12/08/2014

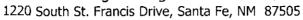
WS L

PMAM1434229695

ABOVE THIS LINE FOR DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION

- Engineering Bureau -





ADMINISTRATIVE APPLICATION CHECKLIST

| Т | HIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE |
|---------|--|
| Applic | ration Acronyms: [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response] |
| [1] | TYPE OF APPLICATION - Check Those Which Apply for [A] [A] Location - Spacing Unit - Simultaneous Dedication NSL NSP SD |
| | Check One Only for [B] or [C] [B] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM Pool - Hardin Tank; Bo. [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD IPI EOR PPR Spring 9666 |
| | [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery WFX PMX SWD IPI BOR PPR Spring G61 |
| | [D] Other: Specify |
| [2] | NOTIFICATION REQUIRED TO: - Check Those Which Apply, or □ Does Not Apply [A] □ Working, Royalty or Overriding Royalty Interest Owners |
| | [B] Offset Operators, Leaseholders or Surface Owner |
| | [C] Application is One Which Requires Published Legal Notice |
| | [D] Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office |
| | [E] For all of the above, Proof of Notification or Publication is Attached, and/or, |
| | [F] Waivers are Attached |
| [3] | SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE. |
| | CERTIFICATION: I hereby certify that the information submitted with this application for administrative val is accurate and complete to the best of my knowledge. I also understand that no action will be taken on this ation 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. |
| | Larson Attorney 12-05-2014 |
| Print o | Type Name Signature Title Date |
| | glarson@hinklelawfirm.com e-mail Address |



HINKLE SHANOR LLP

ATTORNEYS AT LAW
PO BOX 2068
SANTA FE, NEW MEXICO 87504
505-982-4554 (FAX) 505-982-8623

WRITER:

Gary W. Larson, Partner glarson@hinkielawfirm.com

December 5, 2014

VIA HAND DELIVERY

Scott Dawson Oil Conservation Division 1220 South Saint Francis Drive Santa Fe, NM 87505

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for the Bulldawg 33 Fed #602H Well to be located in Sections 28

and 33, Township 25 South, Range 34 East, N.M.P.M., Lea County

Dear Scott:

On behalf of EOG Resources, Inc. ("EOG") (OGRID No. 7377), this is to request administrative approval of an unorthodox well location for EOG's Bulldawg 33 Fed #602H horizontal well. EOG anticipates that it will complete the well within the Hardin Tank; Bone Spring Pool (Pool Code 96661) to test the 3rd Bone Spring formation underlying the E/2 E/2 of Section 28, Township 25 South, Range 34 East, N.M.P.M., in Lea County.

This well will be drilled from a surface location 320 feet from the North line and 880 feet from the East line in Section 33, Township 25 South, Range 34 East to a bottom hole location 230 feet from the North line and 1,260 feet from the East line in Section 28, Township 25 South, Range 34 East. Because this acreage is governed by the Division's statewide rules providing that wells are to be located no closer than 330 feet from the outer boundary of the spacing unit, the completed interval of EOG's well will be unorthodox. The Division's approval of the unorthodox completed interval for the well will serve the interests of preventing waste and improving well performance.

Enclosed are the following documents:

- 1. Exhibit A: The Well Location and Acreage Dedication Plat (Form C-102);
- 2. Exhibit B: A land plat showing the proposed Bulldawg 33 Fed #602H Well in relation to the adjoining units;

- 3. Exhibit C: A list of affected persons; and
- 4. The Division's Administrative Application Checklist.

EOG owns 100% of the leasehold interests and operating rights in all of the spacing units located to the north, east, and west of its proposed well, while Devon Energy Production Co., LP ("Devon") owns 100% of the leasehold interests in the spacing units located to the south. A complete copy of this application with all attachments has been sent by certified mail this date to Devon and to the Bureau of Land Management advising them that, if they object to EOG's application, they must file a written objection with the Division within twenty (20) days from the date the Division received this application.

Thank you for your attention to this matter.

Very truly yours,

Gary W. Larson

Enclosures

<u>District 1</u>
1625 N. French Dr., Hobbs, NM 88240
Phonic (575) 393-6161 Fax: (575) 393-0720
<u>District II</u>
811 S. First St., Artesia, NM 88210

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., Sante 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.
Sante 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

API Number

Property Code

Property Name
BULLDAWG 33 FED

OGRID No.

Operator Name
EOG RESOURCES, INC.

