ceived by OCP; AJ/26/2024 strict:24:	30 AM State of New Mexi	CO		Form C-103		
Office District I – (575) 393-6161	Energy, Minerals and Natural Resources		Revised August 1, 2011			
1625 N. French Dr., Hobbs, NM 88240			WELL API NO.			
<u>District II</u> – (575) 748-1283 811 S. First St., Artesia, NM 88210	OIL CONSERVATION D	DIVISION	<u>30-005-60332</u>	r		
District III - (505) 334-6178	1220 South St. Franci	is Dr.	5. Indicate Type of I STATE X	Lease FEE		
1000 Rio Brazos Rd., Aztec, NM 87410 <u>District IV</u> – (505) 476-3460	Santa Fe, NM 875	05	6. State Oil & Gas L			
1220 S. St. Francis Dr., Santa Fe, NM 87505			K0-5110-1			
SUNDRY NOT: (DO NOT USE THIS FORM FOR PROPO	ICES AND REPORTS ON WELLS SALS TO DRILL OR TO DEEPEN OR PLUG CATION FOR PERMIT" (FORM C-101) FOR		SOUTH LUCKY LA	nit Agreement Name AKE QUEEN UNIT		
PROPOSALS.) 1. Type of Well: Oil Well X	Gas Well Other		8. Well Number 001A			
2. Name of Operator BAR V BARB, LLC			9. OGRID Number 371067			
3. Address of Operator			10. Pool name or W	ildcat		
P.O. BOX 4435, ROSWELL, NM	88202		LUCKY LAKE QUI			
4. Well Location		1 1000				
Unit Letter O :	660 feet from the SOUTH line		feet from the EAST	line		
Section 16		0		CHAVES County		
	11. Elevation (Show whether DR, R 3,843.5' – GR)			
	5,045.5 - OK					
12. Check	Appropriate Box to Indicate Nat	ure of Notice,	Report or Other Da	ata		
PERFORM REMEDIAL WORK TEMPORARILY ABANDON PULL OR ALTER CASING DOWNHOLE COMMINGLE	CHANGE PLANS	REMEDIAL WOR COMMENCE DRI CASING/CEMEN ⁻		LTERING CASING 🗌 AND A		
 PERMIAN RESOURCES T 30-005-60332) ON NMOCE RESOURCES OPERATING 1) SET 4-1/2" CIBP @ 1,7 2) PUMP (25) SXS. CLAS 3) PERF. X ATTEMPT TO TAG. 4) PERF. X CIRC. TO SU SALT). 5) DIG OUT X CUT OFF PLATE TO CSGS. X IN DURING THIS PROCED 	MELL. BY LETTER DATED NOV O PLUG AND ABANDON THE SOU O'S BEHALF PURSUANT TO ITS AU G, LLC RESPECTFULL SUBMITS TH '50'; CIRC. WELL W/ M.L.F.; PRES. SS "C" CMT. @ 1,750'-1,550'; WOC O SQZ. (120) SXS. CLASS "C" CMT RF., FILLING ALL ANNULI, (120) S WELLHEAD 3' B.G.L.; VERIFY CM NSTALL BELOW GROUND DRY H URE WE PLAN TO USE THE CLOSH QUIRED DISPOSAL, PER OCD RUL	JTH LUCKY LA UTHORITY UNI HIS NOI TO P& TEST CSG. TO X TAG TOC. (2) @ 1,300'-944' (SXS. CLASS "C" MT. TO SURF. O OLE MARKER (ED-LOOP SYST	KE QUEEN UNIT #0 DER ORDER NO. R-2 A ON BEHALF OF B. 500# X HOLD 30 MII (T/7-R, T/YATES, B/S " CMT. @ 353'-3' (8-5 DN ALL ANNULI; WE (LPCH AREA).	01A WELL (API 23410. PERMIAN AR V BARB, LLC. NS.; RUN CBL. SALT) ; WOC X 5/8" SHOE, T/ ELD ON STEEL		
hereby certify that the information	above is true and complete to the best	of my knowledg	e and belief.			
SIGNATURE <u>Jessica Z</u>	-	atory Specialist		DATE: 11/26/2024		
Type or print name: Jessica Doolin	0	.dooling@permia	nres com DUANE.	432-999-3072		
	5 L-man address. Jessica.	aoonng@perilla	mes.com inone.			
For State Use Only						
APPROVED BY	TITLE		DATE			

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Conditions of Approval (if any): Released to Imaging: 12/19/2024 2:53:25 PM

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		SAN ANDRES			PLUG#2	SHOE	50 SXS	8700'-8800'
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		CAPITAN REEF		*	PLUG#3	CIBP	25 SXS	5300'
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30-005-60332 **PLUGGING & ABANDONMENT WORKSHEET** BARB, LLC (371067 OPERATOR BAR LUCKY LAKE UNIT LEASENAME SOUTH OOI A NELL 155 RNG 29E TWN SECT 16 60. NOL 1,980 EWL FROM FORMATION @ TD TD: FORMATION @ PBTD PBTD: TISALT~ 260' PERF. X CIRC. (120) 5×5.0353-3' B/SALT. -994' T/YATES~1,035' TI7-R.~1,250' M.L.F. 7/ QN.~1,760 PERF. X SQZ. (120) 5X5 @ 1,300'- 944' - THG M.L.F. Pump (25) SXS. @ 1,750'-1,550'~ TAC. - SET 4-1/2" CIBPE1,750' 1,765-75 TD 1.848'

