

ABOVE THIS LINE FOR DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - 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

**Application 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
- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
 WFX  PMX  SWD  IPI  EOR  PPR
- [D] Other: Specify \_\_\_\_\_

NSL 1453  
 - EOL RESOURCES, Inc  
 7377  
 2016 AUG - 1 P 3:21  
 RECEIVED OGD

- [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

LEI  
 - KITTLESON  
 2876 d con # 704  
 30-025-42876  
 Pod  
 - WC-0256-09  
 526332705  
 UPRC  
 WLFCAmp  
 9(04)

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[4] **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

*Jordan L. Kessler*  
 Signature

Attorney  
 Title

8/1/16  
 Date

jlkessler@hollandhart.com  
 e-mail Address

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., 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

|  |  |   |  |                        |  |
|--|--|---|--|------------------------|--|
| <sup>1</sup> API Number<br><b>30-025-42876</b> |  | <sup>2</sup> Pool Code<br><b>98097</b>                      |  | <sup>3</sup> Pool Name |  |
| <sup>4</sup> Property Code                     |  | <sup>5</sup> Property Name<br><b>RATTLESNAKE 28 FED COM</b> |  |                        | <sup>6</sup> Well Number<br><b>#704H</b> |
| <sup>7</sup> OGRID No.<br><b>7377</b>          |  | <sup>8</sup> Operator Name<br><b>EOG RESOURCES, INC.</b>    |  |                        | <sup>9</sup> Elevation<br><b>3245'</b>   |

