtherConductivity	0	OtherConductivity	202	OtherConductivity	863
DissolvedCO2	360	DissolvedCO2	0	DissolvedCO2	110.00	DissolvedCO2	280
DissolvedO2	0	DissolvedO2	0	DissolvedO2	0	DissolvedO2	0
DissolvedH2S	40	DissolvedH2S	13.00	DissolvedH2S	0.00	DissolvedH2S	0
GasPressure	0	GasPressure	0	GasPressure	0	GasPressure	0
GasCO2	8	GasCO2	4.00	GasCO2	0	GasCO2	0
GasCO2PP	0	GasCO2PP	0	GasCO2PP	0	GasCO2PP	0
GasH2S	0	GasH2S	0.00	GasH2S	0	GasH2S	0
GasH2SPP	0	GasH2SPP	0	GasH2SPP	0	GasH2SPP	0
PitzerCaCO3_70	0	PitzerCaCO3_70	0	PitzerCaCO3_70	0	PitzerCaCO3_70	0
PitzerBaSO4_70	0	PitzerBaSO4_70	0	PitzerBaSO4_70	0	PitzerBaSO4_70	0
PitzerCaSO4_70	0	PitzerCaSO4_70	0	PitzerCaSO4_70	0	PitzerCaSO4_70	0
PitzerSrSO4_70	0	PitzerSrSO4_70	0	PitzerSrSO4_70	0	PitzerSrSO4_70	0
PitzerFeCO3_70	0	PitzerFeCO3_70	0	PitzerFeCO3_70	0	PitzerFeCO3_70	0
PitzerCaCO3_220	0	PitzerCaCO3_220	0	PitzerCaCO3_220	0	PitzerCaCO3_220	0
PitzerBaSO4_220	0	PitzerBaSO4_220	0	PitzerBaSO4_220	0	PitzerBaSO4_220	0
PitzerCaSO4_220	0	PitzerCaSO4_220	0	PitzerCaSO4_220	0	PitzerCaSO4_220	0
PitzerSrSO4_220	0	PitzerSrSO4_220	0	PitzerSrSO4_220	0	PitzerSrSO4_220	0
PitzerFeCO3_220	0	PitzerFeCO3_220	0	PitzerFeCO3_220	0	PitzerFeCO3_220	0

Gas Compatibility in the San Juan Basin
 - The San Juan basin has productive siliciclastic reservoirs (Pictured Cliffs, Blanco Mesaverde, Basin Dakota, etc.) and a productive coalbed methane reservoir (Basin Fruitland Coal).
 - These siliciclastic and coalbed methane reservoirs are commingled extensively throughout the basin in many different combinations with no observed damage from clay swelling due to differing formation waters or gas composition.
 - The samples below all show offset gas analysis variability by formation is low.
 - Data taken from standalone completions in the zone of interest within a 2 mile radius of the well. A farther radius is used if there is not enough data for a proper statistical analysis.

Well Name	API
SAN JUAN 28-6 UNIT 128M	3003927845

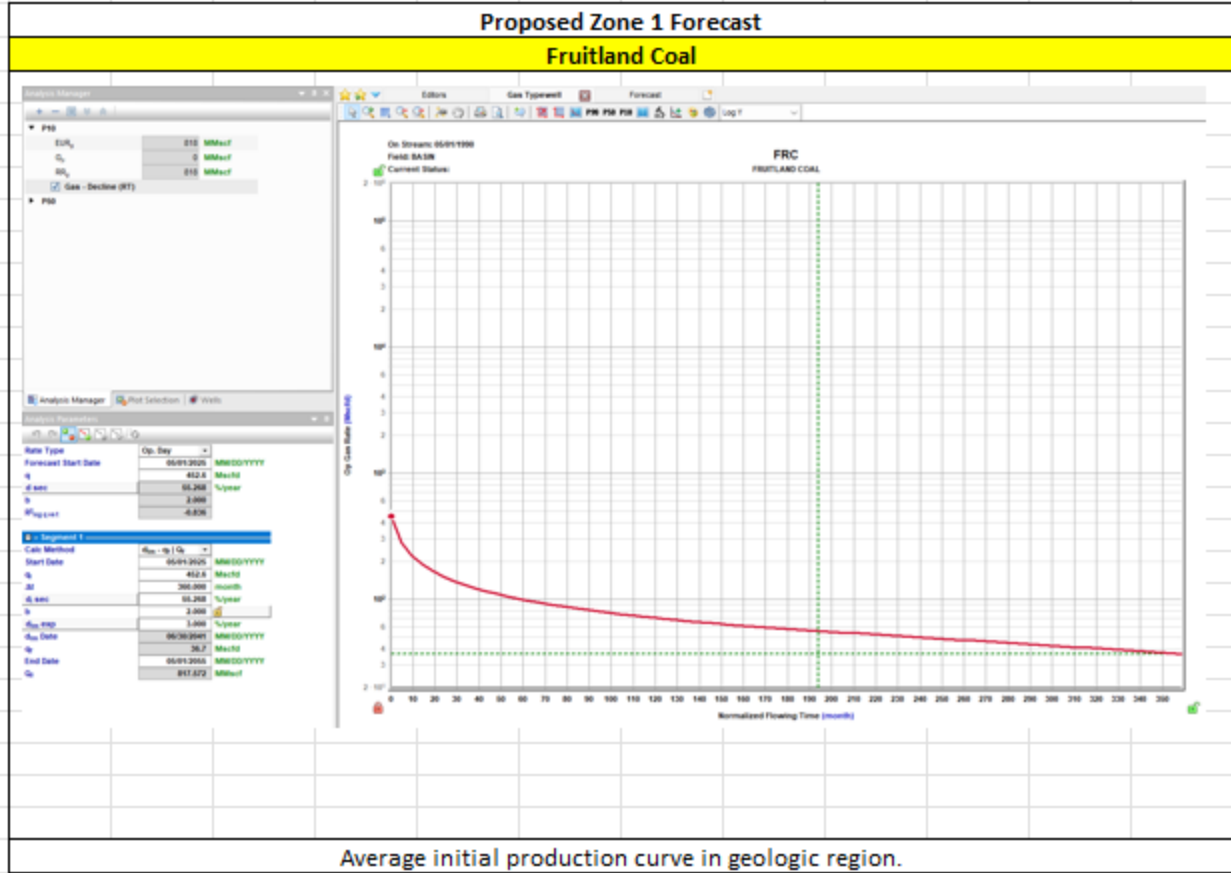
FRC Offset (7.91 MILES)		PC Offset (7.49 MILES)		MV Offset (4.84 MILES)		DK Offset (6.32 MILES)	
AssetCode	3003924298	AssetCode	3003920509	AssetCode	3003927250	AssetCode	3003926938
AssetName	SAN JUAN 29-7 UNIT NP 513	AssetName	SAN JUAN 29-7 UNIT 103	AssetName	SAN JUAN 28-7 UNIT 61B	AssetName	SAN JUAN 28-7 UNIT 230F
CO2	0.004735	CO2	0.002269	CO2	0.00932	CO2	0.008434
N2	0.003974	N2	0.005198	N2	0.002537	N2	0.003343
C1	0.865605	C1	0.82752	C1	0.781186	C1	0.819665
C2	0.060088	C2	0.07061	C2	0.110063	C2	0.087053
C3	0.039999	C3	0.054778	C3	0.055017	C3	0.045647
ISOC4	0.008179	ISOC4	0.01174	ISOC4	0.009261	ISOC4	0.009007
NC4	0.008865	NC4	0.014186	NC4	0.015693	NC4	0.012044
ISOC5	0.003009	ISOC5	0.004943	ISOC5	0.004703	ISOC5	0.004521
NC5	0.001949	NC5	0.003414	NC5	0.003486	NC5	0.003087
NEOC5	0	NEOC5	0	NEOC5	0	NEOC5	0
C6	0	C6	0	C6	0	C6	0
C6_PLUS	0.003597	C6_PLUS	0.005342	C6_PLUS	0.008734	C6_PLUS	0.007199
C7	0	C7	0	C7	0	C7	0
C8	0	C8	0	C8	0	C8	0
C9	0	C9	0	C9	0	C9	0
C10	0	C10	0	C10	0	C10	0
AR	0	AR	0	AR	0	AR	0
CO	0	CO	0	CO	0	CO	0
H2	0	H2	0	H2	0	H2	0
O2	0	O2	0	O2	0	O2	0
H2O	0	H2O	0	H2O	0	H2O	0
H2S	0	H2S	0	H2S	0	H2S	0.00
HE	0	HE	0	HE	0	HE	0
C_O_S	0	C_O_S	0	C_O_S	0	C_O_S	0
CH3SH	0	CH3SH	0	CH3SH	0	CH3SH	0
C2H5SH	0	C2H5SH	0	C2H5SH	0	C2H5SH	0
CH2S3_2CH3S	0	CH2S3_2CH3S	0	CH2S3_2CH3S	0	CH2S3_2CH3S	0
CH2S	0	CH2S	0	CH2S	0	CH2S	0
C6HV	0	C6HV	0	C6HV	0	C6HV	0
CO2GPM	0	CO2GPM	0	CO2GPM	0	CO2GPM	0
N2GPM	0	N2GPM	0	N2GPM	0	N2GPM	0
C1GPM	0	C1GPM	0	C1GPM	0	C1GPM	0
C2GPM	1.6115	C2GPM	1.8945	C2GPM	2.9542	C2GPM	2.3357
C3GPM	1.105	C3GPM	1.514	C3GPM	1.5212	C3GPM	1.2617
ISOC4GPM	0.2684	ISOC4GPM	0.3854	ISOC4GPM	0.3042	ISOC4GPM	0.2957
NC4GPM	0.2803	NC4GPM	0.4487	NC4GPM	0.4965	NC4GPM	0.3809
ISOC5GPM	0.1104	ISOC5GPM	0.1814	ISOC5GPM	0.1726	ISOC5GPM	0.1659
NC5GPM	0.0708	NC5GPM	0.1242	NC5GPM	0.1268	NC5GPM	0.1123
C6_PLUSGPM	0.161	C6_PLUSGPM	0.2392	C6_PLUSGPM	0.3912	C6_PLUSGPM	0.3224

