

**BEFORE THE OIL CONSERVATION DIVISION
EXAMINER HEARING OCTOBER 9, 2025**

CASE NO. 25606

RHODA ABRAMS 2P - MESAVERDE INCREASED DENSITY

SAN JUAN COUNTY, NEW MEXICO



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

**APPLICATION OF HILCORP ENERGY COMPANY FOR
AN EXCEPTION TO THE WELL DENSITY
REQUIREMENTS OF THE SPECIAL RULES AND
REGULATIONS FOR THE BLANCO-MESAVERDE GAS
POOL, SAN JUAN COUNTY, NEW MEXICO.**

CASE NO. 25606

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

**APPLICATION OF HILCORP ENERGY
COMPANY FOR AN EXCEPTION TO THE
WELL DENSITY REQUIREMENTS OF THE
SPECIAL RULES AND REGULATIONS FOR
THE BLANCO-MESAVERDE GAS POOL,
SAN JUAN COUNTY, NEW MEXICO.**

CASE NO. 25606

APPLICATION

Hilcorp Energy Company, ("Hilcorp") (OGRID No. 372171), through its undersigned counsel, hereby files this application with the Oil Conservation Division for an order for an exception to the well density requirements of the Blanco-Mesaverde Gas Pool (72319), San Juan County, New Mexico. Specifically, Hilcorp seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to drill and complete one additional Mesaverde vertical and/or directional gas well, making a total of five vertical and/or directional gas wells within the same standard 319.71-acre, more or less, spacing and proration unit. In support of this application, Hilcorp states:

1. Hilcorp is the operator of a standard 319.71-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico, in which the following four vertical and/or directional wells were drilled and completed/recompleted, and are currently producing:

- a. Fee #5 (API No. 30-045-23776), which is vertically drilled with a surface location in Lot 1 (NE/4 NE/4 equivalent) of said Section irregular 5;

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Submitted by: Hilcorp Energy Company
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- b. Rhoda Abrams 2N (API No. 30-045-35090), which is directionally drilled with a surface location in Lot 1 (NE/4 NE/4 equivalent), and a bottom hole location in Lot 2 (NW/4 NE/4 equivalent) of said irregular Section 5;
- c. Rhoda Abrams 1P (API No. 30-045-35156), which is directionally drilled with a surface location in NE/4 SE/4 (Unit I), and a bottom hole location in the NE/4 SE/4 (Unit I) of said irregular Section 5; and
- d. Rhoda Abrams 1N (API No. 30-045-35162), which is directionally drilled with a surface location in NE/4 SE/4 (Unit I), and a bottom hole location in the SW/4 SE/4 (Unit O) of said irregular Section 5.

2. The Blanco-Mesaverde Gas Pool is governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. See Order No. R-8170, as superseded by Order No. R-10987-A, and amended by Order No. R-10987-A(6), effective Sept. 25, 2019. These Special Pool Rules and Regulations provide:

I. ACREAGE AND WELL LOCATION REQUIREMENTS

A. Standard GPU (Gas Proration Unit): *A standard GPU in the Blanco-Mesaverde Pool shall be 320 acres, more or less, comprising any two contiguous quarter sections of a single section that is a legal subdivision of the U. S. Public Land Surveys.*

B. Well density:

- (1) Up to four (4) vertical or directional wells may be drilled and completed in the Blanco-Mesaverde Pool underlying a standard GPU;*
- (2) In addition to the four (4) wells authorized to be drilled and completed under B(1), an operator may conduct operations to recomplete up to four (4) vertical or directional wells in the Blanco-Mesaverde Pool within a standard GPU;*
- (3) No more than four (4) wells producing from the Blanco-Mesaverde Pool shall be located within either quarter section in a GPU; and*

(4) *Any deviation from the above-described well density requirements shall be authorized only after hearing.*

3. The objective formation in each of the above-described wells in Paragraph 1 is the Blanco-Mesaverde Gas Pool, and each well was permitted and drilled with a Mesaverde completion.

4. Hilcorp now proposes to simultaneously dedicate and produce the following additional well within the same standard spacing and proration unit, at the following location:

- a. **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), to be directionally drilled with a surface hole location in the NW/4 SE/4 (Unit J), and a bottom hole location in the NW/4 SE/4 (Unit J) of said irregular Section 5.

5. Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), within Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, permitting the total number of vertical and/or directionally drilled wells dedicated and producing within this spacing and proration unit to five.

6. Approval of this application will not impair the correlative rights of any other interest owner in the Blanco-Mesaverde Gas Pool and will afford Hilcorp the opportunity to produce incremental reserves from this spacing unit, avoiding waste.

7. Approval of this application will be in the best interest of conservation, the prevention of waste, and the protection of correlative rights.

WHEREFORE, Hilcorp Energy Company requests that this application be set before an Examiner of the Oil Conservation Division on October 9, 2025, and, after notice and hearing as required by law, that the Division enter an order:

- Granting an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool (72319) permitting the total number of vertical and/or directional wells dedicated and producing within this spacing and proration unit to five; and
- Authorizing Hilcorp to complete and produce the **Rhoda Abrams 2P Well** (API No. 30-045-PENDING) from the Blanco-Mesaverde Gas Pool.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
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ATTORNEYS FOR HILCORP ENERGY COMPANY

CASE _____: **Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico.** Applicant in the above-styled cause seeks an order for an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (72319), San Juan County, New Mexico, to permit it to drill and complete one additional Mesaverde vertical and/or directional gas well, making a total of five vertical and/or directional gas wells within the same standard 319.71-acre, more or less, spacing and proration unit comprised of Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico. Hilcorp further seeks approval for the proposed location of the **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), to be directionally drilled with a surface hole location in the NW/4 SE/4 (Unit J), and a bottom hole location in the NW/4 SE/4 (Unit J) of irregular Section 5, and authorization to complete and produce from the Blanco-Mesaverde Gas Pool. Said area is located approximately 1 mile north of Aztec, New Mexico.

