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

#### APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

CASE NO. 24220

#### **EXHIBIT INDEX**

Compulsory Pooling Checklist

Exhib	it A	Self-Affirmed Statement of Rex D. Barker
	A-1	Application & Proposed Notice of Hearing
	A-2	C-102s
	A-3	Plat of Tracts, Tract Ownership, Applicable Lease Numbers, Unit Recapitulation, Pooled Parties
	A-4	Sample Well Proposal Letters & AFEs
	A-5	Chronology of Contact
Exhib	it B	Self-Affirmed Statement of Darin A. Dolezal
	B-1	Project Location Map
	B-2	Subsea Structure Map
	B-3	Stratigraphic Cross-Section
	B-4	Gross Isopach Map of First Bone Spring Sand
	B-5	Gross Isopach Map of Second Bone Spring Sand Interval
Exhib	it C	Self-Affirmed Statement of Dana S. Hardy
	C-1	Sample Notice Letter to All Interested Parties
	C-2	Chart of Notice to All Interested Parties
	C-3	Copies of Certified Mail Green Cards and White Slips

### COMPULSORY POOLING APPLICATION CHECKLIST

Case: 24220	APPLICANT'S RESPONSE
Date	April 21, 2024
Applicant	BTA Oil Producers, LLC
Designated Operator & OGRID (affiliation if applicable)	OGRID No. 260297
Applicant's Counsel:	Hinkle Shanor LLP
Case Title:	Application of BTA Oil Producers, LLC for Compulsory
	Pooling, Lea County, New Mexico.
Entries of Appearance/Intervenors:	None
Well Family	Crazy Goat
Formation/Pool	
Formation Name(s) or Vertical Extent:	Bone Spring
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Bone Spring
Pool Name and Pool Code:	Ojo Chiso; Bone Spring Pool (Code 96553)
Well Location Setback Rules:	Statewide
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320-acres
Building Blocks:	quarter-quarter
Orientation:	South/North
Description: TRS/County	E/2 E/2 of Sections 11 and 14, Township 22 South, Range 34 East, Lea County, New Mexico.
Standard Horizontal Well Spacing Unit (Y/N), If No, describe and is	Yes.
approval of non-standard unit requested in this application?	
Other Situations	Vee there is a doubt severage in the Dana Caring
Depth Severance: Y/N. If yes, description	Yes, there is a depth severance in the Bone Spring formation within the Unit and BTA seeks to pool interests
	from the top of the First Bone Spring to the Base of the
	Second Bone Spring, found at a stratigraphic equivalent
Dravinity Tractor If you description	of 10,444 feet.
Proximity Tracts: If yes, description	No
Proximity Defining Well: if yes, description	
Applicant's Ownership in Each Tract	Exhibit A-3
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	Add wells as needed
Well #1	Crazy Goat 8711 14-11 State Com 4H (API #)
	SHL: 285' FSL & 1650' FEL (Unit O), Section 14, T22S, R34E
	BHL: 50' FNL & 990' FEL (Unit A), Section 11, T22S, R34E Completion Target: Approx. 10,350' TVD
Well #2	
Well #2	Crazy Goat 8711 14-11 State Com 65H (API #) SHL: 285' FSL & 1590' FEL (Unit O), Section 14, T22S, R34E
	BHL: 50' FNL & 990' FEL (Unit A), Section 11, T22S, R34E
Released to Imaging: 3/19/2024 9:10:58 AM	Completion Target: Approx. 9,600' TVD

Received by OCD: 3/19/2024 9:01:57 AM Horizontal Well First and Last Take Points	Exhibit A-2
Completion Target (Formation, TVD and MD)	Exhibit A-4
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$12,000.00
Production Supervision/Month \$	\$1,200.00
Justification for Supervision Costs	Exhibit A
Requested Risk Charge	200%
Notice of Hearing	
Proposed Notice of Hearing	Exhibit A-1
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit C-1, Exhibit C-2, Exhibit C-3
Proof of Published Notice of Hearing (10 days before hearing)	N/A
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibit A-3
Tract List (including lease numbers and owners)	Exhibit A-3
If approval of Non-Standard Spacing Unit is requested, Tract List	
(including lease numbers and owners) of Tracts subject to notice requirements.	N/A
Pooled Parties (including ownership type)	Exhibit A-3
Unlocatable Parties to be Pooled	N/A
Ownership Depth Severance (including percentage above & below)	Exhibit A-3
Joinder	
Sample Copy of Proposal Letter	Exhibit A-4
List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-3
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	Exhibit A-4
Cost Estimate to Drill and Complete	Exhibit A-4
Cost Estimate to Equip Well	Exhibit A-4
Cost Estimate for Production Facilities	Exhibit A-4
Geology	
Summary (including special considerations)	Exhibit B
Spacing Unit Schematic	Exhibit B-1
Gunbarrel/Lateral Trajectory Schematic	N/A
Well Orientation (with rationale)	Exhibit B
Target Formation	Exhibit B
HSU Cross Section	Exhibit B-2
Depth Severance Discussion	Exhibit A
Forms, Figures and Tables	
C-102	Exhibit A-2
Tracts	Exhibit A-3
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit A-3
General Location Map (including basin)	Exhibit B-1
Well Bore Location Map	Exhibit B-1
Structure Contour Map - Subsea Depth eleased to Imaging: 3/19/2024 9:10:58 AM	Exhibit B-2

Received by OCD: 3/19/2024 9:01:57 AM		<b>Page 4 of 37</b>
Cross Section Location Map (including wells)	Exhibit B-2	
Cross Section (including Landing Zone)	Exhibit B-3	
Gross Isopach Map	Exhibit B-4, B-5	
Additional Information		
Special Provisions/Stipulations	N/A	
CERTIFICATION: I hereby certify that the information provid	led in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Dana S. Hardy	
Signed Name (Attorney or Party Representative):	/s/ Dana S. Hardy	
Date:	3/19/2024	

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

#### APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

**CASE NO. 24220** 

#### SELF-AFFIRMED STATEMENT OF REX D. BARKER

1. I am a landman with BTA Oil Producers, LLC ("BTA") and am over 18 years of age. I have personal knowledge of the matters addressed herein and am competent to provide this Self-Affirmed Statement. I have previously testified before the New Mexico Oil Conservation Division ("Division") and my credentials as an expert in land matters were accepted as a matter of record.

