

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

**APPLICATIONS OF ALPHA ENERGY
PARTNERS, LLC TO POOL ADDITIONAL
INTERESTS UNDER ORDER NO. R-23005,
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24826
ORDER NO. R-23005**

**APPLICATIONS OF ALPHA ENERGY
PARTNERS, LLC TO POOL ADDITIONAL
INTERESTS UNDER ORDER NO. R-23006,
EDDY COUNTY, NEW MEXICO.**

**CASE NO. 24827
ORDER NO. R-23006**

**REPLY MOTION TO DISMISS AND
TERMINATE ORDERS**

Permian Resources Operating, LLC (“Permian”), through undersigned attorneys, hereby submits this reply in support of its Motion. For the reasons stated in the Motion and outlined in this reply, Alpha Energy Partners, LLC’s (“Alpha”) applications should be dismissed and their orders terminated.

ARGUMENT

Alpha’s 21-page response raises a range of irrelevant rhetorical and argumentative issues but admits the dispositive facts that mandate dismissal and confirm Permian has standing to seek dismissal.¹ In addition, Alpha’s applications should be dismissed for a second independent reason.

¹ In its response, Alpha concedes Permian is a party subject to the Division’s notice requirements in both Case Nos. 23005 and 23006. *See* Alpha Response ¶¶ 11-12 (“ . . . Permian with approximately 9.6% of unpooled working interest in the N/2 Unit.” and “Permian Resources was able to track down and obtain a miniscule 0.13% working interest in the S/2 Unit, . . .”). Permian therefore has a right to object to both cases proceeding to hearing by affidavit and to seek dismissal of the applications and termination of the existing orders on the grounds that they suffer from material defects. To perfect any technical requirements to formally appear and object, Permian has filed a written entry of appearance and objection in Case No. 24827.

First, as Alpha concedes, the applications are defective because they do not correctly designate the intended operator of either spacing unit. The New Mexico Oil and Gas Act (“the Act”) requires that “each order shall describe the lands included in the unit designated thereby, identify the pool or pools to which it applies and designate an operator for the unit.” NMSA § 70-2-17 (emphasis added). By its own admission, Alpha intends Paloma Permian Asset Co, LLC (“Paloma”) to be the designated operator of these spacing units. *See* Alpha Response ¶ 31 (acknowledging Alpha’s farmout grants Paloma “the drilling and operation of the wells on the Subject Lands[,]” which rights revert to Alpha only if “Paloma does not comply with the specifications” of the farmout agreement). Alpha made that decision before it even filed its applications; the Memorandum of Agreement (“MOA”) was fully executed on July 11, 2024 and the applications were not filed until August 30, 2024. Plus, Alpha’s intent is confirmed by the fact that Paloma—not Alpha—filed C-102s and APDs in October and November 2024 for the wells proposed in the spacing units. *See* Exhibit A. This type of material deficiency, i.e., “Change of Operator Name” and “Change in Operator OGRID Number,” is literally identified verbatim in the OCD Notice: Material Changes or Deficiencies in Applications Submitted to the OCD Engineering Bureau (Effective June 11, 2020) (“OCD Material Changes Notice”). *See* Exhibit B. It is clearly a material deficiency with Alpha’s applications—as clear as Alpha’s intent is to make Paloma the operator of the units.²

More astonishing than Alpha’s inability to own up to its materially deficient applications are the assumptions it makes about what it believes Permian would have done had it come to an agreement with Alpha. *See* Alpha Response ¶ 34-38. Alpha completely misconstrues the communications between the parties. *See id.*; *see also* Alpha Response Exhibit 6. Rather than point out all the misstatements it is sufficient to point to one. Had Permian and Alpha come to an agreement, Permian

² Note, that in Alpha’s Response it concedes this deficiency by confirming it will refile its applications. *See* Alpha Response ¶ 46.

would have reopened the pooling orders to designate itself as operator, just like it did in Case No. 24340.³ Alpha is completely off the mark.

Second, and more importantly, contrary to its assertion, Alpha is unqualified to be operator of the units—farmout agreement or not—because it is out of compliance with the Division’s inactive well rules. *See* 19.15.5.9(A)(4)(a) and (B)(1)(a) NMAC. At the time the Division issued Order Nos. R-23005 and R-23006, the Division may have determined Alpha was at least nominally “qualified” to operate its proposed wells. *See* Alpha Response ¶ 42. But that finding is no longer supported by the facts.

Alpha operates four wells in New Mexico—total. Of those wells, three are inactive. *See* Exhibit C. To be in compliance, Alpha can have no more than two wells, or 50%, of the wells it operates out of compliance. 19.15.5.9(A)(4)(a) NMAC. Here, 75% of Alpha’s wells are out of compliance. Non-compliance as an operator is “of consequence” to the status of its applications. *See* Exhibit B. “A change or deficiency is material if its existence or nonexistence is of consequence to the public notice or substantive rules for the application.” *Id.* The fact that Alpha is out of compliance with the Division rules for inactive wells is yet another material deficiency with their applications, *and* this particular material deficiency makes Alpha subject to sanctions for non-compliance. *See* 19.15.5.10 NMAC. Alpha’s applications should be dismissed for this independent reason.

CONCLUSION

Permian has standing in both cases; it owns an interest in the units, Alpha is reopening the cases and the Division retains jurisdiction, and there are material deficiencies with the applications that impact not only Permian but the other interest owners in these cases. Ironically, it is Alpha, with its materials deficiencies, that does not have a leg to stand on in these cases.

³ In Case No. 24340, SPC Resources, LLC reopened its existing Pooling Order, OCD Order R-21096, to, among other things, designate Permian as operator after being wholly acquired by Permian. Proper notice was provided to all previously pooled interests owners of the same.

WHEREFORE, Permian respectfully requests that Alpha's Case Nos. 24826 and 24827 be dismissed and Order No. R-23005 and No. R-23006 be terminated.

Respectfully submitted,

HOLLAND & HART, LLP



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**ATTORNEYS FOR PERMIAN RESOURCES OPERATING,
LLC**

CERTIFICATE OF SERVICE

I hereby certify that on January 7, 2025, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

Form C-101
August 1, 2011

Permit 375496

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
		3. API Number 30-015-55727
4. Property Code 336494	5. Property Name The Dude Fee 20-19	6. Well No. 701H

7. Surface Location

UL - Lot H	Section 20	Township 22S	Range 27E	Lot Idn	Feet From 1912	N/S Line N	Feet From 184	E/W Line E	County Eddy
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8. Proposed Bottom Hole Location

UL - Lot M	Section 19	Township 22S	Range 27E	Lot Idn LOT 4	Feet From 880	N/S Line S	Feet From 200	E/W Line W	County Eddy
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9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3123
16. Multiple N	17. Proposed Depth 19783	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/18/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☒ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	505	0
Int1	12.25	9.625	40	3184	1045	0
Prod	8.5	5.5	23	19773	3055	0

Casing/Cement Program: Additional Comments

Plan to use DV tool in the top of the Bone Spring ~5400 ft and do 2 stage cement job on production casing.
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22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	Axon
Pipe	10000	10000	Axon
Annular	5000	5000	Axon

<p>23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable.</p> <p>Signature:</p> <p>Printed Name: Electronically filed by Brittney Brunner</p> <p>Title: OpAdmin</p> <p>Email Address: bbrunner@palomaresources.com</p> <p>Date: 10/24/2024</p> <p>Phone: 713-654-8534</p>	<p>OIL CONSERVATION DIVISION</p> <p>Approved By: Ward Rikala</p> <p>Title: Petroleum Specialist Supervisor</p> <p>Approved Date: 11/13/2024</p> <p>Expiration Date: 11/13/2026</p> <p>Conditions of Approval Attached</p>
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EXHIBIT
A

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

Form C-102
August 1, 2011
Permit 375496

WELL LOCATION AND ACREAGE DEDICATION PLAT

1. API Number 30-015-55727	2. Pool Code 98220	3. Pool Name PURPLE SAGE;WOLFCAMP (GAS)
4. Property Code 336494	5. Property Name The Dude Fee 20-19	6. Well No. 701H
7. OGRID No. 332449	8. Operator Name Paloma Permian AssetCo, LLC	9. Elevation 3123

10. Surface Location

UL - Lot H	Section 20	Township 22S	Range 27E	Lot Idn	Feet From 1912	N/S Line N	Feet From 184	E/W Line E	County Eddy
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11. Bottom Hole Location If Different From Surface

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
12. Dedicated Acres 634.36	13. Joint or Infill	14. Consolidation Code Forced Pooling	15. Order No.						