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SELF-AFFIRMED STATEMENT OF CARSON RICE

1. My name is Carson Rice. I work for Hilcorp Energy Company ("Hilcorp") as a Landman.

2. I have not previously testified before the New Mexico Oil Conservation Division as an expert witness in petroleum land matters; therefore, my resume is attached as **Hilcorp Exhibit B-1**. I believe my credentials as a petroleum landman qualify me to testify as an expert in petroleum land matters before the Division. I ask that my qualifications as a petroleum landman be accepted by the Division and made a matter of record.

3. I am familiar with the application filed by Hilcorp in this case, and I am familiar with the status of the lands in the subject areas.

4. None of the affected parties in this case has indicated opposition, and therefore I do not expect any opposition at the hearing.

5. Hilcorp seeks an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool to permit it to drill and complete one additional Mesaverde vertical and/or directional gas well, making a total of five vertical and/or directional gas wells within the same standard 319.71-acre, more or less, spacing and proration unit.

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6. The Blanco-Mesaverde Gas Pool is governed by Special Rules and Regulations which provide for 320-acre spacing and proration units on which as many as four wells may be drilled. *See* Order No. R-8170, as superseded by Order No. R-10987-A, and amended by Order No. R-10987-A(6), effective Sept. 25, 2019. The Special Rules also provide that well density exceptions can be approved only after notice and hearing.

7. Hilcorp is the operator of a standard 319.71-acre, more or less, spacing and proration unit in the Blanco-Mesaverde Gas Pool comprised of Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico, in which the following four vertical and/or directional wells were drilled and completed/recompleted, and are currently producing:

- a. Fee #5 (API No. 30-045-23776), which is vertically drilled with a surface location in Lot 1 (NE/4 NE/4 equivalent) of said Section irregular 5;
- b. Rhoda Abrams 2N (API No. 30-045-35090), which is directionally drilled with a surface location in Lot 1 (NE/4 NE/4 equivalent), and a bottom hole location in Lot 2 (NW/4 NE/4 equivalent) of said irregular Section 5;
- c. Rhoda Abrams 1P (API No. 30-045-35156), which is directionally drilled with a surface location in NE/4 SE/4 (Unit I), and a bottom hole location in the NE/4 SE/4 (Unit I) of said irregular Section 5; and
- d. Rhoda Abrams 1N (API No. 30-045-35162), which is directionally drilled with a surface location in NE/4 SE/4 (Unit I), and a bottom hole location in the SW/4 SE/4 (Unit O) of said irregular Section 5.

8. Hilcorp now proposes to simultaneously dedicate and produce the following additional well within the same standard spacing and proration unit, at the following locations:

- a. **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), to be directionally drilled with a surface hole location in the NW/4 SE/4 (Unit J), and a bottom hole location in the NW/4 SE/4 (Unit J) of said irregular Section 5.

9. Hilcorp therefore requests that the Division enter an order granting an exception to the well density requirements of Rule I.B of the Special Rules and Regulations of the Blanco-Mesaverde Pool to authorize Hilcorp to simultaneously dedicate and produce the **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), within Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, permitting the total number of vertical and/or directionally drilled wells dedicated and producing within this spacing and proration unit to five.

10. The proposed simultaneous dedication of the proposed well will target development of incremental Blanco-Mesaverde gas reserves in areas where there is not adequate gas drainage.

11. Pursuant to the Special Rules and Division precedent, Hilcorp provided notice to all Division-designated operators in offsetting 320-acre spacing units. Where Hilcorp is the operator, Hilcorp identified all working interest owners in offsetting spacing units as affected parties requiring notice. In some offsetting spacing units, Hilcorp may own 100% of the working interest, in which case there are no affected parties to notice.

12. **Hilcorp Exhibit B-2** is an overview map identifying the location of the subject Blanco-Mesaverde Gas Pool spacing unit to which the proposed well will be dedicated.

13. Hilcorp Exhibit B-1 also identifies the locations of the existing Blanco-Mesaverde wells as black circles. Also depicted is the proposed well as a red square.

14. Hilcorp Exhibit B-1 also depicts the notice area, which is the area within the tan shading surrounding the subject spacing unit. Hilcorp has provided notice of this application to the

operators within the notice area. In some instances, Hilcorp may be the operator of offsetting spacing units within the notice area, in which case notice of the application was provided to all the working interest owners within the notice area.

15. **Hilcorp Exhibit B-3** identifies the affected parties within the offsetting tracts/spacing units who are required to be noticed. I provided a list of all affected parties requiring notice to Holland & Hart LLP. All parties were locatable.

16. To the best of my knowledge, the addresses used to provide notice are valid and correct addresses which have been recently used by Hilcorp and at which mail has been received by the notice parties.

17. **Hilcorp Exhibits B-1 through B-3** were prepared by me or under my direction and supervision.

18. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.



Carson Rice

September 28, 2025

Date

CARSON PARKER RICEcarice@hilcorp.com (512)-970-2719**EDUCATION**

Texas Tech University, Rawls College of Business

May 2016

*Bachelor of Business Administration, Energy Commerce***PROFESSIONAL EXPERIENCE**

Hilcorp Energy Company

Senior Landman (San Juan Basin)

July 2025 to Present

Landman III (San Juan Basin)

January 2025 to June 2025

Landman II (San Juan Basin)

January 2021 to December 2024

- Establish and maintain strong relationships with working interest parties, mineral owners, and surface owners
- Prepare properties for drilling, recompletions, reworks and PxA
- Possess working knowledge of rules and regulations of NMOCD and BLM
- Negotiate and manage trades and joint venture activities
- Organize and supervise efforts of outside brokers, contact landmen and title attorneys
- Engage in mineral research on acreage to determine burdens and encumbrances on the minerals and/or surface
- Work cooperatively with internal counterparts in regulatory, operations, construction, engineering, geology, EH&S, etc., to build comprehensive plans for development of San Juan Basin
- Establish and maintain accurate oil and gas contract records to assure the continued validity of leases and compliance with contract terms
- Manage over 750,000 gross acres and 5,000 wells throughout the San Juan Basin

