

06/11/2014 DATE IN	SUSPENSE	MCMLN ENGINEER	06-11-2014 LOGGED IN	NSP TYPE	PEH1416256502 APP NO.
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ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
**- Engineering Bureau -**  
 1220 South St. Francis Drive, Santa Fe, NM 87505



**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Application Acronyms:**

[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]  
 [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]  
 [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]  
 [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]  
 [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]  
 [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

[A] Location - Spacing Unit - Simultaneous Dedication  
☐ NSL ☒ NSP ☐ SD

Check One Only for [B] or [C]

[B] Commingling - Storage - Measurement  
☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

[D] Other: Specify \_\_\_\_\_

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or ☐ Does Not Apply

- [A] ☒ Working, Royalty or Overriding Royalty Interest Owners
- [B] ☐ Offset Operators, Leaseholders or Surface Owner
- [C] ☐ Application is One Which Requires Published Legal Notice
- [D] ☐ Notification and/or Concurrent Approval by BLM or SLO  
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E] ☒ For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F] ☐ Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note:** Statement must be completed by an individual with managerial and/or supervisory capacity.

David Catanach  
 Print or Type Name

David Catanach  
 Signature

6/11/14  
 Date

Agent for RKI Exploration & Production, LLC  
 Title

drcatanach@netscape.com  
 E-Mail Address

*NSP - 246 289 1997*  
*30-015-IPENDING*  
*RKI EXPIRATION & PRODUCTION*  
*page 97853*  
*Wildcat GO-3 5263016N*  
*BONE SPRING*

June 11, 2014

**Hand Delivered**

New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

Attention: Ms. Jami Bailey  
Division Director

Re: Application for Non-Standard Spacing Unit/  
Horizontal Project Area  
RDX Federal Com 28 No. 1H (API No. N/A)  
**Surface Location (SL):** 330' FNL & 1095' FEL (Unit A)  
**First Take Point (FTP):** 497' FNL & 990' FEL (Unit A)  
Section 28, Township 26 South, Range 30 East, NMPM,  
**Bottomhole Location (BHL):** 230' FSL & 990' FEL (Lot 1)  
**Last Take Point (LTP):** 330' FSL & 990' FEL (Lot 1)  
Irregular Section 33, Township 26 South, Range 30 East, NMPM,  
Eddy County, New Mexico

Dear Ms. Bailey:

Pursuant to Division Rule 19.15.15.11, RKI Exploration & Production, LLC ("RKI") respectfully requests administrative approval for a 224.80-Acre Non-Standard Spacing Unit/Horizontal Project Area comprising the E/2 E/2 of Section 28 and Unit A and Lot 1 (E/2 NE/4 equivalent) of Irregular Section 33, both in Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

The proposed RDX Federal Com 28 No. 1H, which will be drilled as a horizontal well at a standard well location to test the Wildcat G-03 S263016K Bone Spring Pool (97863), will be dedicated to the proposed non-standard spacing unit. Additional wells may be drilled and dedicated to the proposed non-standard spacing unit if the RDX Federal Com 28 No. 1H is successful.

The Wildcat G-03 S263016K Bone Spring Pool is currently governed by Division Rule 19.19.15.9 which requires standard 40-acre oil spacing and proration units with wells to be located no closer than 330 feet to the outer boundary of the spacing unit.

The attached plat shows that Section 33 is an irregular section whose southern boundary is the New Mexico/Texas State Line. This section is comprised of four standard 40-acre units (Units A, B, C & D) and four non-standard lots (Lots 1-4) that each comprise approximately 24 acres.

The concurrent development of Sections 28 and 33 in the Bone Spring formation in the manner proposed by RKI represents a reasonable and effective method by which portions of Irregular Section 33 can be incorporated into horizontal Bone Spring project areas.

In addition to the currently proposed non-standard spacing unit, RKI, as operator of the Bone Spring formation in Sections 28 & 33, is concurrently filing for approval of three additional non-standard Bone Spring Spacing Units/Horizontal Project Areas comprising: i) the W/2 W/2 of Section 28 and Unit D and Lot 4 (W/2 NW/4 equivalent) of Irregular Section 33; ii) E/2 W/2 of Section 28 and Unit C and Lot 3 (E/2 NW/4 equivalent) of Irregular Section 33 and; iii) W/2 E/2 of Section 28 and Unit B and Lot 2 (W/2 NE/4 equivalent) of Irregular Section 33.

