

NSL

Initial

Application

RECEIVED: <b>01/21/21</b>	REVIEWER: <b>LRL</b>	TYPE: <b>NSL</b>	APP NO: <b>pLEL2102239311</b>
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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:** EOG Resources, Inc. **OGRID Number:** 7377  
**Well Name:** Frazier 27 State Com #206H Well **API:** 30-025-46780  
**Pool:** Triste Draw; Bone Spring, East pool **Pool Code:** 96682

**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 holders  
 B. ☐ Royalty, overriding royalty owners, revenue owners  
 C. ☐ Application requires published notice  
 D. ☒ Notification and/or concurrent approval by SLO  
 E. ☐ Notification and/or concurrent approval by BLM  
 F. ☐ Surface owner  
 G. ☒ 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.**

Kaitlyn A. Luck

Print or Type Name

Signature

1/21/2021

Date

505-954-7286

Phone Number

kaluck@hollandhart.com

e-mail Address

January 21, 2021

**VIA ONLINE FILING**

Adrienne Sandoval  
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 EOG Resources, Inc. for administrative approval of an unorthodox well location for its Frazier 27 State Com #206H Well in the E/2 of Sections 27 and 24, Township 24 South, Range 33 East, N.M.P.M., Lea County, New Mexico.**

Dear Ms. Sandoval:

EOG Resources, Inc. (OGRID No. 7377) seeks administrative approval of an unorthodox well location for its **Frazier 27 State Com #206H Well** (API No. 30-025-46780) to be completed within the Triste Draw; Bone Spring, East Pool [96682], underlying the E/2 of Sections 27 and 24, Township 24 South, Range 33 East, N.M.P.M., Lea County, New Mexico.

This well is to be drilled and completed at a surface location 559 feet from the north line and 2220 feet from the west line (Unit C) of Section 27. The *first take point* is located 100 feet from the north line and 2591 feet from the east line (Unit B) of Section 27, and the *last take point* is located 100 feet from the south line and 2589 feet from the east line (Unit O) of Section 34. Since this acreage is governed by the Division's statewide rules, the completed interval for this well will be unorthodox because it is closer than the standard offsets to the western boundary of the spacing unit. Approval of the unorthodox completed interval will allow EOG to use their preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

**Exhibit A** includes a Form C-102 and an as-drilled plat, showing the completed interval of the proposed **Frazier 27 State Com #206H Well** encroaches on the spacing unit/tracts to the west in the E/2 W/2 of Sections 27 and 34.

**Exhibit B** is a plat for Sections 27 and 34 that shows the proposed **Frazier 27 State Com #206H Well** in relation to adjoining spacing unit to the west.

Ownership is diverse between the subject spacing unit and the affected spacing unit to the west. **Exhibit C** is a landman statement indicating the New Mexico State Land Office is the only “affected party” and proof that a copy of this application with all attachments has been sent by certified mail to each affected party advising that any objections must be filed in writing with the Division within 20 days from the date the Division receives the application.

**Exhibit D** is a statement from a petroleum engineer providing justification for the needed exception.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kaitlyn Luck', written over a horizontal line.

Kaitlyn A. Luck  
**ATTORNEY FOR EOG RESOURCES, INC.**

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 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

EXHIBIT A

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	<sup>3</sup> Pool Name
<sup>4</sup> Property Code	<sup>5</sup> Property Name <b>FRAZIER 27 STATE COM</b>	<sup>6</sup> Well Number <b>206H</b>
<sup>7</sup> OGRID No.	<sup>8</sup> Operator Name <b>EOG RESOURCES, INC.</b>	<sup>9</sup> Elevation <b>3517'</b>