Associate Landman (San Juan Basin, Texas, Louisiana, Pennsylvania & Ohio)January 2017 to December 2020

- Analysis of leases, contracts and land records covering San Juan Basin, Texas, Louisiana, Pennsylvania & Ohio assets
- Communicate with landowners to discuss leasing and purchasing properties
- Assist in property sales, acquisitions and respective due diligence efforts
- Act as liaison with internal and external customers to resolve ownership problems, royalty/rental inquiries and release demands
- Assist with regulatory filings
- Analyze title opinions, title requirements, divisions orders, JIBs, and revenue statements to determine working interest
- Provided review of abstracts of title from patent to present in multiple counties and parishes
- Prepare and review documents such as JOA's, AFE's, farmout agreements, etc.
- Managed surveyors and conducted pre-construction on-site analysis for new ventures projects
- Negotiated damage settlements with various landowners
- Interface with land/royalty owners, partners and/or attorneys on curative matters

Land InternSummer 2016

- Prepared detailed land summaries for 25+ fields in Texas & Louisiana

Leadership & Activities

Hilcorp – Presented to and mentored 6 classes of interns

Hilcorp – Completed 2023/2024/2025 Texas MS150 Bike Ride with Team Hilcorp Harvest

Dallas Marathon 2024 Finisher

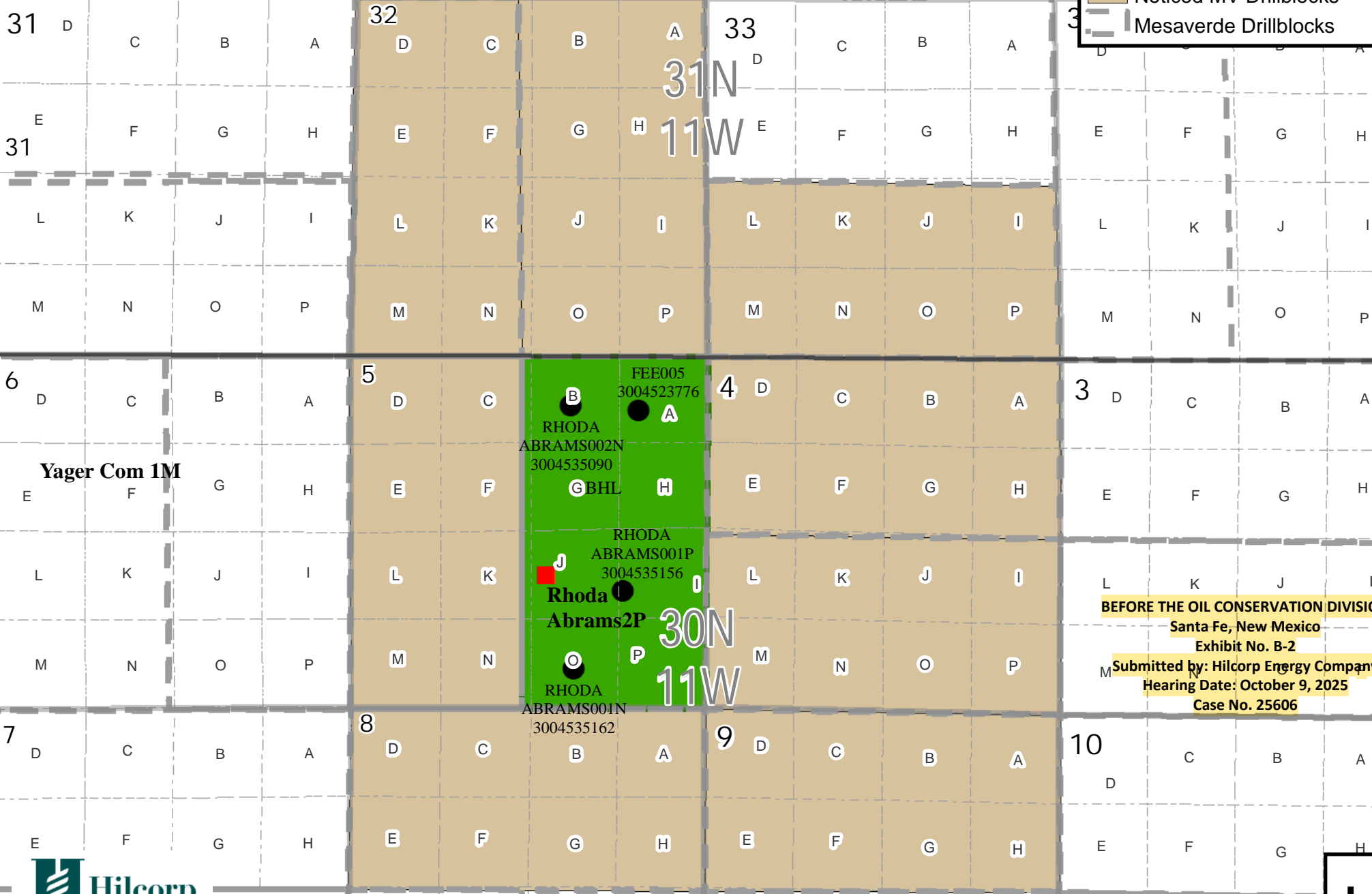
Houston Half Marathon 2025 Finisher

Texas Tech Football 2012-2013

BEFORE THE OIL CONSERVATION DIVISION**Santa Fe, New Mexico****Exhibit No. B-1****Submitted by: Hilcorp Energy Company****Hearing Date: October 9, 2025****Case No. 25606**