The near wellbore shut-in bottom hole pressures of the above reservoirs are much lower than the calculated far-field stabilized reservoir pressured due to the low permeability of the reservoirs. Based on pressure transient analysis performed in the San Juan Basin, it would take 7-25 years for shut-in bottom hole pressures to build up to the calculated far-field reservoir pressure. Our observation is that even for areas of high static reservoir pressures, the low permeability of the reservoir rock results in rapid depletion of the near-fracture region, quickly enough that the wells are unable to produce without the aid of a plunger. Given low permeabilities and low wellbore flowing pressures in the above reservoirs, loss of reserves due to cross-flow is not an issue during producing or shut-in periods. Given low shut-in bottom hole pressures, commingling the above reservoirs in this well will not result in shut-in or flowing wellbore pressures in excess of any commingled pool's fracture parting pressure. The pressures provided in the C-107A are based on shut-in bottom hole pressures of offset standalone wells which match expected near-wellbore shut-in bottom hole pressures of this proposed commingled completion.

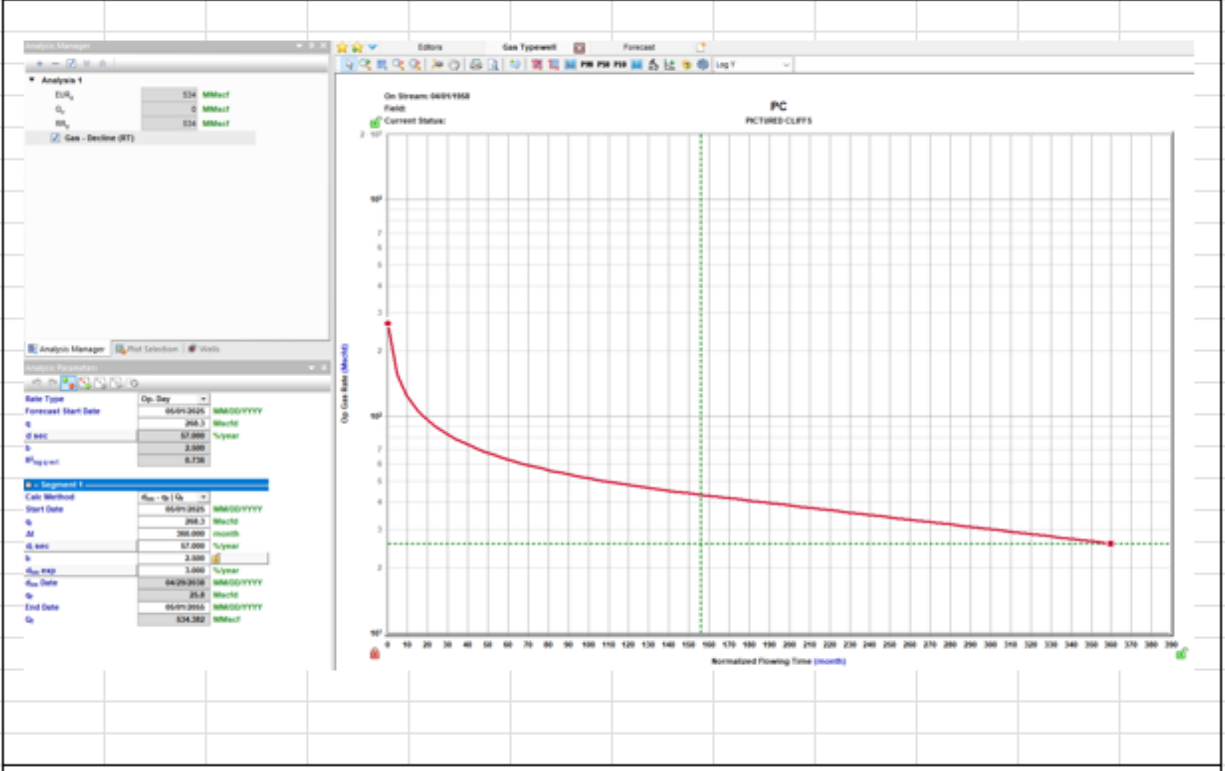
<p>Shut in pressures were calculated for operated offset standalone wells in each of the zones being commingled in the well in question via the following process:</p> <p>1) Wells were shut in for 24 hours 2) Echometer was used to obtain a fluid level 3) Shut in BHP was calculated for the proposed commingled completion</p>		
API	Well Name	Formation
List of wells used to calculate BHPs for the Project:		
3003925240	San Juan 29-7 Unit 534	FRC
3003926995	San Juan 29-7 Unit 181	PC
3003925859	San Juan 29-7 Unit 40B	MV
3003921330	San Juan 29-7 Unit 109	DK
<p>I believe each of the reservoirs to be continuous and in a similar state of depletion at this well and at each of the wells from which the pressures are being derived.</p>		

Note: BTU Data taken from standalone completions in the zone of interest within a 2 mile radius of the well.

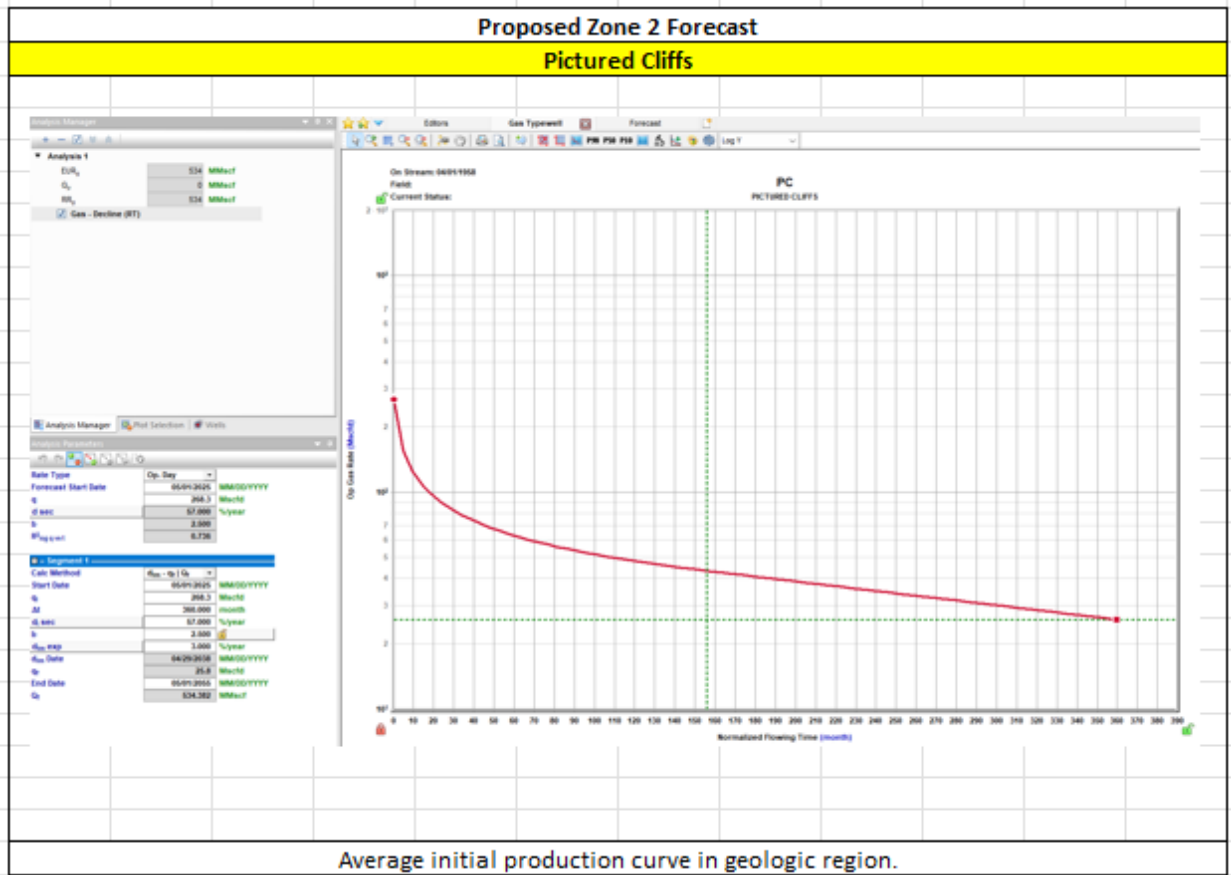
A farther radius is used if there is not enough data for a proper statistical analysis.



Proposed Zone 2 Forecast Pictured Cliffs



Average initial production curve in geologic region.



HEC Comments

The production forecasts have been generated using type curves of production in the surrounding trend.

These zones are proposed to be commingled because the application of dual completions impedes the ability to produce the shallow zone without artificial lift and the deeper zones with reduced artificial lift efficiency. All horizons will require artificial lift due to low bottomhole pressure (BHP) and permeability.

