				Revised March 23, 2017 32,542
RECEIVED: 10/19/17	REVIEWER: LRL	TYPE: NSP	APP NO: 1729	2300
	NEW MEXICO OI - Geological & 220 South St. Francis ADMINISTRATIVI ST IS MANDATORY FOR ALL ADMIN REGULATIONS WHICH REQUIRE P	Engineering Bui Drive, Santa Fe E APPLICATION	DN DIVISION reau – , NM 87505 CHECKLIST FOR EXCEPTIONS TO DIV	VISION RULES AND
oplicant: COG PRODUC	FION LLC			lumber: 217995
ell Name: COPPERHEAD			API: 30-015	And the second
OI: PURPLE SAGE; WOLFC	AMP (GAS)		Pool Cod	e: 98220
TYPE OF APPLICATION A. Location – Spor INSL B. Check one on [1] Commingl IDHC [1] Injection – WFX NOTIFICATION REQ A. Offset oper B. Royalty, ov C. Application D. Notification For all of the H. No notice r	DN: Check those which icing Unit – Simultaneo INSP(PROJECT AR IV for [1] or [11] ing – Storage – Measur CTB PLC Disposal – Pressure Inc PMX SWD UIRED TO: Check those ators or lease holders erriding royalty owners nerduires published no and/or concurrent ap and/or concurrent ap ner e above, proof of notified equired	ement PC DLS ement PC DLS crease - Enhance IPI EOR which apply. , revenue owners tice proval by SLO oproval by BLM	RATION UNIT) SD	NSR-2078 FOR OCD ONLY Notice Complete Application Content Complete , and/or,
administrative appr understand that no	ereby certify that the in oval is accurate and c action will be taken of pritted to the Division.	omplete to the b n this application	pest of my knowle until the require	edge. I also d information and
Note: Sta	ement must be completed by		agerial and/or supervis	

Debona d. Elelbourn Signature

575-748-6958 Phone Number

dwilbourn@concho.com e-mail Address



Oil Conservation Division Attention: Mr. Leonard Lowe 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

Re: Application for Non-standard Proration Unit Copperhead 31 Fee #20H API #30-015-44319 SHL: 670' FSL 400' FWL (Lot 2), Sec. 31-T26S-R29E BHL: 1650' FNL 375' FWL (Lot 2), Sec. 19-T26S-R29E Eddy County, New Mexico

Dear Mr. Lowe:

Pursuant to Division Rule 19.15.15.11, COG Operating LLC (COG) respectfully requests administrative approval of a Non-standard Proration Unit and Non-standard Project Area for the Copperhead 31 Fee #20H well. The proposed acreage dedication is less than the Purple Sage; Wolfcamp (gas) pool rules requirement and one spacing unit in the project area contains less than 70% of the required 40 acres. Attached is Form C-102 showing the project and producing areas of this well. The wellbore, as well as first and last take points, fall within the standard location boundaries.

COG is seeking approval of the non-standard unit due to the change of Wolfcamp pool rules in this area. The new Purple Sage; Wolfcamp (gas) pool rules would require an acreage dedication of W/2 of Section 19, the W/2 of Section 30, and the NW/4 of Section 31 (773.10 acres). The factors supporting COG's request for a smaller acreage dedication are as follows:

- COG's existing Copperhead Fee A #4H well is producing from the Purple Sage; Wolfcamp (gas) pool. The spacing unit for this well is the W/2 of Section 31 and the NW/4 of Section 30. Due to the fact COG is including acreage in Section 19 in the wellbore of the proposed Copperhead 31 Fee #20H, it cannot be drilled as an infill well.
- Due to unleased federal mineral acreage in the NW/4NW/4 and E/2SW/4 of Section 19, COG is also unable to dedicate the required acreage under the Purple Sage; Wolfcamp pool (gas) rules in this section.