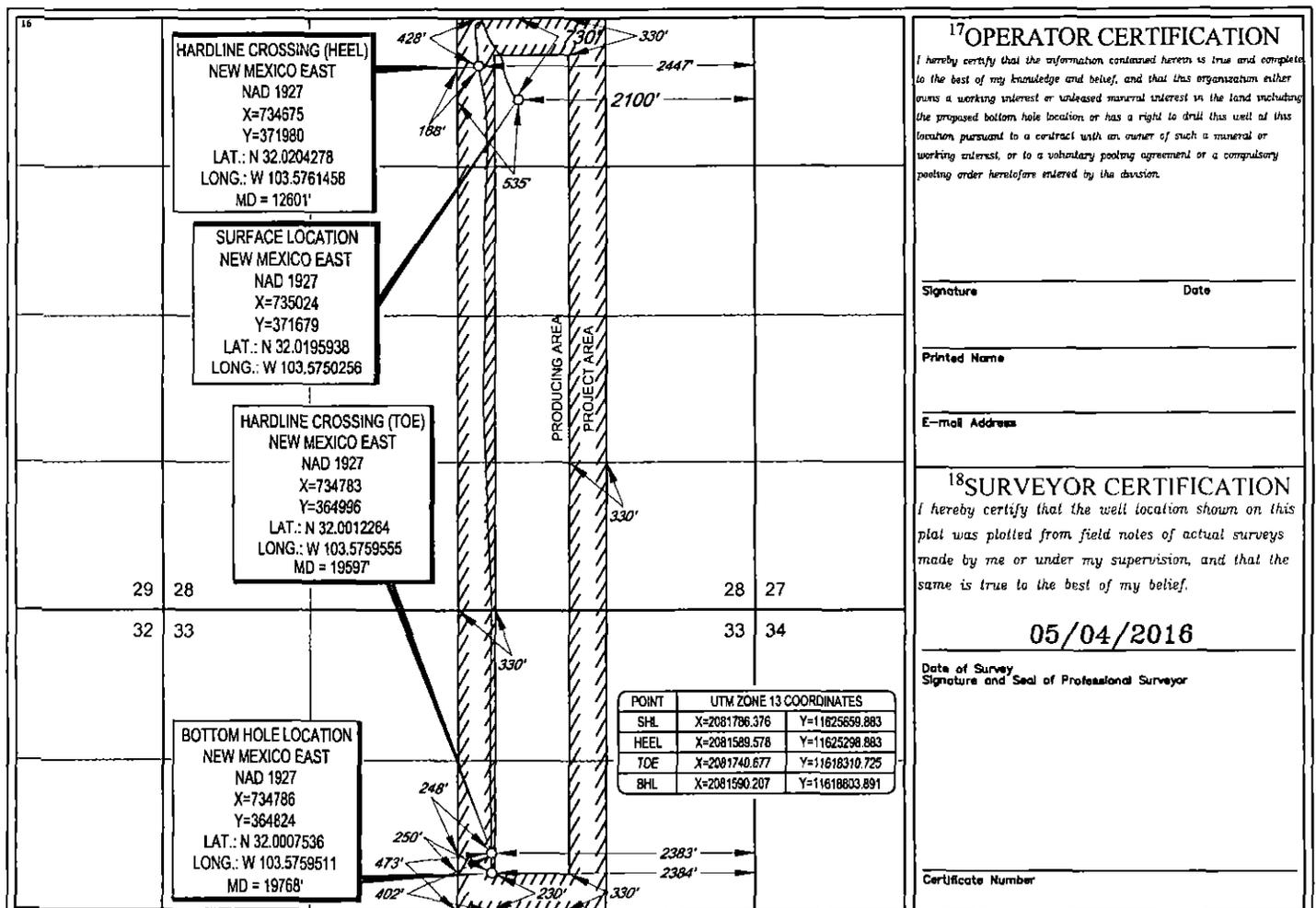
<sup>10</sup>Surface Location

| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| B             | 28      | 26-S     | 33-E  | -       | 730'          | NORTH            | 2100'         | EAST           | LEA    |

| UL or lot no. | Section | Township | Range | Lot Idn | Feet from the | North/South line | Feet from the | East/West line | County |
|---------------|---------|----------|-------|---------|---------------|------------------|---------------|----------------|--------|
| G             | 33      | 26-S     | 33-E  | -       | 230'          | SOUTH            | 2384'         | EAST           | LEA    |

|  |                               |                                  |                         |
|--|-------------------------------|----------------------------------|-------------------------|
| <sup>12</sup> Dedicated Acres<br><b>236.03</b> | <sup>13</sup> Joint or Infill | <sup>14</sup> Consolidation Code | <sup>15</sup> Order No. |
|--|-------------------------------|----------------------------------|-------------------------|

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.



HOLLAND & HART LLP



Jordan L. Kessler  
Associate  
Phone (505) 988-4421  
Fax (505) 983-6043  
jkessler@hollandhart.com

August 1, 2016

**VIA HAND DELIVERY**

David Catanach  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

2016 AUG - 1 P 3:22  
RECEIVED OGD

**Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox well location for its Rattlesnake 28 Fed Com No. 704H Well in the W/2 E/2 of Section 28 and the W/2 E/2 of Section 33, Township 26 South, Range 33 East, N.M.P.M., Lea County, New Mexico.**

Dear Mr. Catanach:

EOG Resources, Inc. (OGRID No. 7377) seeks administrative approval of an unorthodox well location for its **Rattlesnake 28 Fed Com No. 704H Well** to be completed within the WC-025 G-09: S263327G; Upper Wolfcamp Pool (Pool Code 98097) underlying Section 28 and irregular Section 33, Township 26 South, Range 33 East, N.M.P.M., Lea County, New Mexico. This well will be drilled from a surface location 730 feet from the North line and 2,100 feet from the East line (Unit B) of Section 28. The upper most perforation will be located 428 feet from North line and 2,447 feet from the East line (Unit B) of Section 28 and the lower most perforation will be 396 feet from the South line and 2,384 feet from the <sup>ESSP</sup> West line of irregular Section 33 (Unit G). Section 33 is along the Texas border and is an irregular section. Since this acreage is governed by the Division's statewide rules which provides for wells to be located no closer than 330 feet to the outer boundary of the spacing unit, the completed interval for this well will be unorthodox because it is closer than 330 feet to the western boundary of the project area. Approval of the unorthodox completed interval will allow for efficient spacing of horizontal wells and thereby prevent waste.