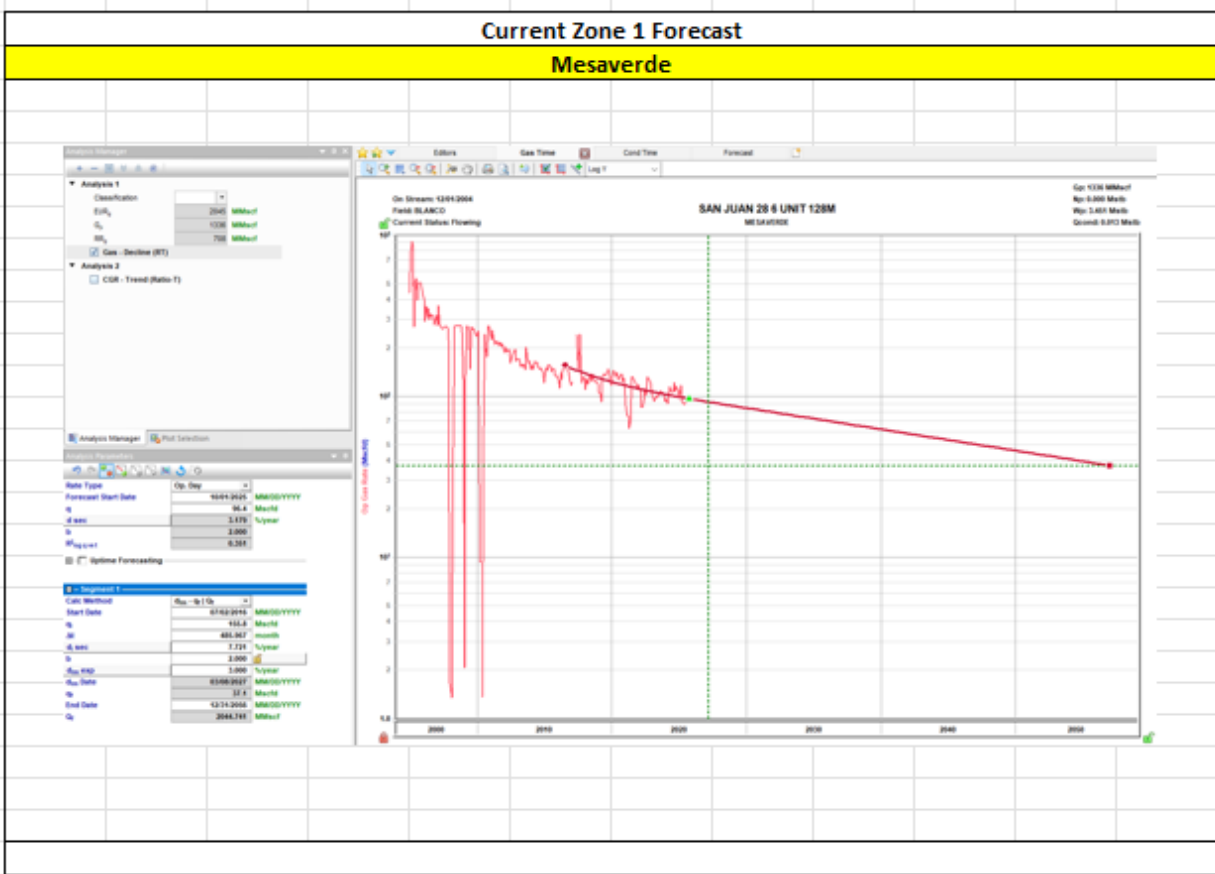
The BHPs of all zones, producing and non-producing, were estimated based upon basinwide Moving-Domain Material Balance models that have proven to approximate the pressure in the given reservoirs well in this portion of the basin. These models were constructed incorporating reservoir dynamics and physics, historic production, and observed pressure data. Historic commingling operations have proven reservoir fluids are compatible.

Production Allocation Method - Subtraction

Gas Allocation:

Production for the downhole commingle will be allocated using the subtraction method in agreement with local agencies. **The base formations are the Mesaverde and Dakota. The added formations to be commingled are the Fruitland Coal and Pictured Cliffs.** The subtraction method applies an average monthly production forecast to the base formation using historic production. All production from this well exceeding the forecast will be allocated to the new formation. After 3 years production will stabilize. A production average will be gathered during the 4th year and will be utilized to create a fixed percentage based allocation.

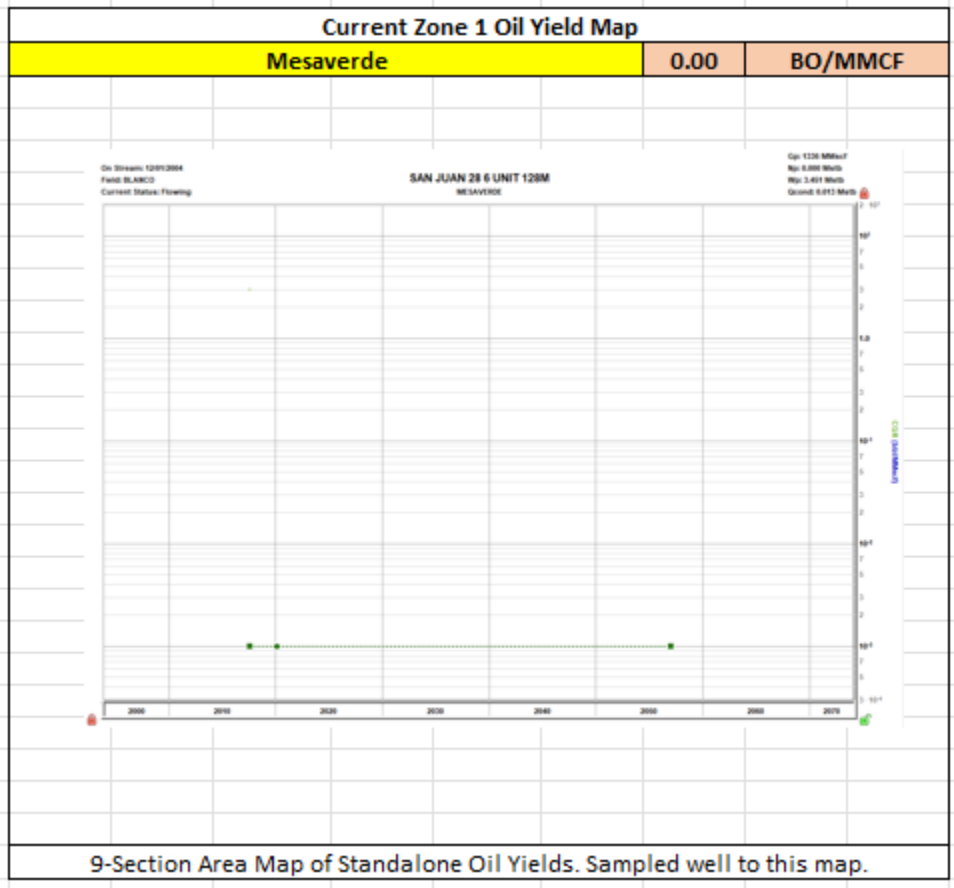
Formation	Remaining Reserves (MMcf)	% Gas Allocation
FRC	818	61%
PC	534	39%