The affected offset tracts are as follows:

 Township 26 South, Range 29 East

 Section 19:
 NW/4NW/4 (Tract 1)

 E/2NW/4 (Tract 2)
 E/2SW/4 (Tract 3)

 Section 30:
 E/2NW/4 (Tract 4)

 E/2SW/4 (Tract 5)
 Section 31:

CORPORATE ADDRESS

ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701 P432.683.7443 | F432.683.7441 ARTESIA WEST OFFICE

2208 MAIN STREET | ARTESIA. NEW MEXICO 88210 P575.748 6940 | #575.746 2096 August 16, 2017 Oil Conservation Division Page 2

The owners of said tracts have been notified by certified letter of COG's proposed non-standard unit. The notice letters advise the owners that in the event they have an objection to COG's application, they must

file a written letter of objection with the Division within twenty (20) days from the date the Division receives the application.

Thank you for your consideration of this application. Should you have questions or require further information, please contact me at 575-748-6958 or by email at <u>dwilbourn@concho.com</u>.

Sincerely,

Debora L. Vililbourn

Debora L, Wilbourn Regulatory Analyst

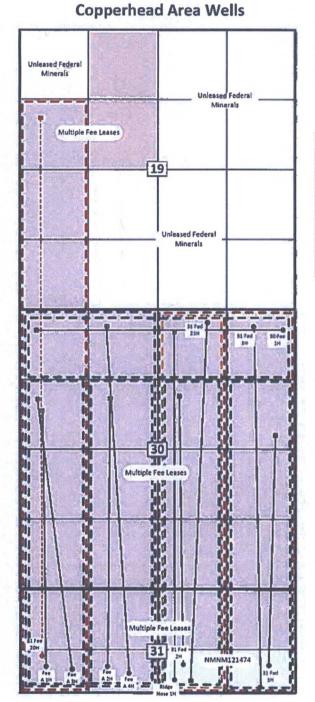
Enclosures cc: OCD Artesia DISTRICT II 011 6. FIRST ST., ARTESIA, NM 86210 Phone: (676) 748-1283 Paz; (675) 745-9720 DISTRICT III 1000 RIO BRAZOS RD., AZTEC, NM 87418 Phone: (805) 334-8178 Fax: (805) 334-8170 DISTRICT IV

DISTRICT I State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 SOUTH ST. FRANCIS DR. Santa Fe, New Mexico 87505

