

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

**APPLICATION OF LONGFELLOW ENERGY, LP
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NO. 21651

**APPLICATION OF SPUR ENERGY PARTNERS, LLC
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

CASE NO. 21733

ORDER NO. R-21834

ORDER

The Director of the New Mexico Oil Conservation Division (“OCD”), having heard these matters through a Hearing Examiner on June 17 and 18, 2021, and after considering the testimony, evidence, and recommendation of the Hearing Examiner, issues the following Order.

FINDINGS AND CONCLUSIONS

1. Due public notice has been given as required by law, and OCD has jurisdiction of these cases and the subject matter.
2. These cases involve competing compulsorily pooling applications located within the same formation and the same section with overlapping horizontal spacing units filed by Longfellow Energy, LP (“Longfellow”) and Spur Energy Partners, LLC (“Spur”). These cases were consolidated for hearing and a single order is being issued for the consolidated cases.
3. Both Longfellow and Spur have the right to drill within the proposed spacing units, and each seeks to be named operator of their proposed wells and spacing units.
4. Applications: Case No. 21651. On January 11, 2021, Longfellow filed an application to compulsorily pool the uncommitted oil and gas interests in the Yeso formation underlying a standard 480-acre, more or less, horizontal spacing unit comprised of N/2 of Section 13 and the NE/4 of Section 14, Township 17 South, Range 28 East, NMPM, Eddy County, New Mexico. Longfellow proposed to dedicate to this unit five wells: the Hendrix State Com 1314 ABX 001H - 005H wells.
5. Case No. 21733. On February 4, 2021, Spur filed a competing application to compulsorily pool the uncommitted oil and gas interests in the Yeso formation underlying a standard 480-acre horizontal spacing unit comprised of the N/2 of Section 13 and the NE/4 of Section 14, Township 17 South, Range 28 East, NMPM, Eddy County, New Mexico. Spur proposed to dedicate to this unit six wells: the Aid North #10H, 11H, 12H, 50H, 51H and 70H wells.

6. Hearing. The cases were heard at an OCD hearing docket on June 17 and 18, 2021. The hearing, which was conducted on a virtual platform, was conducted in accordance with Section 19.15.4 NMAC. Both Longfellow and Spur presented witnesses and exhibits. No other party presented evidence. Each of the witnesses were sworn, were qualified to present expert opinion testimony and were subject to cross-examination by the other party and by the OCD Hearing Examiners. Following the hearing, Longfellow and Spur submitted written closing statements by July 23, 2021.
9. Longfellow presented three witnesses in support of its application:
 - a. Ryan Reynolds, landman;
 - b. Jennifer Eker, geologist; and
 - c. David Mitchell, petroleum engineer.
10. Spur presented three witnesses in support of its application:
 - a. Paul Eschete, landman;
 - b. C. J. Lipinski, geologist; and
 - c. Normand Pennington, petroleum engineer.
11. Legal Background. The Oil and Gas Act authorizes OCD to compulsory pool the lands or interests in a spacing unit. When the owners of the interests in a spacing unit have not agreed to voluntarily pool their interests, and when one owner, who has the right to drill, applies to OCD, OCD can pool the lands or interests in the unit “to avoid the drilling of unnecessary wells or to protect correlative rights, or to prevent waste”. NMSA 1978, §70-2-17.C.
12. OCD and the Oil Conservation Commission (“Commission”) have developed a number of factors to consider in evaluating competing compulsory pooling applications.
13. The Commission, in a 1997 order involving vertical well proposals, concluded that “the most important consideration in awarding operations to competing interest owners is geologic evidence as it relates to well location and recovery of oil and gas and associated risk.” *KCS Medallion Resources, Inc.*, Order R-10731-B, ¶ 23(f) (Feb. 28, 1997). In this Order, the Commission also listed several other factors such as lack of good faith negotiation, differences in proposed risk charge and ability to prudently operate the property but concluded that in the absence of “any reason why one operator would economically recover more oil or gas by virtue of being awarded operations than the other”, “working interest control” would be the “controlling factor”. *Id.* ¶24.
14. Since then, OCD and Commission decisions have applied the factors in Order R-10731-B, with some additions, in compulsory pooling cases including those involving horizontal well proposals. In a recent decision, the Commission listed the

factors it “may consider” in evaluating competing compulsory pooling applications:

- a. A comparison of geologic evidence presented by each party as it relates to the proposed well location and the potential of each proposed prospect to efficiently recover the oil and gas reserves underlying the property.
- b. A comparison of the risk associated with the parties' respective proposal for the exploration and development of the property.
- c. A review of the negotiations between the competing parties prior to the applications to force pool to determine if there was a "good faith" effort.
- d. A comparison of the ability of each party to prudently operate the property and, thereby, prevent waste.
- e. A comparison of the differences in well cost estimates (AFEs) and other operational costs presented by each party for their respective proposals.
- f. An evaluation of the mineral interest ownership held by each party at the time the application was heard
- g. A comparison of the ability of the applicants to timely locate well sites and to operate on the surface (the "surface factor").

Novo Oil & Gas Northern Delaware, LLC, Order R-21420-A, ¶9 (Sept. 17, 2020).

15. Factors. Each party presented testimony on the factors listed above. The parties agreed that they both seek to pool the same horizontal spacing unit, that they seek to drill into the same formation and there is no significant geological difference between their competing proposals. The parties disagree on which development proposal is better and on the amounts of working interest controlled by each party. OCD's first task is to determine which development plan “will most efficiently develop the subject acreage, prevent waste and protect correlative rights”. Order R-20368 ¶18 (2/6/2019). If there are no significant differences between the development plans, then OCD must look at other factors, and, in particular, working interest control.
16. Development Plans. The plans for development are similar. Besides being located in the same section, both parties are targeting the same formation. Both propose horizontal wells of the same length with the same orientation.
17. Longfellow proposes 5 wells drilled from west to east. Longfellow proposes a ‘wine rack’ pattern with 3 wells in the ‘Paddock’ bench and two wells in the ‘Blinebry’ bench, The wells will be evenly spaced about 900 horizontal feet apart and about 450 vertical feet between the benches. Longfellow claims this pattern will maximize recovery within the unit while minimizing impact on existing Longfellow wells in an adjacent unit. The wells in the adjacent unit follow the same pattern.

18. Longfellow testified that the benches it proposes to drill, the Paddock and the Upper Blinebry, are the most productive. According to Longfellow's witnesses, the lower benches, such as the Middle Blinebry where Spur proposes to drill, are unproven. Longfellow also proposes a larger fracture stimulation which it claims will drain a larger area and therefore result in a greater return per well. Longfellow claims that Spur's well pattern proposal is irregular and will result in a lower return of reserves, will strand productive areas and may result in well communication.
19. Longfellow owns and operates 5 producing horizontal wells in an adjacent spacing unit. Longfellow states that it has significant surface infrastructure within the immediate area, including facilities for water storage and recycling. Longfellow also testified that its nearby wells have not been flared and its new wells will be designed to avoid flaring.
20. Spur proposes 6 wells also drilled from west to east. Spur proposes an additional well to be located in a deeper Blinebry bench which Spur claims is quite productive and, therefore, Longfellow's failure to develop that bench constitutes waste. Spur sought to demonstrate that its spacing of 3 Blinebry wells would leave a smaller undeveloped space between the Spur wells and the Longfellow Blinebry wells in the adjacent unit.
21. Spur also presented evidence that Longfellow's increased fracture density will not result in significant production benefits and will only unnecessarily increase costs.
22. Working Interest Control. Spur testified that it is the working interest owner of 46.25% of the Unit. (Ex. C4) Under Spur's calculation, Longfellow is the working interest owner of 33.53%. Longfellow claimed that the interest of the parties in the unit is Longfellow 47.23% and Spur 40.31%.
23. The differences in the totals presented by each party are largely associated with the question of whether to included interests subject to a joint operating agreement ("JOA"). Longfellow is the designated operator under two JOAs: the Puma JOA and the Aid JOA. Spur argues vigorously that these interests cannot be used to determine working interest control.
24. While the parties debated the meaning of working interest ownership in several pleadings, the issue is the meaning of "working interest control" as it is used in analyzing competing compulsory pooling applications. The term "working interest control" comes not from the Oil and Gas Act but from a Commission order that set forth the basic analysis for competing pooling proposals. Order R-10731-B. In this Order, the Commission stated:

In the absence of compelling factors such as geologic and prospect differences, ability to operate prudently or any reason why one operator would economically recover more oil or gas by virtue of being awarded

operations than the other, "working interest control" as defined and modified by findings 23 (d) and (e) should be the controlling factor in awarding operations.

Id. ¶24 (emphasis added)

25. In those defining subparagraphs 23 (d) and (e), the Commission seems to take the initial working interest ownership percentages of each competing party and “credit” additional acreage held by other parties. The exact criteria for what triggers a credit is not entirely clear but it appears to reflect other owners support or prior relationship with the applicant. Under the analysis in R-10731-B, it would not be unreasonable to consider the acreage covered by the JOAs as part of Longfellow’s “working interest control”.
26. However, the differences between Spur and Longfellow’s claims of working interest control are not very significant and that makes it difficult to use working interest control as the deciding factor in this case. Neither party claimed over 50% at the time of the applications, and the gap between the parties is either around 7 or 12%. In recent cases where working interest control has been the deciding factor, the differences were quite clear. In the two most recent Division orders, one case had one party with a 96% interest in its proposed unit and a 50% interest in the competing unit, while in the other case, one party had at least a 62.5% interest (and therefore a 25% greater interest) in each of 4 proposed units. *COG Operating LLC*, R-21826, Aug. 31, 2021; *Matador Production Company*, R-21800, Aug. 26, 2021.
27. Other Factors. Most other factors show little difference between the parties. Both parties propose a 200% risk charge. Both parties engaged in negotiation prior to applying and OCD finds no evidence of bad faith in negotiation. Both companies have experience with horizontal well development. Longfellow has developed the unit adjacent to the proposed development. Spur provided evidence that it has drilled 30 horizontal wells in New Mexico and operates over 3000 producing wells.
28. Both parties presented considerable conflicting evidence on each other’s cost estimates. However, under Order R-10731-B, differences in cost estimates “are not significant factors in awarding operations and have only minor significance in evaluating an operator’s ability to prudently operate the property”. ¶23(j).
29. Analysis. The analysis comes down to the competing development plans. This analysis includes consideration of the geologic evidence, the proposed location of the wells, the risks in development and an additional factor identified as the “surface factor”. For competing horizontal well proposals, OCD added consideration of the “surface factor”: a comparison of the ability of the applicants to timely locate well sites and to operate on the surface. *Ascent Energy, LLC*, Order R-14847 ¶26 (Aug. 31, 2018). The Commission has now included the surface factor in its list of factors. See, e.g., Order R-21420-A.

30. The evidence favors Longfellow's development plans. Longfellow proposes a 'wine rack' pattern of well placement which follows Longfellow's development in the adjacent unit, matches the geologic evidence of productivity from the benches, and allows for adequate horizontal and vertical spacing between wells. Spur proposes to drill an additional well in a lower, less proven zone which will result in tighter well spacing. One of the OCD's statutory mandates in approving compulsory pooling is "to avoid the drilling of unnecessary wells." NMSA 1978, §70-2-17(C).
31. In addition, the surface factor favors Longfellow. Longfellow has surface facilities, including water storage and recycling facilities within the immediate area. Longfellow also has a proven record of avoiding flaring during operation.
32. OCD concludes that to avoid the drilling of unnecessary wells, to protect correlative rights, and to avoid waste, the application of Longfellow should be granted.