**Exhibit A** is an as-drilled plat for the **Rattlesnake 28 Fed Com No. 704H Well** which shows that the completed interval encroaches on the spacing and proration unit to the West.

**Exhibit B** is a land plat for Sections 28 and 33 and the surrounding sections that shows the **Rattlesnake 28 Fed Com No. 704H Well** in relation to adjoining units and existing wells.

Holland & Hart LLP

Phone [505] 988-4421 Fax [505] 983-6043 www.hollandhart.com

110 North Guadalupe Suite 1 Santa Fe, New Mexico 87501 Mailing Address P.O. Box 2208 Santa Fe, NM 87504-2208

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C. ☉

HOLLAND & HART<sup>LLP</sup>



EOG is the operator of the well in the E/2 W/2 of Section 28 and the E/2 W/2 of Section 33. The working interest owners are identical to those in the spacing unit for the **Rattlesnake 28 Fed Com No. 704H Well**. Accordingly, there are no parties affected by the encroachment to the West. Nonetheless, a copy of this application has been provided to the Bureau of Land Management-Carlsbad Field Office.

Your attention to this matter is appreciated.

Sincerely,

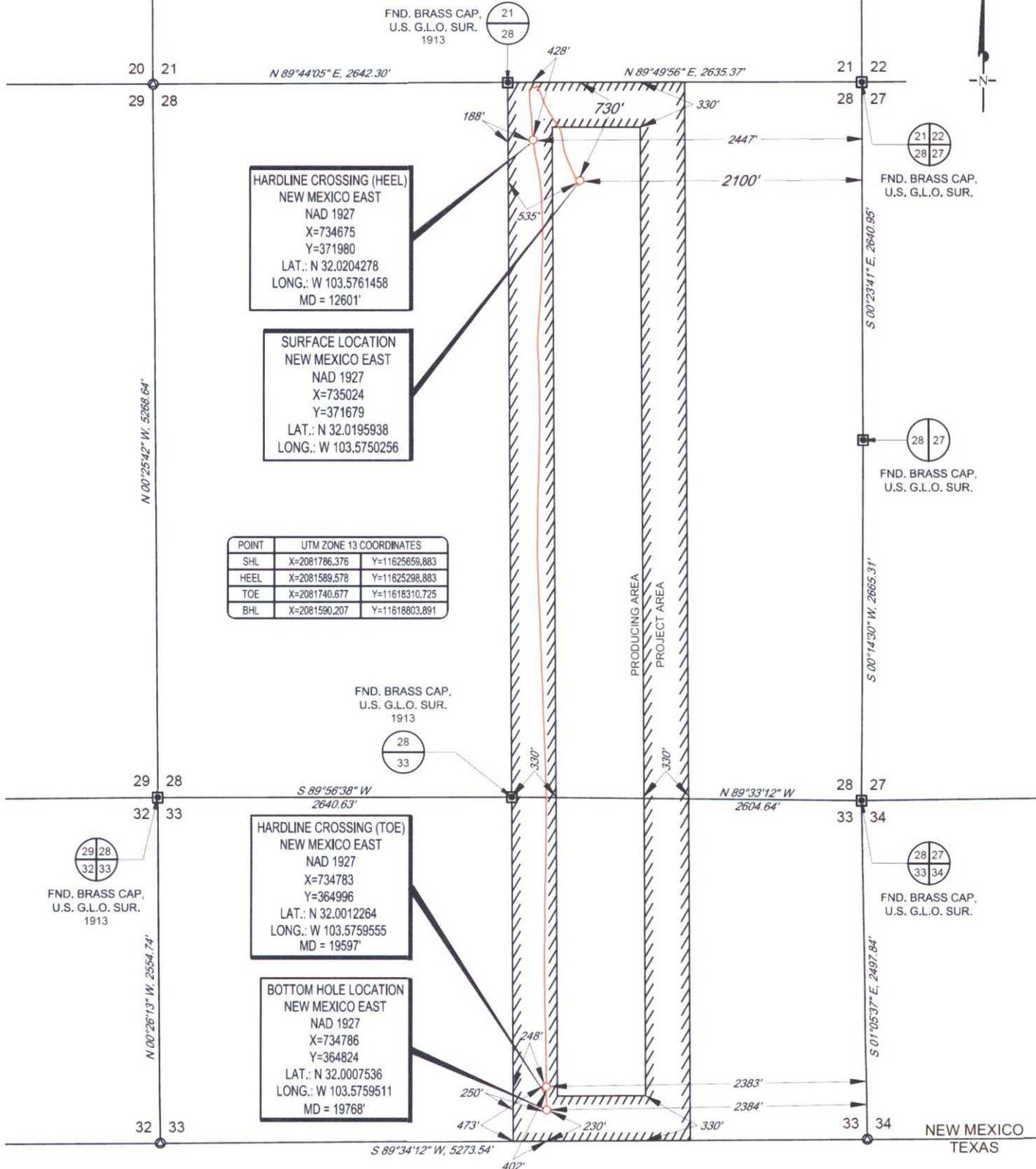
Jordan L. Kessler

**ATTORNEY FOR EOG RESOURCES, INC.**

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

SCALE: 1" = 1000'  
0' 500' 1000'

SECTION 28, TOWNSHIP 26-S, RANGE 33-E, N.M.P.M.  
LEA COUNTY, NEW MEXICO



**HARDLINE CROSSING (HEEL)**  
NEW MEXICO EAST  
NAD 1927  
X=734675  
Y=371980  
LAT.: N 32.0204278  
LONG.: W 103.5761458  
MD = 12601'

**SURFACE LOCATION**  
NEW MEXICO EAST  
NAD 1927  
X=735024  
Y=371679  