Increased Density Plat
Rhoda Abrams 2 E/2 Sec. 5
Mesaverde Gas Pool

- ! Existing MV Drill Wells
- New MV Drill Well
- Subject MV Drillblock
- Noticed MV Drillblocks
- Mesaverde Drillblocks



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Name 1	Street	City	Region	Postal Code
WPC OIL & GAS LP	4040 NORTH CENTRAL EXPWY SUITE 750	DALLAS	TX	75204
PASSPORT ENERGY INC	131 CALLE DON JOSE	SANTA FE	NM	87501
JMJ RESOURCES LLC	2204 N SANTIAGO AVE	FARMINGTON	NM	87401
SIMCOE, LLC	1201 LOUISIANA ST STE 3400	HOUSTON	TX	77002-5632
JUNIPER INVESTMENTS LLC	1200 E 20TH ST	FARMINGTON	NM	87401

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-3
Submitted by: Hilcorp Energy Company
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SELF-AFFIRMED STATEMENT OF SIKANDAR KHAN

1. My name is Sikandar Khan. I work for Hilcorp Energy Company (“Hilcorp”) as a reservoir engineer.

2. I have not previously testified before the New Mexico Oil Conservation Division as an expert in reservoir engineering. Attached as **Hilcorp Exhibit C-1** is my resume, which summarizes my education and work experience as a reservoir engineer. I ask that my credentials as an expert in reservoir engineering be accepted by the Division and made a matter of record.

3. I am familiar with the application filed by Hilcorp in this case and have conducted an engineering study of the subject area and of the Blanco-Mesaverde Gas Pool.

4. I used a decline curve analysis on existing wells to estimate ultimate recoveries for the subject spacing unit under the existing well density. I then compared the estimated ultimate gas recoveries against log-derived volumetric calculations for the original gas in place with the cumulative gas production in the spacing unit.

5. Using this approach, we identified areas, including the subject spacing unit, that have substantial remaining recoverable gas and lower-than-expected gas recoveries where additional well bores or well completions are necessary to adequately drain remaining gas reserves.

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6. **Hilcorp Exhibit C-2** contains information relating to the subject spacing unit and the general location of the additional well proposed to be drilled and simultaneously dedicated within the subject spacing unit:

- a. **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), to be directionally drilled with a surface hole location in the NW/4 SE/4 (Unit J), and a bottom hole location in the NW/4 SE/4 (Unit J) of said irregular Section 5.

7. This will be the fifth Blanco-Mesaverde completion within the spacing unit. I anticipate that it will help drain the southern portion of the spacing unit.

8. **Hilcorp Exhibit C-3** is a basin-wide map reflecting Hilcorp's calculations for original gas in place across the Blanco-Mesaverde Gas Pool. The warmer colors represent areas where there is more original gas in place. The cooler colors indicate areas where there is less original gas in place. The white star indicates the location of the subject well, which is in an area where Hilcorp calculated moderately high volumes of original gas in place.

9. **Hilcorp Exhibit C-4** is a map depicting the calculated cumulative gas production from the Blanco-Mesaverde Gas Pool. The red star identifies the location of the subject well where there is relatively low cumulative gas production.

10. **Hilcorp Exhibit C-5** is a map depicting calculated remaining recoverable gas. The cooler colors indicate areas where there is relatively less remaining recoverable gas. The warmer colors reflect areas where there is relatively more remaining recoverable gas. The red star identifies the location of the subject well, which is in an area where Hilcorp calculated that there is remaining recoverable gas and relatively low cumulative production under the existing well density.

11. **Hilcorp Exhibit C-6** is a table that supports this volumetric analysis. The first column titled "Volumetric OGIP" reflects the calculated volumetric original gas in place on a

section basis around the subject spacing unit. The column titled “CTD/RF%” shows the cumulative gas production to date on a section basis and the calculated recovery factor. The column titled “EUR/RF%” shows the estimated ultimate gas recovery and recovery factor calculated on a section basis. And the last column tabulates the total recoverable gas remaining on a section basis. I calculated the recoverable gas remaining within the subject spacing unit is approximately 27.53 Bcf.

12. I would expect recovery factors of approximately 70-80% in a gas pool of this type. The relatively low recovery factors in Hilcorp Exhibit C-6 indicate that this area is not being sufficiently drained by the existing wells in the subject spacing unit under the existing well density and that additional well bores, or completions, are necessary to adequately drain the Blanco-Mesaverde Gas Pool in this area.

13. Approval of Hilcorp’s application is therefore necessary to drain the unrecovered gas reserves that will otherwise be left in place under the existing well density within the subject spacing unit.

14. In my opinion, granting this application will not impair the Blanco-Mesaverde Gas Pool, and will be in the interest of conservation, the prevention of waste and will protect correlative rights.

15. **Hilcorp Exhibits C-1 through C-6** were prepared by me or under my direction and supervision.

16. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.

A rectangular box containing a handwritten signature in blue ink. The signature is stylized and appears to read 'Sikandar Khan'.

Sikandar Khan

09/30/2025

Date

SIKANDAR KHAN

Houston, TX 77007 | 7035098842 | Sikandar.Khan@hilcorp.com

Professional Summary

Detail-oriented team player with strong organizational skills. Ability to handle multiple projects simultaneously with a high degree of accuracy. Strong technical background and work ethic facilitates ability to quickly provide high quality evaluations and solutions. Desire to continue to learn, improve and be challenged.

Accomplishments

PUBLICATION: Evaluation of an Innovative Hybrid Gas Lift Technique (SPE-201168)

Skills

- Harmony Suite (Forecast/Reservoir)
- Microsoft Office Suite
- Spotfire
- Enerdeq (IHS)
- Aries
- Petra
- CMG
- Programming (R, VBA, Python)
- Project RA (Rose&Associates Software)
- PIPESIM

Work History

Reservoir Engineer 06/2023 to Present

Hilcorp Energy Company – Houston, TX

- Reservoir Engineer for Hilcorp's activities in San Juan Basin.