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

O AMENDED REPORT

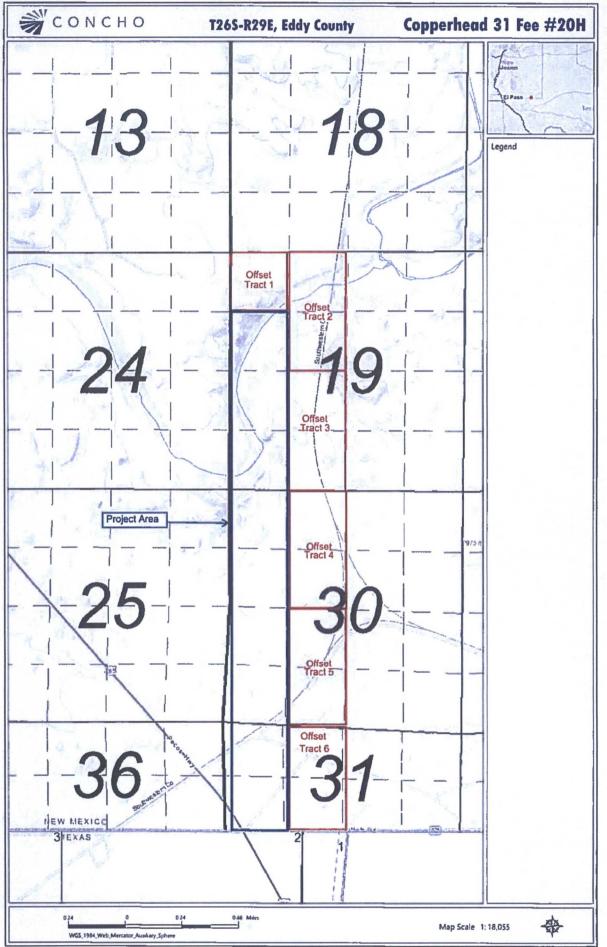
API Number		WELL LOCATION AND ACREAGE DEDICATION		Pool Name					
30-015-44319			98220			ple Sage; Wolf	ble Sage; Wolfcamp		
Property				001	Property Nan			Well Nun	
318350	and the local day of the local day is a second day of the local day of the		COPPERHEAD 31 FEE				20H		
OGRID No. 229137		4	COG OPERATING, LLC					Elevation 2928.7'	
					Surface Loc	ation			
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
2	31	26-S	29-E		670	SOUTH	400	WEST	EDDY
			Bottom	Hole Loc	cation If Diffe	erent From Sur	face		
UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
2	19	26-S	29-E		1650	NORTH	375	WEST	EDDY
Dedicated Acre	s Joint c	or Infill Co	nsolidation (Code Or	der No.			I	
343.26									
the second se	WARLE I	TILL BE A	SSIGNED	TO THIS	COMPLETION I	UNTIL ALL INTER	FSTS HAVE BI	FEN CONSOLID	TED
NO ADDO						APPROVED BY			AIED
	7 <u>5426.6 N</u> 34658.8 E	3757	TR LOT 2	Y=375434. X=635977. NAD 83 M PROPOSED BU	O E		or unleased in including the or bas a right location pursu owner of such or to a volunt.	certify that the init and complete to the and bellef, and their liber owns a working liber owns a working to drill this well at ant to a contract win mineral or working ary pooling agreeme.	t interest e land le location t this ith an interest, nt or a
X=6. 1780'	34658.8 E LTP FNL & 375' f =32.030488 h =104.030969' 3	w III	39.85 Ac	X=635977. NAD 83 M PROPOSED BI HOLE LOCA HOLE LOCA LOCA X=635036. LAT.=32.0308 LONG.=104.030 SER	0 E ME <u>DTFOM</u> <u>TTON</u> 2 N 5 E 45' N		owner of such or to a voluat computerr point by the division Signature Debora L. Printed Nam dwilbourni E-mail Addrei	mineral or working sr pooling streeme. bing order beretofor wilbourn wilbourn wilconcho.com se DR CERTIFICAT	to enterest. at or s re entered teg/16/
X=6. 1780' (AT. LONG. SUR Ya X: X: LAT.	34658.8 E LTP FNL & 375' f =32.030488 h =104.030969' 3	M M M TOL 2 V	39.85 Ac LOT 2 39.61 Ac 39.61 Ac 1007 2 39.61 Ac 1007 2 30.61 Ac 1007 2 1007 2 100	X=635977. NAD 83 N PROPOSED B HOLE LOCAL Y=375091. X=635036. LAT.=32.0308 LONG.= 104.030 SER SER SER SER SER SER SER SER	0 E IME <u>DTTOM</u> <u>TTOM</u> 5 E 145' N 1966' W 		owner of such or to a voluat computary point by the division Signature Debora L. Printed Nam dwilbourn E-mail Addres SURVEYO I hereby shown on this notes of actua under my supe true and corre M	mineral or working ary pooling agreeme. Ding order heretofou Da Wilbourn te Concho.com B Concho.com CERTIFICAT certify that the me plat was plotted fro I survey made by t prizion, and that th of to the best of m AY 1, 2017 Date of Survey iseal of Professional D L. HARCPOR	Tionerest, at or a re entered (autor tes/16/ Tion Tion Tion Tion Tion Tion Supression a same in y belief.



