

From: [Lowe, Leonard, EMNRD](#)
To: [Jordan Kessler](#)
Subject: RE: [EXTERNAL] Withdraw of NSL application
Date: Wednesday, April 13, 2022 2:16:00 PM
Attachments: [image001.png](#)

Ms. Jordan Kessler,

The OCD will withdraw your NSL application, as requested.

Thank you,

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/oecd/>

From: Jordan Kessler <Jordan_Kessler@eogresources.com>
Sent: Wednesday, April 13, 2022 1:35 PM
To: Lowe, Leonard, EMNRD <Leonard.Lowe@state.nm.us>; Engineer, OCD, EMNRD <OCD.Engineer@state.nm.us>
Subject: [EXTERNAL] Withdraw of NSL application

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Hi Leonard,

EOG would like to request that the NSL application for the Ruthless 509H be withdrawn. The Action ID is 90673, and the reference ID is PLEL 2207730853. The application was submitted on 3/16/22 and on modified 3/18/22.

Please let me know if you have any additional questions.

Thanks!

Jordan

Jordan Kessler

Senior Regulatory Advisor



125 Lincoln Avenue, Suite 213
Santa Fe, NM 87501
Mobile: (432) 488-6108
Office: (575) 748-4158
jordan_kessler@eogresources.com

RECEIVED: 03/16/22	REVIEWER: LRL	TYPE: NSL	APP NO: pLEL2207730853
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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: Ruthless 11 Fed Com 509H **API:** 30-025-47722
Pool: WC-025 G-08 S253235G; Lower Bone Spring **Pool Code:** 97903

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.

Jordan L Kessler

Print or Type Name

Signature

03/16/2022

Date

432 488-6108

Phone Number

jordan_kessler@eogresources.com

e-mail Address



Jordan Lee Kessler
Phone: (432) 488-6108
Email: jordan_kessler@eogresources.com

March 16, 2022

VIA ONLINE FILING

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

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 509H well in the E/2E/2 of Sections 11 and 14, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico.

Dear Director Sandoval,

EOG Resources, Inc. (OGRID No. 7377) seeks administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 509H well (API No. 30-025-47722). This well has been drilled but not yet completed. The spacing unit dedicated to the well is comprised of the E/2E/2 of Sections 11 and 14, Township 25 South, Range 32 East, Lea County, New Mexico and is within the WC-025 G-08 S253235G; Lower Bone Spring pool (97903). The horizontal spacing unit for the well is approximately 640 acres, which includes proximity tracts. The defining well for the spacing unit is the Ruthless 11 Fed Com No. 507H well (API No. 30-025-47720).

The well has been drilled and is proposed to be completed as follows:

- The surface location is located 951 feet from the North line, 706 feet from the East line (Unit A) of Section 11,
- The bottom hole location, as drilled, is located 109 feet from the South line, 320 feet from the East line (Unit P) of Section 14,
- The first take point is located 100 feet from the North line, 365 feet from the East line (Unit A) of Section 11,
- The last take point is located 109 feet from the South line, 320 feet from the East line (Unit P) of Section 14.

The acreage is governed by the Division's statewide rules. Accordingly, the proposed completed interval is unorthodox because, as drilled, it is closer than the 330 feet to the eastern boundary. It encroaches on the spacing units in the W/2W/2 of Sections 12 and 13. Approval of the unorthodox

location will allow EOG to use its preferred well spacing plan for horizontal wells, which will prevent waste, and reflects the as-drilled location of the well.

Exhibit A shows the location of the as-drilled well, including the proposed unorthodox completed interval, of the Ruthless 11 Fed Com No. 509H well. The proposed completed interval encroaches on the spacing unit/tracts to the east.

Exhibit B is the Form C-102 filed with the Division.

Exhibit C is a plat that shows the Ruthless 11 Fed Com No. 509H well in relation to the adjoining spacing units/tracts to the east.