Reservoir Engineer 05/2019 to 06/2023

Peregrine Petroleum – Houston, TX

EXPLORATION

- In-depth production and log analysis coupled with geologic interpretation to identify new potential prospects.
- In-depth field studies and background literature reviews.
- Utilized various correlations, trends and methodologies to derive rock and fluid properties along with additional potential insights.
- High-grade AOI and identify the recipe for success.
- Various model applications calibrated to actual production including numerical, monte carlo, DCA, machine learning, volumetric, or combo to test confidence.
- Highlight risks and uncertainty and incorporate in model/economics.

- Final model derivation, volumetric analysis and type curve development for full field development scenarios and economics.
- Document analysis/insights and present to both technical and management teams.

DEVELOPMENT/OPTIMIZATION

- Monitor and analyze current development well's production and stimulation.
- Oversee, analyze and incorporate additional data such as core, PVT, logs, etc.
- Perform RTA, production analysis, and analyze pressure communication and well responses.
- Utilize CMG to create full field model and guide approach to maximize recovery and economics.
- Work closely with geologists and operations engineers to develop optimal completion and production approach.
- Perform nodal analysis to optimize VLP or help identify reservoir issues.
- Identify additional areas and methods to increase recovery and economic potential.
- Provide weekly updates on well performance and identify key wells to further investigate that may require remedial action.

OTHER

- Maintain Spotfire projects for quick look diagnostics and visualizations.
- Streamline and incorporate new methodologies/tools tailored to each respective field.
- Utilize data analytics and machine learning for both exploration and development.
- Continued research and expansion of knowledge.
- Maintain documentation and learnings for both exploration and development areas.

Education

Master of Science: Petroleum Engineering

12/2019

University of Oklahoma - Norman, OK

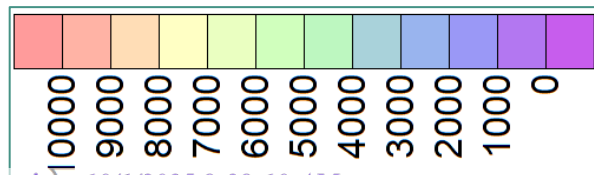
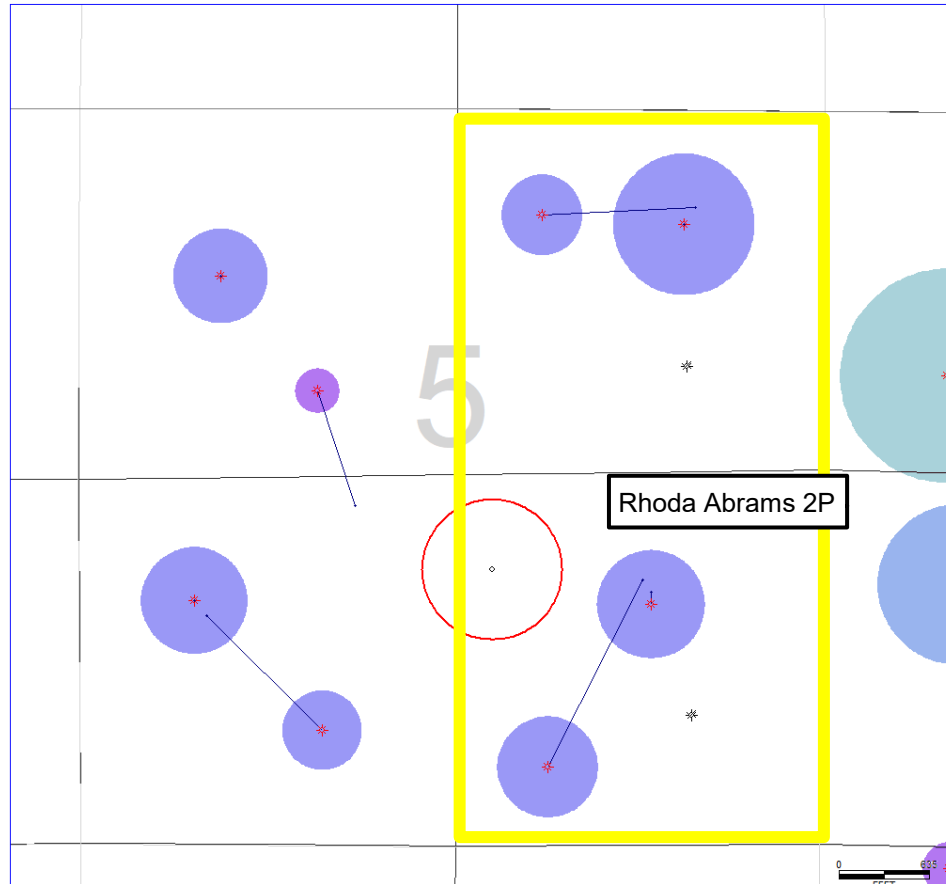
Bachelor of Science: Petroleum Engineering