LAT.: N 32.0195938  
LONG.: W 103.5750256

| POINT | UTM ZONE 13 COORDINATES |                |
|-------|-------------------------|----------------|
| SHL   | X=2081786.376           | Y=11625659.883 |
| HEEL  | X=2081589.578           | Y=11625298.883 |
| TOE   | X=2081740.677           | Y=11618310.725 |
| BHL   | X=2081590.207           | Y=11618803.891 |

**HARDLINE CROSSING (TOE)**  
NEW MEXICO EAST  
NAD 1927  
X=734783  
Y=364996  
LAT.: N 32.0012264  
LONG.: W 103.5759555  
MD = 19597'

**BOTTOM HOLE LOCATION**  
NEW MEXICO EAST  
NAD 1927  
X=734786  
Y=364824  
LAT.: N 32.0007536  
LONG.: W 103.5759511  
MD = 19768'

LEASE NAME & WELL NO.: RATTLESNAKE 28 FED COM #704H  
SECTION 28 TWP 26-S RGE 33-E SURVEY N.M.P.M.  
COUNTY LEA STATE NM ELEVATION 3245'  
DESCRIPTION 730' FNL & 2100' FEL

**TOPOGRAPHIC**  
LOYALTY INNOVATION LEGACY  
1400 EVERMAN PARKWAY, Ste. 197 • FT. WORTH, TEXAS 76140  
TELEPHONE: (817) 744-7512 • FAX (817) 744-7548  
2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705  
TELEPHONE: (432) 882-1653 OR (800) 767-1653 • FAX (432) 882-1743  
WWW.TOPOGRAPHIC.COM

**MICHAEL B. BROWN**  
NEW MEXICO  
18329  
PROFESSIONAL SURVEYOR

Michael Blake Brown, P.S. No. 18329  
JULY 25, 2016



|   |           |
|---|-----------|
| RATTLESNAKE 28<br>FED COM #704H<br>PRE-COMPLETION | REVISION: |
| DATE: 07/25/16                                    |           |
| FILE: C:\RATTLESNAKE28\FEDCOM_704H_REV2           |           |
| DRAWN BY: A.C.C.                                  |           |
| SHEET: 1 OF 1                                     |           |

