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 APPLICATION SFOR EXCEPTIONS TO DIVISION RULES AND REGULA WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE Application Acronyms: [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unk] [SD-Simultaneous Dedication] [PC-Pool Commingling] [CIS - OfL-Lease Storage] [OLM-Off-Lease Measurement] [NFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Sait Water Disposal] [IPI-Injection Pressure Increase] [COR-Qualified Enhanced Di Recovery Certification] [PPR-Pool Cells of Response] [] TYPE OF APPLICATION - Check Those Which Apply for [A] [A] Location - Spacing Unit - Simultaneous Dedication [] MFX Water Disposal - Pressure Increase - Enhanced Oil Recovery [] MFX [] PMX [] SWD [] PI [] EOR [] PPR [] Other: Specify	30. March. 07 DATE IN	SUSPENSE	W. JOACS	02. April. 07	NST TYPE	PCLP0700 APPNO.	229651
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[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. WILLIAM F. CAPE Print or Type Name Signature Signature Milliam Attronce Signature Signature Milliam Attronce Signature Signat



William F. Carr wcarr@hollandhart.com

March 30, 2007

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HAND-DELIVERED

Mark E. Fesmire, P.E. Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Drive Santa Fe, New Mexico 87505

DRAPER MILL (96392)

Re: Application of EOG Resources, Inc. for administrative approval of an unorthodox bottomhole well location for its Ochoa Federal Well No. 1 which has been re-entered and recompleted as a horizontal wellbore in the Red-Hills-Bone Spring/Pool in Section 15, Township 25 South, Range 33 East, N.M.P.M. from a surface location 1979 feet from the North and East lines to a bottomhole location 1444 feet from the South line and 858 feet from the West line of said Section 15, Lea County, New Mexico.

Dear Mr. Fesmire:

EOG Resources, Inc. ("EOG") hereby seeks administrative approval pursuant to the provisions of Division Rule 104 F (2)-(4) adopted on August 12, 1999, of an unorthodox bottomhole well location for its Ochoa Federal Well No. 1 that has been re-entered and drilled from a surface location 1979 feet from the North and East lines of Section 15, Township 25 South, Range 33 East, N.M.P.M., Lea County, New Mexico. The well was drilled in 1985 to test the Morrow formation at a standard gas well location. By approved Form C-102, dated December 5, 2006, EOG was authorized to plug back this well and drill a southwest trending lateral in the Third Bone Spring Sand. The approved Project Area for this horizontal well was comprised of the SW/4 NE/4, SE/4 NW/4, N/2 SW/4 and the SW/4 SW/4 of Section 15. The proposed lateral was to be drilled to a standard bottomhole location 990 feet from the South line and 330 feet from the West line of Section 15.

This well did not reach its projected bottomhole location due to wellbore conditions and the mechanical risks involved in continuing to drill to the original approved location. The terminus of the lateral wellbore is at a point 1444 feet from the South line and 858 feet from the West line of the section. Since the producing interval in the well does not develop or traverse the SW/4 SW/4 of Section 15, it does not qualify for inclusion in the Project Area for the well under Division Rule 111 and will have to be contracted to exclude the SW/4 SW/4 of the section. When the Project Area is amended, the bottomhole location for the well will be too close to and encroaches on the outer boundary of the Project Area.

Holland & Hart LLP

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

110 North Guadalupe Suite 1 Santa Fe, NM 87501 Mailing Address P.O. Box 2208 Santa Fe, NM 87504-2208 Aspen Billings Boise Boulder Cheyenne Colorado Springs Denver Denver Tech Center Jackson Hole Salt Lake City Santa Fe Washington, D.C. 🙃

HOLLAND&HART

This location in the Bone Spring formation is unorthodox because it is governed by the Division's statewide rules which provide for wells on 40-acre spacing units to be located no closer than 330 feet to

the outer boundary of the quarter-quarter section on which the well is located and no closer than 10 feet to any quarter-quarter section line or subdivision inner boundary. The proposed unorthodox well location is only 124 feet from an southern boundary of the dedicated horizontal well Project Area and therefore 206 feet too close to the South line of the dedicated Project Area.

Exhibit A is a copy of the original approved Form C-102 for the well.

Exhibit B is an amended C-102 for the well showing the revised Project Area for the well and the location of the wellbore. This form will be filed after the location for the well is approved.