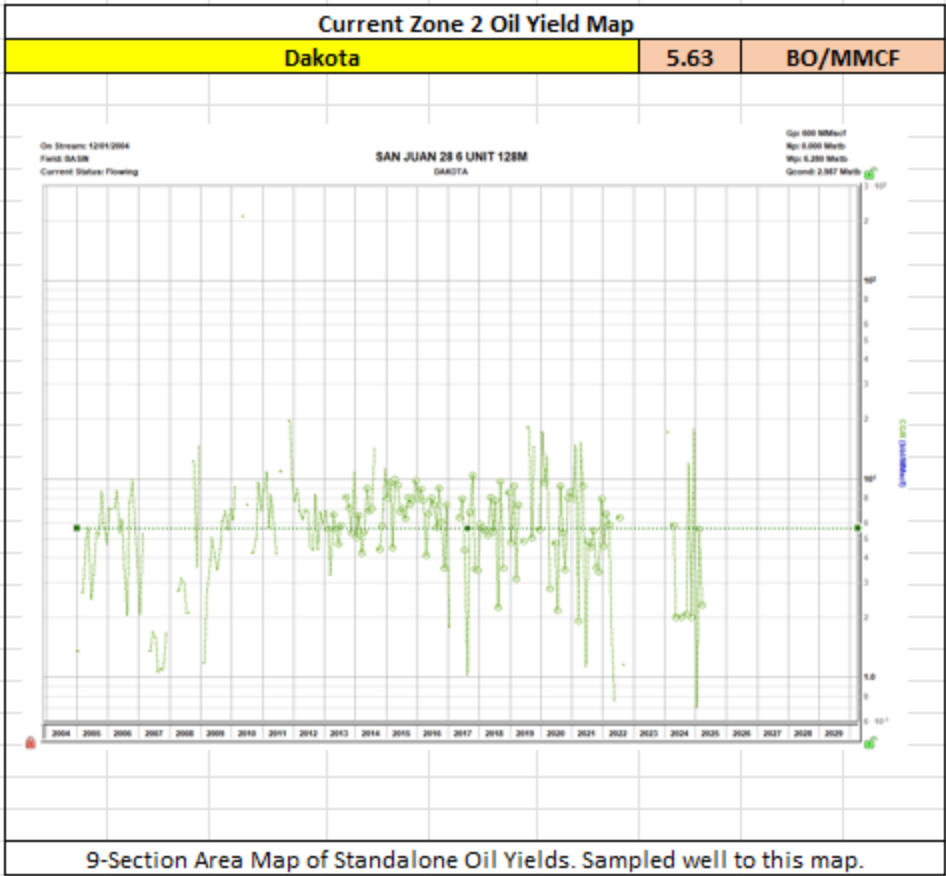


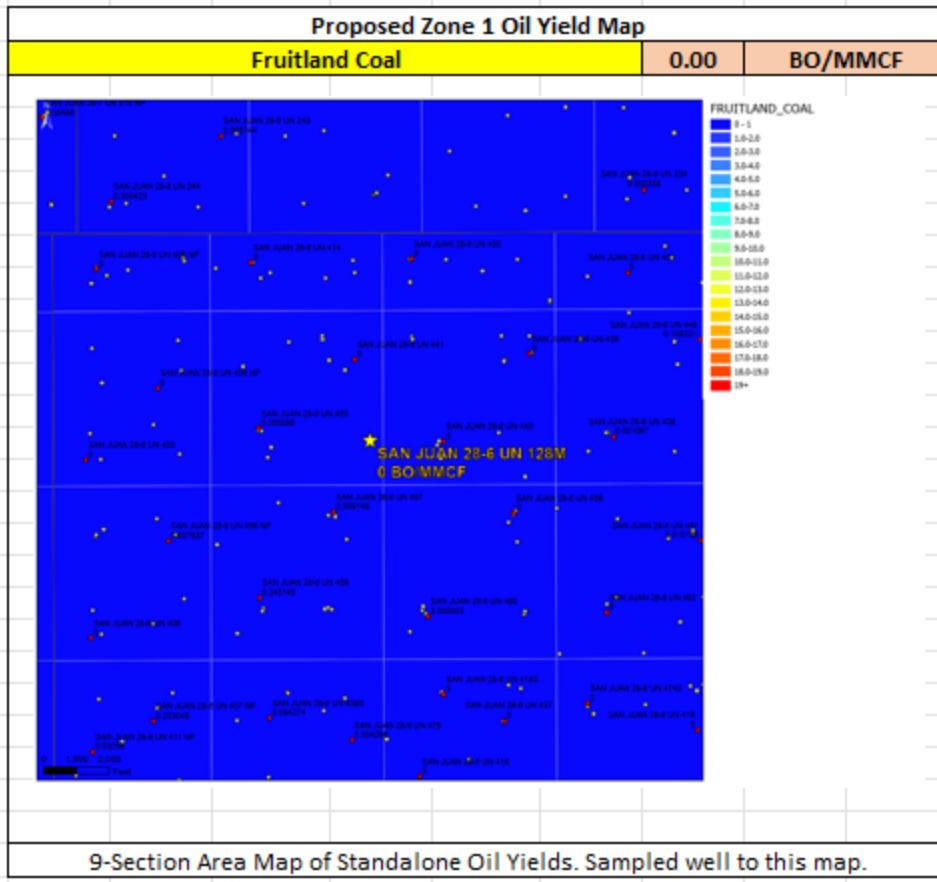
Oil production will be allocated based on average formation yields from offset wells and will be a fixed rate for 4 years.

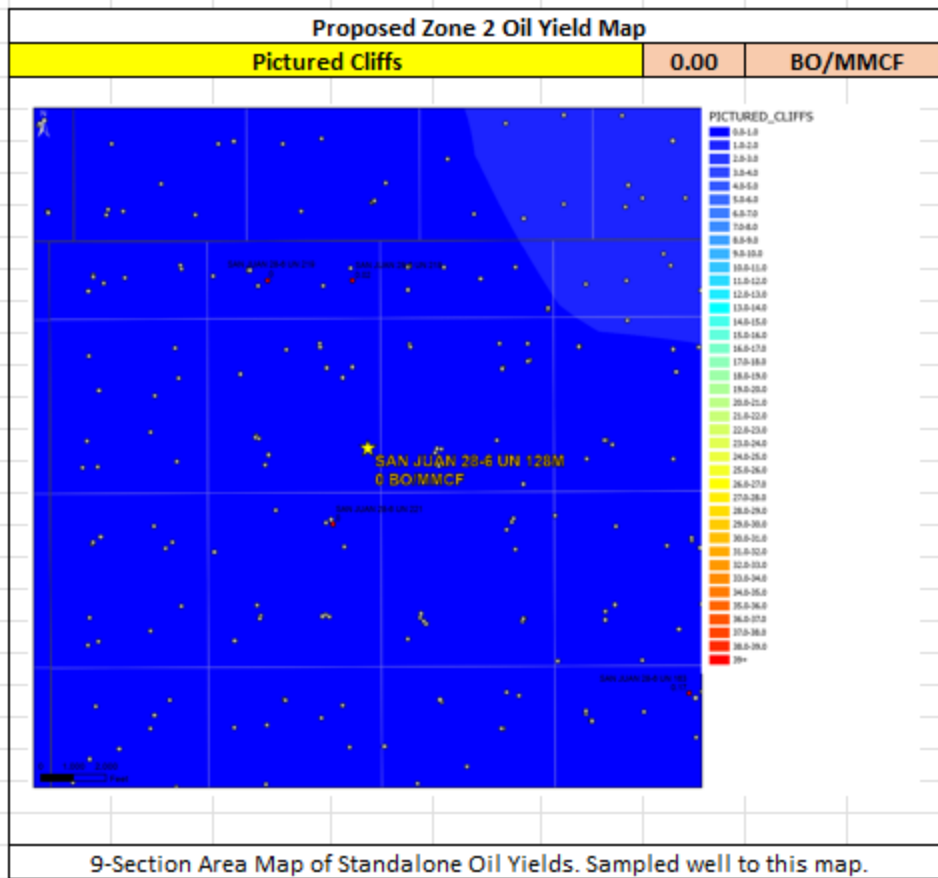
After 4 years oil will be reevaluated and adjust as needed based on average formation yields and new fixed gas allocation.

Formation	Yield (bbl/MM)	Remaining Reserves (MMcf)	% Oil Allocation
MV	0.00	708	0%
DK	5.63	333	100%
FRC	0.00	818	0%
PC	0.00	534	0%
			100%









U.S. Department of the Interior
BUREAU OF LAND MANAGEMENT

Well Name: SAN JUAN 28-6 UNIT	Well Location: T28N / R6W / SEC 17 / NESE / 36.657695 / -107.482824	County or Parish/State: RIO ARRIBA / NM
Well Number: 128M	Type of Well: CONVENTIONAL GAS WELL	Allottee or Tribe Name:
Lease Number: NMSF079192	Unit or CA Name: SAN JUAN 28-6 UNIT--DK, SAN JUAN 28-6 UNIT--MV	Unit or CA Number: NMNM78412A, NMNM78412C
US Well Number: 3003927845	Operator: HILCORP ENERGY COMPANY	

Notice of Intent

Sundry ID: 2881569

Type of Submission: Notice of Intent

Type of Action: Workover Operations

Date Sundry Submitted: 11/05/2025

Time Sundry Submitted: 11:31

Date proposed operation will begin: 11/19/2025

Procedure Description: Hilcorp Energy Company requests permission to recompleate the subject well in the Fruitland Coal/Pictured Cliffs and downhole commingle with the existing Mesaverde/Dakota. Please see the attached procedure, current and proposed wellbore diagram, plat and natural gas management plan. A closed loop system will be used. Hilcorp will contact the FFO Surface group within 90 days after the well has been recompleated, before any interim reclamation work, to conduct the onsite. A reclamation plan will be submitted after the onsite.

Surface Disturbance

Is any additional surface disturbance proposed?: No

NOI Attachments

Procedure Description

San_Juan_28_6_Unit_128M_RC_NOI_20251105113128.pdf

Well Name: SAN JUAN 28-6 UNIT

Well Location: T28N / R6W / SEC 17 / NESE / 36.657695 / -107.482824

County or Parish/State: RIO ARRIBA / NM

Well Number: 128M

Type of Well: CONVENTIONAL GAS WELL

Allottee or Tribe Name:

Lease Number: NMSF079192

Unit or CA Name: SAN JUAN 28-6 UNIT--DK, SAN JUAN 28-6 UNIT--MV

Unit or CA Number: NMNM78412A, NMNM78412C

US Well Number: 3003927845

Operator: HILCORP ENERGY COMPANY

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: DAWN NASH-DEAL

Signed on: NOV 05, 2025 11:31 AM

Name: HILCORP ENERGY COMPANY

Title: Operations Regulatory Tech

Street Address: 1111 TRAVIS ST

City: HOUSTON State: TX

Phone: (505) 324-5132

Email address: DNASH@HILCORP.COM

Field

Representative Name:

Street Address:

City: State: Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Name: KENNETH G RENNICK

BLM POC Title: Petroleum Engineer

BLM POC Phone: 5055647742

BLM POC Email Address: krennick@blm.gov

Disposition: Approved

Disposition Date: 11/05/2025

Signature: Kenneth Rennick

Form 3160-5
(October 2024)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0220
Expires: October 31, 2027

SUNDRY NOTICES AND REPORTS ON WELLS
Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.

5. Lease Serial No.	NMSF079192
6. If Indian, Allottee or Tribe Name	

SUBMIT IN TRIPLICATE - Other instructions on page 2

1. Type of Well <input type="checkbox"/> Oil Well <input checked="" type="checkbox"/> Gas Well <input type="checkbox"/> Other		7. If Unit of CA/Agreement, Name and/or No. SAN JUAN 28-6 UNIT--DK, SAN JUAN 28-6 UNIT--MV/NMNM78412A, NMNM78412
2. Name of Operator HILCORP ENERGY COMPANY		8. Well Name and No. Hilcorp Energy Company
3a. Address	3b. Phone No. (include area code) (713) 209-2400	9. API Well No. 3003927845
4. Location of Well (Footage, Sec., T.,R.,M., or Survey Description) SEC 17/T28N/R6W/NMP		10. Field and Pool or Exploratory Area BLANCO MESAVERDE/BASIN DAKOTA
		11. Country or Parish, State RIO ARRIBA/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 checked="" type="checkbox"/> Other	
	<input 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 recomplete 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 performed 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 recompletion 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 determined that the site is ready for final inspection.)

