

# NSL Initial Application

Received: 01/21/2020



January 21, 2020

Deana M. Bennett  
505.848.1834  
dmb@modrall.com

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 Marathon Oil Permian LLC for administrative approval of unorthodox well location for Willow Lake 15 WXY Fee 3H well located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.**

Dear Director Sandoval:

Marathon Oil Permian LLC ("Marathon"), OGRID Number 372098, is seeking administrative approval of an unorthodox well location ("NSL") for the **Willow Lake 15 WXY Fee 3H well** (the "Well") to be completed within the Purple Sage Wolfcamp Gas Pool (Pool ID: 98220) underlying the N/2S/2 of Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico. A C-102 for the Well is attached as Exhibit A. This is a horizontal well that will be drilled as follows:

- Surface Hole Location: 1402' from the South line and 297' from the East line of Section 15;
- First Take Point: 1980' from the South line and 100' from the East line of Section 15;
- Last Take Point and Bottom Hole Location: 1980' from the South line and 100' from the West line of Section 15.

Marathon has included as Exhibit B a letter explaining why this application is needed. Marathon also provides a midland map of this area, attached as Exhibit C.

This well will produce from the Purple Sage Wolfcamp Gas Pool (Pool ID: 98220). The special pool rules establish 330' foot setback requirements. The completed interval for the proposed well is closer than 330' from the boundary of the spacing unit. The unorthodox location will encroach towards the SE/4 of Section 16 and the SW/4 of Section 14 of Township 24 South, Range 28 East.

Modrall Sperling  
Roehl Harris & Sisk P.A.

500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
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Pursuant to NMAC 19.15.4.12(A)(2) and NMAC 19.15.2.7(A)(8), when, as here, the adjacent tracts are dedicated to existing spacing units, notice must only be provided to the operator of those spacing units. Mewbourne Oil Company (Mewbourne) is the operator of a 480-acre Wolfcamp spacing unit in the NE/4 of Section 21 and the E/2 of Section 16, Township 16, Township 24 South, Range 28 East (*see* Case No. 16234; Order No. R-20295) (the Creedence unit), which is the unit covering the section directly adjacent to the west of the proposed Willow Lake 15 WXY Fee 3H well. Matador Production Company (Matador) is the operator of a 320-acre Wolfcamp spacing unit located in the S/2 of Section 14, Township 24 South, Range 28 East (the Tiger unit), which is the unit covering the section directly adjacent to the east of the proposed Willow Lake 15 WXY Fee 3H well. Marathon is providing notice to both Mewbourne and Matador. Proof of mailing, along with a copy of the notice letter sent to affected parties, is attached hereto as Exhibit D.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett". The signature is written in dark ink and is positioned above a horizontal line.

Deana M. Bennett  
***Attorney for Marathon Oil  
Permian LLC***

PO#: RECPG-200121-NSL000

Revised March 23, 2017

|                     |               |                |                        |
|---------------------|---------------|----------------|------------------------|
| RECEIVED: 1/21/2020 | REVIEWER: LRL | TYPE: NSL-7979 | APP NO: pJAG2002230102 |
|---------------------|---------------|----------------|------------------------|

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & 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

**Applicant:** Marathon Oil Permian LLC **OGRID Number:** 372098  
**Well Name:** Willow Lake 15 WXY Fee 3H **API:** 30-0XX-PENDING  
**Pool:** Purple Sage; Wolfcamp (Gas) **Pool Code:** 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION  
 INDICATED BELOW**

**1) TYPE OF APPLICATION:** Check those which apply for [A]

A. Location - Spacing Unit - Simultaneous Dedication

☒ NSL☐ NSP (PROJECT AREA)☐ NSP (PRORATION UNIT)☐ SD

B. Check one only for [I] or [II]

[I] Commingling - Storage - Measurement

☐ DHC☐ CTB☐ PLC☐ PC☐ OLS☐ OLM

[II] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX☐ PMX☐ SWD☐ IPI☐ EOR☐ PPR**2) NOTIFICATION REQUIRED TO:** Check those which apply.A. ☒ Offset operators or lease holdersB. ☐ Royalty, overriding royalty owners, revenue ownersC. ☐ Application requires published noticeD. ☐ Notification and/or concurrent approval by SLOE. ☐ Notification and/or concurrent approval by BLMF. ☐ Surface ownerG. ☒ For all of the above, proof of notification or publication is attached, and/or,H. ☐ No notice required**FOR OCD ONLY**☐ Notice Complete☐ Application  
Content  
Complete