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Michelle Lujan-Grisham Governor

Melanie A. Kenderdine Cabinet Secretary-Designate

Benjamin Shelton Deputy Secretary (Acting) **Gerasimos Razatos,** Division Director (Acting) Oil Conservation Division



BY ELECTRONIC MAIL

Rob Montgomery Senior Counsel Permian Resources Operating, LLC 300 N. Marienfeld Street, Suite 1000 Midland, Texas 79701

Re: Oil Conservation Division Authorization for Permian Resource to Plug and Abandon Well(s)

Mr. Montgomery:

The Oil Conservation Division ("OCD") received your request of October 11, 2024, requesting authorization for Permian Resources Operating, LLC ("PR"), to plug and abandon the following well: South Lucky Lake Queen Unit #001A Well API: 30-005-60332. Bar V Barb, LLC ("BVB") is the registered operator of this well and PR is the leaseholder where the well is located. As the leaseholder, PR may be deemed a responsible operator for purposes of plugging and remediation activities or for indemnification of costs incurred by OCD for such activities.

On September 20, 2024, OCD issued Final Order R-23410 ("R-23410"), setting forth plugging compliance deadlines to be met by BVB. That Final Order R-23410 is incorporated herein as though set forth in full. BVB has not complied with the plugging deadline established in the Order and OCD is authorized to plug and abandon the well.

OCD hereby authorizes PR, to plug and abandon the above-identified well on OCD's behalf pursuant to its authority under R-23410.

Please contact Assistant General Counsel, Christy Treviño at (505)-607-4524 or Christy.Trevino@emnrd.nm.gov, with questions, including the submission of plugging sundries as OCD will not be transferring operatorship to you and will need to place the plugging sundries into the well files.

Regards Alora

Gerasimos Razatos Director (Acting)

cc:

EMNRD-OGC

11/19/2024

Date

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

IN RE BAR V BARB, LLC Respondent.

CASE NO. 24773 ORDER NO. R-23410

<u>ORDER</u>

This matter came before the Director of the New Mexico Oil Conservation Division ("Division" or "OCD") on the Notice of Violation ("NOV") dated on or about July 23, 2024, issued to Bar V Barb LLC, OGRID #371067 ("Operator"). The Division's Hearing Examiner conducted a public hearing on September 12, 2024. The Director, having considered the testimony and evidence presented, and being otherwise fully advised in the premises, finds, concludes and orders:

FINDINGS OF FACT

- 1. The Division has jurisdiction over the parties and the subject matter herein.
- On or about July 23, 2024, the Division issued the NOV, which alleged three violations (OCD Ex.2):
 - a. Operator allegedly violated 19.15.5.9(A)(4)(a) NMAC. At the time of the NOV, Operator was the registered operator of twelve wells in New Mexico. Under 19.15.5.9(A)(4)(a) NMAC, as the operator of 100 wells or less, Operator was not permitted to have more than two inactive wells out of compliance with 19.15.25.8 NMAC, which requires inactive wells to be plugged and abandoned or placed into approved temporary abandonment status. At the time of the NOV, Operator had twelve inactive wells which were not plugged and abandoned or placed into temporary abandonment status as demonstrated by OCD Ex. 2-A.

- b. Operator allegedly violated 19.15.8.9 NMAC by lacking financial assurance for three wells.
- c. Operator allegedly violated 19.15.7.24 NMAC by not filing the required monthly production reports, form C-115, as demonstrated by OCD Ex 2-B.
 Operator had not submitted a C-115 for any well since at least April 2023.
- 3. The NOV requested the following relief:
 - a. Operator shall plug and abandon all twelve wells listed in OCD Ex. 2-A by a certain date or failing to do so, the Division would assume that duty,
 - b. Operator's financial assurance shall be forfeited,
 - c. Operator's authority to transport from the twelve registered wells identified in OCD Ex. 2-A shall be terminated,
 - d. Operator is civilly liable for violations of 19.15.5.9(A)(4)(a) NMAC in the amount of \$4,500.00, for violations of 19.15.8.9 NMAC in the amount of \$1,350.00, and for violations of 19.15.7.24 NMAC in the amount of \$21,600.00.
- The NOV informed Operator of OCD's informal resolution process, and in the event Operator did not respond to the NOV, that a formal hearing would occur on the September 12, 2024 docket.
- 5. Operator did not contact the Division during the informal resolution period or provide any evidence that the alleged violations had not occurred. Operator did not file a prehearing statement to enter an appearance or otherwise present evidence pursuant to 19.15.5 NMAC.

