

**State of New Mexico**  
**Energy, Minerals and Natural Resources Department**

**Michelle Lujan Grisham**  
 Governor

**Melanie A. Kenderdine**  
 Cabinet Secretary

**Ben Shelton**  
 Deputy Secretary

**Erin Taylor**  
 Deputy Secretary

**Albert C.S. Chang**  
 Division Director  
 Oil Conservation Division



Sara Guthrie  
[sara\\_guthrie@OXY.com](mailto:sara_guthrie@OXY.com)

**ADMINISTRATIVE NON-STANDARD LOCATION**

**Administrative Order NSL – 9109**

**OXY U.S.A., Inc. [OGRID 16696]**  
**Soro CC 19 30 Federal Com Well No. 12H**  
**API No. 30-015-56485**

Reference is made to your application received on September 3<sup>rd</sup>, 2025.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	415 FSL & 1654 FWL	N	30	24S	29E	Eddy
First Take Point	100 FSL & 1651 FWL	N	30	24S	29E	Eddy
Last Take Point	100 FNL & 1780 FWL	C	19	24S	29E	Eddy
Terminus	50 FNL & 1780 FWL	C	19	24S	29E	Eddy

**Proposed NSL Horizontal Unit**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
E/2 W/2 Section 30	160	Pierce Crossing; Bone Spring, South	96671

You have requested to drill this horizontal well at an unorthodox well location described above in the referenced pool or formation. 19.15.16.15(B)(1)(a) NMAC governs this proposed well and provides that the operator dedicate a horizontal well at a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal well's completed interval penetrates, each of which consists of a governmental quarter - quarter section or equivalent. 19.15.16.15(C)(1)(a) NMAC governs the distance in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit, measured along a line perpendicular to the completed interval or to the tangent thereof, shall be a minimum of 330 feet for an oil well. 19.15.16.15(C)(1)(b) NMAC governs the first and last take point of a horizontal

Administrative Order NSL – 9109  
OXY USA INC.  
Page 2 of 2

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well shall be no closer than 100 feet for a well within the horizontal plane, to any outer boundary of the horizontal spacing unit.

The request to deviate from an orthodox location has met all requirements of 19.15.16.15 (C)(5)(a) NMAC. It is understood that you are seeking this exception in order to create a non-standard location, comprised of Take Points referenced above, within the described Horizontal Spacing Unit.

This well's completed interval is as close as 260 feet to the western edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 30, encroachment to the W/2 W/2

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in 19.15.2.7(A)(8) NMAC, in all adjoining units towards which the proposed location encroaches.

The Division is informed that the entire horizontal spacing unit draws resources from two pools; (1) Pierce Crossing; Bone Spring, South (96671) and the (2) Pierce Crossing; Bone Spring (50371) with a total acreage of 320 acres. The unorthodox location pertains only to the **Pierce Crossing; Bone Spring, South Pool (96671)**. The Division understands you are seeking this unorthodox location due to a deviation of the well resulting of an attempt to manage anti-collision risks to the east with an existing well in the Bonespring formation underlying the E/2 W/2 Section 30. Thereby maximizing recovery of resources and preventing waste within the pool/formation.

Your application has been filed under 19.15.16.15(C)(6) NMAC, 19.15.15.13 NMAC and 19.15.4.12 (A)(2) NMAC.

Per 19.15.15.13 (B) NMAC, **Division approves this unorthodox location.**

Reference this NSL order number on the As Drilled C-102 submitted with the Authorization to Transport, to place this well into production.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as the Division deems necessary.



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**Albert C.S. Chang**  
Division Director  
AC/lrl

Date: 11/10/2025

ID NO. 502545

NSL - 9109

Revised March 23, 2017

RECEIVED: <b>09/03/25</b>	REVIEWER:	TYPE:	APP NO:
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
- Geological & 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

**Applicant:** [OXY USA INC. \(16696\)](#) **OGRID Number:** [16696](#)  
**Well Name:** [SORO CC 19\\_30 FEDERAL COM 12H](#) **API:** [30-015-56485](#)  
**Pool:** [PIERCE CROSSING; BONE SPRING, SOUTH](#) **Pool Code:** [96671](#)

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

**1) TYPE OF APPLICATION:** Check those which apply for [A]

A. Location – Spacing Unit – Simultaneous Dedication

NSL       NSP<sub>(PROJECT AREA)</sub>       NSP<sub>(PRORATION UNIT)</sub>       SD

B. Check one only for [ I ] or [ II ]

[ I ] Commingling – Storage – Measurement

DHC     CTB     PLC     PC     OLS     OLM

[ II ] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery

WFX     PMX     SWD     IPI     EOR     PPR

**2) NOTIFICATION REQUIRED TO:** Check those which apply.

- A.  Offset operators or lease holders
- B.  Royalty, overriding royalty owners, revenue owners
- C.  Application requires published notice
- D.  Notification and/or concurrent approval by SLO
- E.  Notification and/or concurrent approval by BLM
- F.  Surface owner
- G.  For all of the above, proof of notification or publication is attached, and/or,
- H.  No notice required