**3) 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.**

Deana M. Bennett

Print or Type Name

Signature

January 21, 2020

Date

505-848-1800

Phone Number

dmb@modrall.com

e-mail Address

District I  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-9720  
District II  
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  
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, NM 87505

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

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

|                                  |  |   |
|----------------------------------|--|---|
| <sup>1</sup> API Number          | <sup>2</sup> Pool Code<br>98220                        | <sup>3</sup> Pool Name<br>PURPLE SAGE; WOLFCAMP (GAS) |
| <sup>4</sup> Property Code       | <sup>5</sup> Property Name<br>WILLOW LAKE 15 WXY FEE   | <sup>6</sup> Well Number<br>3H                        |
| <sup>7</sup> OGRID No.<br>372098 | <sup>8</sup> Operator Name<br>MARATHON OIL PERMIAN LLC | <sup>9</sup> Elevation<br>2992'                       |

<sup>10</sup> Surface Location

| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| I             | 15      | 24S      | 28E   |         | 1402          | SOUTH            | 297           | EAST           | EDDY   |

<sup>11</sup> 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 |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| L             | 15      | 24S      | 28E   |         | 1980          | SOUTH            | 100           | WEST           | EDDY   |

| <sup>12</sup> Dedicated Acres | <sup>13</sup> Joint or Infill | <sup>14</sup> Consolidation Code | <sup>15</sup> Order No. |
|-------------------------------|-------------------------------|----------------------------------|-------------------------|
| 320.0                         |                               |                                  |                         |

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.

|   |  |                                  |  |
|---|--|----------------------------------|--|
| <p><b>SURFACE HOLE LOCATION</b><br/>1402' FSL 297' FEL, SECTION 15<br/>NAD 83, SPCS NM EAST<br/>X:623389.41' / Y:441908.65'<br/>LAT:32.21460521N / LON:104.06802013W<br/>NAD 27, SPCS NM EAST<br/>X:582205.88' / Y:441850.05'<br/>LAT:32.21448344N / LON:104.06752835W</p>                | <p><b>KICK OFF POINT / FIRST TAKE POINT</b><br/>1980' FSL 100' FEL, SECTION 15<br/>NAD 83, SPCS NM EAST<br/>X:623586.08' / Y:442486.42'<br/>LAT:32.21619208N / LON:104.06737955W<br/>NAD 27, SPCS NM EAST<br/>X:582402.57' / Y:442427.80'<br/>LAT:32.21607031N / LON:104.06688775W</p> | <p>SECTION 11<br/>SECTION 14</p> | <p><b>" OPERATOR CERTIFICATION</b><br/>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 released 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 a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</p> <p>Signature _____ Date _____</p> <p>Printed Name _____</p> <p>E-mail Address _____</p> |
| <p><b>LAST TAKE POINT/BOTTOM HOLE LOCATION</b><br/>1980' FSL 100' FWL, SECTION 15<br/>NAD 83, SPCS NM EAST<br/>X:618507.35' / Y:442502.17'<br/>LAT:32.21626888N / LON:104.08380159W<br/>NAD 27, SPCS NM EAST<br/>X:577323.92' / Y:442443.62'<br/>LAT:32.21614736N / LON:104.08330910W</p> | <p><b>CORNER COORDINATES</b><br/>NAD 83, SPCS NM EAST<br/>A - X: 618408.72' / Y: 443161.70'<br/>B - X: 623686.28' / Y: 443136.56'<br/>C - X: 623685.59' / Y: 440506.10'<br/>D - X: 618403.24' / Y: 440522.49'</p>  | <p>SECTION 16<br/>SECTION 21</p> | <p><b>"SURVEYOR CERTIFICATION</b><br/>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.</p> <p>Date of Survey _____<br/>Signature and Seal of Professional Surveyor: _____</p> <p><b>PRELIMINARY</b><br/>THIS DOCUMENT IS NOT TO BE USED FOR RECORDATION, SALE OR THE BASIS FOR THE ISSUANCE OF A PERMIT.</p> <p>Certificate Number _____</p>  |

Distances/areas relative to NAD 83 Combined Scale Factor: 0.99977572 Convergence: 00°08'09.70192"

