

Santa Fe Main Office  
Phone: (505) 476-3441  
General Information  
Phone: (505) 629-6116

State of New Mexico  
Energy, Minerals and Natural Resources

Form C-103  
Revised July 18, 2013

Online Phone Directory Visit:  
<https://www.emnrd.nm.gov/ocd/contact-us/>

OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

WELL API NO. 30-015-55901
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input checked="" type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name The Horned Frog
8. Well Number #32H
9. OGRID Number 372290
10. Pool name or Wildcat Red Lake
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 3288 GR

**SUNDRY NOTICES AND REPORTS ON WELLS**  
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: Oil Well  Gas Well  Other

2. Name of Operator Riley Permian Operating Company, LLC

3. Address of Operator 29 E Reno Ave, St2 500, Oklahoma City, OK 73104

4. Well Location  
Unit Letter 1 : 1336 feet from the North line and 852 feet from the West line  
Section 19 Township 18S Range 27E NMPM County Eddy

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data


<b>NOTICE OF INTENTION TO:</b>		<b>SUBSEQUENT REPORT OF:</b>	
PERFORM REMEDIAL WORK <input type="checkbox"/>	PLUG AND ABANDON <input type="checkbox"/>	REMEDIAL WORK <input type="checkbox"/>	ALTERING CASING <input type="checkbox"/>
TEMPORARILY ABANDON <input type="checkbox"/>	CHANGE PLANS <input checked="" type="checkbox"/>	COMMENCE DRILLING OPNS. <input type="checkbox"/>	P AND A <input type="checkbox"/>
PULL OR ALTER CASING <input type="checkbox"/>	MULTIPLE COMPL <input type="checkbox"/>	CASING/CEMENT JOB <input type="checkbox"/>	
DOWNHOLE COMMINGLE <input type="checkbox"/>			
CLOSED-LOOP SYSTEM <input type="checkbox"/>			
OTHER: <input type="checkbox"/>		OTHER: <input type="checkbox"/>	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Please see attached. SHL change only. KOP, FTP, LTP, BHL all remain the same.  
Change of plans sundry as appropriate mechanism for this change was approved by Ward Rikala on 3/26.

Spud Date:  Rig Release Date:

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE  TITLE Sr. Regulatory Specialist DATE 3/31/2026

Type or print name Alex Rizzo E-mail address: alexrizzo@rileypermian.com PHONE: 918-839-2995  
**For State Use Only**

APPROVED BY: \_\_\_\_\_ TITLE \_\_\_\_\_ DATE \_\_\_\_\_

Conditions of Approval (if any):

<b>C-102</b>  Submit Electronically Via OCD Permitting	State of New Mexico <b>Energy, Minerals &amp; Natural Resources Department</b> <b>OIL CONSERVATION DIVISION</b>	Revised July 9, 2024  Submittal Type: <input type="checkbox"/> Initial Submittal <input checked="" type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled
Property Name and Well Number <p style="text-align: center;"><b>THE HORNFED FROG 32H</b></p>		

**WELL LOCATION AND ACREAGE DEDICATION PLAT**

API Number <b>30-015-55901</b>	Pool Code <b>3250</b>	Pool Name <b>ATOKA; GLORIETTA-YESO</b>
Property Code <b>335042</b>	Property Name <b>THE HORNFED FROG</b>	
OGRID No. <b>372290</b>	Operator Name <b>RILEY PERMIAN OPERATING COMPANY LLC</b>	Well Number <b>32H</b>
Ground Level Elevation <b>3288'</b>		
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

**Surface Location**

UL or Lot No.	Section	Township	Range	Lot	Feet from the N/S	Feet from the E/W	Latitude	Longitude	County
1	19	18 S	27 E		1336 FNL	852 FWL	N 32.736943°	W 104.324094°	EDDY

**Bottom Hole Location If Different From Surface**

UL or Lot No.	Section	Township	Range	Lot	Feet from the N/S	Feet from the E/W	Latitude	Longitude	County
E	24	18 S	26 E		1805 FNL	10 FWL	N 32.735626°	W 104.343934°	EDDY