Hilcorp Energy Company requests permission to recomplete the subject well in the Fruitland Coal/Pictured Cliffs and downhole commingle with the existing Mesaverde/Dakota. Please see the attached procedure, current and proposed wellbore diagram, plat and natural gas management plan. A closed loop system will be used. Hilcorp will contact the FFO Surface group within 90 days after the well has been recompleted, before any interim reclamation work, to conduct the onsite. A reclamation plan will be submitted after the onsite.

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed) DAWN NASH-DEAL / Ph: (505) 324-5132	Title Operations Regulatory Tech
Signature (Electronic Submission)	Date 01/17/2026

THE SPACE FOR FEDERAL OR STATE OFFICE USE

Approved by KENNETH G RENNICK / Ph: (505) 564-7742 / Approved	Title Petroleum Engineer	Date 11/05/2025
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 FARMINGTON

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

Location of Well

0. SHL: NESE / 1350 FSL / 395 FEL / TWSP: 28N / RANGE: 6W / SECTION: 17 / LAT: 36.657695 / LONG: -107.482824 (TVD: 0 feet, MD: 0 feet)

BHL: NESE / 1350 FSL / 395 FEL / TWSP: 28N / SECTION: / LAT: 36.657695 / LONG: 107.482824 (TVD: 0 feet, MD: 0 feet)



**HILCORP ENERGY COMPANY
SAN JUAN 28-6 UNIT 128M
RECOMPLETION SUNDRY**

Prepared by:	Matthew Esz
Preparation Date:	October 31, 2025

WELL INFORMATION			
Well Name:	SAN JUAN 28-6 UNIT 128M	State:	NM
API #:	3003927845	County:	
Area:	13	Location:	
Route:	1303	Latitude:	
Spud Date:	October 30, 2004	Longitude:	

PROJECT DESCRIPTION
Perforate, fracture, and comingle the Fruitland Coal and Pictured Cliffs formations with the existing zones.

CONTACTS			
Title	Name	Office Phone #	Cell Phone #
Engineer	Matthew Esz		770-843-9226
Area Foreman			
Lead			
Artificial Lift Tech			
Operator			



**HILCORP ENERGY COMPANY
SAN JUAN 28-6 UNIT 128M
RECOMPLETION SUNDRY**

JOB PROCEDURES
<ol style="list-style-type: none"> 1. MIRU service rig and associated equipment; test BOP. 2. TOOH with 2-3/8" tubing set at 7,827'. 3. Set a 4-1/2" plug at +/- 4,402' to isolate the Dakota and Mesa verde. 4. Will not pull CBL. Sufficient cmt based on CBL dated 11/10/2004. 5. Load the hole and pressure test the casing. 6. N/D BOP, N/U frac stack and pressure test frac stack. 7. Perforate and frac the Fruitland Coal from 3,193'-3,448' and the Pictured Cliffs from 3,448'-3,544'. 8. Nipple down frac stack, nipple up BOP and test. 9. TIH with a mill and drill out top isolation plug and Fruitland Coal/Pictured Cliffs frac plugs. 10. Clean out to Dakota/Mesa Verde isolation plug. 11. Drill out Dakota/Mesa Verde isolation plug and cleanout to PBTD of 7,910'. TOOH. 12. TIH and land production tubing. Get a comingled Dakota/Mesa Verde/Pictured Cliffs/Fruitland Coal flow rate.



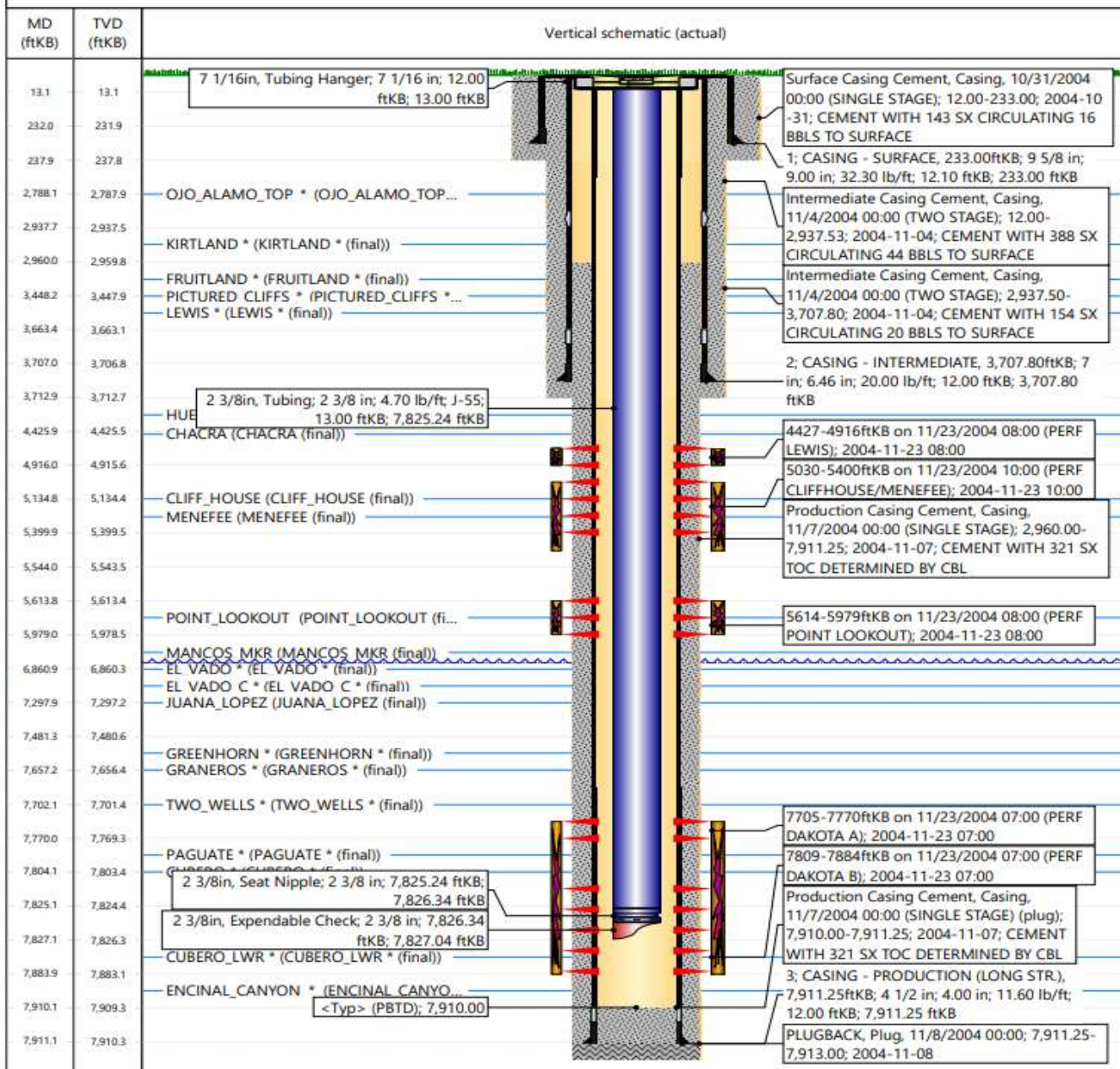
HILCORP ENERGY COMPANY
SAN JUAN 28-6 UNIT 128M
RECOMPLETION SUNDRY

SAN JUAN 28-6 UNIT 128M - CURRENT WELLBORE SCHEMATIC

Well Name: SAN JUAN 28-6 UNIT #128M

API / LWI 3003927845	Surface Legal Location 017-028N-006W-1	Field Name BLANCO MESAVERDE (PRORATED GAS)	Route 1303	State/Province NEW MEXICO	Well Configuration Type VERTICAL
Ground Elevation (ft) 6,628.00	Original KB/RT Elevation (ft) 6,640.00	Tubing Hanger Elevation (ft)	RKB to GL (ft) 12.00	KB-Casing Flange Distance (ft)	KB-Tubing Hanger Distance (ft)
Tubing Strings					
Run Date 5/6/2021 09:00	Set Depth (ftKB) 7,827.04	String Max Nominal OD (in) 2 3/8	String Min Nominal ID (in) 2.00	Weight/Length (lb/ft) 4.70	Original Spud Date 10/30/2004 21:30

Original Hole, 30039278450000 [VERTICAL]