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

	<p>OPERATOR CERTIFICATION</p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location(s) or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p>E-Signed By: Brittney Brunner</p> <p>Title: OpAdmin</p> <p>Date: 10/24/2024</p>
	<p>SURVEYOR CERTIFICATION</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>Surveyed By: Tim Pappas</p> <p>Date of Survey: 10/18/2024</p> <p>Certificate Number: 21209</p>

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

Form C-101
August 1, 2011

Permit 375599

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
		3. API Number 30-015-55728
4. Property Code 336494	5. Property Name The Dude Fee 20-19	6. Well No. 702H

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
H	20	22S	27E		1892	N	184	E	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
L	19	22S	27E	LOT 3	2200	S	200	W	Eddy

9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3123
16. Multiple N	17. Proposed Depth 19527	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/18/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☒ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	505	0
Int1	12.25	9.625	40	3126	1035	0
Prod	8.5	5.5	23	19526	3005	0

Casing/Cement Program: Additional Comments

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22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	Axon
Pipe	10000	10000	Axon
Annular	5000	5000	Axon

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature:	OIL CONSERVATION DIVISION
Printed Name: Electronically filed by Brittney Brunner	Approved By: Ward Rikala
Title: OpAdmin	Title: Petroleum Specialist Supervisor
Email Address: bbrunner@palomaresources.com	Approved Date: 11/13/2024 Expiration Date: 11/13/2026
Date: 10/24/2024 Phone: 713-654-8534	Conditions of Approval Attached

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July 9, 2024	
		Submittal Type:	<input type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

WELL LOCATION INFORMATION

API Number 30-015-55728 PENDING	Pool Code 98220	Pool Name PURPLE SAGE WOLFCAMP (GAS)
Property Code 336494	Property Name THE DUDE FEE COM 20-19	Well Number #702H
OGRID No. 332449	Operator Name PALOMA PERMIAN ASSETCO, LLC	Ground Level Elevation 3123'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

Surface Location

UL H	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 1892' FNL	Ft. from E/W 184' FEL	Latitude 32.380372°	Longitude -104.203592°	County EDDY
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Bottom Hole Location

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 3	Ft. from N/S 2200' FSL	Ft. from E/W 200' FWL	Latitude 32.376410°	Longitude -104.236965°	County EDDY
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Dedicated Acres 634.36	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers.			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL L	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 2200' FSL	Ft. from E/W 270' FWL	Latitude 32.376825°	Longitude -104.202135°	County EDDY
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First Take Point (FTP)

UL I	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 2200' FSL	Ft. from E/W 330' FEL	Latitude 32.376825°	Longitude -104.204078°	County EDDY
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Last Take Point (LTP)


UL	Section 19	Township 22 S	Range 27 E	Lot LOT 3	Ft. from N/S 2200' FSL	Ft. from E/W 330' FWL	Latitude 32.376420°	Longitude -104.236544°	County EDDY
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Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3123'
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OPERATOR CERTIFICATIONS

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.

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.


Signature
Date
10/21/2024

Lelan J Anders

Printed Name

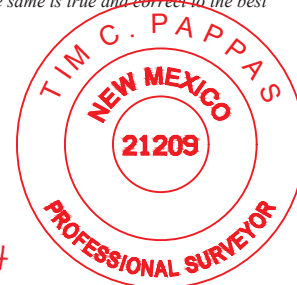
LAnders@PalomaResources.com

Email Address

SURVEYOR CERTIFICATIONS

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.


18 Oct 2024



Signature and Seal of Professional Surveyor

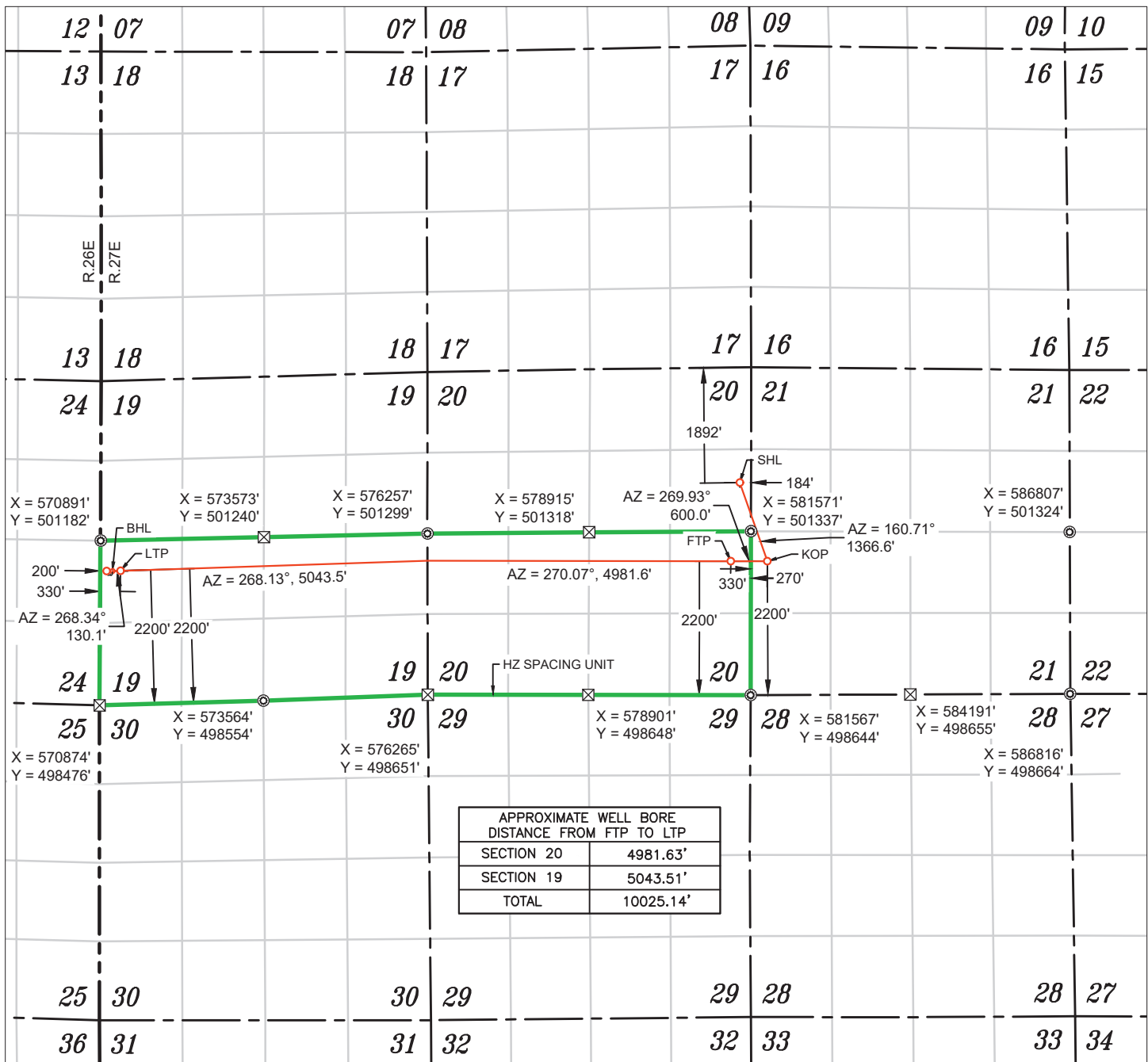
21209

OCTOBER 10, 2024

Certificate Number

Date of Survey

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.



WELL NAME: THE DUDE FEE COM 20-19 #702H
ELEVATION: 3123'

NAD 83 (SHL) 1892' FNL & 184' FEL
LATITUDE = 32.380372°
LONGITUDE = -104.203592°
NAD 27 (SURFACE HOLE LOCATION)
LATITUDE = 32.380253°
LONGITUDE = -104.203090°
STATE PLANE NAD 83 (N.M. EAST)
N: 502135.18' E: 581388.82'
STATE PLANE NAD 27 (N.M. EAST)
N: 502075.64' E: 540207.26'

NAD 83 (KOP) 2200' FSL & 270' FWL
LATITUDE = 32.376825°
LONGITUDE = -104.202135°
NAD 27 (KOP)
LATITUDE = 32.376706°
LONGITUDE = -104.201633°
STATE PLANE NAD 83 (N.M. EAST)
N: 500845.30' E: 581840.24'
STATE PLANE NAD 27 (N.M. EAST)
N: 500785.79' E: 540658.65'

NAD 83 (FTP) 2200' FSL & 330' FEL
LATITUDE = 32.376825°
LONGITUDE = -104.204078°
NAD 27 (FTP)
LATITUDE = 32.376706°
LONGITUDE = -104.203576°
STATE PLANE NAD 83 (N.M. EAST)
N: 500844.61' E: 581240.24'
STATE PLANE NAD 27 (N.M. EAST)
N: 500785.11' E: 540058.66'