- On August 12, 2024, OCD filed and served the Docketing Notice and formally requested a hearing. Operator did not answer the NOV as contemplated by 19.15.5.10(E)(2)(b) NMAC.
- The Division provided Operator with notice of the September 12, 2024 hearing as required under 19.15.5.10 NMAC.
- A hybrid hearing (in-person at Pecos Hall in Santa Fe, NM and virtually through Microsoft Teams) on the NOV was held on September 12, 2024 before a Division Hearing Examiner. Operator did not appear.
- 9. The Division presented sworn testimony through the Affidavits of Nicholas Karns, Compliance Officer and Bond Administrator with the Division's Administrative and Compliance Bureau, and Shelia Apodaca, OCD Law Clerk.
- 10. The Division provided evidence of notice of the Docketing Statement. OCD Ex. 4 & 5.
- 11. Five Exhibits were admitted into evidence without objection in support of the NOV.
- 12. Mr. Karns, who was previously qualified as an expert in administrative compliance before the Division, provided the following evidence in support of the ongoing violations:
 - a. As of September 12, 2024, Operator remained out of compliance with the inactive well requirements of 19.15.5.9(A)(4)(a) NMAC. As of June 27, 2024, Operator had twelve wells, all of which were inactive wells that had not been plugged and abandoned or placed in approved temporary abandonment status. OCD Ex. 2-A.
 - Deperator remained out of compliance with 19.15.8.9 NMAC by lacking financial assurance for three wells. OCD Ex. 2-B.

- c. Operator remained out of compliance with 19.15.7.24 NMAC, because
 Operator had not filed the required C-115 production reports since
 September 2019. OCD Ex 2-C.
- 13. OCD provided Final Order R-21756 dated June 24, 2021 that required Operator to plug and abandon ten of the subject wells. Operator failed to comply with the Order. OCD Ex 2-D.
- On September 9, 2024 Operator sent an email to OCD Counsel disputing the ownership of the subject wells. OCD Ex. 5.
- 15. The Oil and Gas Act provides that "[i]n assessing a penalty authorized by this section, the division shall take into account the seriousness of the violation, any good faith efforts to comply with the applicable requirements, any history of noncompliance under the Oil and Gas Act and other relevant factors." NMSA 1978, §70-2-31(C). OCD provided evidence that the penalties were reasonable and in accordance with the law. OCD Ex. 2-E.

CONCLUSIONS OF LAW

- 16. The Division has met its burden to show by a preponderance of evidence that Operator has violated 19.15.5.9(A)(4)(a) NMAC by failing to plug and abandon twelve inactive wells.
- Operator has violated 19.15.8.9 NMAC by lacking financial assurance for three of the subject wells.
- Operator has violated 19.15.7.24 NMAC by failing to submit the required C-115 forms for all subject wells.
- 19. The civil penalties calculated by the Division are allowed by law, reasonable under 19.15.5.10(B) NMAC, and are supported by the evidence in the Administrative and Hearing Records.

ORDER

- 20. Operator's authority to transport from subject wells is hereby suspended until such time as Operator is compliant with this Order and the NM Oil and Gas Act.
- Operator shall plug and abandon all twelve wells listed in OCD Ex. 2-A no later than 30 days after issuance of this Order.
- 22. If Operator fails to plug and abandon the subject wells as directed herein, the Division shall be authorized to plug and abandon the wells and to forfeit the financial assurance for the wells. Such plugging activities may include necessary reclamation or remediation work associated with wells that have been partially plugged and abandoned, Operator shall pay the excess cost to plug and abandon the wells no later than 30 days after actual or attempted service of the Division's written demand. If the excess costs to the Division are not received, the Division may seek indemnification.
- 23. The Division retains jurisdiction of this matter for the entry of such further orders as it may deem necessary.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

GERASIMOS RAZATOS ACTING DIRECTOR

DATED: September 20, 2024

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

APPLICATION OF PERMIAN RESOURCES OPERATING, LLC AND NEW MEXICO OIL CORP. TO REMOVE BAR V BARB, LLC AS OPERATOR OF RECORD OF THE SOUTH LUCKY LAKE QUEEN UNIT #001A, SOUTH LUCKY LAKE QUEEN UNIT #001, AND SOUTH LUCKY LAKE QUEEN UNIT #002 WELLS, CHAVES COUNTY, NEW MEXICO.

CASE NO.: 23729 ORDER NO.: R-23336

<u>ORDER</u>

The Director of the New Mexico Oil Conservation Division ("OCD"), having heard this matter through its Hearing Examiner on September 7, 2023, and after considering the testimony, evidence, and recommendations of the Hearing Officer and Technical Examiner, issues the following Order.