HILCORP ENERGY COMPANY
SAN JUAN 28-6 UNIT 128M
RECOMPLETION SUNDRY

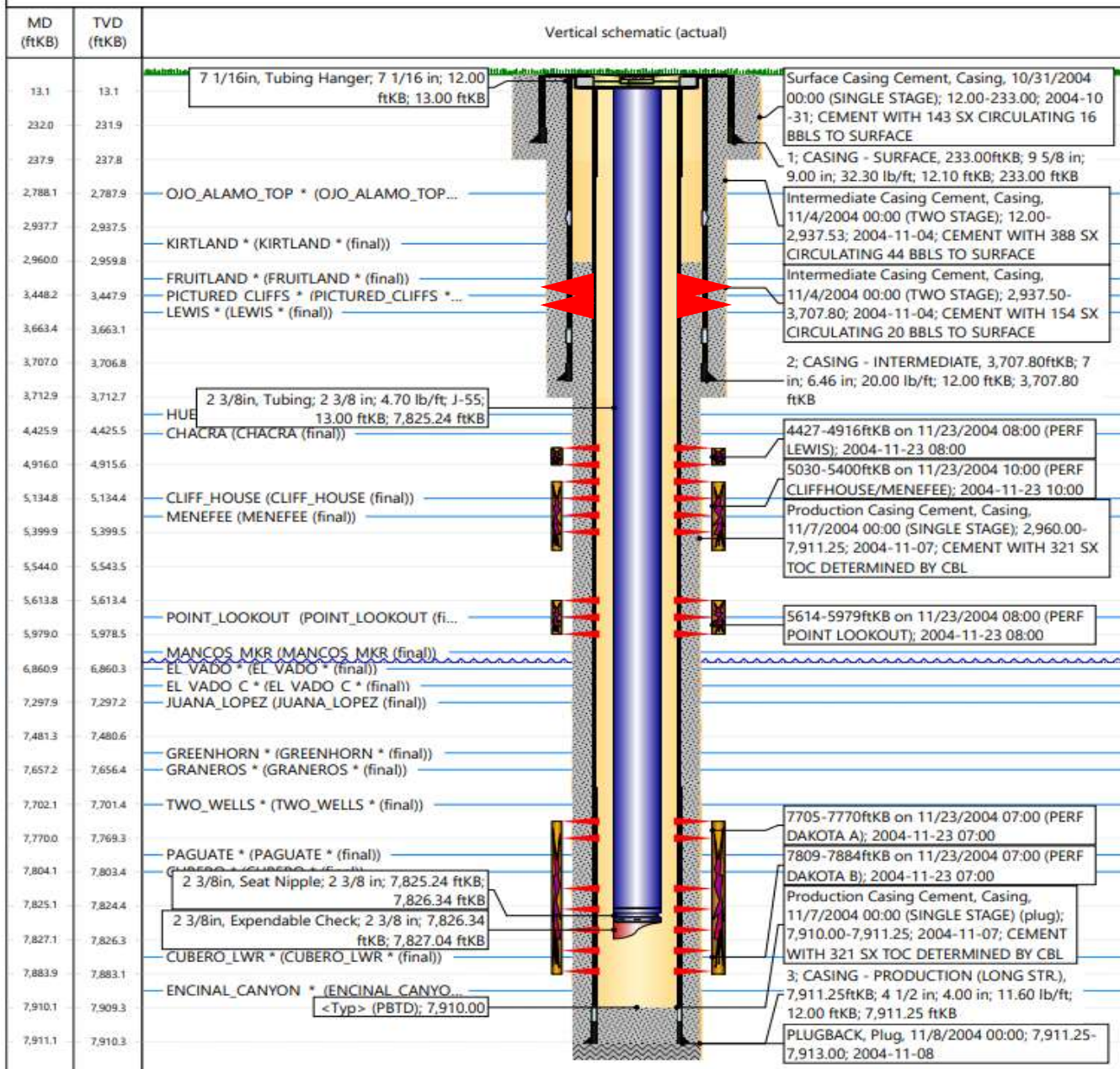
SAN JUAN 28-6 UNIT 128M - Proposed Schematic

Well Name: SAN JUAN 28-6 UNIT #128M

API / LWI 3003927845	Surface Legal Location 017-028N-006W-1	Field Name BLANCO MESAVERDE (PRIORATED GAS)	Route 1303	State/Province NEW MEXICO	Well Configuration Type VERTICAL
Ground Elevation (ft) 6,628.00	Original KB/RT Elevation (ft) 6,640.00	Tubing Hanger Elevation (ft)	RKB to GL (ft) 12.00	KB-Casing Flange Distance (ft)	KB-Tubing Hanger Distance (ft)

Tubing Strings					
Run Date 5/6/2021 09:00	Set Depth (ftKB) 7,827.04	String Max Nominal OD (in) 2 3/8	String Min Nominal ID (in) 2.00	Weight/Length (lb/ft) 4.70	Original Spud Date 10/30/2004 21:30

Original Hole, 30039278450000 [VERTICAL]



Santa Fe Main Office Phone: (505) 476-3441 Fax: (55) 476-3462 General Information Phone: (505) 629-6116 Online Phone Directory Visit: https://www.emnrd.nm.gov/ocd/contact-us/	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	C-102 Revised July 9, 2024 Submit Electronically via OCD Permitting
		Submittal Type: <input type="checkbox"/> Initial Submittal <input type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled

WELL LOCATION INFORMATION

API Number 30-039-27845	Pool Code 71629	Pool Name BASIN FRUITLAND COAL
Property Code 318710	Property Name SAN JUAN 28-6 UNIT	Well Number 128M
OGRID No. 372171	Operator Name Hilcorp Energy Company	Ground Level Elevation 6628'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
I	17	28N	06W		1050' FSL	395' FEL	36.6576958	-107.4828186	RIO ARRIBA

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
I	17	28N	06W		1050' FSL	395' FEL	36.6576958	-107.4828186	RIO ARRIBA

Dedicated Acres 320.00	Infill or Defining Well Infill	Defining Well API 30-039-24789	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers. N/A			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

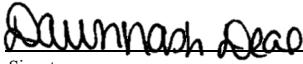
First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

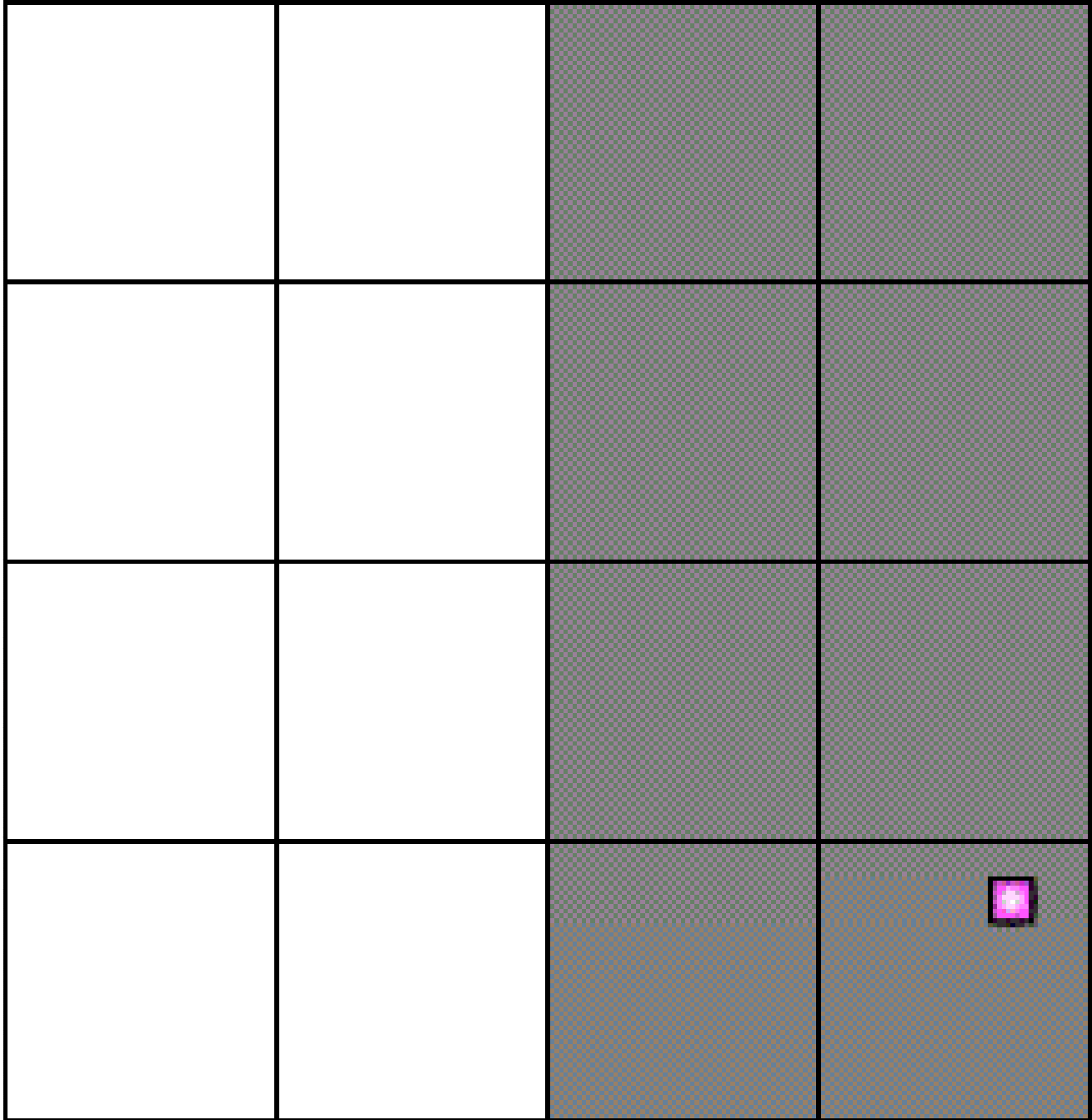
Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input checked="" type="checkbox"/> Vertical	Ground Floor Elevation: 6628'
---	--	----------------------------------

<p>OPERATOR CERTIFICATIONS</p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p><i>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</i></p> <p> 11/04/2025 _____ Signature Date</p> <p>Dawn Nash-Deal _____ Printed Name</p> <p>Dnash@hilcorp.com _____ Email Address</p>	<p>SURVEYOR CERTIFICATIONS</p> <p><i>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 and correct to the best of my belief.</i></p> <p>Jason C. Edwards _____ Signature and Seal of Professional Surveyor</p> <p>15269 11/18/2003 _____ Certificate Number Date of Survey</p>
--	---

Note: 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.