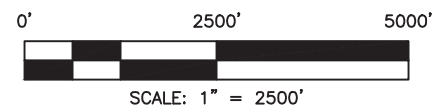
NAD 83 (LTP) 2200' FSL & 330' FWL
LATITUDE = 32.376420°
LONGITUDE = -104.236544°
NAD 27 (LTP)
LATITUDE = 32.376302°
LONGITUDE = -104.236041°
STATE PLANE NAD 83 (N.M. EAST)
N: 500686.62' E: 571217.79'
STATE PLANE NAD 27 (N.M. EAST)
N: 500627.24' E: 530036.33'

NAD 83 (BHL) 2200' FSL & 200' FWL
LATITUDE = 32.376410°
LONGITUDE = -104.236965°
NAD 27 (BHL)
LATITUDE = 32.376292°
LONGITUDE = -104.236462°
STATE PLANE NAD 83 (N.M. EAST)
N: 500682.86' E: 571087.77'
STATE PLANE NAD 27 (N.M. EAST)
N: 500623.48' E: 529906.31'

- FOUND MONUMENT
 CALC. CORNER
 SHL/ KOP/ FTP / PPP/ LTP / BHL
 HORIZONTAL SPACING UNIT
 STATE OIL & GAS LEASE
 BLM OIL & GAS LEASE

NOTES

- ALL COORDINATES, BEARINGS, AND DISTANCES CONTAINED HEREIN ARE GRID, BASED UPON THE NEW MEXICO STATE PLANE COORDINATES SYSTEM, NORTH AMERICAN DATUM 83, NEW MEXICO EAST (3001).
- THIS DOCUMENT IS BASED UPON AN ON THE GROUND SURVEY PERFORMED DURING OCTOBER, 2024. CERTIFICATION OF THIS DOCUMENT IS ONLY TO THE LOCATION OF THIS EASEMENT IN RELATION TO RECORDED MONUMENT OF DEEDS PROVIDED BY THE CLIENT.
- ELEVATIONS MSL, DERIVED FROM G.N.S.S. OBSERVATION AND DERIVED FROM SAID ON-THE-GROUND SURVEY.



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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

Form C-101
August 1, 2011

Permit 376175

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
4. Property Code 336494		3. API Number 30-015-55729
5. Property Name The Dude 20-19		6. Well No. 703H

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
A	20	22S	27E		798	N	460	E	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
E	19	22S	27E	LOT 2	1865	N	200	W	Eddy

9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3122
16. Multiple N	17. Proposed Depth 19453	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/25/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☒ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	540	0
Int1	12.25	9.625	40	3121	895	0
Prod	8.75	5.5	23	19453	2950	0

Casing/Cement Program: Additional Comments

Our 9-5/8" 40# L-80 casing is special drift to 8.75".

22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	AXON
Pipe	10000	10000	AXON
Annular	5000	5000	AXON

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature:	OIL CONSERVATION DIVISION
Printed Name: Electronically filed by Brittney Brunner	Approved By: Ward Rikala
Title: OpAdmin	Title: Petroleum Specialist Supervisor
Email Address: bbrunner@palomaresources.com	Approved Date: 11/13/2024 Expiration Date: 11/13/2026
Date: 11/1/2024 Phone: 713-654-8534	Conditions of Approval Attached

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION		Revised July 9, 2024	
			Submittal Type:	<input type="checkbox"/> Initial Submittal
				<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled		

30-015-55729

WELL LOCATION INFORMATION

API Number PENDING		Pool Code 98220		Pool Name PURPLE SAGE WOLFCAMP (GAS)	
Property Code 336494		Property Name THE DUDE FEE COM 20-19			Well Number #703H
OGRID No. 332449		Operator Name PALOMA PERMIAN ASSETCO, LLC			Ground Level Elevation 3122'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal				Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal	

Surface Location

UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 798' FNL	Ft. from E/W 460' FEL	Latitude 32.383369°	Longitude -104.204477°	County EDDY
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Bottom Hole Location

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 2	Ft. from N/S 1865' FNL	Ft. from E/W 200' FWL	Latitude 32.379871°	Longitude -104.236940°	County EDDY
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Dedicated Acres 634.28	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers.			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL E	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 1865' FNL	Ft. from E/W 270' FWL	Latitude 32.380444°	Longitude -104.202123°	County EDDY
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First Take Point (FTP)

UL H	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 1865' FNL	Ft. from E/W 330' FEL	Latitude 32.380441°	Longitude -104.204066°	County EDDY
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Last Take Point (LTP)

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 2	Ft. from N/S 1865' FNL	Ft. from E/W 330' FWL	Latitude 32.379881°	Longitude -104.236519°	County EDDY
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Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3122'
---	---	----------------------------------

OPERATOR CERTIFICATIONS

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.

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.

10/21/2024

Signature

Date

Lelan J Anders

Printed Name

LAnders@PalomaResources.com

Email Address

SURVEYOR CERTIFICATIONS

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.

18 Oct 2024

Signature and Seal of Professional Surveyor

21209

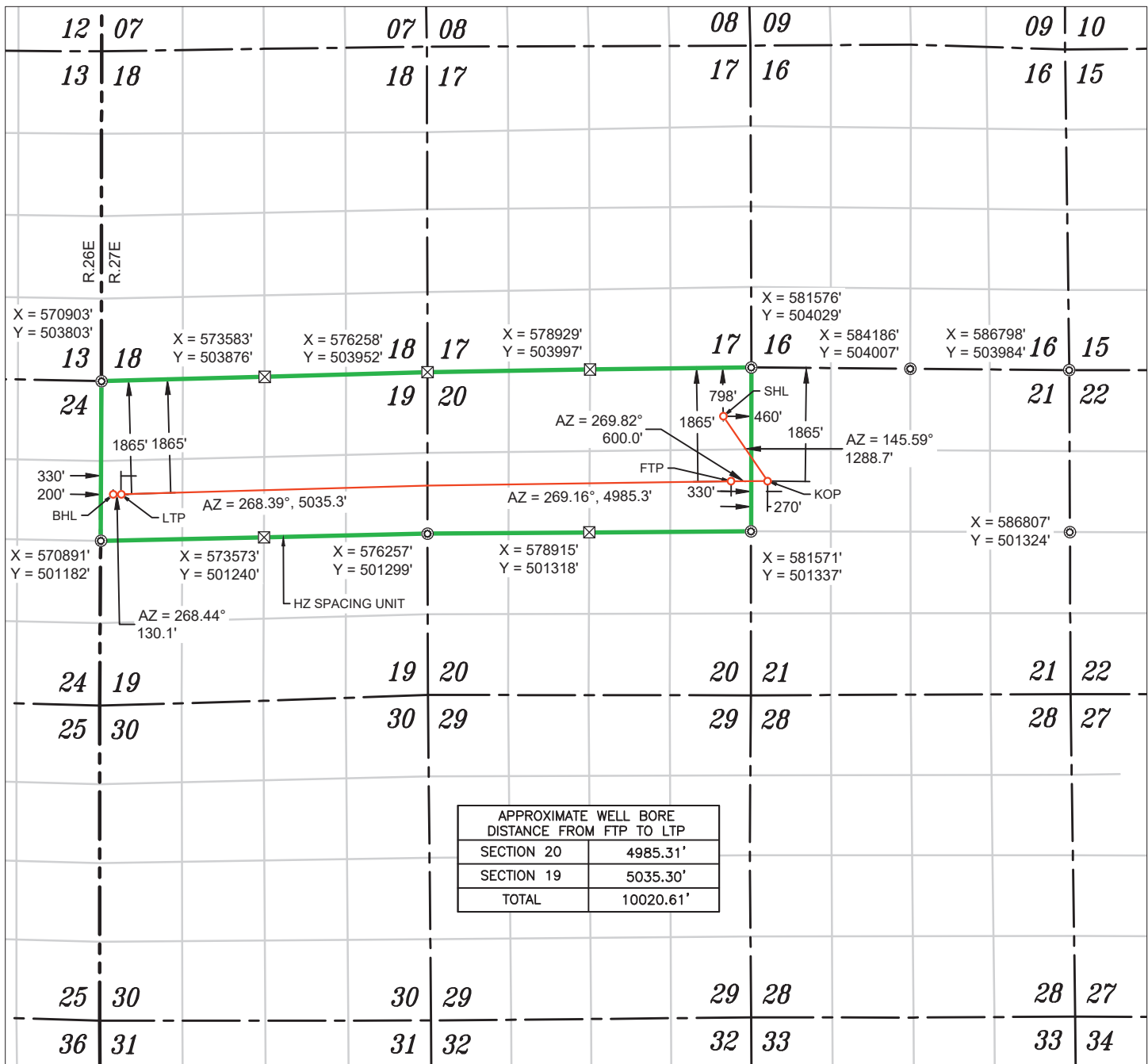
OCTOBER 10, 2024

Certificate Number

Date of Survey

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.