FINDINGS OF FACT

- 1. Permian Resources Operating, LLC ("Permian") and New Mexico Oil Corporation ("NMOC") submitted an application ("Application") to remove Bar V Barb, LLC ("BVB") as operator of record of the following wells ("the Wells") and designate Permian as operator of record:
 - South Lucky Lake Queen Unit #001A (API: 30-005-60332) (Lease No. K0-5110-1)
 - South Lucky Lake Queen Unit #001 (API: 30-005-60360) (Lease No. L0-1894-1)
 - South Lucky Lake Queen Unit #002 (API: 30-005-60371) (Lease No. L0-1894-1)
- 2. Permian's wholly owned subsidiary Read & Stevens is the record title owner of State Lease L0-1894-1 dated December 17, 1968.
- 3. NMOC is the record title owner of State Lease K0-5110-1 dated July 20, 1965.
- 4. BVB is the registered operator of record for the Wells with OCD.
- 5. Permian seeks to plug the Wells as the designated operator.
- 6. At the September 7, 2023, Hearing, Permian presented evidence by affidavit in support of its application which was admitted into evidence without objection.
- 7. The evidence shows that Permian made contact with Steve Oldfield (identified in OCD records as owner of BVB) who transferred his interest in BVB to Scott Standard in May 2019. Mr. Oldfield stated that he has no contact information for Scott Standard and is not

willing to plug and abandon the Wells or execute C-145s because he no longer has an interest in BVB.

- 8. The New Mexico Secretary of State Records show that BVB's corporate status has been revoked.
- 9. In 2021, BVB did not appear or answer the allegations contained in a Notice of Violation filed in Case No. 21900. The NOV alleged that BVB had fifteen inactive wells that had not been plugged and abandoned or placed in approved temporary abandonment status, and that BVB did not have sufficient financial assurance for the inactive wells.
- 10. Subsequently, the OCD revoked BVB's authority to transport from all wells and assessed civil penalties.
- 11. The evidence shows that Permian and NMOC are record title owners of the leases, and the New Mexico State Land Office has informed the owners that they are responsible for certain oil and gas operations on the leases, including remediation and ensuring wells on the lease are properly plugged and abandoned.

CONCLUSIONS OF LAW

- 12. Pursuant to 19.15.9.9.B NMAC, Permian must apply to the OCD for approval their Application to change the operator of the Wells without a joint application (a unilateral transfer).
- 13. OCD has jurisdiction to issue this Order pursuant to NMSA 1978 § 70-2-12.
- 14. OCD satisfied the notice requirements for the hearing as required by 19.15.4.9 NMAC.

<u>ORDER</u>

- 15. The Application to unilaterally remove BVB as Operator of Record of the Wells is hereby denied.
- 16. Permian and NMOC shall submit a request to OCD's Legal Director Jesse Tremaine requesting permission to plug and remediate the Wells as a non-Operator of Record.
- 17. Permian and NMOC shall obtain approval prior to commencing work.
- 18. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

STATE OF NEW MEXICO OIL CONSERVATION DIVISION

Twalos

Date: 8/28/2024

GERASIMOS RAZATOS DIRECTOR (Acting) GR/jag

CASE NO. 23729 ORDER NO. R-23336

Page 3 of 3

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State of New Mexico Energy, Minerals and Natural Resources Department Oil Conservation Division Standard Plugging Conditions



This document provides OCD's general plugging conditions of approval. It should be noted that the list below may not cover special plugging programs in unique and unusual cases, and OCD expressly reserves the right to impose additional requirements to the extent dictated by project conditions. The OCD also reserves the right to approve deviations from the below conditions if field conditions warrant a change. A C-103F NOI to P&A must be approved prior to plugging operations. Failure to comply with the conditions attached to a plugging approval may result in a violation of 19.15.5.11 NMAC, which may result in enforcement actions, including but not limited to penalties and a requirement that the well be re-plugged as necessary.

- 1. Notify OCD office at least 24 hours before beginning work and seek prior approval to implementing any changes to the C-103 NOI to PA.
 - North Contact, Monica Kuehling, 505-320-0243, monica.kuehling@emnrd.nm.gov
 - South Contact, Gilbert Cordero, 575-626-0830, gilbert.cordero@emnrd.nm.gov
- 2. A Cement Bond Log is required to ensure strata isolation of producing formations, protection of water and correlative rights. A CBL must be run or be on file that can be used to properly evaluate the cement behind the casing.

Note: Logs must be submitted to OCD via OCD permitting. A copy of the log may be emailed to OCD inspector for faster review times, but emailing does not relieve the operators obligation to submit through OCD permitting.

- 3. Once Plugging operations have commenced, the rig must not rig down until the well is fully plugged without OCD approval. If gap in plugging operations exceeds 30 days, the Operator must file a subsequent sundry of work performed and revised NOI for approval on work remaining. At no time shall the rig be removed from location if it will result in waste or contamination of fresh water.
- 4. Insure all bradenheads have been exposed, identified and valves are operational prior to rig up.
- 5. Fluids must be placed between all cement plugs mixed at 25 sacks per 100 bbls of water.
 - North, water or mud laden fluids
 - South, mud laden fluids
- 6. Closed loop system is to be used for entire plugging operation. Upon completion, contents of steel pits are to be hauled to an OCD permitted disposal facility.