05/2018

University of Oklahoma - Norman, OK

30N 11W Section 5 MESAVERDE

Rhoda Abrams 2P



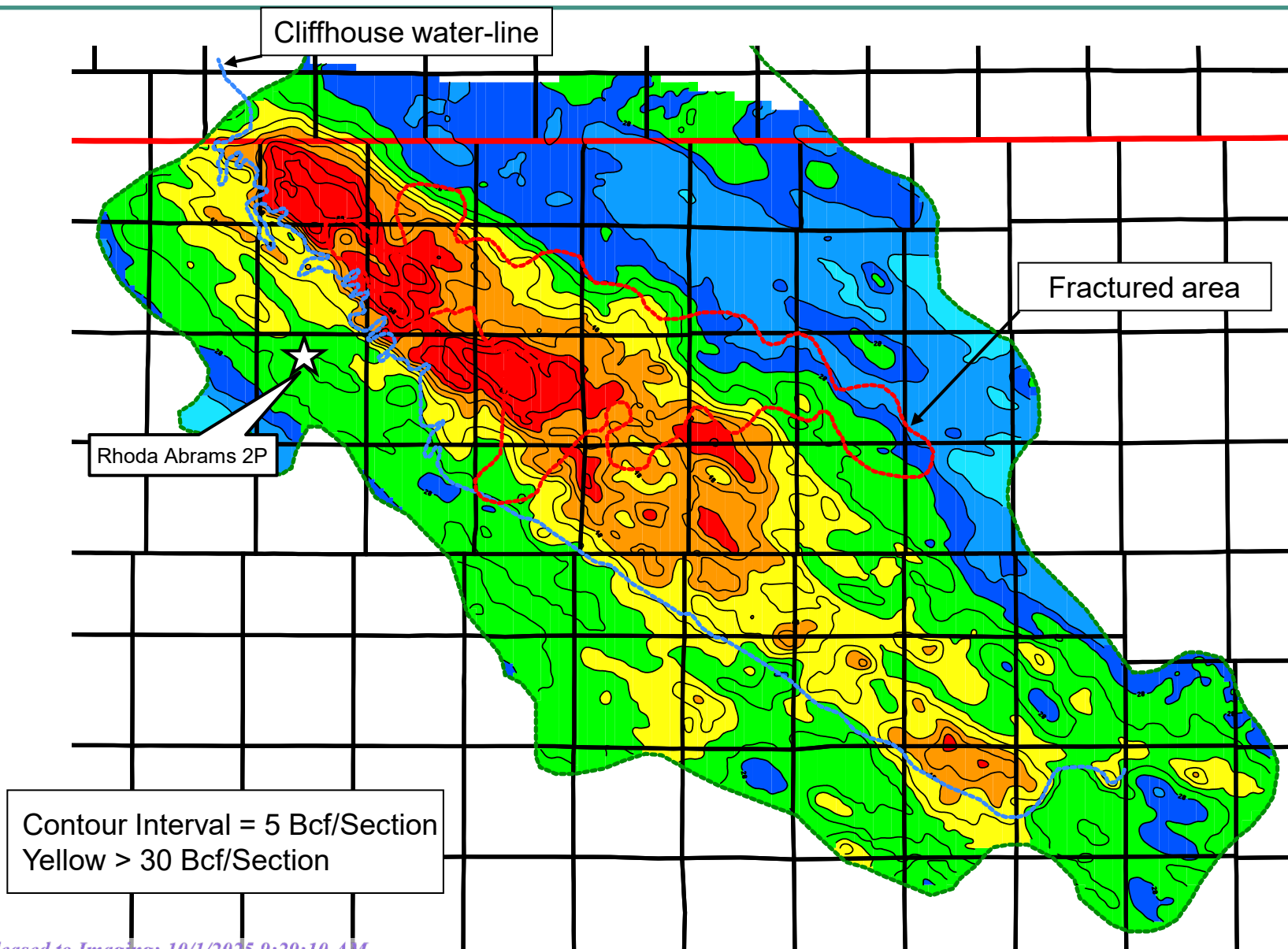
MMCF

Overview

- 4 Mesaverde wells in Spacing Unit
- Proposing one (1) additional infill well to further deplete the reservoir
- Drilling from existing disturbances
- Will commingle Dakota and Mesaverde reservoirs

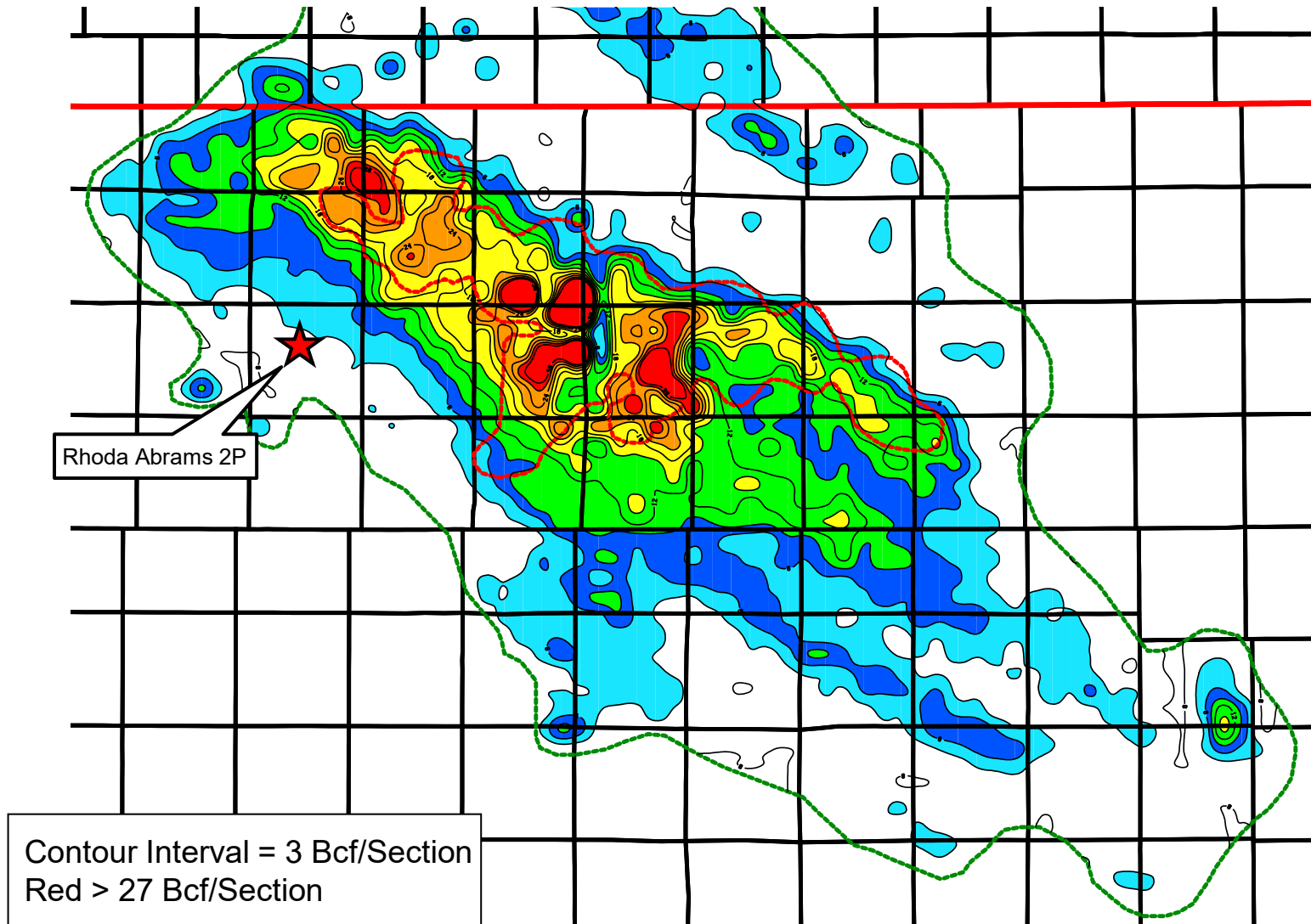
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 Submitted by: Hilcorp Energy Company
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MV Original Gas-in-Place

