

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

**APPLICATION OF CONOCOPHILLIPS COMPANY  
FOR COMPULSORY POOLING AND APPROVAL  
OF NON-STANDARD SPACING UNIT,  
EDDY COUNTY, NEW MEXICO.**

**CASE NO. \_\_\_\_\_**

**APPLICATION**

Pursuant to NMSA 1978, Section 70-2-17, ConocoPhillips Company (OGRID No. 217817) (“ConocoPhillips” or “Applicant”) applies for an order pooling all uncommitted interests in Bone Spring formation underlying a 1,600-acre, more or less, non-standard horizontal spacing unit comprised of the S/2 of Section 23, and all of Sections 26 and 35, Township 23 South, Range 30 East, Eddy County, New Mexico (“Unit”). In support of this application, ConocoPhillips states the following.

1. Applicant is a working interest owner in the Unit and has the right to drill wells thereon.
2. Applicant seeks to dedicate the Unit to the following wells (“Wells”):
  - a. **Fury Road Fed Com 501H** and **Fury Road Fed Com 521H**, which will be drilled from surface hole locations in the NE/4 SW/4 (Unit K) of Section 23 to bottom hole locations in the SW/4 SW/4 (Unit M) of Section 35;
  - b. **Fury Road Fed Com 502H**, which will be drilled from a surface hole location in the NE/4 SW/4 (Unit K) of Section 23 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 35;
  - c. **Fury Road Fed Com 522H**, which will be drilled from surface hole locations in the NW/4 SE/4 (Unit J) of Section 23 to bottom hole locations in the SE/4 SW/4 (Unit N) of Section 35;

- d. **Fury Road Fed Com 503H**, which will be drilled from a surface hole location in the NW/4 SE/4 (Unit J) of Section 23 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 35; and
  - e. **Fury Road Fed Com 504H** and **Fury Road Fed Com 523H**, which will be drilled from surface hole locations in the NW/4 SE/4 (Unit J) of Section 23 to bottom hole locations in the SE/4 SE/4 (Unit P) of Section 35.
3. The completed intervals of the Wells will be orthodox.
  4. Applicant requests approval of a non-standard horizontal spacing unit pursuant to Rule 19.15.16.15(B)(5) NMAC, which will create cost efficiencies, prevent waste, and protect correlative rights.
    5. The spacing unit for the Wells partially overlaps with the spacing units for the following wells, which produce from the Forty Niner Ridge; Bone Spring Pool (Code 24720):
      - a. Forty Niner Ridge 23 Federal 1H (API 30-015-40615) dedicated to the E/2 E/2 of Section 23, Township 23 South, Range 30 East; and
      - b. Forty Niner Ridge 23 Federal 2H (API 30-015-40649) dedicated to the W/2 E/2 of Section 23, Township 23 South, Range 30 East.
  6. Applicant has undertaken diligent, good-faith efforts to obtain voluntary agreements from all interest owners to participate in the drilling of the Wells but has been unable to obtain voluntary agreements from all interest owners.
  7. The pooling of uncommitted interests will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.
  8. In order to allow Applicant to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in the Unit should be pooled and Applicant

should be designated the operator of the Wells and Unit.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on July 9, 2026, and, after notice and hearing as required by law, the Division enter an order:

- A. Pooling all uncommitted interests in the Unit;
- B. Approving the non-standard spacing unit;
- C. Approving the overlapping spacing unit;
- D. Approving the Wells in the Unit; and
- E. Designating Applicant as operator of the Unit and the Wells to be drilled thereon.

Respectfully submitted,

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