NSL

Initial

Application

Received: 08/15/19

This application is placed in file for record. It MAY or MAY NOT have been reviewed to be determined Administratively Complete

Signature

Revised March 23, 2017

RECEIVED: REVIEWER: TYPE: APP NO: LRL 08/15/19 pLEL1922755771

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION



- Geological & Engi 1220 South St. Francis Drive	
ADMINISTRATIVE APE	PLICATION CHECKLIST
THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATI	ve applications for exceptions to division rules and
REGULATIONS WHICH REQUIRE PROCESS	ING AT THE DIVISION LEVEL IN SANTA FE
Applicant: Tap Rock Operating, LLC	OGRID Number: 372043
Well Name: WTG Fed Com #211H Well	API: Pending
Pool: Purple Sage; Wolfcamp	Pool Code: 98220
	REQUIRED TO PROCESS THE TYPE OF APPLICATION ED BELOW
1) TYPE OF APPLICATION: Check those which app A. Location – Spacing Unit – Simultaneous De NSL NSP (PROJECT AREA)	
B. Check one only for [1] or [11] [1] Commingling – Storage – Measuremer DHC	ols Olm
2) NOTIFICATION REQUIRED TO: Check those whice A. Offset operators or lease holders B. Royalty, overriding royalty owners, revection and concurrent approved the province of	nue owners al by SLO al by BLM Notice Complete Application Content Complete
3) CERTIFICATION: I hereby certify that the informal administrative approval is accurate and compl understand that no action will be taken on this notifications are submitted to the Division.	ete to the best of my knowledge. I also
Note: Statement must be completed by an indiv	idual with managerial and/or supervisory capacity.
	08/08/2019 Date
Kaitlyn A. Luck	Dale
Print or Type Name	505-954-7286
Translu 1	Phone Number
	kaluck@hollandhart.com

e-mail Address



Kaitlyn A. Luck Associate Phone (505) 954-7286 KALuck@hollandhart.com

August 8, 2019

VIA ONLINE FILING

Adrienne Sandoval, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: Application of Tap Rock Operating, LLC, for administrative approval of an unorthodox well location for its WTG Fed Com #211H Well in the W/2 W/2 of Sections 27 and 34, Township 26 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.

Dear Ms. Sandoval:

Tap Rock Operating, LLC ("Tap Rock") (OGRID No. 372043) seeks administrative approval of an unorthodox well location for its **WTG Fed Com #211H Well** (API No. Pending) to be completed within the Purple Sage; Wolfcamp Pool (98220) underlying the W/2 W/2 of Sections 27 and 34, Township 26 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.

This well will be drilled from a surface location 497 feet from the north line and 395 feet from the west line (Unit D) of Section 27 to a bottom hole location 5 feet from the south line and 331 feet from the west line (Lot 9) of Section 34. The first take point will be located 330 feet from the north line and 331 feet from the west line (Unit D) of Section 27 and the last take point will be 100 feet from the south line and 331 feet from the west line (Lot 9) of Section 34.

Pursuant to Division Order R-14262, this acreage is governed by the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool which provide for wells in the Wolfcamp formation in Eddy County to be located no closer than 330 feet to the outer boundary of the spacing unit. The completed interval for the WTG Fed Com #211H Well will be unorthodox because it is closer than 330 feet to the southern boundary of the horizontal spacing unit. Approval of the unorthodox completed interval will allow Tap Rock to use its preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

Exhibit A is a Well Location and Acreage Dedication Plat (Form C-102), which shows that the completed interval of the proposed **WTG Fed Com #211H Well** encroaches on the spacing units to the south.

Exhibit B is a land plat for Sections 27 and 34 that shows the proposed **WTG Fed Com #211H Well** in relation to the adjoining spacing units to the south in the N/2 N/2 of Section 5, Block 57, Township 1 North (Loving County, Texas).

Ownership is diverse between the subject spacing unit and the tracts to the south. A copy of this application with all attachments has been sent by certified mail to each affected party advising them that if they have an objection it must be filed in writing with the Division within 20 days from the date the Division receives the application. **Exhibit C** is a list of the parties affected by the encroachment to the south together with the tracking information reflecting notice has been provided.

Exhibit D is a statement from Tap Rock's petroleum engineer confirming that Tap Rock's requested unorthodox location is necessary to optimize well spacing, thereby preventing waste.

Your attention to this matter is appreciated.

Sincerely,

Kaitlyn A. Luck

ATTORNEY FOR TAP ROCK OPERATING, LLC



Kaitlyn A. Luck Associate Phone (505) 954-7286 KALuck@hollandhart.com

August 8, 2019

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES:

Re: Application of Tap Rock Operating, LLC, for administrative approval of an unorthodox well location for its WTG Fed Com #211H Well in the W/2 W/2 of Sections 27 and 34, Township 26 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Christian Combs
Tap Rock Resources
(720) 360-4028
ccombs@taprk.com

Sincerely,

Kaitlyn A. Luck

ATTORNEY FOR TAP ROCK OPERATING, LLC

<u>District I</u> 1625 N. French Dr., Hobbs, NM 88240 Phone: (575) 393-6161 Fax: (575) 393-0720 <u>District II</u>

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

1000 Rio Brazos Road, Aztec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505

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.