ORDER

33. The application of Longfellow ("Operator") in Case No. 21651 is granted.
34. The application of Spur in Case No. 21733 is denied.
35. The uncommitted interests in the Unit are pooled as set forth in Exhibit A. The Unit shall be dedicated to the Well(s) set forth in Exhibit A. Operator is designated as operator of the Unit and the Well(s).
36. If the location of a well will be unorthodox under the spacing rules in effect at the time of completion, Operator shall obtain the OCD's approval for a non-standard location in accordance with 19.15.16.15(C) NMAC.
37. The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.
38. This Order shall terminate automatically if Operator fails to comply with Paragraph 27 unless Operator obtains an extension by amending this Order for good cause shown.
39. The infill well requirements in 19.15.13.9 NMAC through 19.15.13.12 NMAC shall be applicable.
40. Operator shall submit each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").

41. No later than thirty (30) days after Operator submits the Estimated Well Costs, the owner of a Pooled Working Interest shall elect whether to pay its share of the Estimated Well Costs or its share of the actual costs to drill, complete and equip the well ("Actual Well Costs") out of production from the well. An owner of a Pooled Working Interest who elects to pay its share of the Estimated Well Costs shall render payment to Operator no later than thirty (30) days after the expiration of the election period, and shall be liable for operating costs, but not risk charges, for the well. An owner of a Pooled Working Interest who fails to pay its share of the Estimated Well Costs or who elects to pay its share of the Actual Well Costs out of production from the well shall be considered to be a "Non-Consenting Pooled Working Interest."
42. No later than one hundred eighty (180) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the Actual Well Costs. The Actual Well Costs shall be considered to be the Reasonable Well Costs unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.
43. No later than sixty (60) days after the expiration of the period to file a written objection to the Actual Well Costs or OCD's order determining the Reasonable Well Costs, whichever is later, each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs shall pay to Operator its share of the Reasonable Well Costs that exceed the Estimated Well Costs, or Operator shall pay to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs its share of the Estimated Well Costs that exceed the Reasonable Well Costs.
44. The reasonable charges for supervision to drill and produce a well ("Supervision Charges") shall not exceed the rates specified in Exhibit A, provided however that the rates shall be adjusted annually pursuant to the COPAS form entitled "Accounting Procedure-Joint Operations."
45. No later than within ninety (90) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the reasonable charges for operating and maintaining the well ("Operating Charges"), provided however that Operating Charges shall not include the Reasonable Well Costs or Supervision Charges. The Operating Charges shall be considered final unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Operating Charges after public notice and hearing.

46. Operator may withhold the following costs and charges from the share of production due to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs: (a) the proportionate share of the Supervision Charges; and (b) the proportionate share of the Operating Charges.
47. Operator may withhold the following costs and charges from the share of production due to each owner of a Non-Consenting Pooled Working Interest: (a) the proportionate share of the Reasonable Well Costs; (b) the proportionate share of the Supervision and Operating Charges; and (c) the percentage of the Reasonable Well Costs specified as the charge for risk described in Exhibit A.
48. Operator shall distribute a proportionate share of the costs and charges withheld pursuant to paragraph 37 to each Pooled Working Interest that paid its share of the Estimated Well Costs.
49. Each year on the anniversary of this Order, and no later than ninety (90) days after each payout, Operator shall provide to each owner of a Non-Consenting Pooled Working Interest a schedule of the revenue attributable to a well and the Supervision and Operating Costs charged against that revenue.
50. Any cost or charge that is paid out of production shall be withheld only from the share due to an owner of a Pooled Working Interest. No cost or charge shall be withheld from the share due to an owner of a royalty interests. For the purpose of this Order, an unleased mineral interest shall consist of a seven-eighths (7/8) working interest and a one-eighth (1/8) royalty interest.
51. Except as provided above, Operator shall hold the revenue attributable to a well that is not disbursed for any reason for the account of the person(s) entitled to the revenue as provided in the Oil and Gas Proceeds Payment Act, NMSA 1978, Sections 70-10-1 *et seq.*, and relinquish such revenue as provided in the Uniform Unclaimed Property Act, NMSA 1978, Sections 7-8A-1 *et seq.*
52. The Unit shall terminate if (a) the owners of all Pooled Working Interests reach a voluntary agreement; or (b) the well(s) drilled on the Unit are plugged and abandoned in accordance with the applicable rules. Operator shall inform OCD no later than thirty (30) days after such occurrence.
53. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



