

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

November 6, 2017

### VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES

Re: Application of RKI Exploration & Production, LLC for administrative approval of a 160-acre non-standard spacing and proration unit in the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Aaron Young **RKI Exploration and Production** (539) 573-3531 Aaron. Young@wpxenergy.com

Jucker Draw 9-4 Jed Com 1H 30-015-44477 Jucker Draw 9-4 Jed Com 2H 30-015-44478 Sincerely, Jucker Draw 9-4 Jed Com 3 H 30-015-44486 Al Ducker Draw 9-4 Jed Com 41 H Jordan L. Kessler ATTORNEY FOR RKI EXPLORATION AND Ducker Draw 9-4 Ded Com 5# **PRODUCTION** 30-015.44488

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 Rillings Pairs Characteristics and Pairs Charac

Ducker Draw 9-4 Jed Com 64 30-015-44479

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REVIEWER:



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- Geological & Engineerin	
1220 South St. Francis Drive, San	ta Fe, NM 87505
ADMINISTRATIVE APPLICAT	TION CHECKLIST
THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLIC REGULATIONS WHICH REQUIRE PROCESSING ATTH	CATIONS FOR EXCEPTIONS TO DIVISION RULES AND IE DIVISION LEVEL IN SANTA FE
Applicant: RKI Exploration & Production, LLC	OGRID Number: 246289
Well Name: Tucker Draw 9-4 Fed Com No. 1H, 2H, 3H, 4H, 5H, 6H, and 7H We	API:
Pool: Purple Sage; Wolfcamp Gas Pool	Pool Code: 98220
SUBMIT ACCURATE AND COMPLETE INFORMATION REQU	IRED TO PROCESS THE TYPE OF APPLICATION
INDICATED BELO	
B. Check one only for [1] or [11]	SP (PRORATION UNIT) SD
[    ] Injection – Disposal – Pressure Increase – Enh	anced Oil Recovery
2) NOTIFICATION REQUIRED TO: Check those which apply A. Offset operators or lease holders  B. Royalty, overriding royalty owners, revenue over the control of the control o	Notice Complete  Application Content Complete
3) CERTIFICATION: I hereby certify that the information suradministrative approval is accurate and complete to understand that no action will be taken on this applicant notifications are submitted to the Division.	the best of my knowledge. Lalso
Note: Statement must be completed by an Individual with	n managerial and/or supervisory capacity.
	November 6, 2017
Jordan L. Kessler	November 6, 2017  Date
Print or Type Name	Date
	505-988-4421
An IZ	Phone Number
	jlkessler@hollandhart.com
Signollure	e-mail Address



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

November 6, 2017

### 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

RECEIVED O

Re:

Application of RKI Exploration & Production, LLC for administrative approval of a 160-acre non-standard spacing and proration unit in the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

Dear Mr. Catanach:

Pursuant to Rule 3 of the Special Rules for the Purple Sage-Wolfcamp Gas Pool and NMAC 19.15.15.11.B(2), RKI Exploration & Production, LLC ("RKI") (OGRID 246289) seeks administrative approval of a 160-acre non-standard spacing and proration unit comprised of the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. The proposed non-standard spacing and proration unit will be combined with a standard 320-acre spacing unit in the E/2 of Section 9 to form a 480-acre project area dedicated the following horizontal wells:

- Tucker Draw 9-4 Fed Com No. 1H
- Tucker Draw 9-4 Fed Com No. 2H
- Tucker Draw 9-4 Fed Com No. 3H
- Tucker Draw 9-4 Fed Com No. 4H
- Tucker Draw 9-4 Fed Com No. 5H
- Tucker Draw 9-4 Fed Com No. 6H
- Tucker Draw 9-4 Fed Com No. 7H

These wells will develop the Wolfcamp formation (Purple Sage; Wolfcamp Gas Pool (98220)). Pursuant to the Special Rules for the Purple Sage-Wolfcamp Gas Pool, set forth in Order No. R-14262, wells within the Purple Sage Pool must be spaced on 320-acres. Rule 3 of the Special Rules for Order R-14262 permit exceptions as allowed in Division rules. The Division rule 19.15.15.11.B(2) authorizes administrative approval of non-standard spacing units when the non-standard spacing unit consists of a single quarter-quarter section or lot or quarter-quarter sections or lots joined by a common side and the non-standard spacing unit lies wholly within a

### Holland & Hart LLP

### HOLLAND&HART

single half section if the well is in a pool for which 320 acres is the standard spacing unit size. The proposed non-standard spacing unit consists of adjoining units and is located wholly within a single half-section.