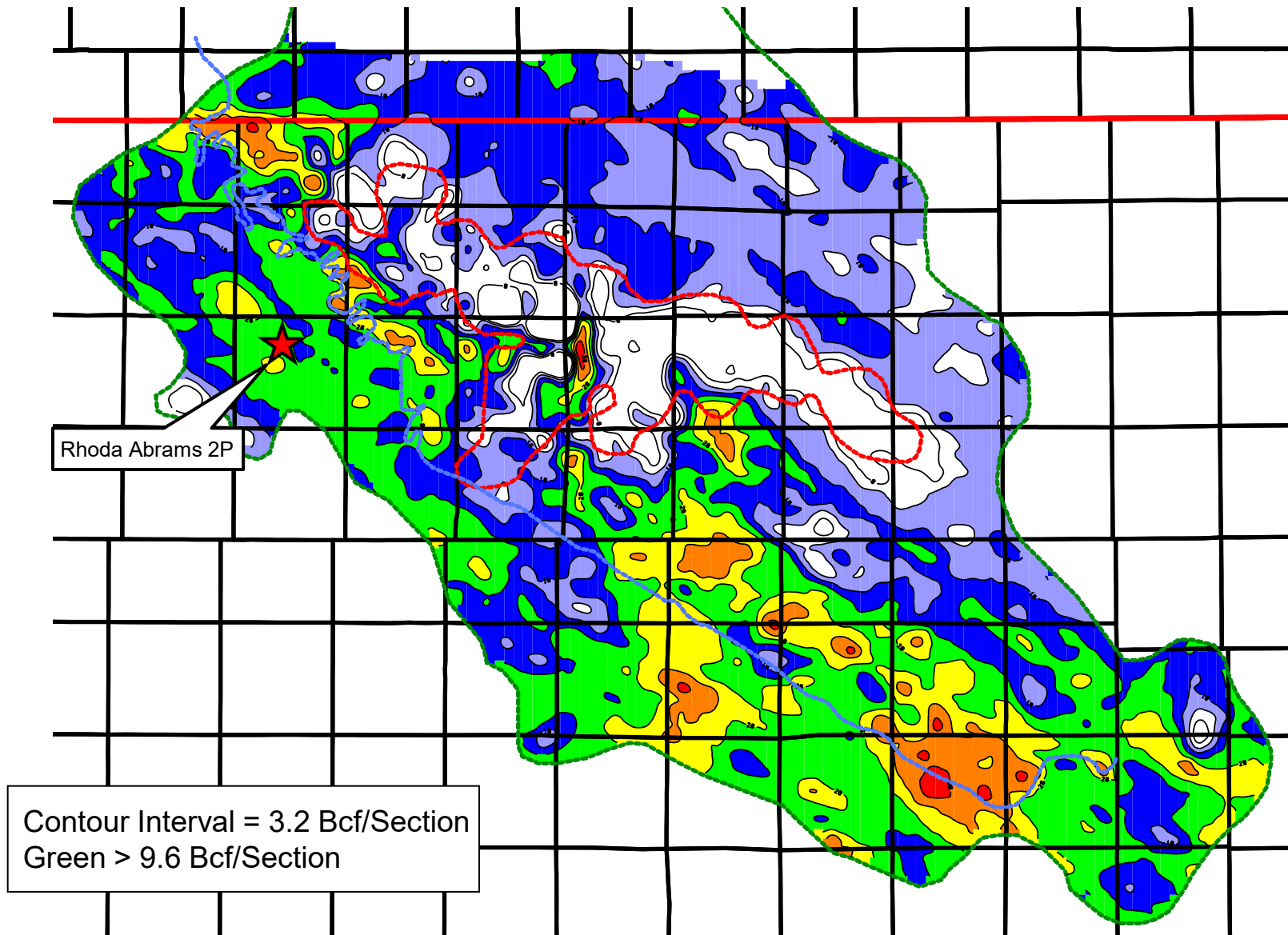




MV Cumulative Gas Production



MV Remaining Gas



30N 11W Section 5 Reserve Summary

Rhoda Abrams 2P



Formation	Volumetric OGIP	CTD / RF%	EUR / RF%	Recoverable Gas Remaining
Mesaverde	46.17 BCF	6.86 BCF / 14.86%	9.41 BCF / 20%	27.53 BCF

- CTD= Cumulative Production to Date
- EUR= Estimated Ultimate Recovery and is based of Decline Curve Analysis
- Recoverable Gas Remaining assumes an 80% Recovery Factor

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**SELF-AFFIRMED STATEMENT OF
PAULA M. VANCE**

1. I am attorney in fact and authorized representative of Hilcorp Energy Company (“HEC”), the Applicant herein. I have personal knowledge of the matter addressed herein and am competent to provide this self-affirmed statement.

