

Well Name	Well Number	US Well Number	Lease Number	Case Number	Operator
BIG EDDY UNIT	6H	3001557350	NMNM04557	NMNM68294X	XTO PERMIAN
BIG EDDY UNIT	5H	3001557349	NMNM04557	NMNM68294X	XTO PERMIAN
BIG EDDY UNIT	1H	3001557345	NMNM04557	NMNM68294X	XTO PERMIAN
BIG EDDY UNIT	4H	3001557348	NMNM04557	NMNM68294X	XTO PERMIAN
BIG EDDY UNIT	3H	3001557347	NMNM04557	NMNM68294X	XTO PERMIAN
BIG EDDY UNIT	2H	3001557346	NMNM04557	NMNM68294X	XTO PERMIAN

Notice of Intent

Sundry ID: 2899343

Type of Submission: Notice of Intent

Type of Action: APD Change

Date Sundry Submitted: 03/09/2026

Time Sundry Submitted: 05:08

Date proposed operation will begin: 03/03/2026

Procedure Description: Update of COA

Oral Submission

Oral Notification Date: Mar 9, 2026

Oral Notification Time: 12:00 AM

Contacted By: Zota Stevens

Contact's Email: zstevens@blm.gov

Conditions of Approval

Specialist Review

BEU_DI_33E_4_2_BATCH_WELLS_COA_20260309052451.pdf

BLM Point of Contact

BLM POC Name: ZOTA M STEVENS

BLM POC Title: Petroleum Engineer

BLM POC Phone: 5752345998

BLM POC Email Address: ZSTEVENS@BLM.GOV

Disposition: Approved

Disposition Date: 03/09/2026

Signature: Zota Stevens

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME: XTO
WELL NAME & NO.: BEU DI 33E 4-2 1H-6H
LOCATION: 4-20S-31E- NMP
COUNTY: Eddy County, New Mexico

*Changes approved through engineering via **Sundry 2899343** on 3/9/2026. Any previous COAs not addressed within the updated COAs still apply.*

Create COAs

H₂S Not Reported	Cave / Karst Low	Waste Prevention Rule Waste Minimization Plan
Potash R-111-Q	R-111-Q Design 4-String: Open 2nd Int x Production (ICP 2 above Relief Zone)	
Wellhead Multibowl <input checked="" type="checkbox"/> Flex Hose <input checked="" type="checkbox"/> Break Testing	Casing 4-String Well <input type="checkbox"/> Liner <input type="checkbox"/> Fluid Filled <input type="checkbox"/> Casing Clearance	
	Cementing <input type="checkbox"/> DV Tool <input checked="" type="checkbox"/> Bradenhead <input checked="" type="checkbox"/> Echometer <input checked="" type="checkbox"/> Offline Cement <input checked="" type="checkbox"/> Open Annulus <input type="checkbox"/> Pilot Hole	
Special Requirements <input checked="" type="checkbox"/> Capitan Reef <input type="checkbox"/> Water Disposal <input type="checkbox"/> COM <input checked="" type="checkbox"/> Unit		

A. HYDROGEN SULFIDE

Hydrogen Sulfide (H₂S) monitors shall be installed prior to drilling out the surface shoe. If H₂S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet 43 CFR 3176 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

APD is within the R-111-Q defined boundary. Operator must follow all procedures and requirements listed within the updated order.

B. CASING

1. The **13-3/8** inch surface casing shall be set at approximately **918** feet (a minimum of **70'** into the Rustler Anhydrite, above the salt, and below usable fresh water) and cemented to the surface.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic-type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
 - b. Wait on cement (WOC) time for a primary cement job will be a minimum of **8 hours** or **500 pounds compressive strength**, whichever is greater (including lead cement.)
 - c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
 - d. If cement falls back, remedial cementing will be done prior to drilling out that string.
2. The minimum required fill of cement behind the **9-5/8** inch 1st Intermediate casing is **cement to surface**. If cement does not circulate, see B.1.a, c-d above.
 - **Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry** due to the presence of cave/karst, Capitan Reef, or potash features.
3. The minimum required fill of cement behind the **7-5/8** inch 2nd Intermediate casing is **cement to surface**. If cement does not circulate, see B.1.a, c-d above.
 - **Special Capitan Reef Requirement:** Ensure freshwater based mud is used across the Capitan interval.
 - **Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry** due to the presence of cave/karst, Capitan Reef, or potash features.
4. The minimum required fill of cement behind the **5-1/2** inch production casing is **500 feet** into the previous casing but not higher **than USGS Marker Bed No. 126 (base of the McNutt Potash ore zone.)**
 - Operator must verify top of cement per R-111-Q requirements. Submit results to the BLM. Operator shall use one of the approved methods for cement verification located in the **General Requirements, Section A.1.**
 - Operator shall run a CBL from TD of the **Surface** casing to tieback requirements after the second stage BH to verify TOC.
 - **Operator shall run Echo-meter to verify Cement Slurry/Fluid top in the annulus.** Submit results to the BLM. No displacement fluid/wash out shall be utilized at the top of the cement slurry between second stage BH and top out.
 - Operator must use a limited flush fluid volume of 1 bbl following backside cementing procedures.

- No displacement fluid/wash out shall be utilized at the top of the cement slurry during second stage bradenhead when running Echo-meter if cement is required to surface.
- Adjust cement volume and excess based on a fluid caliper or similar method that reflects the as-drilled size of the wellbore.
- **A monitored open annulus will be incorporated during completion by leaving the above annulus un-cemented and monitored.** Operator must follow **all** monitoring requirements listed within R-111-Q. Tieback shall be met within **180 days**.
- Operator has proposed an open annulus completion in R-111-Q. Operator shall provide a method of verification pre-completion top of cement. **Submit results to the BLM.**
- Pressure monitoring device and Pressure Safety Valves must be installed at surface on both the intermediate annulus and the production annulus for the life of the well.
- **In the event of a casing failure during completion,** the operator **must** contact the BLM at engineers (575-706-2779) and inspection staff (575-361-2822 Eddy County).