**Affected Offset Acreage-Non-Standard Spacing Unit:** Division Rule 19.15.4.12(A)(3) requires that notice for non-standard proration units be provided to “owners of interest in the mineral estate to be excluded from the proration unit in the quarter-quarter section for 40-acre pools or formations, the one-half quarter section for 80-acre pools or formations, the quarter section for 160-acre pools or formations, the half section for 320-acre pools or formations or section for 640-acre pools or formations in which the non-standard unit is located”. As shown on the attached plat, and as previously stated in this application, all acreage in Section 28 and Irregular Section 33 will ultimately be included in one of four horizontal Bone Spring Project Areas operated by RKI. Please note that RKI will operate all Bone Spring acreage in Section 28 and Irregular Section 33. Also please note that the working interest ownership is not entirely uniform within Section 28 and Irregular Section 33. Consequently, notice of this application, and the three additional concurrently filed applications described above, is being provided to all working interest owners in Section 28 and Irregular Section 33. These working interest owners include Khody Land & Minerals Company, a wholly owned subsidiary of RKI, James W. Brock, Joe R. Henderson, Richard Brace Wigzell and Andrew Kenneth Wigzell, Trustees of the Wigzell 2009 Trust, Ellwade Corporation and Pioneer Natural Resources, USA, Inc.

Attached is a Form C-102 showing the proposed well and proposed non-standard spacing unit. Please note that there are currently no other existing Bone Spring producing wells within the proposed non-standard spacing unit. Also attached is a map that shows other existing or proposed non-standard spacing units/Bone Spring horizontal project areas that either directly offset the proposed non-standard spacing unit, or are located within Section 28 and Irregular Section 33.

In summary, approval of the application will provide RKI the opportunity to recover additional oil and gas reserves from the Wildcat G-03 S263016K Bone Spring

*RKI Exploration & Production, LLC  
Application for Non-Standard Spacing Unit/  
Horizontal Project Area  
RDX Federal Com 28 No. 1H  
Page 3*

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Pool underlying the E/2 E/2 of Section 28 and Unit A and Lot 1 (E/2 NE/4 equivalent) of Irregular Section 33 that may otherwise not be recovered, thereby preventing waste, and will not violate correlative rights.

If you should have any questions, please call me at (505) 690-9453.

Sincerely,



David Catanach, Agent  
RKI Exploration & Production, LLC  
210 Park Avenue, Suite 900  
Oklahoma City, OK 73102

Xc: OCD-Artesia

DISTRICT I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720

DISTRICT II  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720

DISTRICT III  
1000 Rio Brazos Rd., Amos, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170

DISTRICT IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources Department  
**OIL CONSERVATION DIVISION**  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office  
☐ AMENDED REPORT

**WELL LOCATION AND ACREAGE DEDICATION PLAT**

API Number	Pool Code	Pool Name <b>UNDESIGNATED BONE SPRING</b>
Property Code	Property Name <b>RDX FEDERAL COM 28</b>	Well Number <b>1H</b>
OGRID No. <b>246289</b>	Operator Name <b>RKI EXPLORATION &amp; PRODUCTION</b>	Elevation <b>3010'</b>

**Surface Location**

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
<b>A</b>	<b>28</b>	<b>26 S</b>	<b>30 E</b>		<b>330</b>	<b>NORTH</b>	<b>1095</b>	<b>EAST</b>	<b>EDDY</b>

**Bottom Hole Location If Different From Surface**

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
<b>1</b>	<b>33</b>	<b>26 S</b>	<b>30 E</b>		<b>230</b>	<b>SOUTH</b>	<b>990</b>	<b>EAST</b>	<b>EDDY</b>

Dedicated Acres	Joint or Infill	Consolidated Code	Order No.
<b>224.8</b>			

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.