2. The above-referenced application and notice of the hearing on this application was sent by certified mail to the locatable affected parties on the date set forth in the letter attached hereto.

3. The spreadsheet attached hereto contains the names of the parties to whom notice was provided.

4. The spreadsheet attached hereto contains the information provided by the United States Postal Service on the status of the delivery of this notice as of September 29, 2025.

5. I caused a notice to be published to all parties subject to these proceedings. An affidavit of publication from the publication’s legal clerk with a copy of the notice of publication is attached herein.

6. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.

**BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. D
Submitted by: Hilcorp Energy Company
Hearing Date: October 9, 2025
Case No. 25606**



Paula M. Vance

09/30/25

Date



Paula M. Vance
Associate
Phone (505) 988-4421
Fax (505) 954-7286
pmvance@hollandhart.com

September 19, 2025

VIA CERTIFIED MAIL
CERTIFIED RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re: Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico: Rhoda Abrams 2P Well

Ladies & Gentlemen:

This letter is to advise you that Hilcorp Energy Company has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on October 9, 2025, and the status of the hearing can be monitored through the Division's website at <https://www.emnrd.nm.gov/oed/>.

It is anticipated that hearings will be held in a hybrid format with both in-person and virtual participation options. The meeting will be held in the Pecos Hall Hearing Room at the Wendall Chino Building, 1st Floor, 1220 South St. Francis Dr., Santa Fe, New Mexico. To participate virtually in the hearing, see the instructions posted on the OCD Hearings website: <https://www.emnrd.nm.gov/oed/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. Parties appearing in cases are required to file a Pre-hearing Statement four business days in advance of a scheduled hearing that complies with the provisions of NMAC 19.15.4.13.B.

If you have any questions about this matter, please contact Carson Parker Rice at (713) 209-2400 or carice@hilcorp.com.

Sincerely,

A handwritten signature in blue ink that appears to read "Paula M. Vance".

Paula M. Vance
ATTORNEY FOR HILCORP ENERGY COMPANY

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

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

Postal Delivery Report

9414811898765477235300	WPC Oil & Gas LP	4040 N Central Expy Ste 750	Dallas	TX	75204-3152	Your item was delivered to the front desk, reception area, or mail room at 3:13 pm on September 24, 2025 in DALLAS, TX 75204.
9414811898765477235348	Simcoe, LLC	1201 Louisiana St Ste 3400	Houston	TX	77002-5632	We were unable to deliver your package at 2:31 pm on September 27, 2025 in HOUSTON, TX 77010 because the business was closed. We will redeliver on the next business day. No action needed.

BALLANTINE

COMMUNICATIONS

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO

County of San Juan

Edette Zamora, the undersigned, authorized Representative of the Tri-City Record, on oath states that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Law of 1937, that payment therefore has been made of assessed as court cost; and that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 time(s) on the following date(s):

9/24/2025

Sworn and subscribed before me, a notary public in and for the county of La Plata and the State of Colorado, 9-25-25

Gail Lynn Vitarius
Notary Public

PRICE: \$ 142.37

Statement to come at the end of the month.

ACCOUNT NUMBER: 110454

GAIL LYNN VITARIUS
Notary Public
State of Colorado
Notary ID # 20254005989
My Commission Expires 02-12-2029

COPY OF ADVERTISEMENT

30962

Case No. 25606: Application of Hilcorp Energy Company for an Exception to the Well Density Requirements of the Special Rules and Regulations of the Blanco-Mesaverde Gas Pool, San Juan County, New Mexico. Notice to all affected interest owners, including all heirs, devisees and successors of: WPC Oil & Gas LP, Passport Energy Inc.; JMJ Resources LLC; and Juniper Investments LLC and Simcoe, LLC The State of New Mexico, Energy Minerals and Natural Resources Department, Oil Conservation Division ("Division") hereby gives notice that the Division will hold public hearing 8:30 a.m. on October 9, 2025, to consider this application. 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 in the hearings electronically, see the instructions posted on the docket for the hearing date:

<https://www.emnrd.nm.gov/ocd/hearing-info/> or contact Freya Tschantz, at

Freya.Tschantz@emnrd.nm.gov. Applicant in the above-styled cause seeks an order for an exception to the well density requirements of Rule I.B of the Special Rules and Regulations for the Blanco-Mesaverde Gas Pool (72319), San Juan County, New Mexico, to permit it to drill and complete one additional Mesaverde vertical and/or directional gas well, making a total of five vertical and/or directional gas wells within the same standard 319.71-acre, more or less, spacing and proration unit comprised of Lots 1 and 2, S/2 NE/4 and the SE/4 (E/2 equivalent) of irregular Section 5, Township 30 North, Range 11 West, NMPM, San Juan County, New Mexico. Hilcorp further seeks approval for the proposed location of the **Rhoda Abrams 2P Well** (API No. 30-045-PENDING), to be directionally drilled with a surface hole location in the NW/4 SE/4 (Unit J), and a bottom hole location in the NW/4 SE/4 (Unit J) of irregular Section 5, and authorization to complete and produce from the Blanco-Mesaverde Gas Pool. Said area is located approximately 1 mile north of Aztec, New Mexico.

Published in the Tri-City Record
September 24, 2025