C. PRESSURE CONTROL

1. Operator has proposed a multi-bowl wellhead assembly. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be **5000 (5M)** psi.
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. If the cement does not circulate and one-inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
 - e. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172 must be followed.
2. Variance approved to use flex line from BOP to choke manifold. Manufacturer's specification to be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no hard bends).
3. Break testing has been approved for this well ONLY on those intervals utilizing a 5M BOPE or less. **(Annular preventer must be tested to a minimum of 70% of BOPE working pressure and shall be higher than the MASP.)** If in the event break testing is not utilized, then a full BOPE test would be conducted.
 - a. Variance only pertains to the intermediate hole-sections and no deeper than the Bone Springs formation. **BOPE Break Testing is NOT permitted to drill the**

production hole section.

- b. While in transfer between wells, BOPE shall be secured by the hydraulic carrier or cradle.
- c. A full BOPE test is required prior to drilling the first deep intermediate hole section. If any subsequent hole interval is deeper than the first, a full BOPE test will be required. (200' TVD tolerance between intermediate shoes is allowable).
- d. As a minimum, a full BOPE test shall be performed at 21-day intervals.
- e. In the event any repairs or replacement of the BOPE is required, the BOPE shall test as per **43 CFR 3172**. Any well control event while drilling require notification to the BLM Petroleum Engineer (**575-706-2779**) prior to the commencement of any BOPE Break Testing operations.

D. SPECIAL REQUIREMENT(S)

Unit Wells:

The well sign for a unit well shall include the unit number in addition to the surface and bottom hole lease numbers. This also applies to participating area numbers. If a participating area has not been established, the operator can use the general unit designation but will replace the unit number with the participating area number when the sign is replaced.

Commercial Well Determination:

A commercial well determination shall be submitted after production has been established for at least six months. **(This is not necessary for secondary recovery unit wells)**

Offline Cementing

Offline cementing has been approved for **all hole sections**. Contact the BLM prior to the commencement of any offline cementing procedure.

GENERAL REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)

For multi-well pads, notifications for the following operations may be made together going from one well to the next. This does NOT apply to notifications for wells in the R111Q potash area:

- Casing run
- Offline cementing
- Break testing

Contact Eddy County Petroleum Engineering Inspection Staff:

Email or call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220;
[BLM NM CFO DrillingNotifications@BLM.GOV](mailto:BLM_NM_CFO_DrillingNotifications@BLM.GOV); (575) 361-2822

1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator proposed to drill multiple wells utilizing a skid / walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - i. Notify the BLM when moving in and removing the Spudder Rig.
 - ii. Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - iii. BOP/BOPE test to be conducted per **43 CFR 3172** as soon as 2nd Rig is rigged up on swell.
2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will always be operational during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the doghouse or stairway area.
3. For intervals in which cement to surface is required, cement to surface should be verified with a visual check and density or pH check to differentiate cement from spacer and drilling mud. The results should be documented in the driller's log and daily reports.

A. CASING & CEMENT

1. The current acceptable methods of cement verification are as follows:
 - i. Observing cement circulated to surface,
 - ii. Cement Bond Log (CBL),
 - iii. Temperature log within 8-10 hours after completing the cement job,
 - iv. Echometer (if a second-stage bradenhead is being utilized and operator was granted approval prior to operations.)
2. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.
3. Wait on cement (WOC) for Potash Areas: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi for all cement blends of both lead and tail cement, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
4. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
5. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Well specific cement details must be onsite prior to pumping the cement for each casing string.
6. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
7. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
8. If hard band drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a

larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.

9. Whenever a casing string is cemented in the R-111-Q potash area, the NMOCD requirements shall be followed.

B. PRESSURE CONTROL

1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in **43 CFR 3172**.
2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.
3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
 - i. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - ii. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - iii. Manufacturer representative shall install the test plug for the initial BOP test.
 - iv. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172.6(b)(9) must be followed.
 - v. If the cement does not circulate and one-inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - i. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before

cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead cement), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).

- ii. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the cement plug. The BOPE test can be initiated after bumping the cement plug with the casing valve open. (This only applies to single stage cement jobs, prior to the cement setting up.)
- iii. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to **43 CFR 3172** with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for 8 hours or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- iv. The test shall be run on a 5000-psi chart for a 2-3M BOP/BOP, on a 10000-psi chart for a 5M BOP/BOPE and on a 15000-psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one-hour chart. A circular chart shall have a maximum 2-hour clock. If a twelve hour or twenty-four-hour chart is used, tester shall make a notation that it is run with a two -our clock.
- v. The results of the test shall be reported to the appropriate BLM office.
- vi. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- vii. The BOP/BOPE test shall include a low-pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- viii. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per **43 CFR 3172**.

C. DRILLING MUD

Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation, and shall be used until production casing is run and cemented.

D. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created because of drilling operations and completion operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area. Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

Approved by Zota Stevens on 3/9/2026
zstevens@blm.gov / 575-234-5998

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 569543

CONDITIONS

Operator: XTO PERMIAN OPERATING LLC. 3617 Big Spring St. MIDLAND, TX 79705	OGRID: 373075
	Action Number: 569543
	Action Type: [C-103A] NOI Change of Plans (C-103A)

CONDITIONS

Created By	Condition	Condition Date
keith.dziokonski	None	4/14/2026