2. I am familiar with the land matters involved in the above-referenced case. Copies of BTA's application and proposed hearing notice are attached as **Exhibit A-1**.

3. None of the parties proposed to be pooled in this case indicated opposition to this matter proceeding by affidavit, therefore I do not expect any opposition at hearing.

4. BTA seeks an order pooling all uncommitted mineral interests from the top of the First Bone Spring formation to the base of the Second Bone Spring formation underlying a 320acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 11 and 14, Township 22 South, Range 34 East, Lea County, New Mexico ("Unit").

5. The Unit will be dedicated to the Crazy Goat 8711 14-11 State Com #4H and Crazy Goat 8711 14-11 State Com #6H wells ("Wells"), which will be drilled from surface hole locations in the SW/4 SE/4 (Unit O) of Section 14 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 11.

BTA Oil Producers, LLC Case No. 24220 Exhibit A 6. The Wells will be completed in the Ojo Chiso; Bone Spring Pool (Code 96553).

7. The completed interval of the Wells will be orthodox.

8. There is a depth severance in the Bone Spring formation within the Unit. Therefore, BTA seeks to pool interests from the top of the First Bone Spring to the base of the Second Bone Spring, found at a stratigraphic equivalent of 10,444' as shown in the Schlumberger Compensated Neutron/Litho Density Log, Run No. 1 (January 2, 1988) for the 8711 Chiso #1 Wellbore (API #30-025-30141).

9. **Exhibit A-2** contains the C-102s for the Wells.

10. **Exhibit A-3** contains a plat identifying ownership by tract in the Unit. This exhibit also includes any applicable lease numbers, a unit recapitulation, and the interests BTA seeks to pool highlighted in yellow. All of the parties are locatable.

11. BTA has conducted a diligent search of all county public records including phone directories and computer databases. BTA also used the Accurint subscription service to locate interest owners.

12. **Exhibit A-4** contains sample well proposal letters and AFEs sent to working interest owners for the Wells. The estimated costs reflected on the AFEs are fair and reasonable and comparable to the cost of other wells of similar depth and length drilled in the subject formation in the area.

In my opinion, BTA made a good-faith effort to reach voluntary joinder of uncommitted interests in the Wells as indicated by the chronology of contact described in Exhibit A-5.

BTA requests overhead and administrative rates of \$12,000 per month while the 14. Wells are being drilled and \$1,200 per month while the Wells are producing. These rates are fair and are comparable to the rates charged by BTA and other operators in the vicinity.

The attached exhibits were either prepared by me or under my supervision or were 15. compiled from company business records.

In my opinion, the granting of BTA's application will serve the interests of 16. conservation, the protection of correlative rights, and the prevention of waste.

I understand this Self-Affirmed Statement will be used as written testimony in this 17. case. I affirm that my testimony above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next

to my signature below. Rex D. Barker

3-8-2024 Pate

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

#### APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 24220

#### **APPLICATION**

In accordance with NMSA 1978, § 70-2-17, BTA Oil Producers, LLC ("BTA" or "Applicant"), through its undersigned attorneys, files this application with the Oil Conservation Division ("Division") seeking an order pooling all uncommitted interests from the top of the First Bone Spring formation to the base of the Second Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 11 and 14, Township 22 South, Range 34 East, Lea County, New Mexico ("Unit"). In support of this application, BTA states the following.

1. Applicant (OGRID No. 260297) is a working interest owner in the Unit and has the right to drill wells thereon.

2. Applicant seeks to dedicate the Unit to the **Crazy Goat 8711 14-11 State Com** #4H and **Crazy Goat 8711 14-11 State Com** #6H wells ("Wells"), which will be drilled from surface hole locations in the SW/4 SE/4 (Unit O) of Section 14 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 11.

3. The completed intervals of the Wells will be orthodox.

4. There is a depth severance in the Bone Spring formation within the Unit. Accordingly, BTA seeks to pool interests from the top of the First Bone Spring to the base of the Second Bone Spring at a stratigraphic equivalent of 10,444' as shown in the Schlumberger

> BTA Oil Producers, LLC Case No. 24220 Exhibit A-1

Compensated Neutron/Litho Density Log, Run No. 1 (January 2, 1988) for the 8711 Chiso #1 Wellbore (API #30-025-30141).

5. Applicant has sought and been unable to obtain voluntary agreement for the development of these lands from all interest owners in the Unit.