Exhibit C is a plat which shows the subject area and the 160-acre spacing unit/project area comprised of the SW/4 NE/4, SE/4 NW/4, and the N/2 SW/4 of Section 15. The project area includes two federal leases. ExxonMobil Exploration Company owns an overriding royalty interest in the W/2 of the Section and therefore its ownership percentage is slightly larger in the SW/4 SW/4 than in the total Project Area for this well. No other interest owners other than ExxonMobil and EOG is affected by this override. Since the new bottomhole location encroaches on offsetting acreage to the southwest, a copy of this application, including a copy of the plat described above has been sent to ExxonMobile, the only affected interest owner in this offsetting spacing unit by certified mail-return receipt requested in accordance with Rule 1207 (A)(5). ExxonMobile has been advised that if they have an objection to this application it must be filed in writing with the Division's Santa Fe office within twenty days from the date this notice was sent. There are no other affected parties to whom notice of this application must be provided.

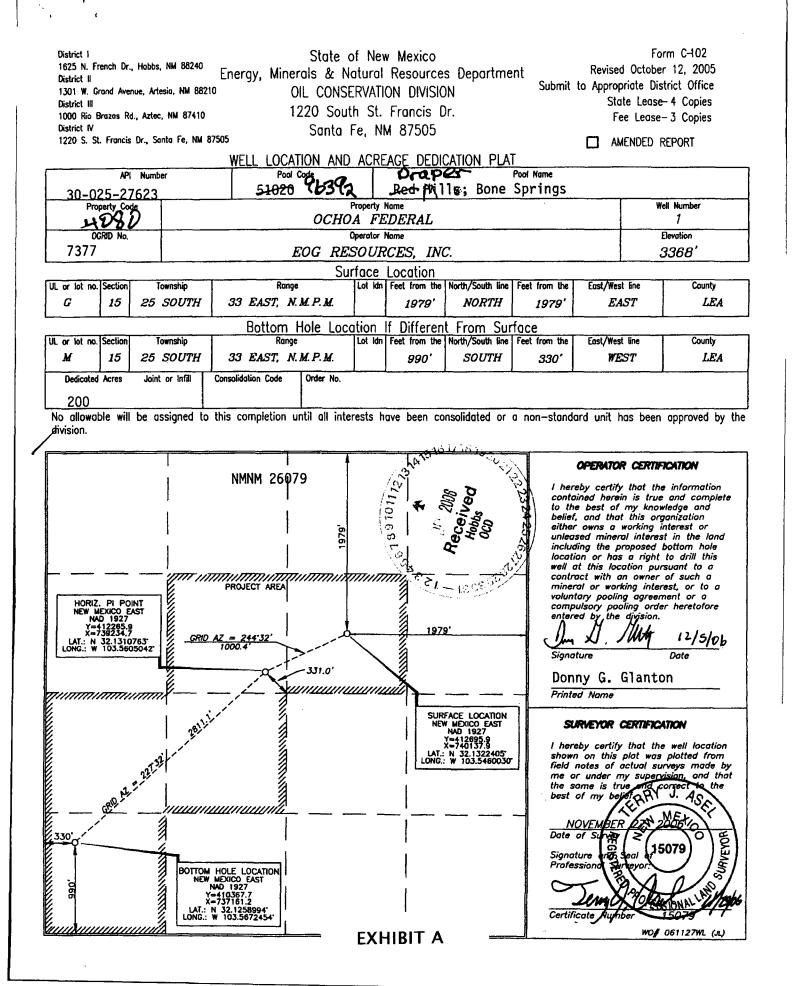
Enclosed in hard copy and disc is a proposed administrative order of the Division.

Your attention to this application is appreciated.

William F. Carr Attorney for EOG Resources, Inc.