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



Santa Fe Main Office Phone: (505) 476-3441 Fax: (55) 476-3462 General Information Phone: (505) 629-6116 Online Phone Directory Visit: https://www.emnrd.nm.gov/ocd/contact-us/	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	C-102 Revised July 9, 2024 Submit Electronically via OCD Permitting
		Submittal Type: <input type="checkbox"/> Initial Submittal <input type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled

WELL LOCATION INFORMATION

API Number 30-039-27845	Pool Code 72439	Pool Name SOUTH BLANCO PICTURED CLIFFS
Property Code 318710	Property Name SAN JUAN 28-6 UNIT	Well Number 128M
OGRID No. 372171	Operator Name Hilcorp Energy Company	Ground Level Elevation 6628'
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal

Surface Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
I	17	28N	06W		1050' FSL	395' FEL	36.6576958	-107.4828186	RIO ARRIBA

Bottom Hole Location

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
I	17	28N	06W		1050' FSL	395' FEL	36.6576958	-107.4828186	RIO ARRIBA

Dedicated Acres 160.00	Infill or Defining Well Defining	Defining Well API	Overlapping Spacing Unit (Y/N) N	Consolidation Code U
Order Numbers. N/A			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

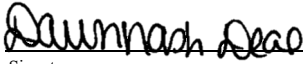
First Take Point (FTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

Last Take Point (LTP)

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County

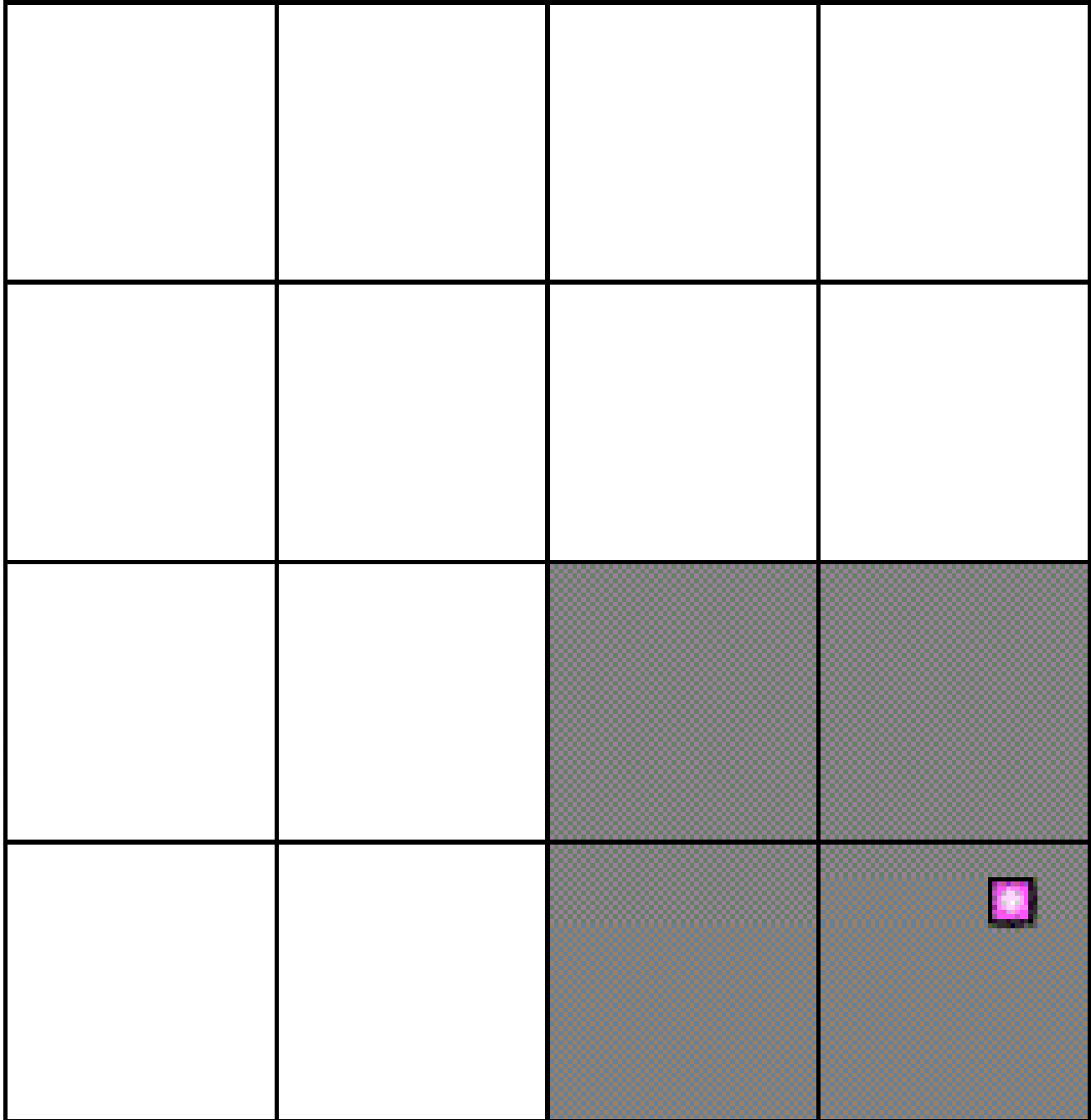
Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input checked="" type="checkbox"/> Vertical	Ground Floor Elevation: 6628'
---	--	----------------------------------

<p>OPERATOR CERTIFICATIONS</p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, 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 a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p><i>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</i></p> <p> 11/04/2025 _____ Signature Date</p> <p>Dawn Nash-Deal _____ Printed Name</p> <p>Dnash@hilcorp.com _____ Email Address</p>	<p>SURVEYOR CERTIFICATIONS</p> <p><i>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 and correct to the best of my belief.</i></p> <p>Jason C. Edwards _____ Signature and Seal of Professional Surveyor</p> <p>15269 11/18/2003 _____ Certificate Number Date of Survey</p>
--	---

Note: 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.

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Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



State of New Mexico
 Energy, Minerals and Natural Resources Department

Submit Electronically
 Via E-permitting

Oil Conservation Division
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

Section 1 – Plan Description Effective May 25, 2021

I. Operator: Hilcorp Energy Company **OGRID:** 372171 **Date:** 10/30/2025

II. Type: Original Amendment due to 19.15.27.9.D(6)(a) NMAC 19.15.27.9.D(6)(b) NMAC Other.

If Other, please describe: _____

III. Well(s): Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D
SJ 28-6 UNIT 128M	30-039-27845	I,17,28N,06W	1050' FSL & 395' FEL	0 BBL	350 MCF	5 BBL

IV. Central Delivery Point Name: IGNACIO PROCESSING PLANT (NON-OP) [See 19.15.27.9(D)(1) NMAC]

V. Anticipated Schedule: Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow Back Date	First Production Date
SJ 28-6 UNIT 128M	30-039-27845					

VI. Separation Equipment: Attach a complete description of how Operator will size separation equipment to optimize gas capture.

VII. Operational Practices: Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.

VIII. Best Management Practices: Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

Section 2 – Enhanced Plan

EFFECTIVE APRIL 1, 2022

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

IX. Anticipated Natural Gas Production:

Well	API	Anticipated Average Natural Gas Rate MCF/D	Anticipated Volume of Natural Gas for the First Year MCF

X. Natural Gas Gathering System (NGGS):

Operator	System	ULSTR of Tie-in	Anticipated Gathering Start Date	Available Maximum Daily Capacity of System Segment Tie-in

XI. Map. Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

XII. Line Capacity. The natural gas gathering system will will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

XIII. Line Pressure. Operator does does not anticipate that its existing well(s) connected to the same segment, or portion, of the natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by the new well(s).

Attach Operator’s plan to manage production in response to the increased line pressure.

XIV. Confidentiality: Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information provided in Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of the specific information for which confidentiality is asserted and the basis for such assertion.

Section 3 - Certifications

Effective May 25, 2021

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or

Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.

If Operator checks this box, Operator will select one of the following:

Well Shut-In. Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

Venting and Flaring Plan. Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- (b) power generation for grid;
- (c) compression on lease;
- (d) liquids removal on lease;
- (e) reinjection for underground storage;
- (f) reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- (h) fuel cell production; and
- (i) other alternative beneficial uses approved by the division.

Section 4 - Notices

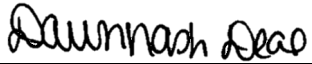
1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

(a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or

(b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.

2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

Signature: 
Printed Name: DAWN NASH-DEAL
Title: OPERATIONS REGULATORY TECHNICIAN
E-mail Address: DNASH@HILCORP.COM
Date: 10/30/2025
Phone: 346-237-2143
OIL CONSERVATION DIVISION (Only applicable when submitted as a standalone form)
Approved By:
Title:
Approval Date:
Conditions of Approval:

VI. Separation Equipment:

Hilcorp Energy Company (HEC or Operator) production facilities include separation equipment designed to efficiently separate gas from liquid phases to optimize gas capture based on projected and estimated volumes from the targeted pool of our recomplete project. HEC will utilize flowback separation equipment and production separation equipment designed and built to industry specifications after the recomplete to optimize gas capture and send gas to sales or flare based on analytical composition. HEC operates facilities that are typically one-well facilities. Production separation equipment is upgraded prior to well being completed, if determined to be undersized or inadequate. This equipment is already on-site and tied into our sales gas lines prior to the recomplete operations.