6. The pooling of uncommitted interests will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

7. In order to permit Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in the Unit should be pooled and Applicant should be designated the operator of the proposed horizontal wells and the Unit.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on March 7, 2024, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the Unit;
- B. Approving the initial wells in the Unit;
- C. Designating Applicant as the operator of the Unit and the horizontal wells to be drilled thereon;
- D. Authorizing Applicant to recover its costs of drilling, equipping, and completing the wells;
- E. Approving the actual operating charges and costs of supervision, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and
- F. Imposing a 200% charge for the risk assumed by Applicant in drilling and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

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Respectfully submitted,

#### HINKLE SHANOR LLP

<u>/s/ Dana S. Hardy</u> Dana S. Hardy Jaclyn M. McLean P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 98208623 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com *Counsel for BTA Oil Producers, LLC* 

Application of BTA Oil Producers, LLC for Compulsory Pooling, Lea County, New Mexico. BTA Oil Producers, LLC ("Applicant") seeks an order pooling all uncommitted interests from the top of the First Bone Spring formation to the base of the Second Bone Spring formation underlying a 320-acre, more or less, standard horizontal spacing unit comprised of the E/2 E/2 of Sections 11 and 14, Township 22 South, Range 34 East, Lea County, New Mexico ("Unit"). Applicant seeks to dedicate the Unit to the Crazy Goat 8711 14-11 State Com #4H and Crazy Goat 8711 14-11 State Com #6H wells ("Wells"), which will be drilled from surface hole locations in the SW/4 SE/4 (Unit O) of Section 14 to bottom hole locations in the NE/4 NE/4 (Unit A) of Section 11. The completed intervals of the Wells will be orthodox. Due to a depth severance in the Bone Spring formation within the Unit, BTA seeks to pool interests from the top of the First Bone Spring to the base of the Second Bone Spring at a stratigraphic equivalent of 10,444' as shown in the Schlumberger Compensated Neutron/Litho Density Log, Run No. 1 (January 2, 1988) for the 8711 Chiso #1 Wellbore (API #30-025-30141). Also to be considered will be the cost of drilling and completing the Wells and the allocation of the costs, the designation of Applicant as operator of the Wells, and a 200% charge for the risk involved in drilling and completing the Wells. The Wells are located approximately 27 miles southwest of Hobbs, New Mexico.



BTA Oil Producers, LLC Case No. 24220 Exhibit A-2

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BTA Oil Producers, LLC Case No. 24220 Exhibit A-3

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#### Crazy Goat 8711 14-11 State Com State Com #4H & 6H Unit Recapitulation

Tract 1	Leasehold Owner	WI	120.00 Acres
State of New Mexico OGL VB-1831	BTA Oil Producers, LLC	47.206166%	56.6472
NE/4 NE/4 and E/2 NE/4 Section 11,	MRC Permian Company	41.305396%	49.5665
T22S, R34E, Lea County, New Mexico	Ross Duncan Properties, LLC	2.619219%	3.1431
	Featherstone Development Corporation	3.143062%	3.7717
	Prospector, LLC	2.357297%	2.8288
	Big Three Energy Group, LLC	2.357297%	2.8288
	Ray Westall and wife, Karen Westall	1.011563%	1.2139
		100.00000%	120.0000
Tract 2	Leasehold Owner	WI	40.00 Acres
Fee Oil and Gas Lease (1897-594)	BTA Oil Producers, LLC	47.206166%	18.8825
Fee Oil and Gas Lease (1897-599)	MRC Permian Company	41.305396%	16.5222
Fee Oil and Gas Lease (1913-804)	Ross Duncan Properties, LLC	2.619219%	1.0477
SE/4 NE/4 of Section 11, T22S, R34E,	Featherstone Development Corporation	3.143062%	1.2572
Lea County, New Mexico	Prospector, LLC	2.357297%	0.9429
	Big Three Energy Group, LLC	2.357297%	0.9429
	Ray Westall and wife, Karen Westall	1.011563%	0.4046
		100.000000%	40.0000
Tract 3	Leasehold Owner	WI	80.0000
State of New Mexico OGL V0-0698	BTA Oil Producers, LLC	100.000000%	80.0000
NE/4 NE/4 and NE/4 SE/4 of			
Section 14, T22S, R34E,			
Lea County, New Mexico			
Tract 3	Leasehold Owner	WI	80.0000

•

State of New Mexico OGL LG-6555 SE/4 NE/4 and SE/4 SE/4 of Section 14, T22S, R34E, Lea County, New Mexico	BTA Oil Producers, LLC	100.000000%	80.0000
Recapitulation	Leasehold Owner	WI	320.0000
Crazy Goat 8711 14-11 State Com	BTA Oil Producers, LLC	73.603083%	235.5297
#4H and 6H	MRC Permian Company	20.652698%	66.0887
	Ross Duncan Properties, LLC	1.309610%	4.1908
	Featherstone Development Corporation	1.571531%	5.0289
	Prospector, LLC	1.178648%	3.7717
	Big Three Energy Group, LLC	1.178648%	3.7717
	Ray Westall and wife, Karen Westall	0.505782%	1.6185
Total		100.00000%	320.0000

CARLTON BEAL, JR

BARRY BEAL

KELLY BEAL

SPENCER BEAL

BARRY BEAL, JR.

STUART BEAL ROBERT DAVENPORT, JR.



**BTA OIL PRODUCERS, LLC** 

104 SOUTH PECOS STREET MIDLAND, TEXAS 79701-5021 432-682-3753 ASHLEY BEAL LAFEVERS ALEX BEAL HILL DAVENPORT TREY FUQUA ADAMS DAVENPORT MICHAEL BEAL

December 20, 2023

Federal Express 7745 5520 7490

In re: Crazy Goat 8711 14-11 State Com Well Proposals E/2 Section 11 and E/2 Section 14, Township 22 South, Range 34 East, Lea County, New Mexico BTA 8711 Chiso, Tr. I, II, V, VI

MRC Permian Company 5400 LBJ Freeway, Suite 1500 Dallas, TX 75240

Attn: Ms. Diane E. Strickling Senior Land Coordinator

Dear Diane:

BTA Oil Producers, LLC ("BTA"), as Operator, proposes to drill the following Crazy Goat 8711 14-11 State Com Wells (the "Wells"), as two-mile horizontal, communitized, 1<sup>st</sup> and 2<sup>nd</sup> Bone Spring Wells. Pad drilling is scheduled to begin in mid-February, 2024.