ADRIENNE SANDOVAL
DIRECTOR
AES/wrb

Date: 9/08/2021

Exhibit "A"

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COMPULSORY POOLING APPLICATION CHECKLIST	
ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 21651	APPLICANT'S RESPONSE
Date	June 17, 2021
Applicant	Longfellow Energy, LP
Designated Operator & OGRID (affiliation if applicable)	372210
Applicant's Counsel:	Montgomery & Andrews, P.A. (Sharon Shaheen & John McIntyre)
Case Title:	Application of Longfellow Energy, LP for Compulsory Pooling, Eddy County, New Mexico
Entries of Appearance/Intervenors:	Sep Permian, LLC, ConocoPhillips
Well Family	Hendrix State Com 1314ABX
Formation/Pool	
Formation Name(s) or Vertical Extent:	Yeso Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Yeso Formation
Pool Name and Pool Code:	Empire; Glorieta-Yeso [96210]
Well Location Setback Rules:	Statewide Rules
Spacing Unit Size:	480 acres, more or less
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	480 acres, more or less
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	East-West
Description: TRS/County	NE/4 of Section 14-17S-28E and N/2 of Section 13-17S-28E
Standard Horizontal Well Spacing Unit (Y/N), if No, describe	Yes
Other Situations	
Depth Severance: Y/N. If yes, description	None
Proximity Tracts: If yes, description	No
Proximity Defining Well: if yes, description	N/A
Applicant's Ownership in Each Tract	Tract 1 = 61.75753%, Tract 2 = 0.00000%, Tract 3 = 77.60485%
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	
Well #1	Hendrix State Com 1314ABX 001H, API 30-015-_____ SHL: 361' FNL and 2,400' FEL of Section 14-17S-28E, BHL: 347' FNL and 20' FEL of Section 13-17S-28E Completion Target: Yeso at approximately 3,900' Well Orientation: East to West Completion located expected to be standard
Horizontal Well First and Last Take Points	FTP (~ 347' FNL and 2,493' FEL of Section 14-17S-28E); LTP (~ 347' FNL and 100' FEL of Section 13-17S-28E)
Completion Target (Formation, TVD and MD)	Yeso Formation - TVD (~ 3,400'), MD (~ 11,400')
Well #2	Hendrix State Com 1314ABX 002H, API 30-015-_____ SHL: 361' FNL and 2,400' FEL of Section 14-17S-28E, BHL: 347' FNL and 20' FEL of Section 13-17S-28E Completion Target: Yeso at approximately 4,300' Well Orientation: East to West Completion located expected to be standard