Released to Imaging: 1/7/2025 3:04:28 PMM



WELL NAME: THE DUDE FEE COM 20-19 #703H
ELEVATION: 3122'

NAD 83 (SHL) 798' FNL & 460' FEL
LATITUDE = 32.383369°
LONGITUDE = -104.204477°
NAD 27 (SURFACE HOLE LOCATION)
LATITUDE = 32.383251°
LONGITUDE = -104.203975°
STATE PLANE NAD 83 (N.M. EAST)
N: 503225.29' E: 581114.27'
STATE PLANE NAD 27 (N.M. EAST)
N: 503165.73' E: 539932.74'

NAD 83 (KOP) 1865' FNL & 270' FWL
LATITUDE = 32.380444°
LONGITUDE = -104.202123°
NAD 27 (KOP)
LATITUDE = 32.380325°
LONGITUDE = -104.201621°
STATE PLANE NAD 83 (N.M. EAST)
N: 502162.04' E: 581842.43'
STATE PLANE NAD 27 (N.M. EAST)
N: 502102.50' E: 540660.87'

NAD 83 (FTP) 1865' FNL & 330' FEL
LATITUDE = 32.380441°
LONGITUDE = -104.204066°
NAD 27 (FTP)
LATITUDE = 32.380323°
LONGITUDE = -104.203564°
STATE PLANE NAD 83 (N.M. EAST)
N: 502160.18' E: 581242.43'
STATE PLANE NAD 27 (N.M. EAST)
N: 502100.64' E: 540060.88'

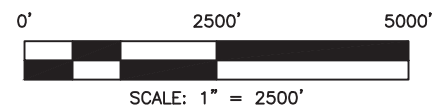
NAD 83 (LTP) 1865' FNL & 330' FWL
LATITUDE = 32.379881°
LONGITUDE = -104.236519°
NAD 27 (LTP)
LATITUDE = 32.379763°
LONGITUDE = -104.236016°
STATE PLANE NAD 83 (N.M. EAST)
N: 501945.63' E: 571224.34'
STATE PLANE NAD 27 (N.M. EAST)
N: 501886.21' E: 530042.90'

NAD 83 (BHL) 1865' FNL & 200' FWL
LATITUDE = 32.379871°
LONGITUDE = -104.236940°
NAD 27 (BHL)
LATITUDE = 32.379753°
LONGITUDE = -104.236437°
STATE PLANE NAD 83 (N.M. EAST)
N: 501942.08' E: 571094.32'
STATE PLANE NAD 27 (N.M. EAST)
N: 501882.66' E: 529912.88'

- FOUND MONUMENT
 CALC. CORNER
 SHL/ KOP/ FTP / PPP/ LTP / BHL
 HORIZONTAL SPACING UNIT
 STATE OIL & GAS LEASE
 BLM OIL & GAS LEASE

NOTES

- ALL COORDINATES, BEARINGS, AND DISTANCES CONTAINED HEREIN ARE GRID, BASED UPON THE NEW MEXICO STATE PLANE COORDINATES SYSTEM, NORTH AMERICAN DATUM 83, NEW MEXICO EAST (3001).
- THIS DOCUMENT IS BASED UPON AN ON THE GROUND SURVEY PERFORMED DURING OCTOBER, 2024. CERTIFICATION OF THIS DOCUMENT IS ONLY TO THE LOCATION OF THIS EASEMENT IN RELATION TO RECORDED MONUMENT OF DEEDS PROVIDED BY THE CLIENT.
- ELEVATIONS MSL, DERIVED FROM G.N.S.S. OBSERVATION AND DERIVED FROM SAID ON-THE-GROUND SURVEY.



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

Form C-101
August 1, 2011

Permit 376184

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
		3. API Number 30-015-55730
4. Property Code 336494	5. Property Name The Dude 20-19	6. Well No. 704H

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
A	20	22S	27E		778	N	460	E	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
D	19	22S	27E	LOT 1	556	N	200	W	Eddy

9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3122
16. Multiple N	17. Proposed Depth 19375	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/25/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☐ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	540	0
Int1	12.25	9.625	40	3100	895	0
Prod	8.75	5.5	23	19375	2940	0

Casing/Cement Program: Additional Comments

Our 9-5/8" 40# L-80 casing is special drift to 8.75".

22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	AXON
Pipe	10000	10000	AXON
Annular	5000	5000	AXON

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature:	OIL CONSERVATION DIVISION
Printed Name: Electronically filed by Brittney Brunner	Approved By: Ward Rikala
Title: OpAdmin	Title: Petroleum Specialist Supervisor
Email Address: bbrunner@palomaresources.com	Approved Date: 11/13/2024 Expiration Date: 11/13/2026
Date: 11/1/2024 Phone: 713-654-8534	Conditions of Approval Attached

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION	Revised July 9, 2024	
		Submittal Type:	<input type="checkbox"/> Initial Submittal
			<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled	

30-015-55730				WELL LOCATION INFORMATION			
API Number PENDING		Pool Code 98220		Pool Name PURPLE SAGE WOLFCAMP (GAS)			
Property Code 336494		Property Name THE DUDE FEE COM 20-19			Well Number #704H		
OGRID No. 332449		Operator Name PALOMA PERMIAN ASSETCO, LLC			Ground Level Elevation 3122'		
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal				Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal			

Surface Location									
UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 778' FNL	Ft. from E/W 460' FEL	Latitude 32.383424°	Longitude -104.204477°	County EDDY

Bottom Hole Location									
UL	Section 19	Township 22 S	Range 27 E	Lot LOT 1	Ft. from N/S 556' FNL	Ft. from E/W 200' FWL	Latitude 32.383471°	Longitude -104.236918°	County EDDY

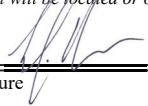

Dedicated Acres 634.28	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers.			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)									
UL D	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 556' FNL	Ft. from E/W 270' FWL	Latitude 32.384043°	Longitude -104.202110°	County EDDY

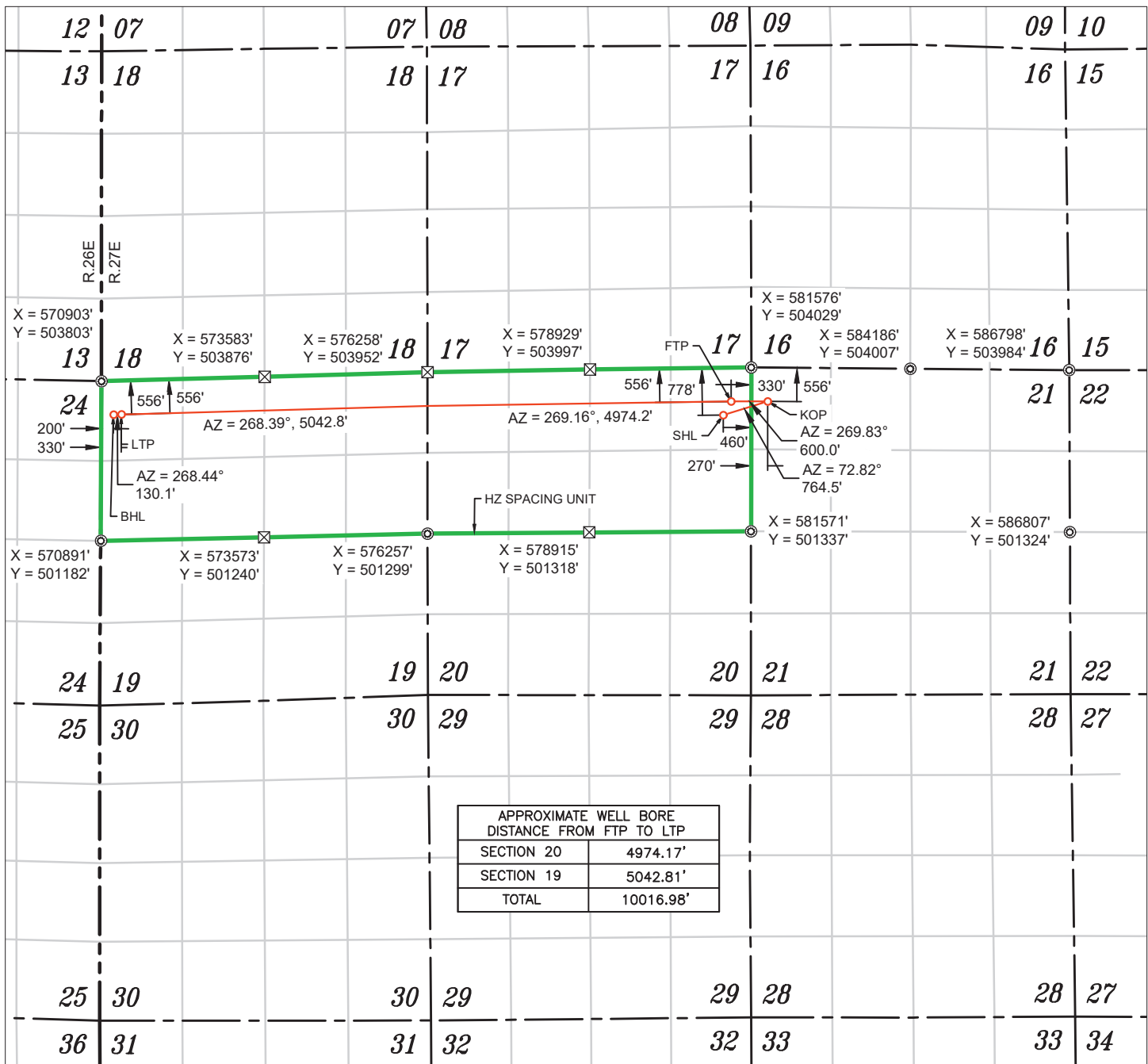
First Take Point (FTP)									
UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 556' FNL	Ft. from E/W 330' FEL	Latitude 32.384040°	Longitude -104.204054°	County EDDY