Dedicated Acres <b>320</b>	Infill or Defining Well <b>INFILL</b>	Defining Well API <b>N/A</b>	Overlapping Spacing Unit (Y/N) <b>N</b>	Consolidated Code <b>P</b>
Order Numbers <b>R-23931</b>			Well Setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL or lot no.	Section	Township	Range	Lot	Feet from the N/S	Feet from the E/W	Latitude	Longitude	County
1	19	18 S	27 E		1311 FNL	852 FWL	N 32.737011°	W 104.324094°	EDDY

**First Take Point (FTP)**

UL or lot no.	Section	Township	Range	Lot	Feet from the N/S	Feet from the E/W	Latitude	Longitude	County
H	24	18 S	26 E		1805 FNL	100 FEL	N 32.735669°	W 104.327193°	EDDY

**Last Take Point (LTP)**


UL or lot no.	Section	Township	Range	Lot	Feet from the N/S	Feet from the E/W	Latitude	Longitude	County
E	24	18 S	26 E		1805 FNL	100 FWL	N 32.735627°	W 104.343641°	EDDY

Unitized Area or Area of Uniform Interest <b>R-23931 (INFILL)</b>	Spacing Unity Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation <b>3313'</b>
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**OPERATOR CERTIFICATION**

*I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.*

*If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.*

Signature:  Date: **3-31-26**

Print Name: **Alex Rizzo**

E-mail Address: **Alexrizzo@rileypermian.com**

**SURVEYORS CERTIFICATION**



Signature and Seal of Professional Surveyor Date

*I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.*

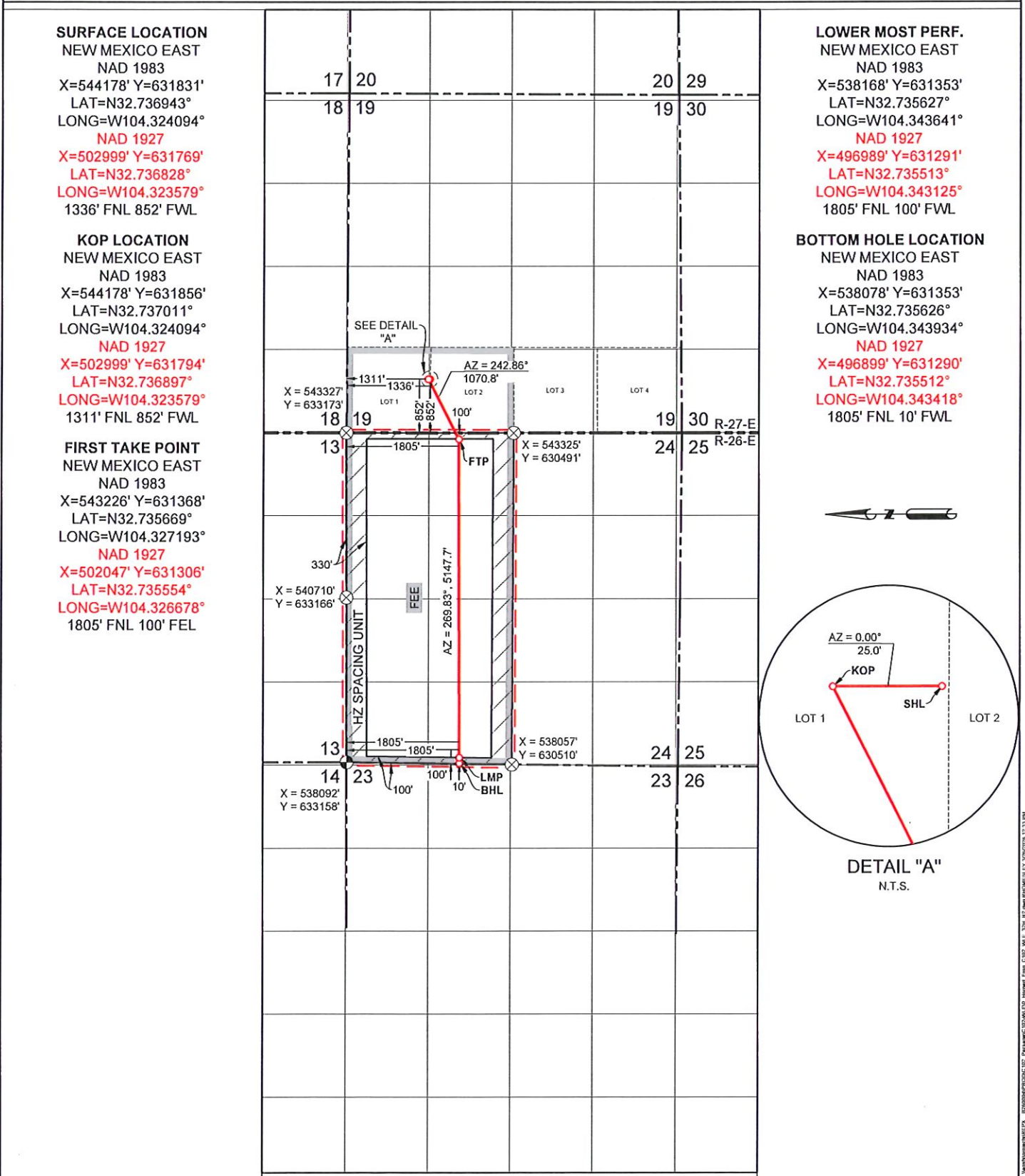
**MITCHELL L. MCDONALD, N.M. P.L.S.**

Certificate Number **29821** Date of Survey **JANUARY 31, 2026**

Note: No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

<b>C-102</b>  Submit Electronically Via OCD Permitting	State of New Mexico <b>Energy, Minerals &amp; Natural Resources Department</b> <b>OIL CONSERVATION DIVISION</b>	Revised July 9, 2024  Submittal Type: <input type="checkbox"/> Initial Submittal <input checked="" type="checkbox"/> Amended Report <input type="checkbox"/> As Drilled