WELL LOCATION AND ACREAGE DEDICATION PLAT

Well Number

Well Number

Well Number

Well Number

Well Number

Well Number

BULLDAWG 33 FED

Operator Name

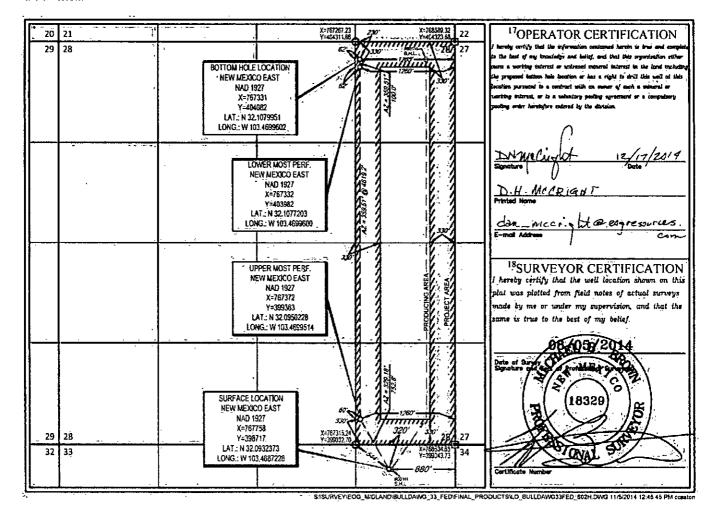
Selevation

3327'

10 Surface Location East/West line UL or lot no. North/South lin Feet from the Feet from the Section Township Lot Ida 33 25-S 320 NORTH 880' EAST LEA A

| UL or lot no. | Section 28 | Township 25-S | Range 34-E | Lot Ida | Feet from the 230° | North/South line NORTH | Feet from the | Enst/West line EAST | County LEA |
|---|--------------------------|---------------|------------------|----------|--------------------|------------------------|---------------|--|---------------|
| ¹² Dedicated Acres 160.00 | ¹³ Joint or l | infill 14Co | asolidation Code | 13 Order | · Na | <i>,</i> | | ······································ | • |

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.



McMillan, Michael, EMNRD

From: Dan McCright <Dan_McCright@eogresources.com>

Sent: Friday, December 19, 2014 2:50 PM

To: McMillan, Michael, EMNRD; GARY W. LARSON (GLARSON@HINKLELAWFIRM.COM)

Subject: EOG's Bulldawg 33 Fed 601H non-standard location application **Attachments:** ECOPY_2015-HP_SMTP_via_LDAP_12-19-2014_15-14-17.pdf

Mr. McMillan & Mr. Larson: Addressing in order the points raised in Mr. McMillan's email of December 8, as well as my telephone conversations with both of you today, please be advised of the following:

a) The uppermost perforation point for the captioned well is 330' FSL & 1260' FEL of Section 28, and the lowermost perforation point is 330' FNL & 1260' FEL of Section 28, all in T25S, R34E, Lea Co., NM;

b) A scan of a signed C-102 for the captioned well is attached;

c) EOG is applying for a non-standard location order for this well in order to prevent waste, protect correlative rights and to prevent the drilling of unnecessary wells;

d) My understanding is that the application was hand-delivered to the OCD on December 5, 2014. Mr. Larson, please confirm.

I hope the foregoing answers Mr. McMillan's points in a satisfactory manner. I will be out of the office on Monday and Tuesday, December 22 & 23rd, but will have cell phone and email available if any questions arise.

In the event we don't speak before next Thursday, best wishes to both of you and your families for a wonderful holiday season.

D.H. McCright.

432-686-3741 (off)

432-686-3770 (fax)

432-254-7274 (mob)

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| V.E. SALACO DRAW (DP) UNIT SOHIO (OPER) | - 33 U.S. | Mitchell Ener 12 - 1 - 2003 92200 4700 EX. B |

List of Affected Persons

Devon Energy Production Co., LP ATTN: Permian Land Manager 333 W. Sheridan Oklahoma City, OK 73102-5010

Bureau of Land Management 620 E. Green Street Carlsbad, NM 88220

McMillan, Michael, EMNRD

From:

Kautz, Paul, EMNRD

Sent:

Monday, December 08, 2014 1:56 PM

To:

McMillan, Michael, EMNRD

Subject:

RE: EOG Resources, Inc. Bulldawg 33 Federal 602H Pool

Mike,

HARDIN TANK; BONE SPRING [96661]

Paul

From: McMillan, Michael, EMNRD

Sent: Monday, December 08, 2014 12:07 PM

To: Kautz, Paul, EMNRD

Subject: EOG Resources, Inc. Bulldawg 33 Federal 602H Pool

Paul:

Can you tell me the pool for EOG Resources, Inc. Bulldawg 33 Federal 602H

Surface: Sec. 33 T25S R34E

Project Area: E/2 E/2 Sec. 28 T 25S R34E

EOG attorney said it was in the Hardin Tank; Bone Spring Pool code 96661

Thanks Mike