EOG is the operator of the two spacing units to the east, however, ownership is diverse between the subject spacing unit and the affected spacing unit/tracts to the east. **Exhibit D** is a certification from the landman indicating that he has reviewed the tracts affected by this request. Exhibit D includes a list of the affected parties and proof that a copy of this application with all attachments has been sent by certified mail to each affected party. This notice advises affected parties that any objection must be filed in writing with the Division within 20 days from the date the Division receives the application.

Exhibit E is a statement from a petroleum engineer providing justification for the requested non-standard location.

Thank you for your attention to this matter.

Very truly yours,

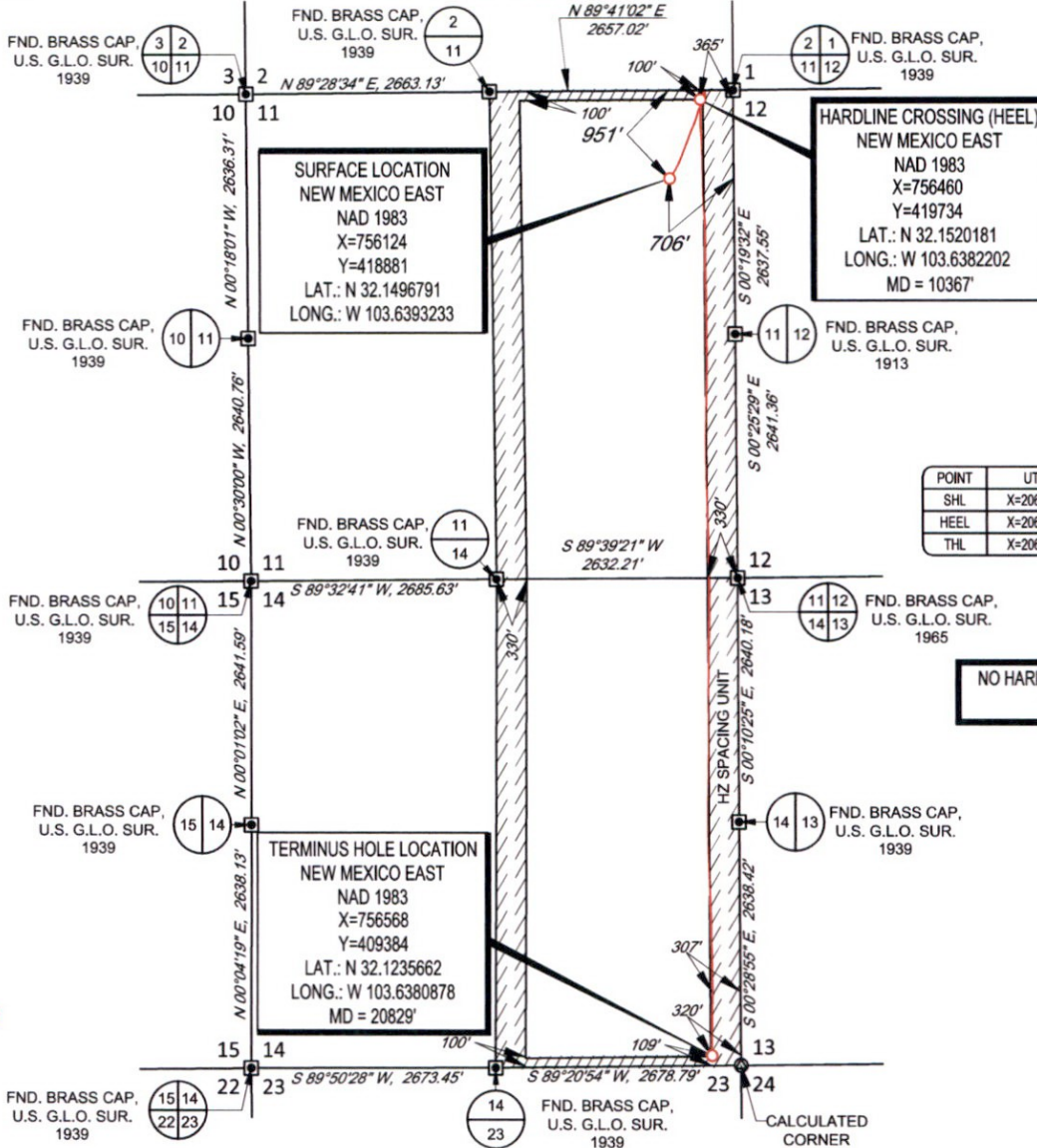


Jordan Kessler
Senior Regulatory Advisor

SCALE: 1" = 2000'