EXHIBIT

A



**Billy Moore**  
Reservoir Engineer

**Marathon Oil Permian LLC**  
5555 San Felipe Street  
Houston, TX 77056  
713.296.1883  
bsmoore@marathonoil.com

January 16, 2020

Ms. Adrienne Sandoval  
Director - NMOCD  
1220 South Francis Drive  
Santa Fe, NM 87505

Re: Non-Standard Location Application  
Willow Lake 15 WXY Fee 3H  
Eddy County, New Mexico

Dear Ms. Sandoval:

Marathon Oil Permian LLC respectfully requests administrative approval of the non-standard location for the Willow Lake 15 WXY Fee 3H well, to be drilled in the Purple Sage; Wolfcamp (Gas) pool (98220). Marathon plans for this well to have a first take point at 1,980' FSL and 100' FEL of Section 15, 24S-28E, and a last take point at 1,980' FSL and 100' FWL of Section 15, 24S-28E which is closer to the unit line than allowed under the subject field rules. Marathon requests this non-standard location because the placement conforms to the first and last take points of the other wells in the section, this spacing best fits into the spacing of wells in the plan of development for the entire section and we believe that it will result in the greatest recovery of reserves.

Thank you for your consideration. Should you have any questions please contact me at (713) 296-3497.

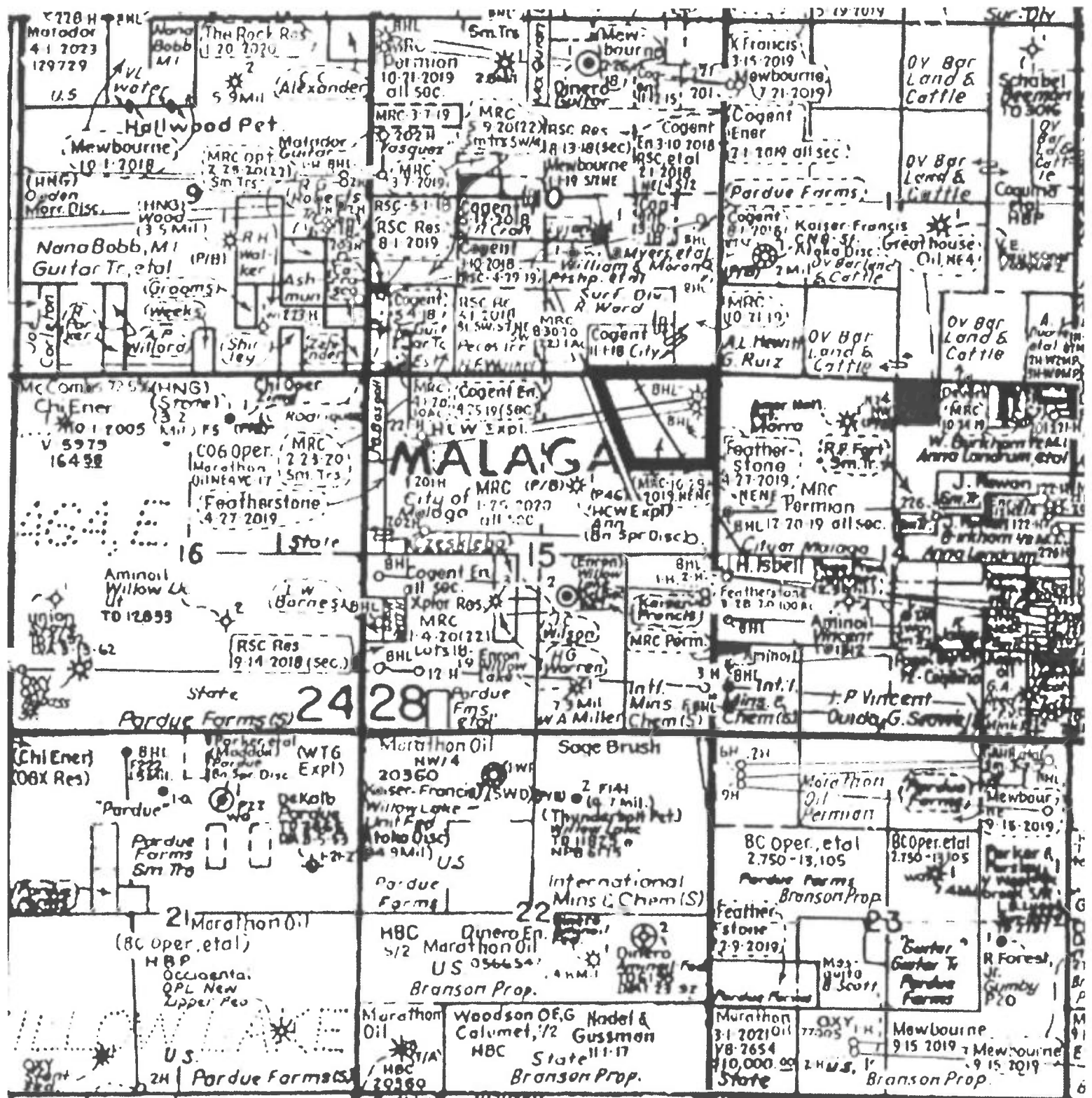
Sincerely,

A handwritten signature in black ink that reads 'Billy D. Moore'.

Billy Moore  
Reservoir Engineer  
Permian Asset







EXHIBIT

C

tabbles



January 21, 2020

**VIA CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

**TO AFFECTED PARTIES**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for Willow Lake 15 WXY Fee 3H well located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for Willow Lake 15 WA Fee 5H well located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.**

**Re: Application of Marathon Oil Permian LLC for administrative approval of unorthodox well location for Willow Lake 15 WXY Fee 7H well located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.**

Ladies and Gentlemen:

Enclosed in the notice are copies of the above referenced applications filed with the New Mexico Conservation Division on this date. Any objections that you have to this application must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, within twenty (20) days from the date the Division receives the above referenced application may be administratively approved by the Division.

If you have any questions concerning this application, please contact:

Clayton Rule  
Land Supervisor  
Marathon Oil Permian LLC  
713.296.2196 (Office)  
[cwrule@marathonoil.com](mailto:cwrule@marathonoil.com)