NW COR SEC 28  
NMSP-E (NAD 83)  
N (Y) = 371527.1'  
E (X) = 677240.1'

NE COR SEC 28  
NMSP-E (NAD 83)  
N (Y) = 371559.3'  
E (X) = 682558.1'

SW COR SEC 28  
NW COR SEC 33  
NMSP-E (NAD 83)  
N (Y) = 366212.5'  
E (X) = 677272.5'

SE COR SEC 28  
NE COR SEC 33  
NMSP-E (NAD 83)  
N (Y) = 366240.9'  
E (X) = 682588.0'

SW COR SEC 33  
NMSP-E (NAD 83)  
N (Y) = 364062.2'  
E (X) = 677281.8'

SE COR SEC 33  
NMSP-E (NAD 83)  
N (Y) = 364087.5'  
E (X) = 682596.1'

**RDX FEDERAL COM 28 1H SHL**  
NMSP-E (NAD 83)  
N (Y) = 371222.8'  
E (X) = 681465.0'  
LAT. = 32°01'11.15"N  
LONG. = 103°52'52.31"W

**RDX 28 FEDERAL COM 1H BHL**  
NMSP-E (NAD 83)  
N (Y) = 364312.7'  
E (X) = 681605.3'  
LAT. = 32°00'02.77"N  
LONG. = 103°52'51.01"W

**NMSP-E (NAD 27)**  
N (Y) = 371165.3'  
E (X) = 640278.7'  
LAT. = 32.0196399°N  
LONG. = 103.8807191°W

**NMSP-E (NAD 27)**  
N (Y) = 364255.6'  
E (X) = 640418.8'  
LAT. = 32.0006434°N  
LONG. = 103.8803607°W

330' 1095'

230' 990'

FIRST TAKE  
497' FNL &  
990' FEL  
NMSP-E (NAD 83)  
N (Y) = 371056.3'  
E (X) = 681570.9'

LAST TAKE  
330' FSL &  
990' FEL  
NMSP-E (NAD 83)  
N (Y) = 364412.7'  
E (X) = 681604.9'

**OPERATOR CERTIFICATION**  
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and 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 such a mineral or working interest, or to voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Signature \_\_\_\_\_ Date \_\_\_\_\_

**BARRY HUNT**

Print Name \_\_\_\_\_

**specialpermitting@gmail.com**

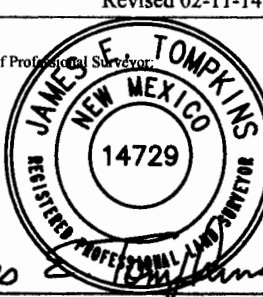
E-mail Address \_\_\_\_\_

**SURVEYORS CERTIFICATION**  
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.

April 29, 2013 Revised 02-11-14

Date of Survey \_\_\_\_\_

Signature and Seal of Professional Surveyor \_\_\_\_\_



Job No. **WTC48881**

**JAMES E. TOMPKINS 14729**

Certificate Number \_\_\_\_\_

30E

21

22

**RKI Exploration & Production, LLC**  
**Application for Non-Standard**  
**Spacing Unit/Horizontal Project Area**  
**RDX Federal Com 28 No. 1H**  
**Wildcat G-03 S263016K; Bone Spring**

S.L.: 330' FNL  
& 1095' FEL

FTP: 497' FNL  
& 990' FEL

29

28

27

**Existing or proposed Bone Spring**  
**Horizontal Project Areas:**  
**Operator: RKI Exploration &**  
**Production, LLC**

**Proposed 224.80-acre**  
**Bone Spring Non-Standard Spacing**  
**Unit/Horizontal Project Area**

330' Setback Line

32

33

34

Existing Bone Spring Project Area: Operator:  
Yates Petroleum Corp.