Last Take Point (LTP)									
UL	Section 19	Township 22 S	Range 27 E	Lot LOT 1	Ft. from N/S 556' FNL	Ft. from E/W 330' FWL	Latitude 32.383481°	Longitude -104.236496°	County EDDY

Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3122'
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OPERATOR CERTIFICATIONS <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> <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>  10/21/2024 Signature Date Lelan J Anders Printed Name LAnders@PalomaResources.com Email Address		SURVEYOR CERTIFICATIONS <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>  18 Oct 2024 Signature and Seal of Professional Surveyor 21209 OCTOBER 10, 2024 Certificate Number Date of Survey	
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WELL NAME: THE DUDE FEE COM 20-19 #704H
ELEVATION: 3122'

NAD 83 (SHL) 778' FNL & 460' FEL
LATITUDE = 32.383424°
LONGITUDE = -104.204477°
NAD 27 (SURFACE HOLE LOCATION)
LATITUDE = 32.383306°
LONGITUDE = -104.203975°
STATE PLANE NAD 83 (N.M. EAST)
N: 503245.29' E: 581114.28'
STATE PLANE NAD 27 (N.M. EAST)
N: 503185.73' E: 539932.75'

NAD 83 (KOP) 556' FNL & 270' FWL
LATITUDE = 32.384043°
LONGITUDE = -104.202110°
NAD 27 (KOP)
LATITUDE = 32.383924°
LONGITUDE = -104.201608°
STATE PLANE NAD 83 (N.M. EAST)
N: 503471.07' E: 581844.68'
STATE PLANE NAD 27 (N.M. EAST)
N: 503411.49' E: 540663.15'

NAD 83 (FTP) 556' FNL & 330' FEL
LATITUDE = 32.384040°
LONGITUDE = -104.204054°
NAD 27 (FTP)
LATITUDE = 32.383922°
LONGITUDE = -104.203552°
STATE PLANE NAD 83 (N.M. EAST)
N: 503469.31' E: 581244.68'
STATE PLANE NAD 27 (N.M. EAST)
N: 503409.74' E: 540063.15'

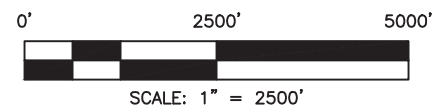
NAD 83 (LTP) 556' FNL & 330' FWL
LATITUDE = 32.383481°
LONGITUDE = -104.236496°
NAD 27 (LTP)
LATITUDE = 32.383363°
LONGITUDE = -104.235993°
STATE PLANE NAD 83 (N.M. EAST)
N: 503255.28' E: 571230.21'
STATE PLANE NAD 27 (N.M. EAST)
N: 503195.83' E: 530048.79'

NAD 83 (BHL) 556' FNL & 200' FWL
LATITUDE = 32.383471°
LONGITUDE = -104.236918°
NAD 27 (BHL)
LATITUDE = 32.383353°
LONGITUDE = -104.236415°
STATE PLANE NAD 83 (N.M. EAST)
N: 503251.73' E: 571100.19'
STATE PLANE NAD 27 (N.M. EAST)
N: 503192.28' E: 529918.78'

- FOUND MONUMENT
 CALC. CORNER
 SHL/ KOP/ FTP / PPP/ LTP / BHL
 HORIZONTAL SPACING UNIT
 STATE OIL & GAS LEASE
 BLM OIL & GAS LEASE

NOTES

- ALL COORDINATES, BEARINGS, AND DISTANCES CONTAINED HEREIN ARE GRID, BASED UPON THE NEW MEXICO STATE PLANE COORDINATES SYSTEM, NORTH AMERICAN DATUM 83, NEW MEXICO EAST (3001).
- THIS DOCUMENT IS BASED UPON AN ON THE GROUND SURVEY PERFORMED DURING OCTOBER, 2024. CERTIFICATION OF THIS DOCUMENT IS ONLY TO THE LOCATION OF THIS EASEMENT IN RELATION TO RECORDED MONUMENT OF DEEDS PROVIDED BY THE CLIENT.
- ELEVATIONS MSL, DERIVED FROM G.N.S.S. OBSERVATION AND DERIVED FROM SAID ON-THE-GROUND SURVEY.



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

General Information
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

Form C-101
August 1, 2011

Permit 375689

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
		3. API Number 30-015-55731
4. Property Code 336494	5. Property Name The Dude Fee 20-19	6. Well No. 801H

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
H	20	22S	27E		1872	N	184	E	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
L	20	22S	27E	LOT 3	1540	S	200	W	Eddy

9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3123
16. Multiple N	17. Proposed Depth 20244	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/18/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☒ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	505	0
Int1	12.25	9.625	40	3154	1040	0
Prod	8.5	5.5	23	20244	3105	0



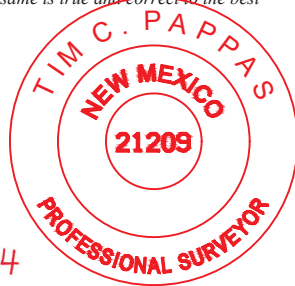
Casing/Cement Program: Additional Comments

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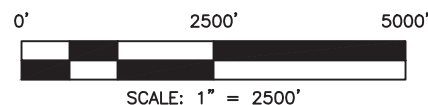
22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	AXON
Pipe	10000	10000	AXON
Annular	5000	5000	AXON

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature:	OIL CONSERVATION DIVISION
Printed Name: Electronically filed by Brittney Brunner	Approved By: Ward Rikala
Title: OpAdmin	Title: Petroleum Specialist Supervisor
Email Address: bbrunner@palomaresources.com	Approved Date: 11/13/2024 Expiration Date: 11/13/2026
Date: 10/24/2024 Phone: 713-654-8534	Conditions of Approval Attached

C-102 Submit Electronically Via OCD Permitting		State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION				Revised July 9, 2024			
		Submittal Type:		<input type="checkbox"/> Initial Submittal <input type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled					
WELL LOCATION INFORMATION									
API Number 30-015-55731 PENDING		Pool Code 98220		Pool Name PURPLE SAGE WOLFCAMP (GAS)					
Property Code 336494		Property Name THE DUDE FEE COM 20-19					Well Number #801H		
OGRID No. 332449		Operator Name PALOMA PERMIAN ASSETCO, LLC					Ground Level Elevation 3123'		
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal					Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal				
Surface Location									
UL H	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 1872' FNL	Ft. from E/W 184' FEL	Latitude 32.380427°	Longitude -104.203592°	County EDDY
Bottom Hole Location									
UL	Section 19	Township 22 S	Range 27 E	Lot LOT 3	Ft. from N/S 1540' FSL	Ft. from E/W 200' FWL	Latitude 32.374594°	Longitude -104.236981°	County EDDY
Dedicated Acres 634.36		Infill or Defining Well		Defining Well API		Overlapping Spacing Unit (Y/N)		Consolidation Code	
Order Numbers.						Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No			
Kick Off Point (KOP)									
UL L	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 1540' FSL	Ft. from E/W 270' FWL	Latitude 32.375011°	Longitude -104.202141°	County EDDY
First Take Point (FTP)									
UL I	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 1540' FSL	Ft. from E/W 330' FEL	Latitude 32.375011°	Longitude -104.204084°	County EDDY
Last Take Point (LTP)									
UL	Section 19	Township 22 S	Range 27 E	Lot LOT 3	Ft. from N/S 1540' FSL	Ft. from E/W 330' FWL	Latitude 32.374604°	Longitude -104.236560°	County EDDY
Unitized Area or Area of Uniform Interest				Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical			Ground Floor Elevation: 3123'		
OPERATOR CERTIFICATIONS <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> <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>  10/21/2024					SURVEYOR CERTIFICATIONS <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>  18 Oct 2024 				
Signature Lelan J Anders					Signature and Seal of Professional Surveyor 21209 OCTOBER 10, 2024				
Printed Name LAnders@PalomaResources.com					Certificate Number		Date of Survey		
Email Address									