RKI seeks approval of this non-standard spacing unit to most efficiently develop the Wolfcamp in this area. All interest owners within the proposed 480-acre project area, include the proposed non-standard spacing unit, have previously been made aware of RKI's development plan.

**Exhibit A** is a copy of the Well Location and Acreage Dedication Plat (Form C-102) for the seven proposed wells.

**Exhibit B** is a copy showing the proposed wells and the proposed spacing unit in the SE/4 of Section 4 and the E/2 of Section 9. Tracts 1 and 2 are the area affected by the administrative application. The working interest owners, royalty owner, and overriding royalty owners in Tracts 1 and 2 have been provided notice of this application.

**Exhibit C** is a list of parties in Tracts 1 and 2. A copy of this application with all attachments has been sent by certified mail to each affected party advising them that if they have an objection it must be filed in writing with the division within 20 days from the date the division receives this application. A courtesy a copy of this application has also been provided to the Bureau of Land Management-Carlsbad.

Your attention to this matter is appreciated.

Sincerely,

Jordan L. Kessler

ALA

ATTORNEY FOR RKI EXPLORATION AND

PRODUCTION

cc: Bureau of Land Management 620 E. Green Street Carlsbad, NM 88220 7017 1450 0002 8377 5687 District.1
1625 N. French Dr., Hobbs, NM 88240
Phone: (375) 393-6161 Fax: (375) 393-0720
District.II
811 S. First St., Artenia, NM 88210
Pleane: (375) 748-1283 Fax: (575) 748-9720
District.III
1000 Rio Birazos Rond. Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District.IV
1220 S. St. Francis Dr., Sonto Fc, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

12 Dedicated Acres

480.0

13 Joint or Infill

14 Consolidation Code

### State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

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

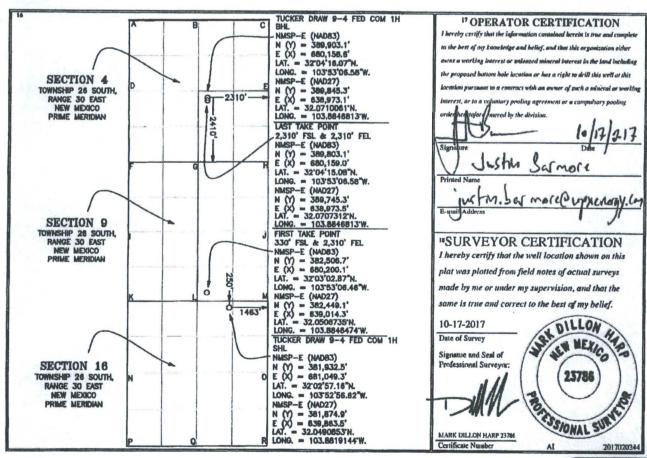
■ AMENDED REPORT

### WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Numbe	r		<sup>2</sup> Pool Code <sup>3</sup> Pool Name           98220         PURPLE SAGE WOLFCAMP (					IP GAS POOL		
<sup>4</sup> Property	Code			TU	<sup>6</sup> Well Number						
7 OGRID 24628				RKI EXP	<sup>8</sup> Operator N LORATION & P.	RODUCTION, LLC		<sup>9</sup> Elevation 3089'			
					" Surface L	ocation					
UL or let no.	Section	Tewnship	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
В	16	26 S	30 E	30 E 250 NORTH 1463					EDDY		
		h.	"Bott	om Hole	Location If	Different From	Surface	**************************************			
UL or lot no.	Section	Townskip	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County		
1	4	26 S	30 E		2410	SOUTH	2310	EAST	EDDY		

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.

Order No.





District 1
1623 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
Pistrict II
811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
District III
1000 Rio Brazios Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francia Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

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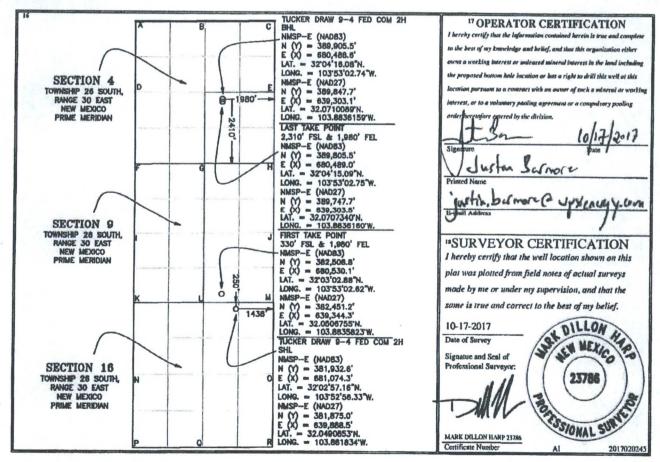
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### WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Nam PURPLE SAGE WOLFO	
<sup>4</sup> Property Code	5 Property TUCKER DRAW	<sup>6</sup> Well Number 2H	
<sup>7</sup> OGRID No. 246289	8 Operator RKI EXPLORATION &	<sup>9</sup> Elevation 3090'	
	" Surface	Location	