0' 1000' 2000'

SECTION 11, TOWNSHIP 25-S, RANGE 32-E, N.M.P.M.
LEA COUNTY, NEW MEXICO



POINT	UTM ZONE 13 COORDINATES
SHL	X=2061410.276 Y=11672672.245
HEEL	X=2061740.935 Y=11673527.174
THL	X=2061912.983 Y=11663179.683

NO HARDLINE CROSSING
(TOE)

PBTD = 20,812'

LEASE NAME & WELL NO.: RUTHLESS 11 FED COM 509H
SECTION 11 TWP 25-S RGE 32-E SURVEY N.M.P.M.
COUNTY LEA STATE NM ELEVATION 3517'
DESCRIPTION 951' FNL & 706' FEL

Signature:



1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140
TELEPHONE: (817) 744-7512 • FAX (817) 744-7554
2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705
TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743
WWW.TOPOGRAPHIC.COM



Ramon A. Dominguez, P.S. No. 24508
March 1, 2022

INTERNAL
PRE-COMPLETION
PLAT

RUTHLESS FED COM 509H PRE-COMPLETION DATE: 03/01/2022 FILE: C:\RUTHLESS_11_FED_COM_509H DRAWN BY: GJU SHEET: 1 OF 1	REVISION:		NOTES: 1. ORIGINAL DOCUMENT SIZE: 8.5" X 11" 2. ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREIN ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM OF 1983, EAST ZONE, U.S. SURVEY FEET. 3. THIS WELL LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY EOG RESOURCES, INC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

Exhibit A

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-025- 30-025-47722		² Pool Code 97903	³ Pool Name WC-025 G-08 S253235G; LOWER BONE SPRING
⁴ Property Code 329701	⁵ Property Name RUTHLESS 11 FED COM		⁶ Well Number 509H
⁷ OGRID No. 7377	⁸ Operator Name EOG RESOURCES, INC.		⁹ Elevation 3517'