VII. Operational Practices:

1. Subsection (A) Venting and Flaring of Natural Gas
 - o HEC understands the requirements of NMAC 19.15.27.8 which outlines that the venting and flaring of natural gas during drilling, completion or production operations that constitutes waste as defined in 19.15.2 are prohibited.
2. Subsection (B) Venting and Flaring during drilling operations
 - o This gas capture plan isn't for a well being drilled.
3. Subsection (C) Venting and flaring during completion or recompletion
 - o Flowlines will be routed for flowback fluids into a completion or storage tank and if feasible under well conditions, flare rather than vent and commence operation of a separator as soon as it is technically feasible for a separator to function.
 - o At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.
4. Subsection (D) Venting and flaring during production operations
 - o At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.
 - o Monitor manual liquid unloading for wells on-site or in close proximity (<30 minutes' drive time), take reasonable actions to achieve a stabilized rate and pressure at the earliest practical time, and take reasonable actions to minimize venting to the maximum extent practicable.
 - o HEC will not vent or flare except during the approved activities listed in NMAC 19.15.27.8 (D) 1-4.
5. Subsection (E) Performance standards
 - o All tanks and separation equipment are designed for maximum throughput and pressure to minimize waste.
 - o If a flare is utilized during production operations it will have a continuous pilot and is located more than 100 feet from any known well or storage tanks.
 - o At any point in the well life (completion, production, inactive) an audio, visual and olfactory inspection be performed at prescribed intervals (weekly or monthly) pursuant to Subsection D of 19.15.27.8 NMAC, to confirm that all production equipment is operating properly and there are no leaks or releases.

6. Subsection (F) Measurement or estimation of vented and flared natural gas
 - o Measurement equipment is installed to measure the volume of natural gas flared from process piping.
 - o When measurement isn't practicable, estimation of vented and flared natural gas will be completed as noted in 19.15.27.8 (F) 5-6.

VIII. Best Management Practices:

1. Operator has adequate storage and takeaway capacity for wells it chooses to recomplete as the flowlines at the sites are already in place and tied into a gathering system.
2. Operator will flare rather than vent vessel blowdown gas when technically feasible during active and/or planned maintenance to equipment on-site.
3. Operator combusts natural gas that would otherwise be vented or flared, when technically feasible.
4. Operator will shut in wells in the event of a takeaway disruption, emergency situation, or other operations where venting or flaring may occur due to equipment failures.

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

**APPLICATION FOR DOWNHOLE COMMINGLING
SUBMITTED BY HILCORP ENERGY COMPANY**

ORDER NO. DHC-5558

ORDER

The Director of the New Mexico Oil Conservation Division (“OCD”), having considered the application and the recommendation of the Engineering Bureau, issues the following Order.

FINDINGS OF FACT

1. Hilcorp Energy Company (“Applicant”) submitted a complete application (“Application”) to downhole commingle the pools described in Exhibit A (“the Pools”) within the well bore of the well identified in Exhibit A (“the Well”).
2. Applicant proposed a method to allocate the oil and gas production from the Well to each of the Pools that is satisfactory to the OCD and protective of correlative rights.
3. Applicant has certified that all produced fluids from all the Pools are compatible with each other.
4. Applicant has certified that downhole commingling the Pools will not decrease the value of the oil and gas production.
5. An exception to the notification requirements within 19.15.12.11(C)(1)(b) NMAC was granted by the Division within Order R-10696.
6. Applicant provided notice of the Application to the Bureau of Land Management (“BLM”) or New Mexico State Land Office (“NMSLO”), as applicable.

CONCLUSIONS OF LAW

7. OCD has jurisdiction to issue this Order pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-6, 70-2-11, 70-2-12, 70-2-16, 70-2-17, and 19.15.12 NMAC.
8. The downhole commingling of the Pools is common, or Applicant has provided evidence that the fluids are compatible and will not damage the Pools in accordance with 19.15.12.11(A)(1) NMAC.
9. The bottom perforation of the lower zone is within one hundred fifty percent (150%) of the depth of the top perforation in the upper zone or Applicant has provided evidence that the proposed commingling of the Pools shall not result in shut-in or flowing well bore pressure in excess of the commingled pool’s fracture parting pressure in accordance with 19.15.12.11(A)(3) NMAC.

10. Applicant's proposed method of allocation, as modified herein, complies with 19.15.12.11(A)(8) NMAC.
11. By granting the Application with the conditions specified below, this Order prevents waste and protects correlative rights, public health, and the environment.

ORDER

1. Applicant is authorized to downhole commingle the Pools described in Exhibit A within the well bore of the well identified in Exhibit A.
2. Applicant shall allocate a fixed percentage of the oil production from the Well to each of the Pools until a different plan to allocate oil production is approved by OCD. Of the oil production from the Well:
 - a. zero percent (0%) shall be allocated to the Basin Fruitland Coal pool (pool ID: 71629);
 - b. zero percent (0%) shall be allocated to the Blanco P.C. South pool (pool ID: 72439);
 - c. zero percent (0%) shall be allocated to the Blanco Mesaverde pool (pool ID: 72319); and
 - d. one hundred percent (100%) shall be allocated to the Basin Dakota pool (pool ID: 71599).

Applicant shall allocate gas production to the new pool(s) equal to the total gas production from the Well minus the projected gas production from the current pool(s) until a different plan to allocate gas production is approved by OCD. The new pool(s) are:

- a. the Basin Fruitland Coal pool (pool ID: 71629); and
- b. the Blanco P.C. South pool (pool ID: 72439).

The current pool(s) are:

- a. the Blanco Mesaverde pool (pool ID: 72319); and
- b. the Basin Dakota pool (pool ID: 71599).

Until a different plan to allocate gas production is approved by OCD, of the gas production allocated to the new pools:

- a. sixty-one percent (61%) shall be allocated to the Basin Fruitland Coal pool (pool ID: 71629); and
- b. thirty-nine percent (39%) shall be allocated to the Blanco P.C. South pool (pool ID: 72439).

Applicant shall calculate the oil and gas production average during the fourth year after the commencement of commingling, which shall be used to establish a fixed percentage of the total oil and gas production that shall be allocated to each of the Pools ("fixed percentage allocation plan"). No later than ninety (90) days after the fourth year, Applicant shall submit a Form C-103 to the OCD Engineering Bureau that includes the fixed percentage allocation plan and all data used to determine it. If Applicant fails to do so, this Order shall terminate on the following day. If OCD denies the fixed percentage allocation plan, this Order shall terminate on the date of such action. If OCD approves the percentage allocation plan with

or without modifications, then the approved percentage allocation plan shall be used to determine oil and gas allocation starting on the date of such action until the Well is plugged and abandoned.

3. If an alteration is made to the Well or a condition within the Well changes which may cause the allocation of production to the Pools as approved within this Order to become inaccurate, then no later than sixty (60) days after that event, Applicant shall submit Form C-103 to the OCD Engineering Bureau describing the event and include a revised allocation plan. If OCD denies the revised allocation plan, this Order shall terminate on the date of such action.
4. If any of the pools being commingled is prorated, or the Well's production has been restricted by an OCD order in any manner, the allocated production from each producing pool in the commingled well bore shall not exceed the top oil or gas allowable rate for a well in that pool or rate restriction applicable to the well.
5. If the Well is deepened, then no later than forty-five (45) days after the Well is deepened, Applicant shall conduct and provide logs to OCD that are sufficient for OCD to determine which pool(s) each new completed interval of the Well will produce from.
6. If the downhole commingling of the Pools reduces the value of the oil and gas production to less than if it had remained segregated, no later than sixty (60) days after the decrease in value has occurred Applicant shall submit a new downhole commingling application to OCD to amend this Order to remove the pool that caused the decrease in value. If Applicant fails to submit a new application, this Order shall terminate on the following day, and if OCD denies the application, this Order shall terminate on the date of such action.
7. If a completed interval of the Well is altered from what is submitted within the Application as identified in Exhibit A, then no later than sixty (60) days after the alteration, Applicant shall submit Form C-103 to the OCD Engineering Bureau detailing the alteration and completed interval.
8. If OCD determines that Applicant has failed to comply with any provision of this Order, OCD may take any action authorized by the Oil and Gas Act or the New Mexico Administrative Code (NMAC).
9. OCD retains jurisdiction of this matter and reserves the right to modify or revoke this Order as it deems necessary.

**STATE OF NEW MEXICO
OIL CONSERVATION DIVISION**

Albert Chang

**ALBERT CHANG
DIVISION DIRECTOR**

DATE: 04/10/2026

State of New Mexico
Energy, Minerals and Natural Resources Department

Exhibit A

Order: **DHC-5558**

Operator: **Hilcorp Energy Company**

Well Name: **San Juan 28 6 Unit Well No. 128M**

Well API: **30-039-27845**

	Pool Name: Basin Fruitland Coal		
Upper Zone	Pool ID: 71629	Current:	New: X
	Allocation:	Oil: 0.0%	Gas: 61.0%
		Top: 3,193	Bottom: 3,448

	Pool Name: Blanco P.C. South		
Intermediate Zone	Pool ID: 72439	Current:	New: X
	Allocation:	Oil: 0.0%	Gas: 39.0%
		Top: 3,448	Bottom: 3,544
	Bottom of Interval within 150% of Upper Zone's Top of Interval:		YES

	Pool Name: Blanco Mesaverde		
Intermediate Zone 2	Pool ID: 72319	Current: X	New:
	Allocation: Subtraction	Oil: 0.0%	Gas: SUBT
		Top: 4,427	Bottom: 5,979
	Bottom of Interval within 150% of Upper Zone's Top of Interval:		NO

	Pool Name: Basin Dakota		
Lower Zone	Pool ID: 71599	Current: X	New:
	Allocation: Subtraction	Oil: 100.0%	Gas: SUBT
		Top: 7,705	Bottom: 7,884
	Bottom of Interval within 150% of Upper Zone's Top of Interval:		NO

Top of Queen Formation:

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

General Information
Phone: (505) 629-6116

Online Phone Directory
<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 544435

CONDITIONS

Operator: HILCORP ENERGY COMPANY 1111 Travis Street Houston, TX 77002	OGRID: 372171
	Action Number: 544435
	Action Type: [C-107] Down Hole Commingle (C-107A)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	4/1/2026