<sup>10</sup>Surface Location

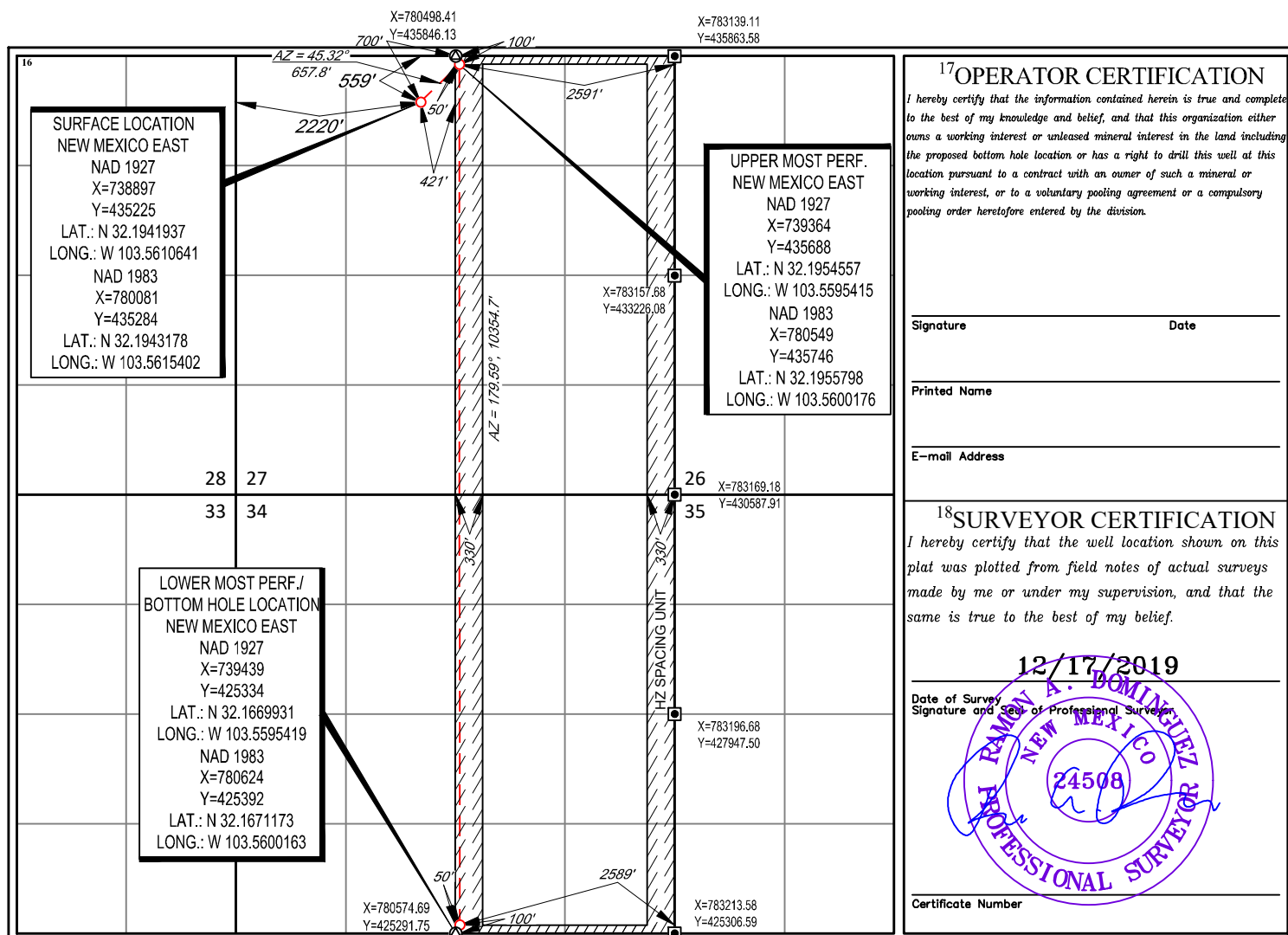
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
<b>C</b>	<b>27</b>	<b>24-S</b>	<b>33-E</b>	<b>-</b>	<b>559'</b>	<b>NORTH</b>	<b>2220'</b>	<b>WEST</b>	<b>LEA</b>

<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
<b>0</b>	<b>34</b>	<b>24-S</b>	<b>33-E</b>	<b>-</b>	<b>100'</b>	<b>SOUTH</b>	<b>2589'</b>	<b>EAST</b>	<b>LEA</b>

<sup>12</sup> Dedicated Acres <b>640.00</b>	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
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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.O. Box 2267, Midland, Texas 79702  
Phone: (432) 686-3600 Fax: (432) 686-3773

January 14, 2020

### **Certification of Ownership**

I have reviewed the ownership of the oil and gas leasehold in Sections 27 and 34-24S-33E, Lea County, New Mexico, for purposes of the unorthodox location for EOG's Frazier 27 State Com #206H well located in the NW/4NE/4 of Section 27-24S-33E. As of the date of this letter, the affected parties are:

1. EOG Resources, Inc.  
5509 Champions Dr.  
Midland, TX 79706
2. New Mexico State Land Office  
P.O. Box 1148  
Santa Fe, NM 87504

Sincerely,

**EOG Resources, Inc.**

A handwritten signature in black ink, appearing to read "RC", followed by a horizontal line.

Reece Cook  
Senior Landman

**EXHIBIT C**





**Kaitlyn A. Luck**  
Phone (505) 954-7286  
kaluck@hollandhart.com

January 21, 2021

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

**New Mexico State Land Office  
P.O. Box 1148  
Santa Fe, New Mexico 87504**

**Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Frazier 27 State Com #206H Well in the E/2 of Sections 27 and 24, Township 24 South, Range 33 East, N.M.P.M., Lea 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:

Reece Cook  
EOG Resources, Inc.  
(432) 848-9216  
reece\_cook@eogresources.com

Sincerely,

A handwritten signature in blue ink, appearing to read "Kaitlyn Luck", written over a horizontal line.

**Kaitlyn A. Luck**  
**ATTORNEY FOR EOG RESOURCES, INC.**



# Shipment Confirmation Acceptance Notice

## A. Mailer Action

**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.

EOG - Frazier 206H NSL

Shipment Date: 01/21/2021

Shipped From:

Name: HOLLAND & HART LLP (1)

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.