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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

Form C-101
August 1, 2011

Permit 376188

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
		3. API Number 30-015-55732
4. Property Code 336494	5. Property Name The Dude 20-19	6. Well No. 802H

7. Surface Location

UL - Lot A	Section 20	Township 22S	Range 27E	Lot Idn	Feet From 838	N/S Line N	Feet From 460	E/W Line E	County Eddy
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8. Proposed Bottom Hole Location

UL - Lot E	Section 19	Township 22S	Range 27E	Lot Idn LOT 2	Feet From 2357	N/S Line N	Feet From 200	E/W Line W	County Eddy
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9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3121
16. Multiple N	17. Proposed Depth 20093	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/25/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☒ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	540	0
Int1	12.25	9.625	40	3135	895	0
Prod	8.75	5.5	23	20093	3070	0

Casing/Cement Program: Additional Comments

Our 9-5/8" 40# L-80 casing is special drift to 8.75".

22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	AXON
Pipe	10000	10000	AXON
Annular	5000	5000	AXON

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable.		OIL CONSERVATION DIVISION	
Signature:			
Printed Name:	Electronically filed by Brittney Brunner	Approved By:	Ward Rikala
Title:	OpAdmin	Title:	Petroleum Specialist Supervisor
Email Address:	bbrunner@palomaresources.com	Approved Date:	11/13/2024
Date:	11/1/2024	Expiration Date:	11/13/2026
Phone:	713-654-8534	Conditions of Approval Attached	

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION		Revised July 9, 2024	
			Submittal Type:	<input type="checkbox"/> Initial Submittal
				<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled		

30-015-55732

WELL LOCATION INFORMATION

API Number PENDING	Pool Code 98220	Pool Name PURPLE SAGE WOLFCAMP (GAS)
Property Code 336494	Property Name THE DUDE FEE COM 20-19	Well Number #802H
OGRID No. 332449	Operator Name PALOMA PERMIAN ASSETCO, LLC	Ground Level Elevation 3121'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

Surface Location

UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 838' FNL	Ft. from E/W 460' FEL	Latitude 32.383260°	Longitude -104.204477°	County EDDY
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Bottom Hole Location

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 2	Ft. from N/S 2357' FNL	Ft. from E/W 200' FWL	Latitude 32.378518°	Longitude -104.236949°	County EDDY
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Dedicated Acres 634.28	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers.			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL E	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 2357' FNL	Ft. from E/W 270' FWL	Latitude 32.379092°	Longitude -104.202127°	County EDDY
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First Take Point (FTP)

UL H	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 2357' FNL	Ft. from E/W 330' FEL	Latitude 32.379089°	Longitude -104.204071°	County EDDY
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Last Take Point (LTP)


UL	Section 19	Township 22 S	Range 27 E	Lot LOT 2	Ft. from N/S 2357' FNL	Ft. from E/W 330' FWL	Latitude 32.378527°	Longitude -104.236528°	County EDDY
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Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3121'
---	---	----------------------------------

OPERATOR CERTIFICATIONS

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.

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.




10/21/2024


Signature
Lelan J Anders
Printed Name
LAnders@PalomaResources.com
Email Address

SURVEYOR CERTIFICATIONS

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.



18 Oct 2024

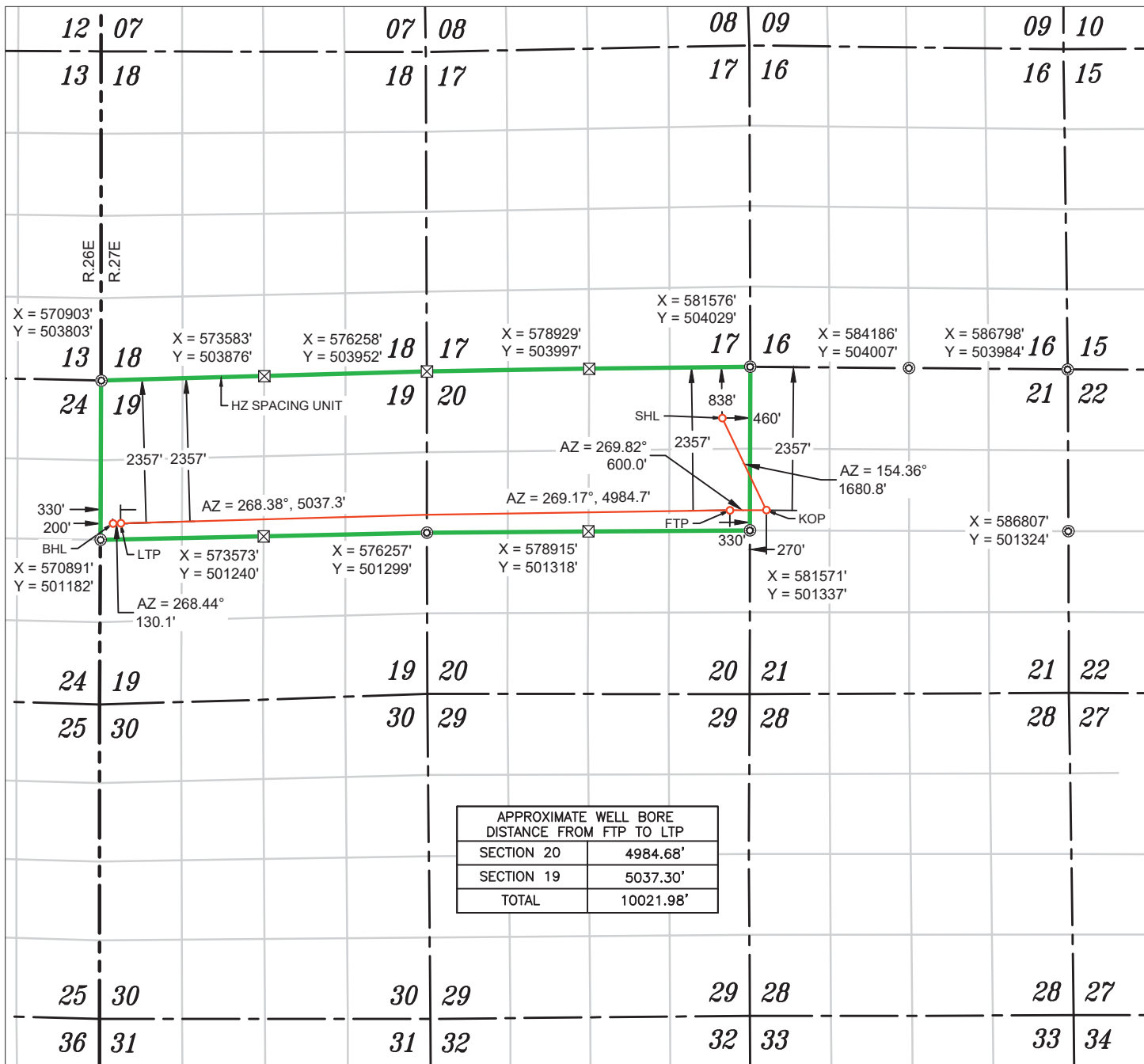


Signature and Seal of Professional Surveyor
21209
OCTOBER 10, 2024

Certificate Number
Date of Survey

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.