BTA proposes drilling the Wells under the terms of a 2015 AAPL Operating Agreement which is included for your review and approval. The JOA has these general provisions:

- 300%/100%/ 300% non-consent penalty;
- \$12,000.00 / \$1,200.00 drilling and producing rates;
- Contract Area of 640 acres, being the E/2 of Section 11 and the E/2 of Section 14, T22S, R34E, limited to the 1<sup>st</sup> and 2<sup>nd</sup> Bone Spring Formation; and
- BTA Oil Producers, LLC named as Operator.

Please review the Operating Agreement, and if acceptable, secure the execution of the signature pages and return the executed set to BTA at your earliest convenience. After the memorandum is recorded in Lea County, New Mexico, BTA will provide you with a copy of such.

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BTA Oil Producers, LLC Case No. 24220 Exhibit A-4

#### BTA Oil Producers, LLC Proposed Wells

#### Crazy Goat 8711 14-11 State Com #3H

BTA proposes drill the 2<sup>nd</sup> Bone Spring horizontal well from the E/2 of Section 14 to the E/2 of Section 11, with a TVD of 10,100' and a MD of 20,355'. SL: 285' FSL & 1680' FEL in Section 14. BHL: 50' FNL & 1815' FEL in Section 11.

3

• BTA's AFE estimates Dry Hole Costs of \$3,869,159.00; Completion and Equipping Costs of \$6,580,480.00; for a total of \$10,449,639.00.

#### Crazy Goat 8711 14-11 State Com #4H

- BTA proposes drill the 2<sup>nd</sup> Bone Spring horizontal well from the E/2 of Section 14 to the E/2 of Section 11, with a TVD of 10,350' and a MD of 20,505'. SL: 285' FSL & 1650' FEL in Section 14. BHL: 50' FNL & 990' FEL in Section 11.
- BTA's AFE estimates Dry Hole Costs of \$3,874,459.00; Completion and Equipping Costs of \$6,580,480.00; for a total of \$10,454,939.00.

#### Crazy Goat 8711 14-11 State Com #5H

- BTA proposes drill the 1<sup>st</sup> Bone Spring horizontal well from the E/2 of Section 14 to the E/2 of Section 11, with a TVD of 9,600' and a MD of 19,755'. SL: 285' FSL & 1620' FEL in Section 14. BHL: 50' FNL & 2260' FEL in Section 11.
- BTA's AFE estimates Dry Hole Costs of \$3,784,041.00; Completion and Equipping Costs of \$6,580,480.00; for a total of \$10,364,521.00.

#### Crazy Goat 8711 14-11 State Com #6H

- BTA proposes drill the 1<sup>st</sup> Bone Spring horizontal well from the E/2 of Section 14 to the E/2 of Section 11, with a TVD of 9,600' and a MD of 19,755'. SL: 285' FSL & 1590' FEL in Section 14. BHL: 50' FNL & 990' FEL in Section 11.
- BTA's AFE estimates Dry Hole Costs of \$3,784,041.00; Completion and Equipping Costs of \$6,580,480.00; for a total of \$10,364,521.00.

Also enclosed are two (2) AFE's for each Crazy Goat Well. If you elect to participate in the drilling of the Wells, please return a signed copy of this letter along with one signed copy of each AFE to this office using the enclosed envelope. Please note the Wells are horizontal wells and there will be no casing point elections.

BTA requests that you make an election within 30 days of receipt of this proposal. In the event that there has been no election after 30 days from your receipt of this proposal, BTA will submit an application for a Compulsory Pooling Order with the New Mexico Oil Conservation Division.

Should you have any questions or require further information, please let me know.

Sincerely Rex D. Barker

Landman rbarker@btaoil.com

 Elect to participate in the Crazy Goat 8711 14-11 State Com #3H Well (Send well information requirements to BTA) Elect not to participate in the Crazy Goat 8711 14-11 State Com #3H Well
 Elect to participate in the Crazy Goat 8711 14-11 State Com #4H Well (Send well information requirements to BTA) Elect not to participate in the Crazy Goat 8711 14-11 State Com #4H Well
 Elect to participate in the Crazy Goat 8711 14-11 State Com #5H Well (Send well information requirements to BTA) Elect not to participate in the Crazy Goat 8711 14-11 State Com #5H Well
 Elect to participate in the Crazy Goat 8711 14-11 State Com #6H Well (Send well information requirements to BTA) Elect not to participate in the Crazy Goat 8711 14-11 State Com #6H Well

MRC Permian Company

By:	
Title:	
Date:	





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#### BTA OIL PRODUCERS WELL COST ESTIMATE & AUTHORITY FOR EXPENDITURE