UL or let no Rang Section Township Lot Idn Peet from the North/South lin Feet from the East/West lim County B 16 26 S 30 E 250 NORTH 1438 EAST EDDY " Bottom Hole Location If Different From Surface UL or lot no. Section Township Ranes Lot lde Feet from the North/South line Feet from the East/West lin County 26 \$ 30 E 2410 SOUTH 1980 EAST EDDY 12 Dedicated Acres 3 Joint or Infill 15 Order No. <sup>4</sup> Consolidation Code 480.0



District 1
1625 N. French Dr., Hobbs, NM \$8,240
Phone: (375) 393-6161 Fax: (575) 393-0720
District II
811 S. Finst St., Artesia, NM 88210
Phone: (575) 748-1283 Pax: (575) 748-9728
District III
1000 Rio Brazus Road, Azsec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87503
Phone: (505) 476-3460 Fax: (305) 476-3462

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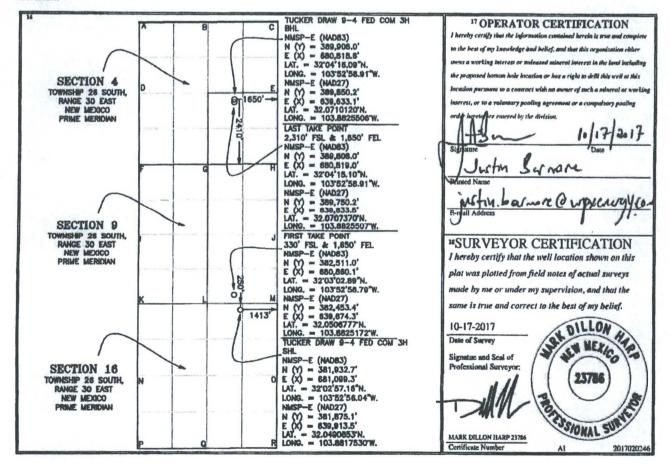
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### WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Nam PURPLE SAGE WOLFO			
<sup>4</sup> Property Code		<sup>5</sup> Property Name TUCKER DRAW 9-4 FED COM			
<sup>7</sup> OGRID No. 246289	<sup>8</sup> Operator RKI EXPLORATION &	9 Elevation 3091'			

Surface Location

UL or lot no. B	Section 16	Township 26 S	Range 30 E	Lot Idn	Feet from the 250	North/South line NORTH	Feet from the 1413	EAST	County EDDY
			" Bott	om Hol	Location If	Different From	Surface		
UL or lot no.	Section 4	Township 26 S	Range 30 E	Lot Idn	Feet from the 2410	North/South line SOUTH	Feet from the	East/West line EAST	County
12 Dedicated Acre 480.0	s 13 Johnt o	InfBl 14 C	ensolidation Ce	de 15 Oro	ler No.	to generally manager			



District 1
1625 N. French Dr., Hobbs, NM 88240
Phann: (575) 393-6161 Fax: (575) 393-0720
District 11
811 S. First St., Arteris, NM 88210
Phann: (575) 748-1283 Fax: (575) 748-9720
District III
1000 Rio Brazos Rond, Azicc, NM 87410
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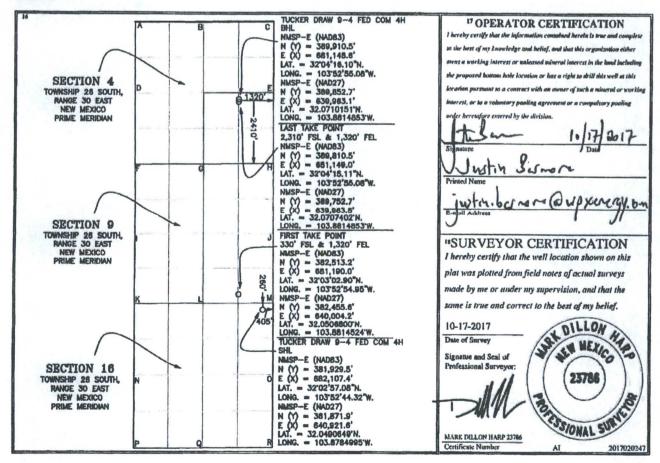
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1	API Numbe	,		<sup>2</sup> Pool Code			<sup>3</sup> Pool Name		
	TES S LYMPHOL	•	1	98220		ED CAR BOOK			
				96220			E SAGE WOLFCA	IMP GAS POOL	
4 Property (	Code				<sup>5</sup> Property No	ame		6 W	eli Number
				T	JCKER DRAW 9-	4 FED COM			4H
7 OGRID I	Vo.			T-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	8 Operator No	Inte		,	Elevation
246289	)			RKI EXI	LORATION & PI	RODUCTION, LLC		-	3103'
	41.				* Surface L	ocation			
UL or let no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
A	16	26 8	30 E		260	NORTH	405	EAST	EDDY
			"Bot	tom Hole	Location If	Different From	Surface		
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
r	4	26 S	30 E		2410	SOUTH	1320	EAST	EDDY
Dedicated Acres 480.0	13 Joint or	r Infill	<sup>4</sup> Consolidation C	ode 15 Ord	ler No.				