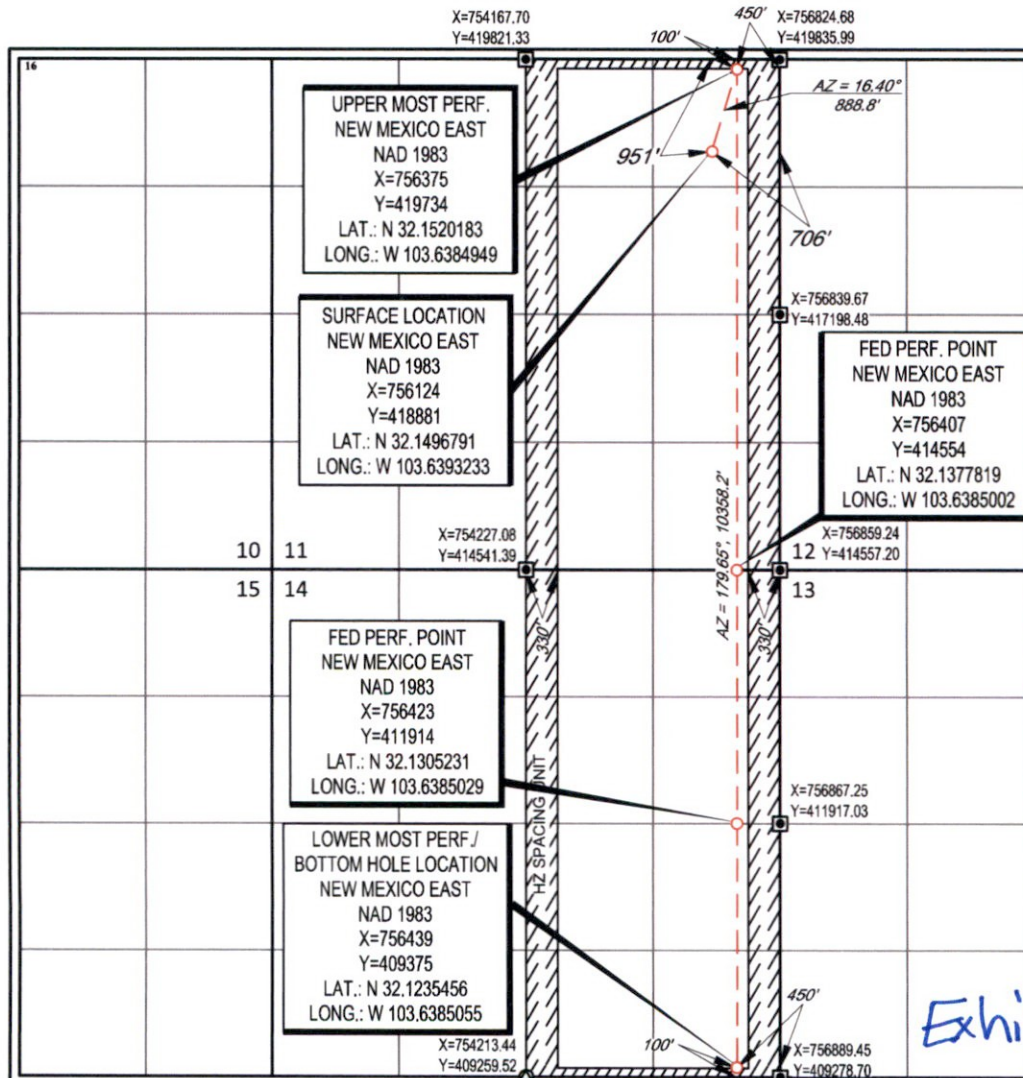
¹⁰ Surface Location									
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
A	11	25-S	32-E	—	951'	NORTH	706'	EAST	LEA

¹¹Bottom 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
P	14	25-S	32-E	-	100'	SOUTH	450'	EAST	LEA

¹² Dedicated Acres 640.00	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ 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.



17 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 a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

Lisa Trascher 12/4/19
Signature Date

Lisa Trascher

Printed Name

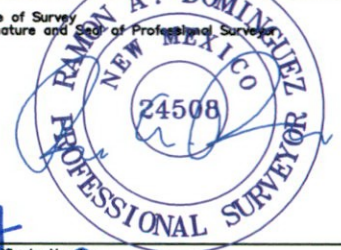
lisa_trascher@eogresources.com

E-mail Address

18 SURVEYOR 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 to the best of my belief.

~~02/06/2019~~

Date of Survey _____
Signature and Seal of Professional Surveyor _____



Certificate Number

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

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

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number		² Pool Code	³ Pool Name
⁴ Property Code	⁵ Property Name RUTHLESS 11 FED COM		⁶ Well Number 509H
⁷ GRID No.	⁸ Operator Name EOG RESOURCES, INC.		⁹ Elevation 3517'

¹⁰Surface Location

UL or lot no. A	Section 11	Township 25-S	Range 32-E	Lot Idn -	Feet from the 951'	North/South line NORTH	Feet from the 706'	East/West line EAST	County LEA
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¹¹Bottom Hole Location If Different From Surface

UL or lot no. P	Section 14	Township 25-S	Range 32-E	Lot Idn -	Feet from the 100'	North/South line SOUTH	Feet from the 450'	East/West line EAST	County LEA
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¹² Dedicated Acres 640.00	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ 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.