NOTES:  
1. ORIGINAL DOCUMENT SIZE: 8.5" X 14"  
2. ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREIN ARE GRID BASED UPON THE NEW MEXICO STATE PLANE COORDINATE SYSTEM, EAST ZONE, U.S. SURVEY FEET, NORTH AMERICAN DATUM 19 27.  
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**  
tabbles  
**A**



## McMillan, Michael, EMNRD

---

**From:** Jordan L. Kessler <JLKessler@hollandhart.com>  
**Sent:** Tuesday, August 23, 2016 11:13 AM  
**To:** McMillan, Michael, EMNRD  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H  
**Attachments:** C\_RATTLESNAKE28FEDCOM\_704H\_REV2.pdf

Please note that I sent you the incorrect "as-drilled" plat earlier. I apologize. The correct version is attached.

You are correct—the bottom hole location is 230 FSL and 2384 FWL.

---

**From:** McMillan, Michael, EMNRD [mailto:Michael.McMillan@state.nm.us]  
**Sent:** Tuesday, August 23, 2016 11:09 AM  
**To:** Jordan L. Kessler  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

Is the BHL 230FSL and 2384 FEL?

---

**From:** Jordan L. Kessler [mailto:JLKessler@hollandhart.com]  
**Sent:** Tuesday, August 23, 2016 9:59 AM  
**To:** McMillan, Michael, EMNRD  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

Will do, thanks!

---

**From:** McMillan, Michael, EMNRD [mailto:Michael.McMillan@state.nm.us]  
**Sent:** Tuesday, August 23, 2016 9:58 AM  
**To:** Jordan L. Kessler  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

Have EOG update the C-102 with the updated perfs-EOG does not have to have it signed by a licensed surveyor.  
Mike

---

**From:** Jordan L. Kessler [mailto:JLKessler@hollandhart.com]  
**Sent:** Tuesday, August 23, 2016 9:57 AM  
**To:** McMillan, Michael, EMNRD  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

The project area is correct, but not the perf point.

---

**From:** McMillan, Michael, EMNRD [mailto:Michael.McMillan@state.nm.us]  
**Sent:** Tuesday, August 23, 2016 9:55 AM  
**To:** Jordan L. Kessler  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

EOG will need to update the C-102 to reflect the project area  
Mike

---

**From:** Jordan L. Kessler [<mailto:JLKessler@hollandhart.com>]  
**Sent:** Tuesday, August 23, 2016 9:53 AM  
**To:** McMillan, Michael, EMNRD  
**Subject:** RE: EOG Resources rattlesnake 28 Federal com Well NO. 704H

Mike,

The footage in my letter, which is the same footage shown in the as-drilled plat (attached, and also attached to the original application) is correct. The C-102 was submitted prior to drilling. If necessary, it can be updated to reflect the actual perf points.

Thanks,  
Jordan

---

**From:** McMillan, Michael, EMNRD [<mailto:Michael.McMillan@state.nm.us>]  
**Sent:** Tuesday, August 23, 2016 9:48 AM  
**To:** Jordan L. Kessler  
**Subject:** EOG Resources rattlesnake 28 Federal com Well NO. 704H

Jordan:

Can you verify the perforated interval for the EOG Resources rattlesnake 28 Federal com Well NO. 704H?