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**Property Name and Well Number**  
**THE HORNFROG 32H**



Note: Bearings, coordinates, and distances (grid) shown hereon are based on the New Mexico State Plane Coordinate System, East Zone, NAD 83-2011 (EPOCH 2010) framework, as derived by OPUS Solution. The elevations shown hereon are based on NAVD 88.

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

API Number <b>30-015-55901</b>	Pool Code <b>3250</b>	Pool Name <b>ATOKA; GLORIETTA-YESO</b>
Property Code <b>335042</b>	Property Name <b>THE HORNED FROG</b>	Well Number <b>32H</b>
OGRID No. <b>3080</b>	Operator Name <b>BURNETT OIL COMPANY INC.</b>	Ground Level Elevation <b>3289.9'</b>
Surface Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input checked="" type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal

**Surface Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
1	19	18-S	27-E		1286 FNL	809 FWL	32.737025°N	104.324094°W	EDDY

**Bottom Hole Location**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
E	24	18-S	26-E		1980 FNL	101 FWL	32.735090°N	104.343637°W	EDDY

Dedicated Acres <b>320</b>	Infill or Defining Well Infill	Defining Well API N/A	Overlapping Spacing Unit (Y/N) N	Consolidation Code P
Order Numbers. R-23931			Well setbacks are under Common Ownership: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

**Kick Off Point (KOP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
1	19	18-S	27-E		1286 FNL	809 FWL	32.737025°N	104.324094°W	Eddy

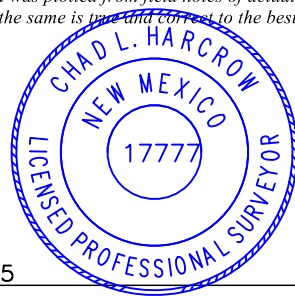
**First Take Point (FTP)**

UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
H	24	18-S	26-E		1980 FNL	101 FEL	32.735109°N	104.327081°W	EDDY