Enclosures

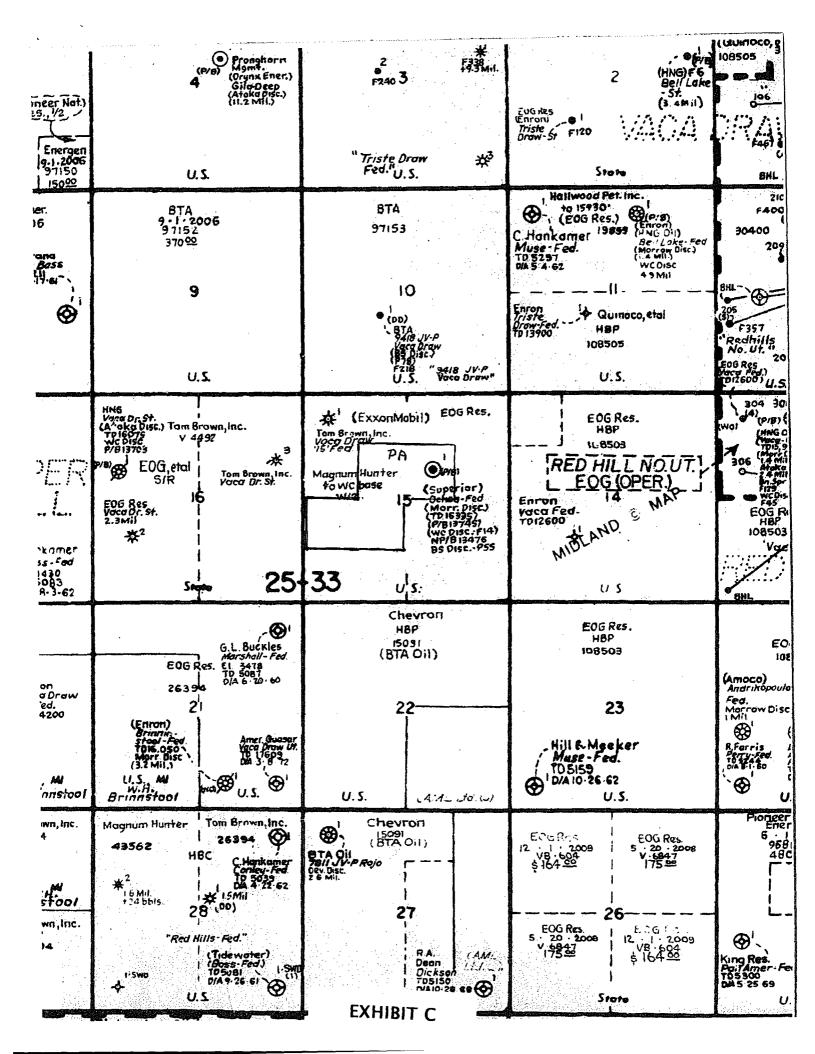
cc: Doug Hurlbut, Landman EOG Resources, Inc. Post Office Box 2267 Midland, Texas 79702



District 1 1625 N. French Dr., F District ff 1301 W. Grand Avenue District N 1000 Rio Brazos Rd., Oistrict N 1220 S. St. Francis D	e, Artesia, I Aztec, NM	E NM 88210 87410	() 1 5	erals & No DIL CONSE 220 South Santa f	atural RVATIO h St. Fe, NN	DN DIVISIC Francis C 1 87505		Submit	to Appropr State Fee	October iate Distr e Leas e-	4 Copies 3 Copies
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EXHIBIT B



EOG Resources, Inc. Post Office Box 2267 Midland, Texas 79705

Attention: Doug Hurlbut

Administrative Order NSL-____

Dear Mr. Hurlbut:

Reference is made to your application dated March 5, 2007 for an unorthodox bottomhole well location for a well to be re-entered and drilled to the Third Bone Springs Sand formation, Red Hills-Bone Spring Pool, for your Ochoa Federal Well No. 1 which has been re-entered and recompleted as a horizontal wellbore in the Red Hills-Bone Spring Pool in Section 15, Township 25 South, Range 33 East, N.M.P.M. from a surface location 1979 feet from the North and East lines to a bottomhole location 1444 feet from the South line and 858 feet from the West line of the section, Lea County, New Mexico.

A 160-acre horizontal well Project Area in the Bone Spring formation comprised of the SW/4 NE/4, SE/4 NW/4, and the N/2 SW/4 of Section 15 is to be dedicated to said well.

By authority granted me under the provisions of Rule 104.F(2) of the General Rules and Regulations of the New Mexico Oil Conservation Division ("Division"), revised by Division Order No. R-10533, issued by the New Mexico Oil Conservation Commission in Case 11,351 on January 18, 1996, the above-described unorthodox well location is hereby approved.

Sincerely,

Mark E. Fesmire, P. E. Director

cc: Oil Conservation Division - Hobbs/Artesia U. S. Bureau of Land Management - Carlsbad