FORM C-102
Revised August 1, 2011
Submit one copy to appropriate
District Office

EXHIBIT

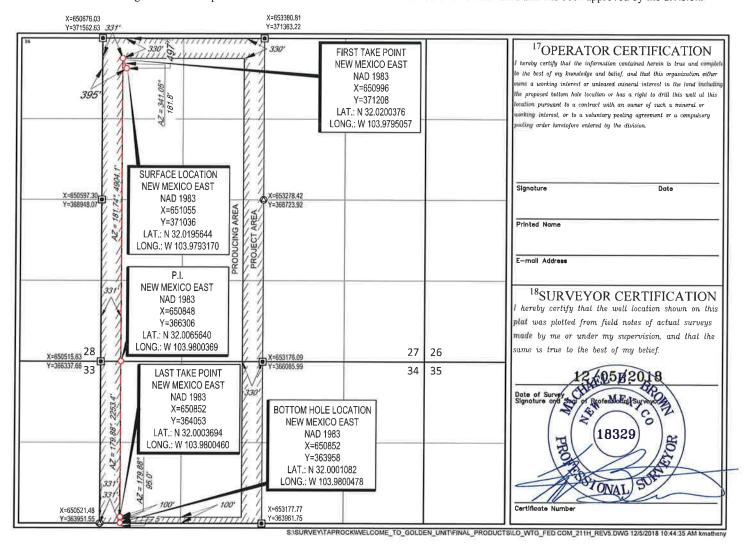
AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

Santa Fe, NM 87505

	¹ API Number	r		² Pool Code			³ Pool Na	ame									
⁴ Property (Code					SProperty Name 6Well Number WTG FED COM 211H											
OGRID No. SOperator Name TAP ROCK OPERATING, LLC. 2884'																	
					¹⁰ Surface Lo	ocation											
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	Ea	st/West line	County							
D	27	26-S	29-E	::	497'	NORTH	395'	WE	ST	EDDY							
			11	Bottom Ho	le Location If D	ifferent From Sur	face										
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	Ea	st/West line	County							
9	34	26-S	29-E	s - 3	5'	SOUTH	331'	WES	ST	EDDY							
¹² Dedicated Acres	13 Joint or I	nfill ¹⁴ Co	nsolidation Co	le ¹⁵ Orde	er No.												

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.





BHP Billiton Petroleum Properties

WTG Fed Com #201H, #211H, #205H, #215H NSL Address List

N/2N/2 Section 5, Block 57, Township 1 North (Loving County, Texas)

BHP Billiton Petroleum Properties P.O. Box 22719 Houston, TX 77027





Shipment Confirmation Acceptance Notice

Note to Mailer: The labels and volume associated to this form online, must match the labeled packages being presented to the USPS® employee with this form.

Tap Rock - NSL -WTG Fed Com #201H, 205H, 211H, 215H CM# 93477.0001

Shipment Date: 08/05/2019

Shipped From:

Name: HOLLAND & HART LLP

Address: 110 N GUADALUPE ST # 1

City: SANTA FE

State: NM_ ZIP+4® _87501

Type of Mail	Volume
Priority Mail Express®*	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	1
Total	1

^{*}Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

B. USPS Action

- Note to RSS Clerk:
 1. Home screen > Mailing/Shipping > More
 2. Select Shipment Confirm
- Scan or enter the barcode/label number from PS Form 5630
- Confirm the volume count message by selecting Yes or No Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail. Leave form with customer or in customer's mail receptacle.

USPS SCAN AT ACCEPTANCE



9275 0901 1935 6200 0016 1498 46



Firm Mailing Book For Accountable Mail

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CONNER WOOD ASSET MANAGER CWOOD @TAPRK COM



August 5, 2019

Adrienne Sandoval, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: Non-Standard Location Request

WTG Fed Com #201H, #205H, #211H and #215H (the "Wells")

Dear Ms. Sandoval:

Tap Rock Operating hereby requests administrative approval of a non-standard location for each of the Wells referenced above by decreasing the last take points from 330 feet to 100 feet from the horizontal plane outer boundary. The Wells are located in the Purple Sage-Wolfcamp Gas Pool (Pool Code 98220). It is Tap Rock's responsibility as a prudent operator to maximize lateral length and to minimize reserves left in the ground. Decreasing the last take point will increase the wells effective lateral length by 230 feet thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

TAP ROCK OPERATING, LLC

Conner Wood

Asset Manager and Reservoir Engineer