**Last Take Point (LTP)**

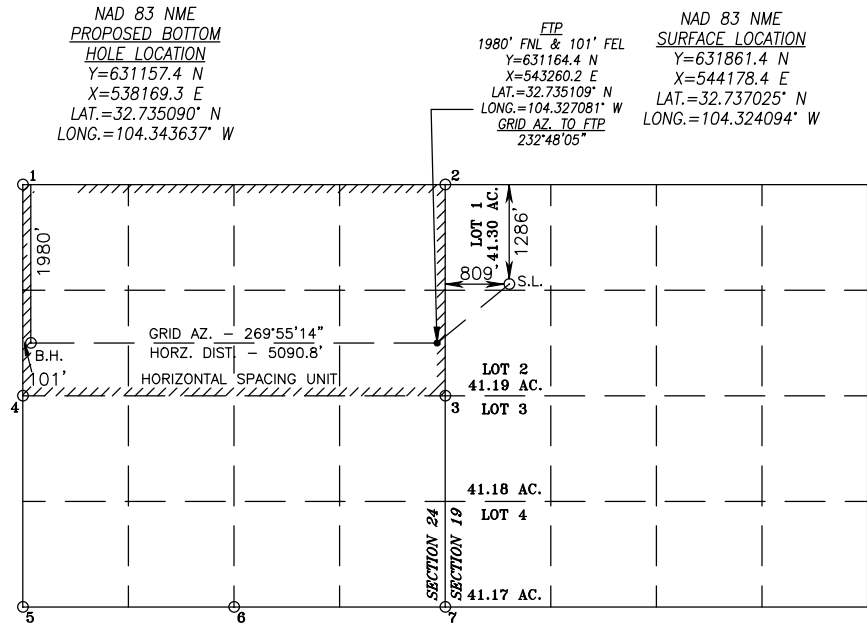
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	Longitude	County
E	24	18-S	26-E		1980 FNL	101 FWL	32.735090°N	104.343637°W	EDDY

Unitized Area or Area of Uniform Interest R-23931 (Infill)	Spacing Unit Type <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation: <b>3289.9'</b>
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<p><b>OPERATOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i></p> <p><i>If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.</i></p>	<p><b>SURVEYOR CERTIFICATIONS</b></p> <p><i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i></p> <div style="text-align: right;">  <p><i>Chad Harcrow</i>      6/11/25</p> </div>
Signature: <i>Randy Bolles</i> Date: 12/10/25 Printed Name: <b>Randy Bolles</b> Email Address: <b>rbolles@cox.net</b>	Signature and Seal of Professional Surveyor  Certificate Number: 17777 Date of Survey: JUNE 4, 2025 W.O.#25-615      DRAWN BY: WN      PAGE 1 OF 2

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box, clearly show the well surface location and bottom hole location, if it is directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other than the First Take Point or Last Take Point) that is closest to any outer boundary of the tract.

Surveyors shall use the latest United States government survey or dependent resurvey. Well locations will be in reference to the New Mexico Principal Meridian. If the land is not surveyed, contact the OCD Engineering Bureau. Independent subdivision surveys will not be acceptable.



POINT LEGEND	
1	Y=633137.3 N X=538096.6 E
2	Y=633144.6 N X=543384.3 E
3	Y=630477.0 N X=543353.2 E
4	Y=630499.3 N X=538058.9 E
5	Y=627861.4 N X=538021.3 E
6	Y=627835.4 N X=540671.7 E
7	Y=627809.5 N X=543322.0 E

State of New Mexico  
Energy, Minerals and Natural Resources Department

Submit Electronically  
Via E-permitting

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

## NATURAL GAS MANAGEMENT PLAN

This Natural Gas Management Plan must be submitted with each Application for Permit to Drill (APD) for a new or recompleted well.

### Section 1 – Plan Description Effective May 25, 2021

I. Operator: Burnett Oil Co., Inc. OGRID: 03080 Date: 12 / 10 / 2025

II. Type:  Original  Amendment due to  19.15.27.9.D(6)(a) NMAC  19.15.27.9.D(6)(b) NMAC  Other.

If Other, please describe: Amended to reflect well name changes and pooling concerns.