	Location:	<ul> <li>Vell Name: Crazy Goat 8711 14-11 State Com #06H</li> <li>ocation: SHL: 285 FSL 1590 FEL Section 14</li> <li>FTP: 100 FSL 990 FEL Section 14</li> <li>LTP: 100 FNL 990 FEL Section 11</li> <li>BHL: 50 FNL 990 FEL Section 11</li> </ul>					Tota	al Depth:		600' TVD 9,755' MD
	Date Prepared:	22S-34E. Lea County, NM 12/13/2023			For	mation:	1st	Bone		
	,			IE	P	repared By: NE		TW		
	INTANGIBLE COST	S		RY	CA	SED HOLE	C	OMPLETION	TOT	AL COSTS
CODE	FORMA	ION EVALUATION	\$	0.000	\$		\$	00.000	\$	00.000
2203 2204	Logs Cores			8,000				20,000		28,000
2205		DN & ACCESS								
2211 2212	Survey 8 Damage			5,000 60,000						5,000 60,000
2213 2214	Road & I Other Lo			80,000 120,000				45,000		125,000 120,000
2223	DRILLIN Mobilizat	G RIG		120,000						120,000
2225 2226	Daywork			630,000		94,500				724,500
2220	Turnkey									
2232	Bits	G SUPPLIES		90,000						90,000
2233 2234	BHA Fuel			55,000 175,000		26,250		65,000		120,000 201,250
2236	Other Su MUD RE									
2241 2242	Mud Pur Mud Rer			55,000		5,000				60,000
2244 2245	Fresh W Brine			55,000 45,000		1,000		800,000		856,000 45,000
2246	Solids C			30,000		4,500				34,500
2247 2249		ated Other		28,000 8,000						28,000 8,000
2252	DRILLIN BOP Rel	G SERVICES ated		15,000		4,000				19,000
2253 2254	Casing F Welding			38,000 8,000		85,000 2,000		10,000		123,000 20,000
2255	Trucking			22,500		10,000		65,000		97,500
2256 2257	Other Se		:	82,000 297,000		8,000		375,000		465,000 297,000
2261	CEMEN Casing C	ementing		90,000		155,000				245,000
2262	Other Ce	menting ACT SERVICES						120,000		120,000
2266	Engineer	ing		8,000						8,000
2267 2268	Geologic Roustab	put		22,000 8,000				65,000		22,000 73,000
2269 2270		Supervision ntract Services		74,000 15,000		11,100		75,000		160,100 15,000
2272	COMPLI Pulling U	TION SERVICES						20,000		20,000
2273 2276	Drilling R Perforate	ig						345,000		345,000
2277	Stimulati	n						3,100,000		3,100,000
2278	OVERH							200,000		200,000
2280	Drilling & TOTAL INTANGIBL	Administrative E COSTS	\$ 2,2	10,000 253,500	\$	406,350	\$	10,000 5,315,000	\$	20,000 7,974,850
	TANGIBLE COSTS									
2311	TUBULA Surface			99,000						99,000
2312 2313	Intermed	iate Casing r & Hanger	:	245,000						245,000
2314	Production	on Casing				475,000				475,000
2315 2316	Other Tu									
2321	WELL E	QUIPMENT d		30,000		25,000		85,000		140,000
2322 2325	Flowline Tubing							105,000 90,000		105,000 90,000
2326 2327	Rods Pumps							,		,
2328	Pumping							05 000		05.000
2329 2331	Other W	ce Equipment ell Equipment		18,000		18,000		35,000 3,000		35,000 39,000
2361	LEASE I Tanks	QUIPMENT						155,000		155,000
2362 2363	Separato Heater T							145,000		145,000
2364 2365	Pumps Electrica							25,000 75,000		25,000 75,000
2366	Meters	-						35,000		35,000
2367 2368	Connect Lact Equ	ipment						65,000		65,000
2369	Other Le	ase Equipment	_					75,000		75,000
	SUBTOT	AL - TANGIBLES	:	392,000		518,000		893,000		1,803,000
2353 2353 2381 2382 2382 2382 2384	Gas Line Compres Gas Plar	Tangibles Intangibles ssor t Tangibles t Intangibles	_							
		AL - SYSTEMS				_		—		
	TOTAL TANGIBLE	COSTS	\$	392,000	\$	518,000	\$	893,000	\$	1,803,000
	GENER/	L CONTINGENCIES		158,730		55,461		372,480		586,671
	TOTALS BY PHASE		\$ 2,8	304,230	\$	979,811	\$	6,580,480	\$	10,364,521
	CUMULATIVE WEL	L COSTS	\$ 2,8	304,230	\$	3,784,041	\$	10,364,521		
	Initial Routing Date:									
	Land Approval Bloc	k:								