Released to Imaging: 1/7/2025 3:04:28 PMM



WELL NAME: THE DUDE FEE COM 20-19 #802H
ELEVATION: 3121'

NAD 83 (SHL) 838' FNL & 460' FEL
LATITUDE = 32.383260°
LONGITUDE = -104.204477°
NAD 27 (SURFACE HOLE LOCATION)
LATITUDE = 32.383142°
LONGITUDE = -104.203975°
STATE PLANE NAD 83 (N.M. EAST)
N: 503185.29' E: 581114.25'
STATE PLANE NAD 27 (N.M. EAST)
N: 503125.73' E: 539932.72'

NAD 83 (KOP) 2357' FNL & 270' FWL
LATITUDE = 32.379092°
LONGITUDE = -104.202127°
NAD 27 (KOP)
LATITUDE = 32.378973°
LONGITUDE = -104.201625°
STATE PLANE NAD 83 (N.M. EAST)
N: 501670.03' E: 581841.58'
STATE PLANE NAD 27 (N.M. EAST)
N: 501610.50' E: 540660.01'

NAD 83 (FTP) 2357' FNL & 330' FEL
LATITUDE = 32.379089°
LONGITUDE = -104.204071°
NAD 27 (FTP)
LATITUDE = 32.378970°
LONGITUDE = -104.203569°
STATE PLANE NAD 83 (N.M. EAST)
N: 501668.13' E: 581241.58'
STATE PLANE NAD 27 (N.M. EAST)
N: 501608.61' E: 540060.02'

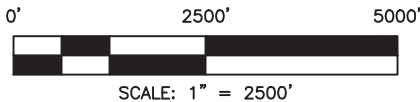
NAD 83 (LTP) 2357' FNL & 330' FWL
LATITUDE = 32.378527°
LONGITUDE = -104.236528°
NAD 27 (LTP)
LATITUDE = 32.378409°
LONGITUDE = -104.236025°
STATE PLANE NAD 83 (N.M. EAST)
N: 501453.39' E: 571222.13'
STATE PLANE NAD 27 (N.M. EAST)
N: 501393.98' E: 530040.68'

NAD 83 (BHL) 2357' FNL & 200' FWL
LATITUDE = 32.378518°
LONGITUDE = -104.236949°
NAD 27 (BHL)
LATITUDE = 32.378400°
LONGITUDE = -104.236446°
STATE PLANE NAD 83 (N.M. EAST)
N: 501449.84' E: 571092.12'
STATE PLANE NAD 27 (N.M. EAST)
N: 501390.44' E: 529910.67'

- FOUND MONUMENT
- CALC. CORNER
- SHL/ KOP/ FTP / PPP/ LTP / BHL
- HORIZONTAL SPACING UNIT
- STATE OIL & GAS LEASE
- BLM OIL & GAS LEASE

NOTES

- ALL COORDINATES, BEARINGS, AND DISTANCES CONTAINED HEREIN ARE GRID, BASED UPON THE NEW MEXICO STATE PLANE COORDINATES SYSTEM, NORTH AMERICAN DATUM 83, NEW MEXICO EAST (3001).
- THIS DOCUMENT IS BASED UPON AN ON THE GROUND SURVEY PERFORMED DURING OCTOBER, 2024. CERTIFICATION OF THIS DOCUMENT IS ONLY TO THE LOCATION OF THIS EASEMENT IN RELATION TO RECORDED MONUMENT OF DEEDS PROVIDED BY THE CLIENT.
- ELEVATIONS MSL, DERIVED FROM G.N.S.S. OBSERVATION AND DERIVED FROM SAID ON-THE-GROUND SURVEY.



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

Form C-101
August 1, 2011

Permit 376190

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

1. Operator Name and Address Paloma Permian AssetCo, LLC 1100 Louisiana, Ste. 5100 Houston, TX 77002		2. OGRID Number 332449
4. Property Code 336494		3. API Number 30-015-55733
5. Property Name The Dude 20-19		6. Well No. 803H

7. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
A	20	22S	27E		818	N	460	E	Eddy

8. Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
D	19	22S	27E	LOT 1	1139	N	200	W	Eddy

9. Pool Information

PURPLE SAGE;WOLFCAMP (GAS)	98220
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Additional Well Information

11. Work Type New Well	12. Well Type GAS	13. Cable/Rotary	14. Lease Type Private	15. Ground Level Elevation 3121
16. Multiple N	17. Proposed Depth 19946	18. Formation Wolfcamp	19. Contractor	20. Spud Date 11/25/2024
Depth to Ground water		Distance from nearest fresh water well		Distance to nearest surface water

☐ We will be using a closed-loop system in lieu of lined pits

21. Proposed Casing and Cement Program

Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surf	17.5	13.375	54.5	654	540	0
Int1	12.25	9.625	40	3100	895	0
Prod	8.75	5.5	23	19946	3050	0

Casing/Cement Program: Additional Comments

Our 9-5/8" 40# L-80 casing is special drift to 8.75".

22. Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Ram	10000	10000	AXON
Pipe	10000	10000	AXON
Annular	5000	5000	AXON

23. I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify I have complied with 19.15.14.9 (A) NMAC <input checked="" type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature:	OIL CONSERVATION DIVISION
Printed Name: Electronically filed by Brittney Brunner	Approved By: Ward Rikala
Title: OpAdmin	Title: Petroleum Specialist Supervisor
Email Address: bbrunner@palomaresources.com	Approved Date: 11/13/2024 Expiration Date: 11/13/2026
Date: 11/1/2024 Phone: 713-654-8534	Conditions of Approval Attached

C-102 Submit Electronically Via OCD Permitting	State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION		Revised July 9, 2024	
			Submittal Type:	<input type="checkbox"/> Initial Submittal
				<input type="checkbox"/> Amended Report
		<input type="checkbox"/> As Drilled		

30-015-55733

WELL LOCATION INFORMATION

API Number PENDING		Pool Code 98220		Pool Name PURPLE SAGE WOLFCAMP (GAS)	
Property Code 336494		Property Name THE DUDE FEE COM 20-19			Well Number #803H
OGRID No. 332449		Operator Name PALOMA PERMIAN ASSETCO, LLC			Ground Level Elevation 3121'
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal				Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal	

Surface Location

UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 818' FNL	Ft. from E/W 460' FEL	Latitude 32.383315°	Longitude -104.204477°	County EDDY
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Bottom Hole Location

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 1	Ft. from N/S 1139' FNL	Ft. from E/W 200' FWL	Latitude 32.381868°	Longitude -104.236928°	County EDDY
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Dedicated Acres 634.28	Infill or Defining Well	Defining Well API	Overlapping Spacing Unit (Y/N)	Consolidation Code
Order Numbers.			Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input type="checkbox"/> No	

Kick Off Point (KOP)

UL D	Section 21	Township 22 S	Range 27 E	Lot	Ft. from N/S 1139' FNL	Ft. from E/W 270' FWL	Latitude 32.382440°	Longitude -104.202116°	County EDDY
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First Take Point (FTP)

UL A	Section 20	Township 22 S	Range 27 E	Lot	Ft. from N/S 1139' FNL	Ft. from E/W 330' FEL	Latitude 32.382437°	Longitude -104.204059°	County EDDY
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Last Take Point (LTP)

UL	Section 19	Township 22 S	Range 27 E	Lot LOT 1	Ft. from N/S 1139' FNL	Ft. from E/W 330' FWL	Latitude 32.381877°	Longitude -104.236507°	County EDDY
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Unitized Area or Area of Uniform Interest	Spacing Unit Type <input type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: 3121'
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OPERATOR CERTIFICATIONS

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.

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.

Signature

10/21/2024

Date

Lelan J Anders

Printed Name

LAnders@PalomaResources.com

Email Address

SURVEYOR CERTIFICATIONS

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.