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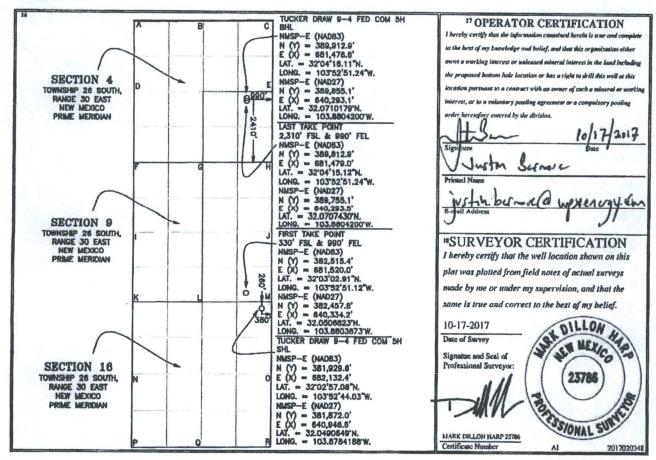
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API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Nas PURPLE SAGE WOLF(		
<sup>4</sup> Property Code	<sup>5</sup> Propert TUCKER DRAW		<sup>6</sup> Well Number 5H	
<sup>7</sup> OGRID No. 246289	RKI EXPLORATION &		9 Elevation 3103'	

Surface Location UL or let no. Section Townshie Rane Let Idn Fast from the North/South lie Feet from the **East/West Im** County 16 A 26 S 30 E 260 NORTH EAST EDDY "Bottom Hole Location If Different From Surface UL or lot no. Section Township Range Lot Ide Feet from the North/South line Feet from the East/West lin County 26 S 30 E 2410 SOUTH 990 EAST **EDDY** 12 Dedicated Acres <sup>13</sup> Joint or Infill Consolidation Code 15 Order No. 480.0



District 1
1625 N. French Dr., Holbis, NM \$8240
Phone: (575) 393-6161 Fex: (575) 393-6720
District II
811 S. First St., Artesie, NM 88210
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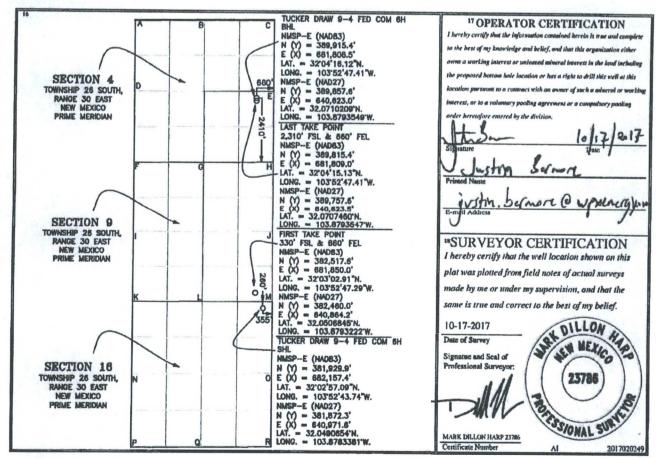
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<sup>1</sup> API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Nat PURPLE SAGE WOLFO	
<sup>4</sup> Property Code	<sup>5</sup> Propert TUCKER DRAW	<sup>6</sup> Well Number 6H	
<sup>7</sup> OGRID No. 246289	RKI EXPLORATION &	<sup>9</sup> Elevation 3103'	
	10 Surface	Location	

UL or let no.	Section 16	Township 26 S	Range 30 E	Lot Idn	Feet from the 260	North/South line NORTH	Feet from the	East/West line EAST	County
			u Bott	om Hole	Location If I	Different From	Surface	and the same of th	
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12 Dedicated Acres 480.0	13 Joint or	Infill 14 C	onsolidation Co	de 15 Orde	r No.				