DATE: \_\_\_\_\_

#### BTA OIL PRODUCERS WELL COST ESTIMATE & AUTHORITY FOR EXPENDITURE

	Well Name: Location:	Crazy Goat 8711 14-11 State Com #04F SHL: 285 FSL 1650 FEL Section 14 FTP: 100 FSL 990 FEL Section 14 LTP: 100 FNL 990 FEL Section 11 BHL: 50 FNL 990 FEL Section 11	1				Tota	al Depth:	~10,350' TVD ~20,505' MD		
	Date Prepared:	22S-34E. Lea County, NM 12/13/2023					Forr	mation:	2nc	l Bone	
	Date i repared.	12/13/2023			Р	repared By:					
				NE DRY	CA	NE SED HOLE	CC	TW DMPLETION	TOT	AL COSTS	
CODE	INTANGIBLE COST FORMAT	S ION EVALUATION	\$		\$		\$		\$		
2203	Logs			8,000				20,000		28,000	
2204 2205	Cores DST										
2211	LOCATIC Survey &	DN & ACCESS Stake		5,000						5,000	
2212 2213	Damages Road & L	3		60,000 80,000				45,000		60,000 125,000	
2213	Other Loo	cation		120,000				45,000		120,000	
2223	DRILLIN Mobilizati			120,000						120,000	
2225 2226	Daywork Footage			661,500		94,500				756,000	
2227	Turnkey	G SUPPLIES									
2232	Bits	3 SUFFLIES		90,000						90,000	
2233 2234	BHA Fuel			55,000 183,750		26,250		65,000		120,000 210,000	
2236	Other Su MUD RE										
2241	Mud Purc	chase		55,000		5,000				60,000	
2242 2244	Mud Ren Fresh Wa			55,000		1,000		800,000		856,000	
2245 2246	Brine Solids Co	ontrol		45,000 31,500		4,500				45,000 36,000	
2247	Mud Mon			28,000		,				28,000	
2249	DRILLIN	G SERVICES		8,000						8,000	
2252 2253	BOP Rela Casing R			15,000 38,000		4,000 85,000				19,000 123,000	
2254 2255	Welding Trucking			8,000 22,500		2,000 10,000		10,000 65,000		20,000 97,500	
2256	Rental Ec			82,000		8,000		375,000		465,000	
2257	Other Se CEMENT			311,850						311,850	
2261 2262	Casing C Other Ce			90,000		155,000		120,000		245,000 120,000	
	CONTRA	CT SERVICES		0.000				120,000			
2266 2267	Engineer Geologica			8,000 22,000						8,000 22,000	
2268 2269	Roustabo Wellsite S	but Supervision		8,000 77,700		11,100		65,000 75,000		73,000 163,800	
2270	Other Co	ntract Services		15,000		,		-,		15,000	
2272	Pulling U	nit						20,000		20,000	
2273 2276	Drilling R Perforate							345,000		345,000	
2277 2278	Stimulatio Other Co	on mpl. Services						3,100,000 200,000		3,100,000 200,000	
	OVERHE	AD		10.000							
2280	TOTAL INTANGIBLE	Administrative E COSTS	\$	10,000 2,313,800	\$	406,350	\$	10,000 5,315,000	\$	20,000 8,035,150	
	TANGIBLE COSTS										
2311	TUBULA Surface (	RS		99,000						99,000	
2312	Intermedi	ate Casing		245,000						245,000	
2313 2314	Drlg Line Productic	r & Hanger n Casing				500,000				500,000	
2315 2316	Productio Other Tul	n Liner & Hanger (10,000 - TD) Julars									
	WELL EC	QUIPMENT		00.000		05.000		05 000		1 10 000	
2321 2322	Well Hea Flowline	a		30,000		25,000		85,000 105,000		140,000 105,000	
2325 2326	Tubing Rods							90,000		90,000	
2327 2328	Pumps Pumping	Lloit									
2329	Subsurfa	ce Equipment						35,000		35,000	
2331		ell Equipment QUIPMENT		18,000		18,000		3,000		39,000	
2361 2362	Tanks Separato	rs						155,000 145,000		155,000 145,000	
2363	Heater Tr							-			
2364 2365	Pumps Electrical	System						25,000 75,000		25,000 75,000	
2366 2367	Meters Connecto	ors						35,000 65,000		35,000 65,000	
2368 2369	Lact Equi							- 75,000		75,000	
2309						= 10,000					
	SUBIOL	AL - TANGIBLES		392,000		543,000		893,000		1,828,000	
2353	SYSTEM Gas Line	<b>S</b> Tangibles									
2353 2381		Intangibles									
2382	Gas Plan	t Tangibles									
2382 2384	Gas Plan Dehydrat	t Intangibles or									
	SUBTOT	AL - SYSTEMS		<u> </u>							
	TOTAL TANGIBLE (		\$	392,000	\$	542.000	\$	893,000	\$	1 939 000	
			Ф		Φ	543,000	Þ		Φ	1,828,000	
		L CONTINGENCIES		162,348		56,961	_	372,480	_	591,789	
	TOTALS BY PHASE		\$	2,868,148	\$	1,006,311	\$	6,580,480	\$	10,454,939	
	CUMULATIVE WEL	L COSTS	\$	2,868,148	\$	3,874,459	\$	10,454,939			
	Initial Routing Date:										
	Land Approval Block	K:									
	APPROVED BY:										
	COMPANY:										

C:\Users\rbarken\Documents\8711 Crazy Goat\AFE's\Crazy Goat #4H AFE

DATE: \_\_\_\_\_

#### CHRONOLOGY OF CONTACT

#### Crazy Goat 8711 14-11 State Com #3H, 4H, 5H & 6H

- 12/20/2023 Rex Barker, Landman for BTA Oil Producers, LLC, sent by FedEx, a Well Proposal Letter to Diane E. Strickling, Senior Land Coordinator for MRC Permian Company, proposing the Crazy Goat 8711 14-11 State Com #3H, 4H, 5H and 6H Wells.
- 1/9/2024 Emailed Diane E. Strickling expressing BTA's hope that MRC Permian Company will elect to participate in the Crazy Goat Wells and letting her know that pad drilling was scheduled to begin February 14, 2024.
- 1/9/2024 Diane Strickling replied that the BTA well proposals were entered into their system for their Team's evaluation. She said Clay Wooten is the Landman overseeing BTA's proposals.
- 1/9/2024 Emailed Diane Strickland, thanking her for her reply and to let her know that we would work through Clay Wooten on this venture.
- 1/11/2024 Clay Wooten, Senior Landman for Matador Resources Company (MRC) emailed a request for technical information on the proposed Crazy Goat Wells.
- 1/11/2024 Replied to Clay that we were gathering the information and asked if they had any questions on the BTA proposed Operating Agreement
- 1/12/2024 Emailed Clay Wooten with the requested technical information.
- 1/15/2024 Emailed BTA's revised drilling schedule to Clay Wooten.
- 1/19/2024 Emailed Clay Wooten and asked if MRC can make an election before our first spud date of February 6, 2024.
- 1/23/2024 Telephoned Clay Wooten about BTA's Crazy Goat Well Proposals.
- 1/23/2024 Clay Wooten emailed requesting a technical team call for January 25<sup>th</sup> at 1:30 p. m.
- 1/25/2024 Microsoft Teams Technical Meeting was held as scheduled. Participants for BTA were Britton McQuien, Engineer, Nick Eaton, Drilling, Trace Wohlfahrt, Completions, Darin Dolezal, Geologist, Willis Price, Land, Rex Barker, Land. Participants for MRC were Clark Collier, Asset Manager/Geologist, Jan Mosnes, Production Engineer, Perry Hawks, Drilling Engineer and Brady Borak, Reservoir Engineer.