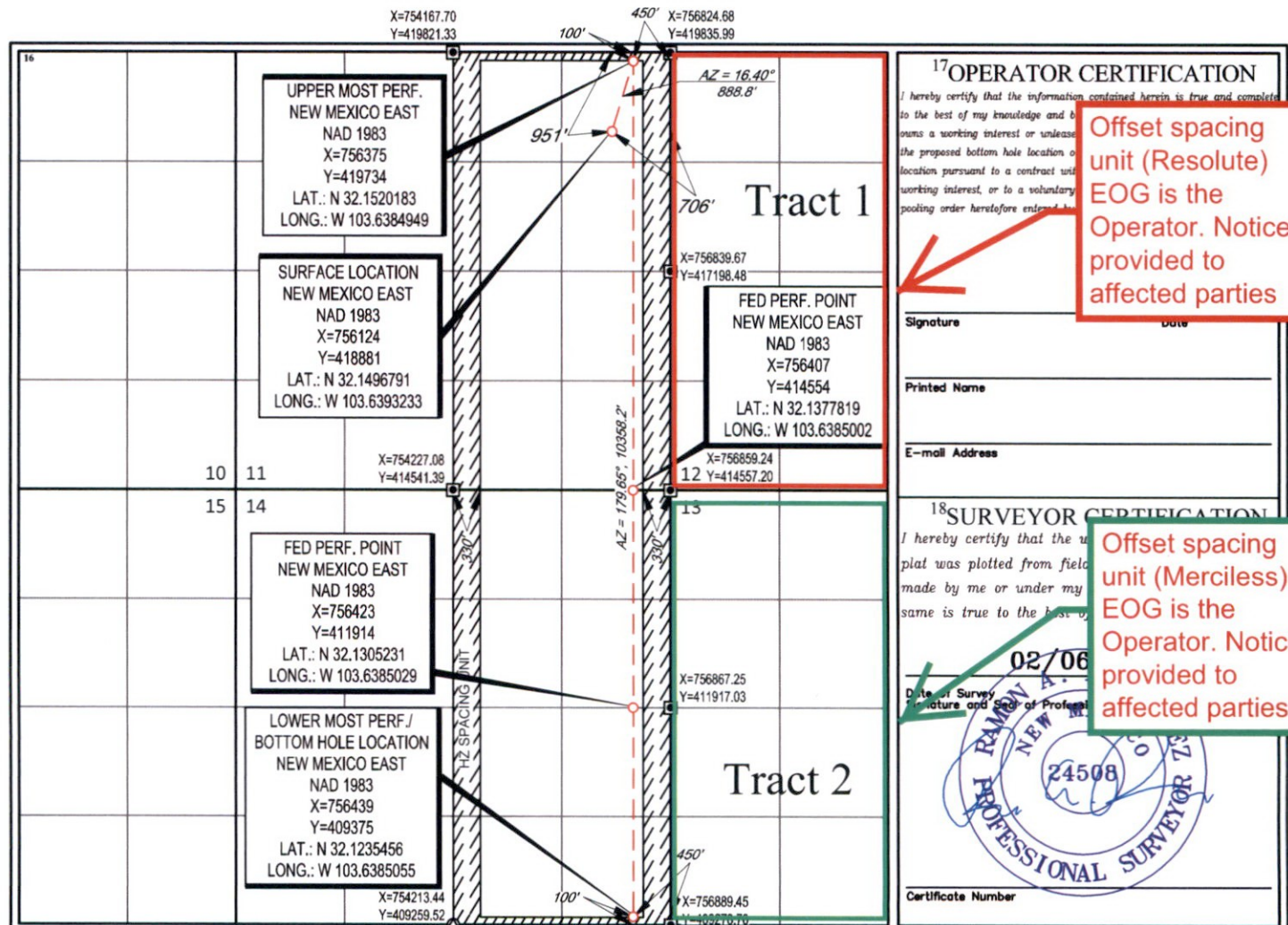


Exhibit C



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

March 10, 2022

Certification of Ownership

I have reviewed the ownership of the oil and gas leasehold in Sections 12 & 13 -25S-32E, Lea County, New Mexico, for purposes of the unorthodox location for EOG's Ruthless 11 Fed Com #509H well located in the E/2E/2 of Sections 11 & 14-25S-32E. As of the date of this letter, the affected parties are:

Tract 1:

1. BUREAU OF LAND MANAGEMENT (ROYALTY OWNER)
301 DINOSAUR TR.
SANTA FE, NM 87508
2. MCCLELLAN OIL CORPORATION (WORKING INTEREST OWNER)
P O BOX 730
ROSWELL, NM 88202-0730
3. DAVID PETROLEUM CORPORATION (WORKING INTEREST OWNER)
116 WEST FIRST STREET
ROSWELL, NM 88201-0000
4. TOLES COMPANY (WORKING INTEREST OWNER)
P O BOX 1300
ROSWELL, NM 88202-1300
5. EOG RESOURCES INC (WORKING INTEREST OWNER)
5509 CHAMPIONS DR.
MIDLAND, TX 79706
6. SHARBRO ENERGY LLC (WORKING INTEREST OWNER)
P O BOX 840
ARTESIA, NM 88211-0840

Tract 2:

1. BUREAU OF LAND MANAGEMENT (ROYALTY OWNER)
301 DINOSAUR TR.
SANTA FE, NM 87508

Exhibit D



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

2. MCCLELLAN OIL CORPORATION (WORKING INTEREST OWNER)
P O BOX 730
ROSWELL,NM 88202-0730
3. DAVID PETROLEUM CORPORATION (WORKING INTEREST OWNER)
116 WEST FIRST STREET
ROSWELL,NM 88201-0000
4. TOLES COMPANY (WORKING INTEREST OWNER)
P O BOX 1300
ROSWELL,NM 88202-1300
5. XTO ENERGY INC. AN EXXONMOBIL SUBSIDIARY (WORKING INTEREST OWNER)
22777 SPRINGWOODS VILLAGE PKWAY, #115
SPRING, TX 77389
6. SHARBRO ENERGY LLC (WORKING INTEREST OWNER)
P O BOX 840
ARTESIA,NM 88211-0840
7. EOG RESOURCES, INC. (WORKING INTEREST OWNER)
5509 CHAMPIONS DR.
MIDLAND, TX 79706

Sincerely,

EOG Resources, Inc.

Matthew Gray

Matthew Gray
Landman



Jordan Lee Kessler
Phone: (432) 488-6108
Email: jordan_kessler@eogresources.com

March 16, 2022

VIA CERTIFIED MAIL

TO: ALL AFFECTED PERSONS

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Ruthless 11 Fed Com No. 509H well in the E/2E/2 of Sections 11 and 14, Township 25 South, Range 32 East, NMPM, 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:

Matthew Gray
EOG Resources, Inc.
(432) 686-3633
Matthew_gray@eogresources.com

Very truly yours,

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

Jordan Kessler
Senior Regulatory Advisor

March 11, 2022

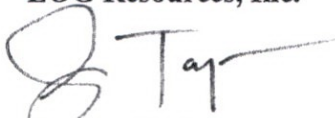
Re: EOG Resources, Inc. NSL Application
Ruthless 11 Fed Com #509H (Well)
E/2 E/2 Section 11 & E/2 E/2 Section 14, T25S-R32E
Lea County, New Mexico

To Whom it may concern:

Considering the distance between wells in the development plan for the Second Bone Spring formation in Sections 11 & 14, T25S-R32E, EOG believes the non-standard location is necessary to develop the Second Bone Spring resource in an economic fashion. The non-standard location also reflects the as-drilled location of the well. Based on analog Second Bone Spring wells along with geologic analysis, EOG believes placing the well at this location maintains optimal spacing to continue development of resources in the formation. Granting the exception will allow for more total production from the section and more efficient development of the asset therefore protecting correlative rights.

Sincerely

EOG Resources, Inc.



Graham Taylor
Reservoir Engineer II

Exhibit E