Lot 4

Lot 3

Lot 2

Lot 1

**New Mexico**

Last Take Point:  
330' FSL & 990' FEL

RDX Federal Com 28 No. 1H  
BHL: 230' FSL & 990' FEL

**Texas**

26S

RKI Exploration & Production, LLC  
Application for Non-Standard Spacing Unit/  
Horizontal Project Area  
RDX Federal Com 28 No. 1H  
Section 28 & Irregular Section 33, T-26S, R-30E, NMPM,  
Eddy County, New Mexico  
**Notice List**

James W. Brock  
P.O. Box 3047  
Odessa, Texas 79760

Joe R. Henderson  
P.O. Box 2477  
Midland, Texas 79702

Richard Brace Wigzell &  
Andrew Kenneth Wigzell,  
Trustees of the Wigzell 2009 Trust  
2601 Wydeewood Drive  
Midland, Texas 79707

Ellwade Corporation  
P.O. Box 10845  
Midland, Texas 79702

Pioneer Natural Resources USA, Inc.  
4901 E. Highway 80  
Midland, Texas 79706



June 11, 2014

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

TO: (SEE ATTACHED OWNERSHIP/NOTICE LIST)

Re: RKI Exploration & Production, LLC  
Applications for 4 Non-Standard Spacing Units/  
Horizontal Project Areas  
Section 28 & Irregular Section 33, T-26 South, R-30 East, NMPM,  
Eddy County, New Mexico

Ladies & Gentlemen:

Enclosed please find a copy of each of four applications filed by RKI Exploration & Production, LLC with the Oil Conservation Division seeking approval to establish four separate non-standard spacing and proration units/horizontal project areas in the Bone Spring formation described as follows. Each of these units will be dedicated to one or more horizontal wells that are to be drilled to develop the Bone Spring interval.

**Non-Standard Spacing Unit**

**Dedicated Well**

W/2 W/2 of Section 28 & Unit D & Lot 4 of Irregular Section 33	RDX Fed. Com 28 # 2H
E/2 W/2 of Section 28 & Unit C & Lot 3 of Irregular Section 33	RDX Fed Com 28 # 4H
W/2 E/2 of Section 28 & Unit B & Lot 2 of Irregular Section 33	RDX Fed Com 28 # 7H
E/2 E/2 of Section 28 & Unit A & Lot 1 of Irregular Section 33	RDX Fed Com 28 # 1H

You are being provided notice of these applications as the owner of an interest that may be affected by the proposed non-standard spacing units. Objections must be filed with the Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within 20 days.

If you should have any questions, please contact me at (505) 690-9453.

Sincerely,



David Catanach-Agent  
RKI Exploration & Production, LLC  
210 Park Avenue, Suite 900  
Oklahoma City, Oklahoma 73102

Enclosure



7012 3050 0000 6819 6721

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 SAN ANTONIO, TX 78705

Sent To: **Joe R. Henderson**  
 P.O. Box 2477  
 Midland, Texas 79702

PS Form 3800, August 2006 See Reverse for Instructions

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Restricted Delivery Fee (Endorsement Required)	\$0.00
<b>Total</b>	<b>\$8.45</b>

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 SAN ANTONIO, TX 78705

Sent To: **Ellwade Corporation**  
 P.O. Box 10845  
 Midland, Texas 79702

PS Form 3800, August 2006 See Reverse for Instructions

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Restricted Delivery Fee (Endorsement Required)	\$0.00
<b>Total</b>	<b>\$8.45</b>

Postmark Here  
 JUN 11 2014  
 CORONADO STATION  
 SAN ANTONIO, TX 78705

Sent To: **James W. Brock**  
 P.O. Box 3047  
 Odessa, Texas 79760

PS Form 3800, August 2006 See Reverse for Instructions

7012 3050 0000 6819 6714

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Restricted Delivery Fee (Endorsement Required)	\$0.00
<b>Total</b>	<b>\$8.45</b>

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 JUN 11 2014  
 CORONADO STATION  
 SAN ANTONIO, TX 78705

Sent To: **Richard Brace Wigzell &  
 Andrew Kenneth Wigzell,  
 Trustees of the Wigzell 2009 Trust**  
 2601 Wyndwood Drive  
 Midland, Texas 79707

PS Form 3800, August 2006 See Reverse for Instructions

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Restricted Delivery Fee (Endorsement Required)	\$0.00
<b>Total</b>	<b>\$8.45</b>

Postmark Here  
 JUN 11 2014  
 CORONADO STATION  
 SAN ANTONIO, TX 78705

Sent To: **Pioneer Natural Res., USA, Inc.**  
 4901 E. Highway 80  
 Midland, Texas 79706

PS Form 3800, August 2006 See Reverse for Instructions