#### CHRONOLOGY OF CONTACT continued

- 1/26/2024 Emailed Clay Wooten for an update on BTA's proposed JOA. Telephoned Clay and left a message asking if MRC might elect to participate now and work on the JOA afterwards.
- 1/29/2024 Clay Wooten emailed Rex Barker that he would get with MRC's attorney to review the JOA.
- 1/30/2024 Telephoned Clay Wooten at MRC and left message.
- 1/30/2024 Clay Wooten returned call to Rex Barker and advised that the Crazy Goat Well Proposals were recommended for executive approval but did not know how long that may take.
- 2/2/2024 Emailed Clay Wooten asking for a report on MRC's Crazy Goat Well Proposal elections.
- 2/5/2024 Clay Wooten emailed and said he would ask his team to focus on the Crazy Goat Well Proposals.
- 2/7/2024 Emailed Clay Wooten for an update on the Crazy Goat Well Proposals.
- 2/9/2024 Emailed Clay Wooten for an update on the Crazy Goat Well Proposals.
- 2/12/2024 Clay Wooten emailed that he would get with his team.
- 2/15/2024 Emailed Clay Wooten and told him that BTA spud the Crazy Goat 8711 14-11 State Com #6H on 2/14/2024 and asked him for MRC's election.
- 2/19/2024 Clay Wooten emailed that MRC Management reviewed the Crazy Goat Well Proposals and that an election should be coming shortly. Clay is waiting to hear back from legal on BTA's proposed operating agreement.
- 2/19/2024 Kristen Juett of MRC emailed BTA with MRC's signed elections to participate in the Crazy Goat 8711 14-11 State Com #3H, 4H, 5H and 6H Wells.
- 2/20/2024 Emailed Clay Wooten and thanked him for the update.
- 2/20/2024 Emailed Kristen Juett thanking MRC for their elections and gave Kristen some requested well information.

#### CHRONOLOGY OF CONTACT continued

- 2/26/2024 Emailed Kristen Juett with some requested well information.
- 3/5/2024 Emailed Clay Wooten and asked for an update.
- 3/11/2024 Emailed Clay Wooten and asked him when we could expect MRC's reply on our proposed operating agreement.
- 3/11/2024 Clay Wooten emailed Rex Barker with MRC's requested JOA revisions.
- 3/11/2024 Emailed Clay Wooten a PDF version of BTA's proposed JOA.
- 3/13/2024 Emailed Clay Wooten with BTA's response to the requested JOA revisions.
- 3/14/2024 Emailed Clay Wooten and explained that BTA would like to finalize the Crazy Goat JOA prior to 3/21/2024 so that we can dismiss the pending compulsory pooling cases. Asked if MRC would approve the JOA revisions this week.
- 3/14/2024 Clay Wooten emailed that people were out of the office on spring break and were unsure if they could get the JOA revisions turned around this week. Clay said he would update BTA early next week.

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

#### APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

#### **CASE NO. 24220**

#### SELF-AFFIRMED STATEMENT OF DARIN A. DOLEZAL

1. I am a geologist at BTA Oil Producers, LLC ("BTA") and am over 18 years of age. I have personal knowledge of the matters addressed herein and am competent to provide this Self-Affirmed Statement. I have previously testified before the New Mexico Oil Conservation Division ("Division") and my credentials as an expert in geologic matters were accepted as a matter of record.

2. I am familiar with the geological matters that pertain to the above-referenced case.

3. **Exhibit B-1** is a project location map that shows the location of the proposed Crazy Goat 8711 14-11 State Com #4H and Crazy Goat 8711 14-11 State Com #6H wells ("Wells").

4. BTA is targeting the First and Second Bone Spring sands. **Exhibit B-2** is a subsea structure map of the Third Bone Spring Carbonate that I prepared for this interval with 50-foot contours. The proposed horizontal well spacing unit is highlighted in red and the approximate wellbore path for each of the proposed Wells are identified by the dashed black lines. The structure map shows the Bone Spring Formation appears consistent across the proposed spacing unit and I do not observe any faulting, pinch outs, or other geologic impediments to drilling horizontal wells in this area.

5. **Exhibit B-2** also shows a cross-section line in blue running North to South reflecting three wells penetrating the Bone Spring Formation. I have used these wells to construct a stratigraphic cross-section from A to A' with a datum on the top of the Second Bone Spring Carbonate in proximity to the

1

proposed Wells. These wells contain good logs and I consider them representative of the geology in the subject area.

6. **Exhibit B-3** is a stratigraphic cross-section that I prepared using the logs from the three wells noted on **Exhibit B-2**. Each well in the cross-section contains the gamma ray in the first track and resistivity in the second track. The target intervals are indicated in green and yellow. The cross-section demonstrates that both targeted intervals are continuous across the proposed spacing unit.

7. **Exhibit B-4** is a Gross Isopach map of the First Bone Spring Sand interval. The proposed horizontal well spacing unit is highlighted in red and the approximate wellbore path for each of the proposed Wells are identified by the dashed black lines. The anticipated average gross thickness of the First Bone Spring Sand interval is 190 feet. The Gross Isopach map demonstrates that the First Bone Spring Sand interval is present across the proposed spacing unit. The location of the previous cross-section from A to A' in **Exhibit B-3** is also shown as a blue line on these maps.