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Horizontal Well First and Last Take Points	FTP (~800' FNL and 2,429' FEL of Section 14-17S-28E); LTP (~800' FNL and 100' FEL of Section 13-17S-28E)
Completion Target (Formation, TVD and MD)	Yeso Formation - TVD (~ 4,300'), MD (~ 11,800')
Well #3	Hendrix State Com 1314ABX 003H, API 30-015-_____ SHL: 1,703' FNL and 2,428' FEL of Section 14-17S-28E, BHL: 1,254' FNL and 20' FEL of Section 13-17S-28E Completion Target: Yeso at approximately 3,900' Well Orientation: East to West Completion located expected to be standard
Horizontal Well First and Last Take Points	FTP (~1,254' FNL and 2,491' FEL of Section 14-17S-28E); LTP (~1,254' FNL and 100' FEL of Section 13-17S-28E)
Completion Target (Formation, TVD and MD)	Yeso Formation - TVD (~ 3,900'), MD (~ 11,400')
Well #4	Hendrix State Com 1314ABX 004H, API 30-015-_____ SHL: 1,728' FNL and 2,428' FEL of Section 14-17S-28E, BHL: 1,708' FNL and 20' FEL of Section 13-17S-28E Completion Target: Yeso at approximately 4,300' Well Orientation: East to West Completion located expected to be standard
Horizontal Well First and Last Take Points	FTP (~1,708' FNL and 2,490' FEL of Section 14-17S-28E); LTP (~1,708' FNL and 100' FEL of Section 13-17S-28E)
Completion Target (Formation, TVD and MD)	Yeso Formation - TVD (~ 4,300'), MD (~ 11,800')
Well #5	Hendrix State Com 1314ABX 005H, API 30-015-_____ SHL: 1,753' FNL and 2,428' FEL of Section 14-17S-28E, BHL: 2,161' FNL and 20' FEL of Section 13-17S-28E Completion Target: Yeso at approximately 3,900' Well Orientation: East to West Completion located expected to be standard
Horizontal Well First and Last Take Points	FTP (~2,161' FNL and 2,489' FEL of Section 14-17S-28E); LTP (~ 2,161' FNL and 100' FEL of Section 13-17S-28E)
Completion Target (Formation, TVD and MD)	Yeso Formation - TVD (~ 3,900'), MD (~ 11,400')
AFE Capex and Operating Costs	
Drilling Supervision/Month \$	\$8,000; see Exhibit A, Paragraph 18
Production Supervision/Month \$	\$800; see Exhibit A, Paragraph 18
Justification for Supervision Costs	Please see AFE at Exhibit A-7
Requested Risk Charge	200%; see Exhibit A, Paragraph 19
Notice of Hearing	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibit C; see Exhibit A-8
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	See Exhibits A-2, A-3 & A-4
Tract List (including lease numbers and owners)	Exhibits A-2, A-3 & A-4
Poolled Parties (including ownership type)	Exhibit A-4

Locatable Parties to be Pooled	None
Ownership Depth Severance (including percentage above & below)	None
Order	
Sample Copy of Proposal Letter	Exhibit A-7
List of Interest Owners	Exhibit A-4
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	See Exhibit A-7
Cost Estimate to Drill and Complete	See AFE at Exhibit A-7
Cost Estimate to Equip Well	See AFE at Exhibit A-7
Cost Estimate for Production Facilities	See AFE at Exhibit A-7
Geology	
Summary (including special considerations)	Exhibit B-1
Spacing Unit Schematic	Exhibit B-3
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-7
Well Orientation (with rationale)	Exhibit B-1
Target Formation	Exhibits B-4, B-5 & B-6
HSU Cross Section	Exhibit B-6
Depth Severance Discussion	n/a
Engineering	
Existing Infrastructure, Producing Wells, Operations	Exhibit C-2, C-3, C-4 & C-5
Water Recycling & Storage Facility	Exhibit C-5
Approved Surface Use Agreements	Exhibit C-6
Spur Surface Location	Exhibit C-7
Flaring Breakdown (Longfellow Development)	Exhibit C-8
Drilling Analysis & Stimulated Lateral Length	Exhibit C-9
AFE Analysis	Exhibit C-12
Reservoir Engineering Analysis	Exhibit C-10, C-11, C-13 & C-14
Forms, Figures and Tables	
C-102	Exhibit A-6
Tracts	Exhibit A-2
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit A-2, A-3 & A-4
General Location Map (including basin)	Exhibit A-1
Well Bore Location Map	Exhibit B-3
Structure Contour Map - Subsea Depth	Exhibit B-2
Cross Section Location Map (including wells)	Exhibit B-5
Cross Section (including Landing Zone)	Exhibit B-6
Additional Information	
Special Provisions/Stipulations	
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Ryan Reynolds
Signed Name (Attorney or Party Representative):	
Date:	6/10/2021

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