State of New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez

Governor

David Martin
Cabinet Secretary

Brett F. Woods, Ph.D. Deputy Cabinet Secretary Jami Bailey, Division Director Oil Conservation Division



December 4, 2014

COG OPERATING LLC Attn: Ms. Melanie Parker

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL-7190 Administrative Application Reference No. pMAM1429455297

COG Operating LLC OGRID 229137 Wild Cap State Well No. 8H API No. 30-015-42720

Proposed Location:

	Footages	Unit	Sec.	Twsp	Range	County_
Surface	190 FSL & 1300 FWL	M	36	19S	31E	Eddy
Penetration Point	541 FSL & 1300 FWL	M	36	19S	31E	Eddy
Terminus	330 FNL & 1300 FWL	D	36	19S	31E	Eddy

Proposed Project Area:

Description	Acres	Pool	Pool Code
W/2 W/2 of Section 36	160	WC Williams Sink; Bone Spring	97650

Reference is made to your application received on October 21, 2014.

You have requested to drill this horizontal well at an unorthodox oil well location described above in the referenced pool or formation. This location is governed by statewide Rule 19.15.15.9.A NMAC, which provides for 40-acre units, with wells located at least 330 feet from a unit outer boundary, and Rule 19.15.16.14.B(2) NMAC concerning directional wells in designated project areas. This surface location is outside the project area, and is permitted by Rule 19.15.16.15.B (4) NMAC which allows for surface locations outside project area. This location is unorthodox because portions of the proposed completed interval are closer to outside boundaries of the proposed project area than any location that would be a standard location under the applicable pool rules.

Your application has been duly filed under the provisions of Division Rules 19.15.15.13 NMAC and 19.15.4.12.A(2) NMAC.

It is our understanding that you are seeking this location, because the well is an increased density test in a developed area where engineering study shows the older offsetting wells do not appear to have been stimulated sufficiently to drain the reservoir.

It is also understood that you have given due notice of this application to all operators or owners who are "affected persons," as defined in Rule 19.15.4.12 A (2) NMAC, in all adjoining units towards which the proposed location encroaches.

Pursuant to the authority conferred by Division Rule 19.15.15.13 (B) NMAC, the above-described unorthodox location is hereby approved.

The above approvals are subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 19.15.5.9 NMAC.

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on December 4, 2014

Jami Bailey Director

JB/mam

cc: New Mexico Oil Conservation Division – Artesia New Mexico State Land Office – Oil, Gas, and Minerals Bureau of Land Management - Carlsbad