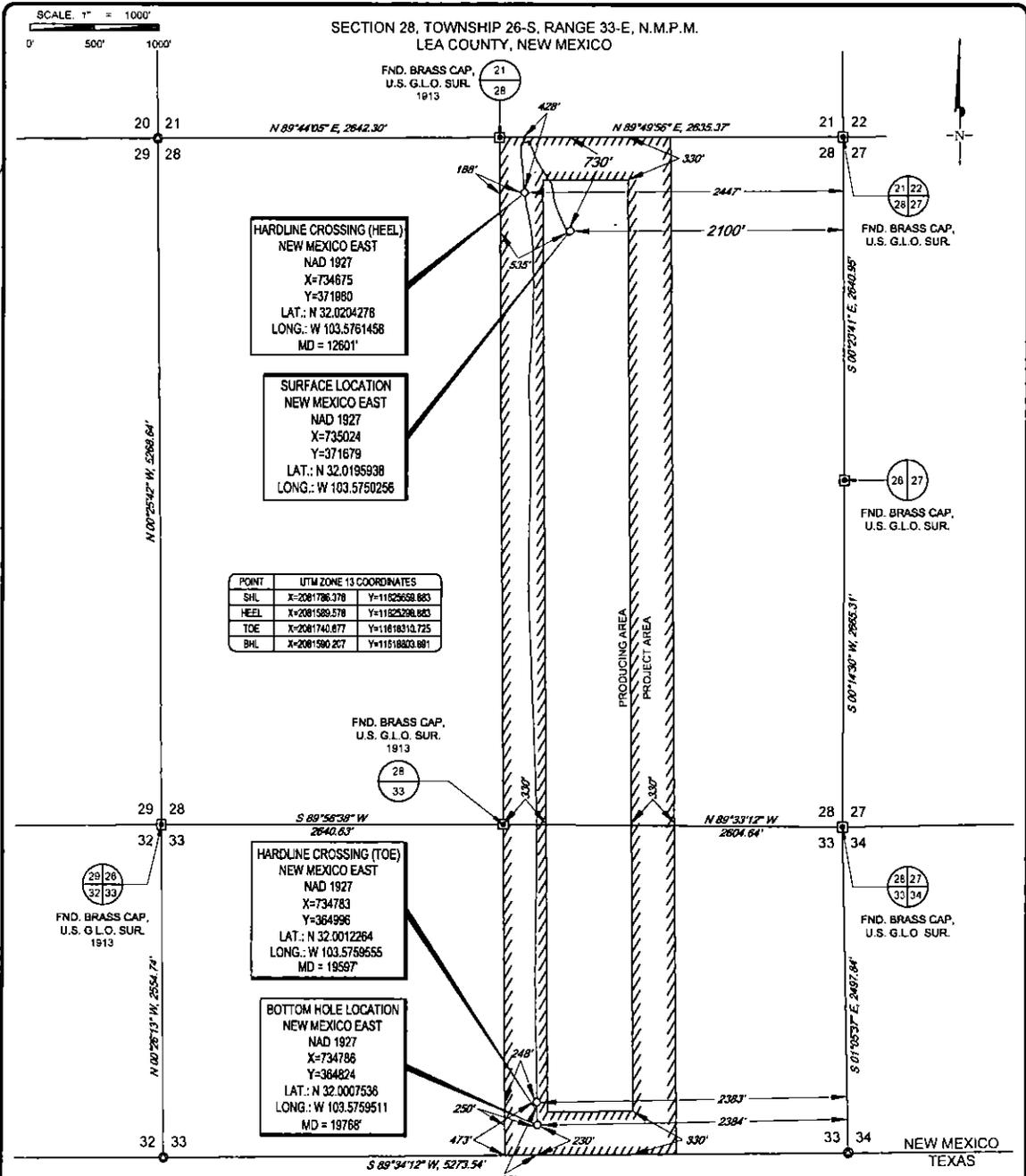
The C-102 shows a project area of the W/2 E/2 of Section 28 and Section 33 T 26S R33E.