7. Class of cement shall be used in accordance with the below table for depth allowed.

Class	TVD Lower Limit (feet)
Class A/B	6,000
Class I/II	6,000
Class C or III	6,000
Class G and H	8,000
Class D	10,000
Class E	14,000
Class F	16,000

- 8. After cutting the well head any "top off cement jobs" must remain static for 30 minutes. Any gas bubbles or flow during this 30 minutes shall be reported to the OCD for approval of next steps.
- 9. Trucking companies being used to haul oilfield waste fluids (Commercial or Private) to a disposal facility shall have an approved OCD C-133 permit.
 - A copy of this permit shall be available in each truck used to haul waste products.
 - It is the responsibility of the Operator and Contractor to verify that this permit is in place prior to performing work.
 - Drivers shall be able to produce a copy upon request of an OCD Compliance Officer.
- 10. Filing a [C-103] Sub. Plugging (C-103P) will serve as notification that the well has been plugged.
- 11. A [C-103] Sub. Release After P&A (C-103Q) shall be filed no later than a year after plugging and a site inspection by OCD Compliance officer to determine if the location is satisfactorily cleaned, all equipment, electric poles and trash has been removed to meet OCD standards before bonding can be released.
- 12. Produced water or brine-based fluids may not be used during any part of plugging operations without prior OCD approval.
- 13. Cementing;
 - All cement plugs will be neat cement and a minimum of 100' in length. 50' of calculated cement excess required for inside casing plugs and 100% calculated cement excess required on outside casing plugs.
 - If cement does not exist between or behind the casing strings at recommended formation depths, the casing perforations will be shot at 50' below the formation top and the cement retainer shall be set no more than 50' from the perforations.
 - WOC (Wait on Cement) time will be:
 - 4 hours for accelerated (calcium chloride) cement.
 - 6 hours on regular cement.
 - Operator must tag all cement plugs unless it meets the below condition.
 - The operator has a passing pressure test for the casing annulus and the plug is only an inside plug.
 - If perforations are made operator must tag all plugs using the work string to tag unless given approval to tag with wireline by the correct contact from COA #1 of this document.
 - This includes plugs pumped underneath a cement retainer to ensure retainer seats properly after cement is pumped.
 - Cement can only be bull-headed with specific prior approval.
 - Squeeze pressures are not to exceed the exposed formations frac gradient or the burst pressure of the casing.

- 14. A cement plug is required to be set from 50' below to 50' above (straddling) formation tops, casing shoes, casing stubs, any attempted casing cut offs, anywhere the casing is perforated, DV tools.
 - Perforation/Formation top plug. (When there is less than 100ft between the top perforation to the formation top.) These plugs are required to be started no greater than 50ft from the top perforation. However, the plug should be set below the formation top or as close to the formation top as possible for the maximum isolation between the formations. The plug is required to be a 100ft cement plug plus excess.
 - Perforation Plug when a formation top is not included. These plugs are required to be started within 50ft of the top perforation. The plug is required to be a 100ft cement plug plus excess.
 - Cement caps on top of bridge plugs or cement retainers for perforation plugs, that are not straddling a formation top, may be set using a bailer with a minimum of 35' of cement in lieu of the 100' plug. The bridge plug or retainer must be set within 50ft of the perforations.
 - Perforations are required below the surface casing shoe if cement does not exist behind the casing, a 30-minute minimum wait time will be required immediately after perforating to determine if gas and/or water flows are present. If flow is present, the well will be shut-in for a minimum of one hour and the pressure recorded. If gas is detected contact the OCD office for directions.
- 15. No more than 3000 feet is allowed between cement plugs in cased hole and no more than 2000 feet is allowed in open hole.
- 16. Formation Tops to be isolated with cement plugs, but not limited to are:
 - Northwest See Figure A
 - South (Artesia) See Figure B
 - Potash See Figure C
 - In the R-111-P (Or as subsequently revised) Area a solid cement plug must be set across the salt section. Fluid used to mix the cement shall be saturated with the salts that are common to the section penetrated and in suitable proportions, not more than 3% calcium chloride (by weight of cement) will be considered the desired mixture whenever possible, woe 4 hours and tag, this plug will be 50' below the bottom and 50' above the top of the Formation.
 - South (Hobbs) See Figure D1 and D2
 - Areas not provided above will need to be reviewed with the OCD on a case by case basis.
- 17. Markers
 - Dry hole marker requirements 19.15.25.10.
 - The operator shall mark the exact location of plugged and abandoned wells with a steel marker not less than four inches in diameter set in cement and extending at least four feet above mean ground level. The marker must include the below information:
 - 1. Operator name
 - 2. Lease name and well number
 - 3. API number
 - 4. Unit letter
 - 5. Section, Township and Range

AGRICULTURE (Below grade markers)

In Agricultural areas a request can be made for a below ground marker. For a below ground marker the operator must file their request on a C-103 notice of intent, and it must include the following;

- A) Aerial photo showing the agricultural area
- B) Request from the landowner for the below ground marker.