8. **Exhibit B-5** is a Gross Isopach map of the Second Bone Spring Sand interval. The proposed horizontal well spacing unit is highlighted in red and the approximate wellbore path for each of the proposed Wells are identified by the dashed black lines. The anticipated average gross thickness of the Second Bone Spring Sand interval is 375 feet. The Gross Isopach map demonstrates that the Second Bone Spring Sand interval is present across the proposed spacing unit. The location of the previous cross-section from A to A' in **Exhibit B-3** is also shown as a blue line on these maps.

9. In my opinion, a stand-up orientation for the Wells is appropriate to properly develop the subject acreage because of consistent rock properties throughout the Unit and is the preferred fracture orientation in this portion of the trend.

2

10. Based on my geologic study, the Bone Spring Formation underlying the subject area is suitable for development by horizontal wells and the acreage comprising the proposed spacing unit will be productive and contribute proportionately to the production from the Wells.

11. In my opinion, the granting of BTA's application will serve the interests of conservation, the protection of correlative rights, and the prevention of waste.

12. The exhibits attached hereto were either prepared by me or under my supervision or were compiled from company business records.

13. I understand this Self-Affirmed Statement will be used as written testimony in this case. I affirm my testimony above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date identified next to my signature below.

Darin Dolezal

3/13/24 Date

Released to Imaging: 3/19/2024 9:10:58 AM





Released to Endgingt: B412/2024 9:10:58 AM



**BTA OIL PRODUCERS, LLC** 

Released to Imaging: 3/19/2024 9:10:58 AM

March, 2024 - DAD/jhb



Release Et hibig Bg 43/19/2024 9:10:58 AM



Release to the inging 3/19/2024 9:10:58 AM

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

#### APPLICATION OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 24220

#### SELF-AFFIRMED STATEMENT OF DANA S. HARDY

1. I am attorney in fact and authorized representative of BTA Oil Producers, LLC, the Applicant herein.

2. I am familiar with the Notice Letters attached as **Exhibit C-1** and caused the Notice Letters, along with the Application in this case, to be sent to the parties set out in the chart attached

as Exhibit C-2.

3. Exhibit C-2 also provides the date each Notice Letter was sent and the date each return was received.

4. Copies of the certified mail green cards and white slips are attached as Exhibit C-3 as supporting documentation for proof of mailing and the information provided on Exhibit C-2.

5. I understand this Self-Affirmed Statement will be used as written testimony in the subject cases. I affirm that my testimony above is true and correct and it made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

*/s/ Dana S. Hardy* Dana S. Hardy <u>March 13, 2024</u> Date

> BTA Oil Producers, LLC Case No. 24220 Exhibit C



#### HINKLE SHANOR LLP

ATTORNEYS AT LAW P.O. BOX 2068 SANTA FE, NEW MEXICO 87504 505-982-4554 (FAX) 505-982-8623

WRITER: Dana S. Hardy, Partner dhardy@hinklelawfirm.com

February 16, 2024

#### <u>VIA CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

#### TO ALL PARTIES ENTITLED TO NOTICE

## Re: Case Nos. 24219 & 24220 – Applications of BTA Oil Producers, LLC for Compulsory Pooling, Lea County, New Mexico.

To whom it may concern:

This letter is to advise you that the enclosed applications were filed with the New Mexico Oil Conservation Division. The hearing will be conducted on **March 21, 2024**, beginning at 8:15a.m.

The hearing will be conducted in a hybrid fashion, both in-person at the Energy, Minerals, Natural Resources Department, Wendell Chino Building, Pecos Hall, 1220 South St. Francis Drive, 1st Floor, Santa Fe, NM 87505 and via the WebEx virtual meeting platform. To participate virtually, the instructions OCD Hearings see posted on the website: https://www.emnrd.nm.gov/ocd/hearing-info/. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Pursuant to Division Rule 19.15.4.13.B, a party who intends to present evidence at the hearing shall file a pre-hearing statement and serve copies on other parties, or the attorneys of parties who are represented by counsel, at least four business days in advance of a scheduled hearing, but in no event later than 5:00 p.m. Mountain Time, on the Thursday preceding the scheduled hearing date. The statement must be submitted through the OCD E-Permitting system (https://wwwapps.emnrd.nm.gov/ocd/ocdpermitting/) or via e-mail to ocd.hearings@emnrd.nm.gov and should include: the names of the parties and their attorneys, a concise statement of the case, the names of all witnesses the party will call to testify at the hearing, the approximate time the party will need to present its case, and identification of any procedural matters that are to be resolved prior to the hearing.

Please contact Rex Barker, Landman, BTA Oil Producers, LLC, at 432-682-3753 if you have questions regarding these matters.

Sincerely,

<u>/s/ Dana S. Hardy</u> Dana S. Hardy

BTA Oil Producers, LLC Case No. 24220 Exhibit C-1

Enclosure

PO BOX 10 ROSWELL, NEW MEXICO 88202 (575) 622-6510 FAX (575) 623-9332 7601 JEFFERSON ST NE · SUITE 180 ALBUQUERQUE, NEW MEXICO 87109 505-858-8320 (FAX) 505-858-8321 PO BOX 2068 SANTA FE, NEW MEXICO 87504 (505) 982-4554 FAX (505) 982-8623

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

#### APPLICATIONS OF BTA OIL PRODUCERS, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 24219 & 24220

#### NOTICE LETTER CHART

PARTY	NOTICE LETTER SENT	<b>RETURN RECEIVED</b>
MRC Permian Company	02/16/24	02/23/24
Attn: Clay Wooten		
5400 LBJ Freeway, Suite 1500		
Dallas, TX 75240		

BTA Oil Producers, LLC Case No. 24220 Exhibit C-2





BTA Oil Producers, LLC Case No. 24220 Exhibit C-3