III. Well(s): Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	ULSTR	Footages	Anticipated Oil BBL/D	Anticipated Gas MCF/D	Anticipated Produced Water BBL/D
THE HORNEF FROG #1H	30-015-54438	D-19-18S-27E	1226 FNL 809 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE HORNEF FROG #31H	30-015-55902	1-19-18S-27E	1246 FNL 809 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE HORNEF FROG #2H	30-015-54437	D-19-18S-27E	1266 FNL 809 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE HORNEF FROG #32H	30-015-55901	1-19-18S-27E	1286FNL 809FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE HORNEF FROG #3H	30-015-54439	D-19-18S-27E	1306 FNL 809 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE MAVERICK #1H	30-015-54684	L-19-18S-27E	1368 FSL 828 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE MAVERICK #31H	30-015-55903	3-19-18S-27E	1348FSL 828FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE MAVERICK #2H	30-015-54685	L-19-18S-27E	1328 FSL 828 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE MAVERICK 32H	30-015-55900	4-19-18S-27E	1308 FSL 828 FWL	550 BBL/D	550 MCF/D	2500 BBL/D
THE MAVERICK #3H	30-015-54686	M-19-18S-27E	1288 FSL 828FWL	550 BBL/D	550 MCF/D	2500 BBL/D

**IV. Central Delivery Point Name:** THE MAVERICK BATTERY [See 19.15.27.9(D)(1) NMAC]

**V. Anticipated Schedule:** Provide the following information for each new or recompleted well or set of wells proposed to be drilled or proposed to be recompleted from a single well pad or connected to a central delivery point.

Well Name	API	Spud Date	TD Reached Date	Completion Commencement Date	Initial Flow Back Date	First Production Date
THE HORNEF FROG #1H	30-015-54438	2/15/2026	2/24/2026	4/08/2026	4/22/2026	4/22/2026
THE HORNEF FROG #31H	30-015-55902	1/5/2026	1/15/2026	3/1/2026	3/11/2026	3/11/2026
THE HORNEF FROG #2H	30-015-54437	2/25/2026	3/03/2026	5/12/2026	5/28/2026	5/28/2026
THE HORNEF FROG #32H	30-015-55901	1/16/2026	1/26/2026	3/5/2026	3/15/2026	3/15/2026
THE HORNEF FROG #3H	30-015-54439	3/04/2026	3/14/2026	5/16/2026	6/2/2026	6/02/2026
THE MAVERICK #1H	30-015-54684	3/15/2026	3/25/2026	4/1/2026	4/16/2026	4/16/2026
THE MAVERICK #31H	30-015-55903	4/1/2026	4/11/2026	5/30/2026	6/10/2026	6/10/2026
THE MAVERICK #2H	30-015-54685	4/26/2026	5/05/2026	6/04/2026	6/20/2026	6/20/2026
THE MAVERICK #32H	30-015-55900	4/12/2026	4/22/2026	5/4/2026	5/14/2026	5/14/2026
THE MAVERICK #3H	30-015-54686	3/06/2026	3/16/2026	4/08/2026	4/25/2026	4/25/2026

**VI. Separation Equipment:**  Attach a complete description of how Operator will size separation equipment to optimize gas capture.

**VII. Operational Practices:**  Attach a complete description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.

**VIII. Best Management Practices:**  Attach a complete description of Operator's best management practices to minimize venting during active and planned maintenance.

**Section 2 – Enhanced Plan**  
**EFFECTIVE APRIL 1, 2022**

Beginning April 1, 2022, an operator that is not in compliance with its statewide natural gas capture requirement for the applicable reporting area must complete this section.

Operator certifies that it is not required to complete this section because Operator is in compliance with its statewide natural gas capture requirement for the applicable reporting area.

**IX. Anticipated Natural Gas Production:**

Well	API	Anticipated Average Natural Gas Rate MCF/D	Anticipated Volume of Natural Gas for the First Year MCF

**X. Natural Gas Gathering System (NGGS):**

Operator	System	ULSTR of Tie-in	Anticipated Gathering Start Date	Available Maximum Daily Capacity of System Segment Tie-in

**XI. Map.**  Attach an accurate and legible map depicting the location of the well(s), the anticipated pipeline route(s) connecting the production operations to the existing or planned interconnect of the natural gas gathering system(s), and the maximum daily capacity of the segment or portion of the natural gas gathering system(s) to which the well(s) will be connected.

**XII. Line Capacity.** The natural gas gathering system  will  will not have capacity to gather 100% of the anticipated natural gas production volume from the well prior to the date of first production.