C) Subsequent plugging report for a well using a below ground marker must have an updated C-102 signed by a certified surveyor for SHL.

Note: A below ground marker is required with all pertinent information mentioned above on a plate, set 3' below ground level, a picture of the plate will be supplied to OCD for record, the exact location of the marker (longitude and latitude by GPS) will be provided to OCD. OCD requires a current survey to verify the location of the below ground marker, however OCD will accept a GPS coordinate that were taken with a GPS that has an accuracy of within 15 feet.

18. If work has not commenced within 1 year of the approval of this procedure, the approval is automatically expired. After 1 year a new [C-103] NOI Plugging (C-103F) must be submitted and approved prior to work.

Figure A

North Formations to be isolated with cement plugs are:

- San Jose
- Nacimiento
- Ojo Alamo
- Kirtland
- Fruitland
- Picture Cliffs
- Chacra (if below the Chacra Line)
- Mesa Verde Group
- Mancos
- Gallup
- Basin Dakota (plugged at the top of the Graneros)
- Deeper formations will be reviewed on a case-by-case basis

Figure B

South (Artesia) Formations to be isolated with cement plugs are:

- Fusselman
- Montoya
- Devonian
- Morrow
- Strawn
- Atoka
- Permo-Penn
- Wolfcamp
- Bone Springs
- Delaware , in certain areas where the Delaware is subdivided into;
 - 1. Bell Canyon
 - 2. Cherry Canyon
 - 3. Brushy Canyon
 - Any salt sections
- Abo

•

- Yeso
- Glorieta
- San Andres
- Greyburg
- Queen
- Yates

Figure C

Potash Area R-111-P

T 18S - R 30E Sec 10 Unit P. Sec 11 Unit M,N. Sec 13 Unit L,M,N. Sec 14 Unit C -P. Sec 15 Unit A G,H,I,J,K,N,O,P. Sec 22 Unit All except for M. Sec 23, Sec 24 Unit C,D,E,L, Sec 26 Unit A-G, Sec 27 Unit A,B,C T 19S – R 29E Sec 11 Unit P. Sec 12 Unit H-P. Sec 13. Sec 14 Unit A,B,F-P. Sec 15 Unit P. Sec 22 Unit A,B,C,F,G,H,I,J K,N,O,P. Sec 23. Sec 24. Sec 25 Unit D. Sec 26 Unit A- F. Sec 27 Unit A,B,C,F,G,H. T 19S – R 30E Sec 2 Unit K,L,M,N. Sec 3 Unit I,L,M,N,O,P. Sec 4 Unit C,D,E,F,G,I-P. Sec 5 Unit A,B,C,E-P. Sec 6 Unit I,O,P. Sec 7 – Sec 10. Sec 11 Unit D, G—P. Sec 12 Unit A,B,E-P. Sec 13 Unit A-O. Sec 14-Sec 18. Sec 19 Unit A-L, P. Sec 20 – Sec 23. Sec 24 Unit C,D,E,F,L,M,N. Sec 25 Unit D. Sec 26 Unit A-G, I-P. Sec 27, Sec 28, Sec 29 Unit A,B,C,D,F,G,H,I,J,O,P. Sec 32 Unit A,B,G,H,I,J,N,O,P. Sec 33. Sec 34. Sec 35. Sec 36 Unit D,E,F,I-P. T 19S – R 31E Sec 7 Unit C,D,E,F,L. Sec 18 Unit C,D,E,F,G,K,L. Sec 31 Unit M. Sec 34 Unit P. Sec 35 Unit M,N,O. Sec 36 Unit O.P. T 20S – R 29E Sec 1 Unit H,I,P. Sec 13 Unit E,L,M,N. Sec 14 Unit B-P. Sec 15 Unit A,H,I,J,N,O,P. Sec 22 Unit A,B,C,F,G,H,I,J,O,P. Sec 23. Sec 24 Unit C,D,E,F,G,J-P. Sec 25 Unit A-O. Sec 26. Sec 27 Unit A,B,G,H,I,J,O,P. Sec 34 Unit A,B,G,H. Sec 35 Unit A-H. Sec 36 Unit B-G. T 20S – R 30E Sec 1 – Sec 4. Sec 5 Unit A,B,C,E-P. Sec 6 Unit E,G-P. Sec 7 Unit A-H,I,J,O,P. Sec 8 – 17. Sec 18 Unit A,B,G,H,I,J,O,P. Sec 19 Unit A,B,G,H,I,J,O,P. Sec 20 – 29. Sec 30 Unit A-L,N,O,P. Sec 31 Unit A,B,G,H,I,P. Sec 32 – Sec 36. T 20S – R 31E Sec 1 Unit A,B,C,E-P. Sec 2. Sec 3 Unit A,B,G,H,I,J,O,P. Sec 6 Unit D,E,F,J-P. Sec 7. Sec 8 Unit E-P. Sec 9 Unit E,F,J-P. Sec 10 Unit A,B,G-P. Sec 11 – Sec 36. T 21S – R 29E Sec 1 – Sec 3. Sec 4 Unit L1 – L16,I,J,K,O,P. Sec 5 Unit L1. Sec 10 Unit A,B,H,P. Sec 11 – Sec 14. Sec 15 Unit A,H,I. Sec 23 Unit A,B. Sec 24 Unit A,B,C,D,F,G,H,I,J,O,P. Sec 25 Unit A,O,P. Sec 35 Unit G,H,I,J,K,N,O,P. Sec 36 A,B,C,F - P.T 21S – R 30E Sec 1 - Sec 36