Signature and Seal of Professional Surveyor

21209

OCTOBER 10, 2024

Certificate Number

Date of Survey

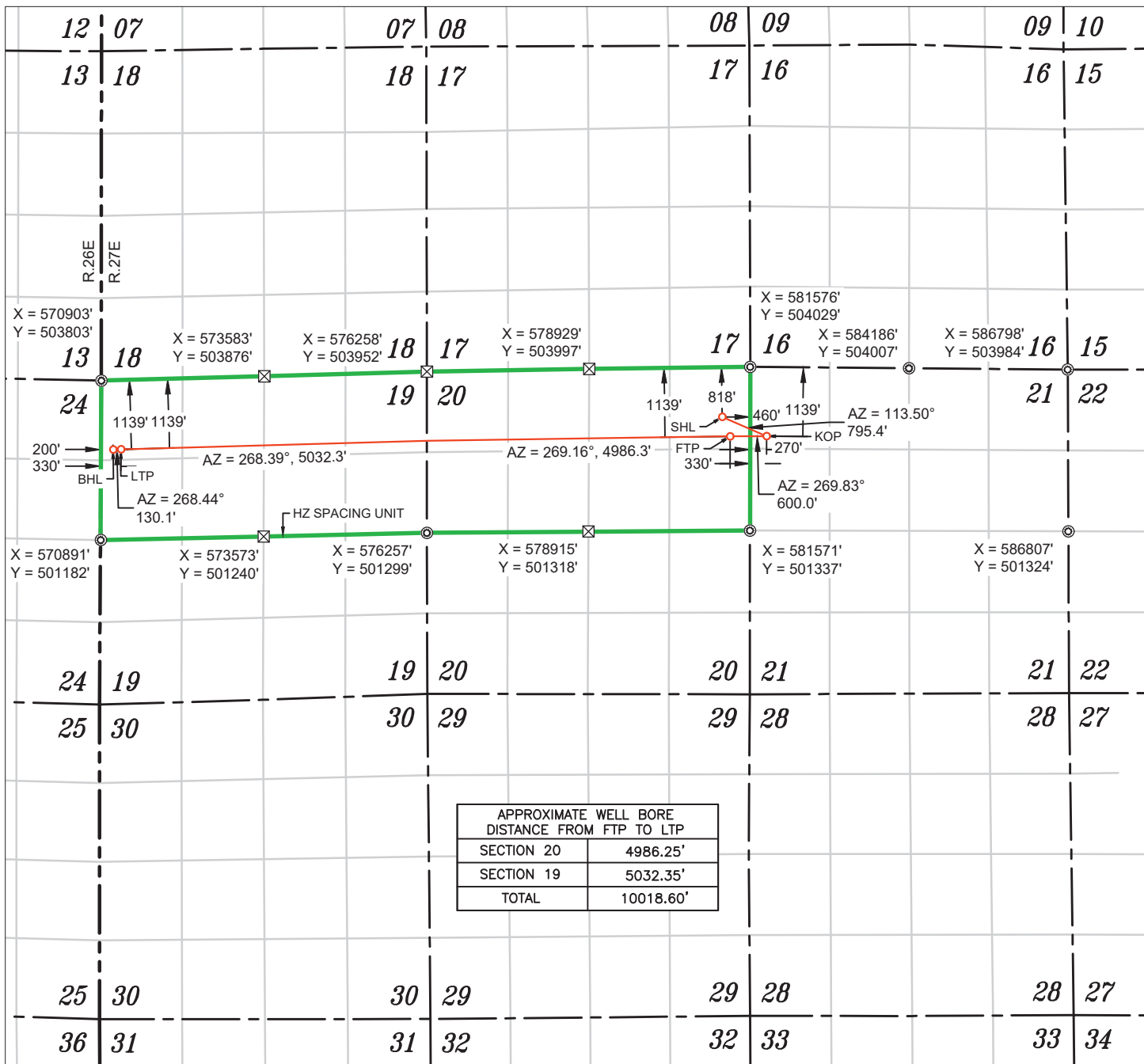
TIM C. PAPPAS

NEW MEXICO

21209

PROFESSIONAL SURVEYOR

18 Oct 2024



WELL NAME: THE DUDE FEE COM 20-19 #803H
ELEVATION: 3121'

NAD 83 (SHL) 818' FNL & 460' FEL
LATITUDE = 32.383315°
LONGITUDE = -104.204477°
NAD 27 (SURFACE HOLE LOCATION)
LATITUDE = 32.383197°
LONGITUDE = -104.203975°
STATE PLANE NAD 83 (N.M. EAST)
N: 503205.29' E: 581114.26'
STATE PLANE NAD 27 (N.M. EAST)
N: 503145.73' E: 539932.73'

NAD 83 (KOP) 1139' FNL & 270' FWL
LATITUDE = 32.382440°
LONGITUDE = -104.202116°
NAD 27 (KOP)
LATITUDE = 32.382321°
LONGITUDE = -104.201614°
STATE PLANE NAD 83 (N.M. EAST)
N: 502888.06' E: 581843.68'
STATE PLANE NAD 27 (N.M. EAST)
N: 502828.50' E: 540662.13'

NAD 83 (FTP) 1139' FNL & 330' FEL
LATITUDE = 32.382437°
LONGITUDE = -104.204059°
NAD 27 (FTP)
LATITUDE = 32.382319°
LONGITUDE = -104.203557°
STATE PLANE NAD 83 (N.M. EAST)
N: 502886.25' E: 581243.67'
STATE PLANE NAD 27 (N.M. EAST)
N: 502826.70' E: 540062.13'

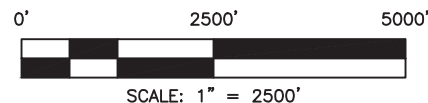
NAD 83 (LTP) 1139' FNL & 330' FWL
LATITUDE = 32.381877°
LONGITUDE = -104.236507°
NAD 27 (LTP)
LATITUDE = 32.381759°
LONGITUDE = -104.236004°
STATE PLANE NAD 83 (N.M. EAST)
N: 502671.99' E: 571227.59'
STATE PLANE NAD 27 (N.M. EAST)
N: 502612.55' E: 530046.16'

NAD 83 (BHL) 1139' FNL & 200' FWL
LATITUDE = 32.381868°
LONGITUDE = -104.236928°
NAD 27 (BHL)
LATITUDE = 32.381750°
LONGITUDE = -104.236425°
STATE PLANE NAD 83 (N.M. EAST)
N: 502668.44' E: 571097.58'
STATE PLANE NAD 27 (N.M. EAST)
N: 502609.00' E: 529916.15'

- FOUND MONUMENT
- CALC. CORNER
- SHL/ KOP/ FTP / PPP/ LTP / BHL
- HORIZONTAL SPACING UNIT
- STATE OIL & GAS LEASE
- BLM OIL & GAS LEASE

NOTES

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- ELEVATIONS MSL, DERIVED FROM G.N.S.S. OBSERVATION AND DERIVED FROM SAID ON-THE-GROUND SURVEY.



State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Sarah Cottrell Propst
Cabinet Secretary

Todd E. Leahy, JD, PhD
Deputy Secretary

Adrienne Sandoval, Director
Oil Conservation Division



NOTICE

MATERIAL CHANGES OR DEFICIENCIES IN APPLICATIONS SUBMITTED TO THE OCD ENGINEERING BUREAU

EFFECTIVE June 11, 2020

The OCD Engineering Bureau (OCD) gives notice that it intends to deny applications for which the applicant proposes a material change during the review process or when a material deficiency is identified during the administrative or technical review process. A change or deficiency is material if its existence or nonexistence is of consequence to the public notice or substantive rules for the application. If OCD denies an application, the applicant may refile through the fee portal.

OCD provides the following non-exclusive list of common material changes and deficiencies:

- **Compulsory Pooling**
 - Change to horizontal spacing unit
 - Change to financial evidence, including expenditures or risk charge
 - Failure to completely and accurately notice as required by 19.15.4.12 NMAC
- **Authorization to Inject**
 - Change to surface or bottom-hole location that results in a new “affected person” as defined in 19.15.2.7(A)(8) NMAC. [Note: If the change of location does not result in a new “affected person”, the applicant must re-notice the application to all previously identified “affected persons.”]
 - Change to injection interval
 - Failure to completely and accurately provide notice as required by 19.15.26.8(C) NMAC
- **Non-Standard Location**
 - Change to first or last take point resulting in increased encroachment
 - Failure to completely and accurately provide notice as required by 19.15.4.12 NMAC for hearings and 19.15.15.13 NMAC for administrative applications

Notice – Material Changes or Deficiencies in Applications

Page 2

- **Downhole Commingling**
 - Change or addition of pool
 - Changes to allocation method made by the applicant
 - Failure to completely and accurately provide notice as required by 19.15.12.11(C) NMAC
- **Surface Commingling**
 - Change or addition of lease
 - Change or addition of pool
 - Change to allocation method made by the applicant
 - Failure to completely and accurately provide notice as required by 19.15.12.10(C)(4) NMAC
- **Off-Lease Storage and Measurement**
 - Change or addition of lease
 - Change or addition of pool
 - Change to location of storage facility or measurement configuration
 - Failure to completely and accurately provide notice as required by 19.15.23.9(A)(5) NMAC
- **OCD Hearing Applications**
 - Change of Operator Name
 - Change in Operator OGRID Number

Inactive Well List
Total Well Count: 4 Inactive Well Count: 3
Printed On: Monday, December 30 2024

District	API	Well	ULSTR	OCD Unit	Ogrid	Operator	Lease Type	Surface Owner	Well Type	Last Production	Formation/Notes	Status	TA Exp Date
2	30-015-21593	COLONIAA COM #001	K-18-22S-27E	K	330859	Alpha Energy Partners LLC	P	P	G	03/2023			
2	30-015-33962	KODIAK #002	O-17-22S-27E	O	330859	Alpha Energy Partners LLC	P	P	G	02/2014	S CARLSBAD MORROW 73960 S/2		
2	30-015-21416	TRACY B COM #001	I-18-22S-27E	I	330859	Alpha Energy Partners LLC	P	P	G	07/2022			

WHERE Operator:330859, County:All, District:All, Township:All, Range:All, Section:All, Production(months):15, Excludes Wells Under ACOI, Excludes Wells in Approved TA Period

EXHIBIT
C