The C-102 shows the final perforation 330 FSL AND 2404 FEL. Your letter states 330 FSL and 2384FWI

Thanks

Mike

*Common Well*



**HARDLINE CROSSING (HEEL)**  
 NEW MEXICO EAST  
 NAD 1927  
 X=734675  
 Y=371880  
 LAT.: N 32.0204278  
 LONG.: W 103.5761458  
 MD = 12601'

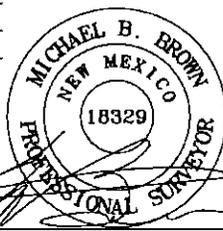
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 NEW MEXICO EAST  
 NAD 1927  
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 LONG.: W 103.5750256

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| HEEL  | X=2081589.578           | Y=11523298.883 |
| TOE   | X=2081740.877           | Y=11618313.725 |
| BHL   | X=2081590.257           | Y=11518803.881 |

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 NEW MEXICO EAST  
 NAD 1927  
 X=734783  
 Y=364996  
 LAT.: N 32.0012264  
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**BOTTOM HOLE LOCATION**  
 NEW MEXICO EAST  
 NAD 1927  
 X=734786  
 Y=364824  
 LAT.: N 32.0007536  
 LONG.: W 103.5759511  
 MD = 19768'

LEASE NAME & WELL NO.: RATTLESNAKE 28 FED COM #704H  
 SECTION 28 TWP. 26-S RGE. 33-E SURVEY N.M.P.M.  
 COUNTY LEA STATE NM ELEVATION 3245'  
 DESCRIPTION 730' FNL & 2100' FEL



Michael Blake Brown, P.S. No. 18329  
 JULY 25, 2016

**TOPOGRAPHIC**  
 LOYALTY INNOVATION LEGACY

1400 EVERMAN PARKWAY, Ste 197 - FT. WORTH, TEXAS 76140  
 TELEPHONE: (817) 744-7012 • FAX (817) 744-7546  
 2503 NORTH HIG SPRING • MIDLAND, TEXAS 79705  
 TELEPHONE: (432) 662-1953 OR (800) 767-1853 • FAX (432) 682-1743  
 WWW.TOPOGRAPHIC.COM

**eg resources, Inc.**

| RATTLESNAKE 28<br>FED COM #704H<br>PRE-COMPLETION |                                  | REVISION: |
|---|----------------------------------|-----------|
| DATE:   | 07/25/16                         |           |
| FILE:   | C:\RATTLESNAKE28FEDCOM_704H_REV2 |           |
| DRAWN BY:   | A.C.C.                           |           |
| SHEET:  | 1 OF 1                           |           |

**NOTES**  
 1. ORIGINAL DOCUMENT SIZE 8 1/2" X 11"  
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 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.

**Lowe, Leonard, EMNRD**

---

**From:** Lowe, Leonard, EMNRD  
**Sent:** Thursday, September 1, 2016 11:51 AM  
**To:** 'Jordan L. Kessler'  
**Cc:** Brown, Maxey G, EMNRD; Kautz, Paul, EMNRD; McMillan, Michael, EMNRD; Goetze, Phillip, EMNRD; Jones, William V, EMNRD; 'lisa@rwbyram.com'; 'jglover@blm.gov'; 'scaffey@blm.gov'; 'jstovall@blm.gov'  
**Subject:** APPROVED: NSL-7453\_Rattlesnake 28 Federal Com Well No. 704H\_Sec 28 26S 33E  
**Importance:** High

Ms. Jordan L. Kessler,

The following permit has been issued and will soon be available on the Division's web site:  
<http://ocdimage.emnrd.state.nm.us/imaging/WellFileCriteria.aspx>

**NSL-7453**

EOG Resources Inc.

API: 30-025-42876

WELL: Rattlesnake 28 Federal Com Well No. **704H**, Lea County

**Leonard Lowe**

Engineering Bureau

Oil Conservation Division

Energy Minerals and Natural Resources Department

1220 South St. Frances

Santa Fe, New Mexico 87004

Office: 505-476-3492

Fax: 505-476-3462

E-mail: [leonard.lowe@state.nm.us](mailto:leonard.lowe@state.nm.us)

Website: <http://www.emnrd.state.nm.us/ocd/>