行行的财产生

Volfcamp Wells 312 112 Copperhead Fee A 4H – Prpl Sage Copperhead 31 Fed Com 2H – NSP Copperhead Fed Com 21H – NSP Copperhead 31 Fee 20H - NSP

Sec. 19, 30, 31-T26S-R29E Eddy County, NM



a.

Copperhead 31 Fee #20H – NSP Application Mailing List

Offset Tracts 1 & 3

Lot 1 and E/2 SW/4, Section 19-T26S-R29E

UNLEASED FEDERAL LANDS: Bureau of Land Management 301 Dinosaur Trail Santa Fe, NM 87508 Receipt # - 7016 0910 0000 2654 6283



E/2 NW/4, Section 19-T26S-R29E

MINERAL INTEREST OWNERS: Delaware Ranch, Inc. 1304 W. Riverside Drive Carlsbad, NM 88220 Receipt # - 7016 0910 0000 2654 6320

Pardue Limited Company, LLC PO Box 2018 Carlsbad, NM 88221 Receipt # - 7016 0910 0000 2654 6375

Edwin H. Fowlkes, Jr. Aka Trey Fowlkes PO Box 23416 Waco, TX 76702 Receipt # - 7016 2070 0000 8090 8961

Kathleen Fowlkes Moller Box 516 Springville, UT 84663 Receipt # - 7016 2070 0000 8090 9067

Christopher Clegg Fowlkes 404 Glenosa Dr El Paso, TX 79928 Receipt # - 7016 2070 0000 8090 8954

Christine Speidel Fowlkes 404 Glenosa Dr El Paso, TX 79928 Receipt # - 7016 2070 0000 8090 8879

Frank Blow Fowlkes 316 Granada Ave El Paso, TX 79912 Receipt # - 7016 2070 0000 8090 8886 Maco Stewart Fowlkes 7915 Fairdale Lane Houston, TX 77063 Receipt # - 7016 2070 0000 8090 8923

John M. Fowlkes PO Box 1470 Marfa, TX 79843 Receipt # - 7016 2070 0000 8090 8909

Estate of Marian Fowlkes Minniece 3014 Virginia Street Houston, TX 77098 Receipt # - 7016 0910 0000 2654 6337

J.M. Fowlkes, Jr. 1801 Madison St Pecos, TX 79772 Receipt # - 7016 2070 0000 8090 8893

Lauren Fowlkes 2048 Timberline Dr Naples, FL 34109 Receipt # - 7016 2070 0000 8090 8916

NVMR Trust #1 Nancy A. Donley, Trustee 2506 Wilderness Hill San Antonio, TX 78231 Receipt # - 7016 0910 0000 2654 6351

Preston L. Fowlkes PO Box 966 Marfa, TX 79843 Receipt # - 7016 2070 0000 8090 8947

Patrick K. Fowlkes PO Box 658 Marfa, TX 79843 Receipt # - 7016 2070 0000 8090 8930

Daniel Vlosich, Trustee of the Daniel Vlosich Trust 104 Twin Lakes Circle Umatilla, FL 32784 Receipt # - 7016 0910 0000 2654 6313

Sonia Scott 2250 S Emerson Place Chandler, AZ 85286 Receipt # - 7016 2070 0000 8090 9098 Russell Parchman and Barbara B. Parchman, Trustees of the Russell Carver Parchman and Barbara Bratton Parchman Trust 8040 Frankford Road #317 Dallas, TX 75252 Receipt # - 7016 0910 0000 2654 6382

Penny Harrison 2101 Brooklake West Denton, TX 76207 Receipt # - 7016 2070 0000 8090 8978

Linda Tenberg 500 Egger Cove Round Rock, TX 78664 Receipt # - 7016 2070 0000 8090 9111

Mark A. Parchman 7 Cordella Place The Woodlands, TX 77382 Receipt # - 7016 2070 0000 8090 9074

LEASEHOLD ESTATE: MRC Permian Company One Lincoln Centre Ste 1500 5400 LBJ Freeway Dallas, TX 75240 Receipt # - 7016 0910 0000 2654 6344