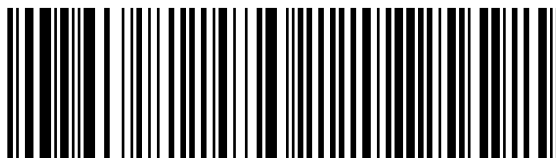
## B. USPS Action

Note to RSS Clerk:

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. 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 0026 4820 49



## Firm Mailing Book For Accountable Mail

Name and Address of Sender		<div>Check type of mail or service<div><div><input type="checkbox"/> Adult Signature Required<input type="checkbox"/> Priority Mail Express<input type="checkbox"/> Adult Signature Restricted Delivery<input type="checkbox"/> Registered Mail<input checked="" type="checkbox"/> Certified Mail<input type="checkbox"/> Return Receipt for Merchandise<input type="checkbox"/> Certified Mail Restricted Delivery<input type="checkbox"/> Signature Confirmation<input type="checkbox"/> Insured Mail<input type="checkbox"/> Signature Confirmation Restricted Delivery<input type="checkbox"/> Priority Mail</div></div></div>		Affix Stamp Here <i>(for additional copies of this receipt).</i> <b>Postmark with Date of Receipt.</b>													
USPS Tracking/Article Number		Addressee (Name, Street, City, State, & ZIP Code™)		Postage	(Extra Service) Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	ASR Fee	ASRD Fee	RD Fee	RR Fee	SC Fee	SCRD Fee	SH Fee	
1. 9214 8901 9403 8330 3244 34		New Mexico State Land Office PO BOX 1148 Santa Fe NM 87504		0.50	3.55	Handling Charge - if Registered and over \$50,000 in value							1.70				
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per ( <i>Name of receiving employee</i> )															
1																	



P.O. Box 2267, Midland, Texas 79702  
Phone: (432) 686-3600 Fax: (432) 686-3773

January 14, 2021

Re: EOG Resources NSL Application  
Frazier 27 State Com #206H

To whom it may concern:

A non-standard location is necessary to develop the Bonespring formation, specifically the Upper Leonard B, in this section efficiently and in an economic manner. A non-standard location optimizes pressures related to the completion and production drawdown of the wells and is expected to yield a higher ultimate recovery than a standard location, thereby preventing waste and protecting correlative rights.

Sincerely,

A handwritten signature in black ink, appearing to read "Marielle Spinks", with a stylized flourish at the end.

EOG Resources  
Marielle Spinks  
Reservoir Engineer

**EXHIBIT D**

**From:** [Lowe, Leonard, EMNRD](#)  
**To:** [Kaitlyn A. Luck](#)  
**Subject:** RE: NSL application EOG - Frazier Well No. 206H  
**Date:** Tuesday, January 26, 2021 4:39:00 PM  
**Attachments:** [image001.png](#)

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Thank you Ms. Luck.

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**From:** Kaitlyn A. Luck <KALuck@hollandhart.com>  
**Sent:** Tuesday, January 26, 2021 1:29 PM  
**To:** Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>  
**Subject:** [EXT] RE: NSL application EOG - Frazier Well No. 206H

Mr. Lowe, here's my answers to your questions, let me know if I can help with anything else:

1. Correct.
2. The Upper Leonard is a geologic reference that EOG uses in this formation.
3. This well is located in the same spacing unit as the Frazier 203H well, which is a proximity tract well, creating an enlarged spacing unit and no NSP is required. **If you could note this in the NSL application, that would be helpful. Additional further inquiries could develop.**

Thanks,

Kaitlyn

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Kaitlyn A. Luck – Associate | Holland & Hart LLP | (o) 505.954.7286 (m) 361.648.1973

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**From:** Lowe, Leonard, EMNRD <[Leonard.Lowe@state.nm.us](#)>  
**Sent:** Tuesday, January 26, 2021 10:35 AM  
**To:** Kaitlyn A. Luck <[KALuck@hollandhart.com](#)>  
**Subject:** NSL application EOG - Frazier Well No. 206H

**External Email**

Ms. Kaitlyn Luck,

In review of your application in the subject above, a few inquiries.

1. EOG is the only Operator in the affected tract. SLO is the only W.I., correct?
2. On page 11 of your application. There is reference to the "Upper Leonard B", is this in error? What reference is this to?


January 14, 2021

Re: EOG Resources NSL Application  
Frazier 27 State Com #206H

To whom it may concern:

A non-standard location is necessary to develop the Bonespring formation, specifically the Upper Leonard B, in this section efficiently and in an economic manner. A non-standard location optimizes pressures related to the completion and production drawdown of the wells and is expected to yield a higher ultimate recovery than a standard location, thereby preventing waste and protecting correlative rights.

Sincerely,



EOG Resources  
Marielle Spinks  
Reservoir Engineer

3. The pool code No. is 96682, this is for Oil: 40 acre spacing unit with 330 feet set backs. The HSU you are seeking is 640 for this well. This well needs an NSP. Correct?

**Leonard R. Lowe**

Engineering Bureau  
OCD - EMNRD  
5200 Oakland Ave. NE  
Albuquerque, N.M. 87113  
C: 505-930-6717  
<http://www.emnrd.state.nm.us/oed/>