**XIII. Line Pressure.** Operator  does  does not anticipate that its existing well(s) connected to the same segment, or portion, of the natural gas gathering system(s) described above will continue to meet anticipated increases in line pressure caused by the new well(s).

Attach Operator's plan to manage production in response to the increased line pressure.

**XIV. Confidentiality:**  Operator asserts confidentiality pursuant to Section 71-2-8 NMSA 1978 for the information provided in Section 2 as provided in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and attaches a full description of the specific information for which confidentiality is asserted and the basis for such assertion.

### **Section 3 - Certifications**

**Effective May 25, 2021**

Operator certifies that, after reasonable inquiry and based on the available information at the time of submittal:

Operator will be able to connect the well(s) to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system; or

Operator will not be able to connect to a natural gas gathering system in the general area with sufficient capacity to transport one hundred percent of the anticipated volume of natural gas produced from the well(s) commencing on the date of first production, taking into account the current and anticipated volumes of produced natural gas from other wells connected to the pipeline gathering system.

***If Operator checks this box, Operator will select one of the following:***

**Well Shut-In.**  Operator will shut-in and not produce the well until it submits the certification required by Paragraph (4) of Subsection D of 19.15.27.9 NMAC; or

**Venting and Flaring Plan.**  Operator has attached a venting and flaring plan that evaluates and selects one or more of the potential alternative beneficial uses for the natural gas until a natural gas gathering system is available, including:

- (a) power generation on lease;
- (b) power generation for grid;
- (c) compression on lease;
- (d) liquids removal on lease;
- (e) reinjection for underground storage;
- (f) reinjection for temporary storage;
- (g) reinjection for enhanced oil recovery;
- (h) fuel cell production; and
- (i) other alternative beneficial uses approved by the division.

### **Section 4 - Notices**

1. If, at any time after Operator submits this Natural Gas Management Plan and before the well is spud:

(a) Operator becomes aware that the natural gas gathering system it planned to connect the well(s) to has become unavailable or will not have capacity to transport one hundred percent of the production from the well(s), no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised venting and flaring plan containing the information specified in Paragraph (5) of Subsection D of 19.15.27.9 NMAC; or

(b) Operator becomes aware that it has, cumulatively for the year, become out of compliance with its baseline natural gas capture rate or natural gas capture requirement, no later than 20 days after becoming aware of such information, Operator shall submit for OCD's approval a new or revised Natural Gas Management Plan for each well it plans to spud during the next 90 days containing the information specified in Paragraph (2) of Subsection D of 19.15.27.9 NMAC, and shall file an update for each Natural Gas Management Plan until Operator is back in compliance with its baseline natural gas capture rate or natural gas capture requirement.

2. OCD may deny or conditionally approve an APD if Operator does not make a certification, fails to submit an adequate venting and flaring plan which includes alternative beneficial uses for the anticipated volume of natural gas produced, or if OCD determines that Operator will not have adequate natural gas takeaway capacity at the time a well will be spud.

I certify that, after reasonable inquiry, the statements in and attached to this Natural Gas Management Plan are true and correct to the best of my knowledge and acknowledge that a false statement may be subject to civil and criminal penalties under the Oil and Gas Act.

Signature: <i>Randy Bolles</i>
Printed Name: Randy Bolles
Title: Regulatory Consultant
E-mail Address: rbolles@cox.net
Date: 12/10/2025
Phone: 405-738-0183
<b>OIL CONSERVATION DMSION</b> <b>(Only applicable when submitted as a standalone form)</b>
Approved By:
Title:
Approval Date:
Conditions of Approval:

## NATURAL GAS MANAGEMENT PLAN

### Section 1 – Attachments

Company: Burnett Oil Co., Inc. Well Name: THE HORNED FROG 1H API 30-015-54438

- VI. Separation Equipment:** Description of how Operator will size separation equipment to optimize gas capture.
- A. This well will be added to an existing tank battery.
  - B. The engineered system is designed to handle 11,500 MCF/D. It will produce through the following vessels:
    1. 2-phase separator,
    2. free-water knockout,
    3. heater treater, and then finally a
    4. 2-phase gas scrubber.
  - C. Current battery throughput is 0 MCF/D.
  - D. The referenced well is anticipated to produce a maximum of 550 MCF/D for a total throughput of 550 MCF/D.
- VII. Operational Practices:** Description of the actions Operator will take to comply with the requirements of Subsection A through F of 19.15.27.8 NMAC.
- A. In all circumstances, the operator shall flare rather than vent natural gas except when flaring is technically infeasible or would pose a risk to safe operations or personnel safety, and venting is a safer alternative than flaring.
  - B. During drilling operations a mud/gas separator will be on location. If needed, it will be utilized to capture natural gas for purposes of flaring. If flaring is required, a properly-sized flare stack will be at a minimum of 100' from the nearest surface hole location unless otherwise approved by the division.
  - C. Venting and flaring during completion or recompletion operations
    1. During completion or recompletion, gas is trapped/retained in the wellbore through use of properly weighted "kill" fluids.
    2. During the completion phase, the well will be routed directly into an existing battery. With this initial flowback already being connected to the existing battery, all flowback gasses will be routed, if applicable, only to flare. No venting will occur during this initial flowback period. As soon as it is feasible, the existing separation will be utilized.
  - D. Equipment redundancies within the system, along with the overall battery design, enables us to service equipment without interruption to gas flow in most scenarios. With the existing battery compression at this

facility, in most cases we can avoid flaring during times of elevated transmission line pressures caused by mid-stream maintenance. Additionally, we have gas takeaway with two (2) midstream companies to try and keep gas going to sales in case one of them has a problem.

#### E. Performance Standards

1. The existing facility is designed for maximum anticipated throughput and pressure to minimize waste.
2. The existing storage tanks are routed to a combustor.
3. The existing flare stack is properly sized and designed to ensure proper combustion efficiency.
4. The existing flare stack is securely anchored and located at least 100 feet from the storage tanks.
5. AVO inspections are conducted weekly.
6. NA
7. NA
8. We strive to minimize waste and shall resolve emergencies as quickly and safely as possible.

#### F. Measurement or estimation of vented and flared natural gas

1. We shall measure or estimate the volume of natural gas that is vented, flared, or beneficially used during drilling, completion and production operations regardless of the reason or authorization for such venting or flaring.
2. The existing flare has a meter to measure the gas going to it.
3. The measurement equipment conforms to an industry standard such as American Petroleum Institute (API) Manual of Petroleum Measurement Standards (MPMS) Chapter 14.10 Measurement of Flow to Flares
4. The measuring equipment is not equipped with a manifold that allows the diversion of natural gas around the metering element except for the sole purpose of inspecting and servicing the measurement equipment.
5. If metering is not practicable due to circumstances such as low flow rate or low pressure venting and flaring, the operator will estimate the volume of vented or flared natural gas using a methodology that can be independently verified.
6. NA
7. The operator shall install measuring equipment whenever the division determines that metering is practicable or the existing measuring equipment or GOR test is not sufficient to measure the volume of vented and flared natural gas.

#### **VIII. Best Management Practices:** Operator's best management practices to minimize venting during active and planned maintenance.

- A. The existing facility is designed for maximum anticipated throughput and pressure to minimize waste.
- B. Equipment redundancies within the system, along with the overall battery design, enables us to service equipment without interruption to gas flow in most scenarios. With the existing battery compression at this facility, in most cases we can avoid flaring during times of elevated transmission line pressures caused by mid-stream maintenance.
- C. During well maintenance, gas is trapped/retained in the wellbore through use of properly weighted "kill" fluids.
- D. Additionally, we have gas takeaway with two (2) midstream companies to try and keep gas going to sales in case one of them has a problem.

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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

Action 569182

**CONDITIONS**

Operator: RILEY PERMIAN OPERATING COMPANY, LLC 29 E Reno Avenue Oklahoma City, OK 73104	OGRID: 372290
	Action Number: 569182
	Action Type: [C-103] NOI Change of Plans (C-103A)

**CONDITIONS**

Created By	Condition	Condition Date
ward.rikala	Any previous COA's not addressed within the updated COA's still apply.	4/8/2026