Beacon E&P Resources LLC 1600 Broadway, Ste 1800 Denver, CO 80202 Receipt # - 7016 0910 0000 2654 6269

Black Mountain Operating LLC 500 Main St., Suite 500 Ft. Worth, TX 76102 Receipt # - 7016 0910 0000 2654 6276

OVERRIDING ROYALTY INTERESTS: R. F. Fort PO Box 65043 Lubbock, TX 79464 Receipt # - 7016 2070 0000 8090 8862

Madison M. Hinkle PO Box 2292 Roswell, NM 88202 Receipt # - 7016 2070 0000 8090 8985 Judy Kathryn Mann PO Box 53191 Lubbock, TX 79453 Receipt # - 7016 2070 0000 8090 9012

Reba Cargile PO Box 421 Crosbyton, TX 79322 Receipt # - 7016 0910 0000 2654 6467

LEASEHOLD ESTATE:

Chevron U.S.A., Inc. (NE/4 NW/4) 15 Smith Road Midland, TX 79705 Receipt # - 7016 0910 0000 2654 6306

OXY USA Inc. (SE/4 NW/4) 5 Greenway Plaza, Suite 110 Houston, TX 77046 Receipt # - 7016 0910 0000 2654 6368

Offset Tract

E/2 SW/4 Section 30, T26S-R29E

MINERAL INTEREST OWNERS: Shirley Smith McCoy 1309 S. Waco Street Weatherford, TX 76086 Receipt # - 7016 2070 0000 8090 9029

Dwayne Keith Blue 4105 Bluffpoint Road Rowlett, TX 75088 Receipt # - 7016 0910 0000 2654 6429

Michael Wayne Blue 5976 State Highway 323 W Henderson, TX 75652 Receipt # - 7016 0910 0000 2654 6436

Nanette Blue Weghorst 1745 Plummer Drive Rockwall, TX 75087 Receipt # - 7016 2070 0000 8090 9135

Laura Jean Peek 1315 Clear Meadow Rockwall, TX 75087 Receipt # - 7016 2070 0000 8090 9081 LeeAnn Blue Anderson 1425 High Meadow Drive Royse City, TX 75189 Receipt # - 7016 0910 0000 2654 6412

LEASEHOLD ESTATE:

OXY USA Inc. 5 Greenway Plaza, Suite 110 Houston, TX 77046 Receipt # - 7016 0910 0000 2654 6368

Offset Tract

NE/4 NW/4 and Lot 3 Section 19, T26S-R29E

MINERAL INTEREST OWNERS:

West Penn Consulting LLC PO Box 11148 Midland, TX 79702 Receipt # - 7016 0910 0000 2654 6405

Charles R. Wiggins 110 N. Marienfeld Suite 160 Midland, TX 79701 Receipt # - 7016 2070 0000 8090 9142

Carmex Inc. PO Box 1718 Carlsbad, NM 88221 Receipt # - 7016 0910 0000 2654 6290

Marsha Lynn McGahey 5400 Hopper Rd Burleson, TX 76028 Receipt # - 7016 2070 0000 8090 9036

Richard M. Hullett 14525 Highway 6 Eastland, TX 76448 Receipt # - 7016 2070 0000 8090 9005

Sandra Hullett Melton 3618 60th St Lubbock, TX 79413 Receipt # - 7016 2070 0000 8090 9043

Louise Ferguson PO Box 626 Eastland, TX 76448 Receipt # - 7016 2070 0000 8090 8855 Vicki Woods Trust Mary Louise Ferguson, Trustee 1011 West 14th Cisco, TX 76437 Receipt # - 7016 0910 0000 2654 6399

LEASEHOLD ESTATE:

OXY USA Inc. 5 Greenway Plaza, Suite 110 Houston, TX 77046 Receipt # - 7016 0910 0000 2654 6368 Rolla R. Hinkle 303 Coal Drive Ruidoso, NM 88345 Receipt # - 7016 2070 0000 8090 8992



E/2 NW/4, Section 3-T26S-R29E

MINERAL INTEREST OWNERS:

Offset Tract

Lon C. Colvin Box 683 Lockney, TX 79241 Receipt # - 7016 0910 0000 2654 6474

Terry Brewer PO Box 41 Lockney, TX 79421 Receipt # - 7016 0910 0000 2654 6450

Dianne Brewer PO Box 388 Lockney, TX 79241 Receipt # - 7016 0910 0000 2654 6443

Marie Colvin, for life PO Box 254 Childress, TX 79201 Receipt # - 7016 0910 0000 2654 6481

Jo Beth Ware 3605 Grandview Plainview, TX 79072 Receipt # - 7016 2070 0000 8090 9128

Janice Simmons Mitchell 800 West Main St Crosbyton, TX 79322 Receipt # - 7016 2070 0000 8090 9050

Ruby Simmons Dewbre 307 S. Ayrshire St Crosbyton, TX 79322 Receipt # - 7016 2070 0000 8090 8848

David Clyde Simmons 1081 CR 119 Lorenzo, TX 79343 Receipt # - 7016 2070 0000 8090 9104



August 16, 2017

Certified Mail – Return Receipt Request 7016 0910 0000 2654 6283

Bureau of Land Management 301 Dinosaur Trail Santa Fe, NM 87508

Re: Application for Non-standard Proration Unit Copperhead 31 Fee #20H API #30-015-44319 SHL: 670' FSL 400' FWL (Lot 2), Sec. 31-T26S-R29E BHL: 1650' FNL 375' FWL (Lot 2), Sec. 19-T26S-R29E Eddy County, New Mexico

Gentlemen:

Attached is a copy of COG Operating LLC's (COG)'s Application for a Non-standard Proration Unit and Non-standard Project Area under the Copperhead 31 Fee #20H well, the SHL of which is located in Sec. 31-T26S-R29E, Eddy County, New Mexico. You are being provided a copy of this Application per OCD's requirement to notify the interest owners of the affected offset acreage. If you have any objection to this Application, notification should be given within 20 days of OCD's receipt of the application.

COG is seeking approval of the non-standard unit due to the change of Wolfcamp pool rules in this area. The new Purple Sage; Wolfcamp (gas) pool rules require an acreage dedication of the W/2 of Section 19, the W/2 of Section 30, and the NW/4 of Section 31 (773.10 acres). The factors supporting COG's request for a smaller acreage dedication are as follows:

- COG's existing Copperhead Fee A #4H well is producing from the Purple Sage; Wolfcamp (gas) pool. The spacing unit for this well is the W/2 of Section 31 and the NW/4 of Section 30. Due to the fact COG is including acreage in Section 19 in the wellbore of the proposed Copperhead 31 Fee #20H, it cannot be drilled as an infill well.
- Due to unleased federal mineral acreage in the NW/4NW/4 and E/2SW/4 of Section 19, COG is also unable to dedicate the required acreage under the Purple Sage; Wolfcamp pool (gas) rules in this section.

If you have any questions regarding this application, please contact Ashley Roush (432) 818-2358 or Ryan Owen at (432) 818-2327 or by email at <u>aroush@concho.com</u> or <u>rowen@concho.com</u>.

Sincerely,

ebora L. Zelelbourn

Debora L. Wilbourn Regulatory Analyst Enclosures

CORPORATE ADDRESS ONE CONCHO CENTER | 600 WEST ILLINOIS AVENUE | MIDLAND, TEXAS 79701 P432.683 7443 | F432.683 7441 ARTESIA WEST OFFICE

2208 MAIN STREET | ARTESIA, NEW MEXICO 88210 P575 748.6940 | **F**575 746 2096