Deana M. Bennett  
505.848.1834  
[dmb@modrall.com](mailto:dmb@modrall.com)

Modrall Sperling  
Roehl Harris & Sisk P.A.  
500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

Tel: 505.848.1800  
[www.modrall.com](http://www.modrall.com)





If you have no objection to this application, please sign the waiver as indicated below and return the original. Your assistance and cooperation in this matter are appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to read "Deana M. Bennett", with a long horizontal flourish extending to the right.

Deana M. Bennett

*Attorney for Marathon Oil  
Permian LLC*

**WAIVER**

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Willow Lake 15 WXY Fee 3H well** located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Willow Lake 15 WA Fee 5H well** located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_

\_\_\_\_\_ hereby waives objection to the above referenced Application for an Unorthodox Location for the **Willow Lake 15 WXY Fee 7H well** located in Section 15, Township 24 South, Range 28 East, NMPM, Eddy County, New Mexico.

Dated: \_\_\_\_\_  
Signature

Karlene Schuman  
 Modrall Sperlberg Roehl Harris & Sisk P.A.  
 500 Fourth Street, Suite 1000  
 Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL  
 01/21/2020



Firm Mailing Book ID: 183007

| Line           | USPS Article Number         | Name, Street, City, State, Zip  | Postage             | Service Fee   | RR Fee        | Rest.Del.Fee  | Reference Contents      |
|----------------|-----------------------------|---|---------------------|---------------|---------------|---------------|-------------------------|
| 1              | 9314 8699 0430 0067 8848 07 | Mewbourne Oil Company<br>500 West Texas, Suite 1020<br>Midland TX 79701                             | \$1.45              | \$3.50        | \$1.60        | \$0.00        | 81363-0124 WL<br>Notice |
| 2              | 9314 8699 0430 0067 8848 14 | Matador Production Company<br>One Lincoln Centre<br>5400 LBJ Freeway, Suite 1500<br>Dallas TX 75240 | \$1.45              | \$3.50        | \$1.60        | \$0.00        | 81363-0124 WL<br>Notice |
| <b>Totals:</b> |                             |   | <b>\$2.90</b>       | <b>\$7.00</b> | <b>\$3.20</b> | <b>\$0.00</b> |                         |
|                |                             |   | <b>Grand Total:</b> |               |               |               | <b>\$13.10</b>          |

List Number of Pieces  
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Total Number of Pieces  
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