T 21S – R 31E Sec 1 – Sec 36 T 22S – R 28E Sec 36 Unit A,H,I,P. T 22S – R 29E Sec 1. Sec2. Sec 3 Unit I,J,N,O,P. Sec 9 Unit G – P. Sec 10 – Sec 16. Sec 19 Unit H,I,J. Sec 20 – Sec 28. Sec 29 Unit A,B,C,D,G,H,I,J,O,P. Sec 30 Unit A. Section 31 Unit C – P. Sec 32 – Sec 36 T 22S – R 30E Sec 1 – Sec 36 T 22S – R 31E Sec 1 – Sec 11. Sec 12 Unit B,C,D,E,F,L. Sec 13 Unit E,F,K,L,M,N. Sec 14 – Sec 23. Sec 24 Unit C,D,E,F,K,L,M,N. Sec 25 Unit A,B,C,D. Sec 26 Unit A,BC,D,G,H. Sec 27 – Sec 34. T 23S – R 28E Sec 1 Unit A T 23S – R 29E Sec 1 – Sec 5. Sec 6 Unit A – I, N,O,P. Sec 7 Unit A,B,C,G,H,I,P. Sec 8 Unit A – L, N,O,P. Sec 9 – Sec 16. Sec 17 Unit A,B,G,H,I,P. Sec 21 – Sec 23. Sec 24 Unit A – N. Sec 25 Unit D,E,L. Sec 26. Sec 27. Sec 28 Unit A – J, N,O,P. Sec 33 Unit A,B,C. Sec 34 Unit A,B,C,D,F,G,H. Sec 35. Sec 36 Unit B,C,D,E,F,G,K,L. T 23S – R 30E Sec 1 – Sec 18. Sec 19 Unit A – I,N,O,P. Sec 20, Sec 21. Sec 22 Unit A – N, P. Sec 23, Sec 24, Sec 25. Sec 26 Unit A,B,F-P. Sec 27 Unit C,D,E,I,N,O,P. Sec 28 Unit A – H, K,L,M,N. Sec 29 Unit A – J, O,P. Sec 30 Unit A,B. Sec 32 A,B. Sec 33 Unit C,D,H,I,O,P. Sec 34, Sec 35, Sec 36. T 23S – R 31E Sec 2 Unit D,E,J,O. Sec 3 – Sec 7. Sec 8 Unit A – G, K – N. Sec 9 Unit A,B,C,D. Sec 10 Unit D,P. Sec 11 Unit G,H,I,J,M,N,O,P. Sec 12 Unit E,L,K,M,N. Sec 13 Unit C,D,E,F,G,J,K,L,M,N,O. Sec 14. Sec 15 Unit A,B,E – P. Sec 16 Unit I, K – P. Sec 17 Unit B,C,D,E, I – P. Sec 18 – Sec 23. Sec 24 Unit B – G, K,L,M,N. Sec 25 Unit B – G, J,K,L. Sec 26 – Sec 34. Sec 35 Unit C,D,E. T 24S – R 29E Sec 2 Unit A, B, C, D. Sec 3 Unit A T 24S – R 30E Sec 1 Unit A – H, J – N. Sec 2, Sec 3. Sec 4 Unit A,B,F – K, M,N,O,P. Sec 9 Unit A – L. Sec 10 Unit A – L, O,P. Sec 11. Sec 12 Unit D,E,L. Sec 14 Unit B – G. Sec 15 Unit A,B,G,H.