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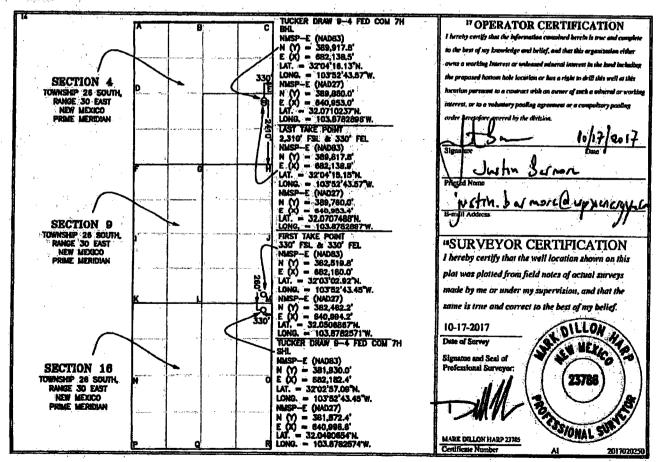
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### WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Numbe	r		Pool Code 98220		PURPLI	<sup>3</sup> Poel Name B SAGE WOLFC			
<sup>4</sup> Property (	Code			TU	Property N CKER DRAW 9	1 12 - 2		6.11	vell Number	
7 OGRID 24628	,			RKI EXPL	Operator NORATION & P	RODUCTION, LLC	*** · · · · · · · · · · · · · · · · · ·	Elevation 3103'		
					<sup>10</sup> Surface L	ocation				
UL or let no.	Section 16	Township 26 S	Range 30 E	Lot Idn	Feet from the 260	North/South tine NORTH	Feet from the	East/West line	County EDDY	
111			" Bott	om Hole	Location If	Different From	Surface	L	and the same	
VI. or lot no. I	Section 4	Township 26 S	Range 30 E	Lot Idn	Feel from the 2410	North/South line SOUTH	Feet from the	East/West line EAST	County EDDY	
11 Dedicated Acres 480,0	13 Joint o	Luffin 14 C	onzolidation Co	de <sup>13</sup> Order	· No.					



32	Tucker Dr	aw Notice F	Plat 34
- <del></del>		· ·	
		Tract 1	
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	Tract 2	· · · · · · · · · · · · · · · · · · ·	
	Eddy	Tucker Draw	(C) 1
	T T S S S S S S S S S S S S S S S S S S	Project Area 480 acres	
	32.00		
8			10
	LEAST STREET,		
			TRANSPORT
i e			
· .		2.894	
			EXHIBIT
			EXHIBIT

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### Exhibit C

### Tract 1

Chevron USA Inc. 6301 Deauville Midland, Texas 79706 7017 1450 0002 1697 1986

Chevron USA Inc. 1400 Smith Street Houston, Texas 77002 7017 1450 0002 1697 2044

CTV O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5540

CTV-LMB I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5557

CTV-LMB II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5564

CTV-CTAM BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5571

CTB-SRB I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5588

CTV-SRB II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5595

Keystone O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6790



Keystone (RMB) BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6783

Keystone (CTAM) BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6776

LMBI O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6769

SRBI O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6752

SRBI I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6745

SRBI II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6738

Thru Line O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6721

BOPCO, L.P. 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6714

Goliad O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6707

WD O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6899 Delbasin Corporation 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6882

BMT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6875

RMB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6868

820 MT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6851

SRBMT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6844

Fine Line O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6837

CMB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6820

TRB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6813

ACB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6806

MBL O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6691 SSB 1193C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6684

PRB II 1993C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6677

RFB 1993C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6660

Capital Partnership O&G, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6653

BEPCO, LP 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6615

Thru Line BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6622

XTO Energy Inc. 810 Houston Street Fort Worth, Texas 76102 7017 1450 0002 1697 6639

801 LLC EOG A Resources Inc EOG M Resources Inc EOG Y Resources Inc 105 S. 4th Street Artesia, New Mexico 88102 7017 1450 0002 1697 6646

EOG A Resources Inc EOG M Resources Inc EOG Y Resources Inc 5509 Champions Drive Midland, Texas 79706 7017 1450 0002 1697 1887