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T 24S – R 31E
Sec 3 Unit B – G, J – O. Sec 4. Sec 5 Unit A – L, P. Sec 6 Unit A – L. Sec 9 Unit A – J, O,P. Sec 10 Unit B – G,
K – N. Sec
35 Unit E – P. Sec 36 Unit E,K,L,M,N.
```

T 25S – R 31E Sec 1 Unit C,D,E,F. Sec 2 Unit A – H.

Figure D1 and D2

South (Hobbs) Formations to be isolated with cement plugs are:

The plugging requirements in the Hobbs Area are based on the well location within specific areas of the Area (See Figure D1). The Formations in the Hobbs Area to be isolated with cement plugs are (see Figure D2)

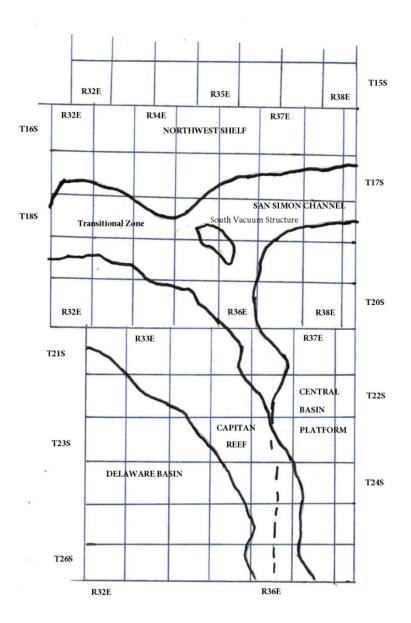


Figure D1 Map

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Figure D2 Formation Table

NDIsthurget Shalf		P'lug to isolate upper a				Com tiral Rooin Diotform
ND!rthwest Shelf	C;iptan Reef Are <a< th=""><th>Trani5ition Zone</th><th>San Simon Oh.annel</th><th>South \lacJUUm Structure</th><th>Delaware Basin</th><th>Ce<n,tiral basin="" platform<="" th=""></n,tiral></th></a<>	Trani5ition Zone	San Simon Oh.annel	South \lacJUUm Structure	Delaware Basin	Ce <n,tiral basin="" platform<="" th=""></n,tiral>
Granit \./ash (Detrital						Granit \./ash (Detrital
basement material and						basement material,
fractured pre-Cambrian	Siluro-Devonian	Morrow	Siluro-Devonian	Ellenburger	Siluro-Devonian	fractured pre-Cambrian
basement rock)						basement rock and fracture
,						Mafic Volcanic intrusives).
Montoya	Mississippian	Atoka	Morrow	Mckee	Morrow	Ellenburger
Fusselman	Morrow	Strawn	\./olfcamp	Siluro-Devonian	Atoka	Connell
Woodford	Atoka	Cisco	Abo Reef	Woodford	Strawn	Waddell
Siluro-Devonian	Strawn	Pennsylvanian	Bone Spring	Mississippian	Pennsylvanian	Mckee
Chester	Pennsylvanian	\./olfcamp	Delaware	Barnett Shale	Low er \./olfcamp	Simpson Group
Austin	\./olfcamp	Bone Spring	San Andres	Morrow	Upper \./olfcamp	Montoya
Mississippian	Abo Reef, if present	Delaware	Queen	Atoka	\./olfcamp	Fusselman
Morrow	Abo, if present	San Andres	Yates	Strawn	Third Bone Spring Sand	Silurian
Morrow	Abo, il present	San Andres	raies	Strawn	(Top of \./olfbone)	Silunan
0.4-1	Owners if another	Grouthurg Son Andres		0	First Bone Spring Sand (Top	Devenier
Atoka	Queen, if present	Grayburg-San Andres	Base of Salt	Canyon	of Lower Bone Spring)	Devonian
Lower Pennsylvanian	Bone Spring	Queen	Rustler	Pennsylvanian	Bone Spring	Strawn
Cisco-Canyon	Delaware	Seven Rivers		Blinebry	Brushy Canyon	Pennsylvanian
Pennsylvanian	Base Capitan Reef	Yates		Bone Spring	Delaw are (Base of Salt)	\./olfcamp
Bough	Seven Rivers	Base of Salt		San Andres	Rustler	Abo
\./olfcamp	Yates	Rustler		Queen		Abo Reef
Abo	Top Capitan Reef			Base of Salt		Drinkard
Abo Reef, if present	Base of Salt			Rustler		Tubb
Yeso (Township 15 South to						
Township 17 South)	Rustler					Blinebry
Drinkard or Low er Y eso						
(Township 15 South to						Paddock
Township 17 South)						
Tubb (Township 15 South to						Glorieta
Township 17 South)						Giolieta
Blinebry (Township 15 South						San Andres
to Township 17 South)						San Andres
Paddock (Township 15						Grayburg
South to Township 17 South) Glorieta						Grayburg-San Andres
San Andres						Queen
Queen (Township 15 South						Seven Rivers
to Township 17 South)						00101111010
Seven Rivers (Township 15						Yates
outh to Township 17 South)						1005
ates (Township 15 South to						Base of Salt
Township 17 South)						Dase Of Sall
Base of Salt						Rustler
Rustler						

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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

CONDITIONS

OGRID:
372165
Action Number:
406722
Action Type:
[C-103] NOI Plug & Abandon (C-103F)

CONDITIONS		
Created By	Condition	Condition Date
loren.diede	Notify the OCD inspection supervisor via email 24 hours prior to beginning Plug & Abandon (P&A) operations.	12/19/2024
loren.diede	A Cement Bond Log (CBL) is required for all Plug & Abandons (P&A) unless a CBL is currently on file with the OCD that can be used to properly evaluate the cement behind the casing.	12/19/2024
loren.diede	Attach a photo of the below ground P&A marker and the GPS coordinates of the marker with the C-103P subsequent P&A report.	12/19/2024

Action 406722