<b>FOR OCD ONLY</b>	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

**3) 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.

8/5/2025

Date

713-497-2851

Phone Number

sara\_guthrie@oxy.com

e-mail Address

Sara Guthrie

Print or Type Name

Sara Guthrie

Signature



# OXY USA Inc

5 Greenway Plaza, Suite 110  
Houston, TX 77046-0521

September 3, 2025

New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Attention: Leonard Lowe

Re: *Application for Administrative Approval of Non-Standard Location*  
*Soro CC 19\_30 Federal Com 12H – Pierce Crossing; Bone Spring (Section 19); Pierce Crossing; Bone Spring, South (Section 30)*  
*Surface – 415' FSL 1654' FWL Unit N, Sec 30 T24S R29E (Pierce Crossing; Bone Spring, South)*  
*First Take Point – 100' FSL 1651' FWL Unit N, Sec 30 T24S R29E (Pierce Crossing; Bone Spring, South)*  
*Last Take Point – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E (Pierce Crossing; Bone Spring)*  
*Bottom Hole – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E (Pierce Crossing; Bone Spring)*  
*Eddy County, New Mexico*

Dear Mr. Lowe:

OXY USA Inc. respectfully requests administrative approval of a non-standard location on the Soro CC 19\_30 Federal Com #12H well. The #12H well is proposed to be completed in both the Pierce Crossing; Bone Spring & Pierce Crossing; Bone Spring, South pool. However, this application will reference the **Pierce Crossing; Bone Spring, South Pool, Pool Code 96671**. This will be a horizontal well in a pool with no special rules for setback, so the setback requirements under Rule 19.15.15.9 (A) and 19.15.16.15 (B) will apply. The proposed producing interval is projected as follows:

Surface – 415' FSL 1654' FWL Unit N, Sec 30 T24S R29E (Pierce Crossing; Bone Spring, South)  
First Take Point – 100' FSL 1651' FWL Unit N, Sec 30 T24S R29E (Pierce Crossing; Bone Spring, South)  
Last Take Point – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E (Pierce Crossing; Bone Spring)  
Bottom Hole – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E (Pierce Crossing; Bone Spring)

The Horizontal Spacing Unit will be in total 320-acres with the encroaching tract being 160-acres including the East ½ of the West ½ of section 30, T24S R29E. The adjoining units which the completed interval, unorthodox location encroaches are located to the West in Section 30 T24S R29E in the following areas:

Section 30 T24S R29E - Units L1, L2, L3, and L4 (Pierce Crossing; Bone Spring, South)  
\*Section 19 T24S R29E – Units L1, L2, L3, and L4 (Pierce Crossing; Bone Spring)

\*Section 19 T24S R29E – Units L1, L2, L3, and L4 are other tracts that offset the subject well HSU. The well was drilled in a standard location in section 19 and does not encroach these tracts.

Approval of the unorthodox location will allow for efficient spacing of horizontal wells in the Bone Spring formation and thereby prevent waste.

To support this request, the following information has been submitted for your review:

1. C-102 Plat for the proposed well.
2. Statement from Oxy Land Negotiator confirming the offset operators and working interest owners.
3. Statement from Oxy Development Area Engineer.

Sincerely,

*Sara Guthrie*

Sara Guthrie  
Regulatory Advisor  
Sara\_Guthrie@oxy.com

C-102

Submit Electronically  
Via OCD PermittingState of New Mexico  
Energy, Minerals, & Natural Resources Department  
OIL CONSERVATION DIVISIONRevised July 9, 2024  
PAGE 1 OF 2Submittal  Initial Submittal  
 Amended Report  
Type:  As Drilled

## WELL LOCATION INFORMATION

API Number 30-015-56485	Pool Code 96671	Pool Name PIERCE CROSSING; BONE SPRING, SOUTH
Property Code	Property Name SORO CC 19_30 FED COM	Well Number 12H
OGRID No. 16696	Operator Name OXY USA INC.	Ground Level Elevation 2906'
Surface Owner: <input checked="" type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input type="checkbox"/> Federal		Mineral Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" type="checkbox"/> Federal

## Surface Location

UL N	Section 30	Township 24S	Range 29E	Lot	Ft. from N/S 415' FSL	Ft. from E/W 1654' FWL	Latitude (NAD83) 32.18228500	Longitude (NAD83) -104.02685029	County EDDY
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## Bottom Hole Location

UL C	Section 19	Township 24S	Range 29E	Lot	Ft. from N/S 100' FNL	Ft. from E/W 1780' FWL	Latitude (NAD83) 32.21009790	Longitude (NAD83) -104.02647182	County EDDY
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Dedicated Acres 160.00	Infill or Defining Well <b>DEFINING</b>	Defining Well API <b>30-015-56485</b>	Overlapping Spacing Unit (Y/N) <b>N</b>	Consolidation Code <b>N/A</b>
Order Numbers: <b>N/A</b>	Well setbacks are under Common Ownership: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

## Kick Off Point (KOP)

UL N	Section 30	Township 24S	Range 29E	Lot	Ft. from N/S 65' FSL	Ft. from E/W 1657' FWL	Latitude (NAD83) 32.18132360	Longitude (NAD83) -104.02687106	County EDDY
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## First Take Point (FTP)

UL N	Section 30	Township 24S	Range 29E	Lot	Ft. from N/S 100' FSL	Ft. from E/W 1651' FWL	Latitude (NAD83) 32.18142040	Longitude (NAD83) -104.02688684	County EDDY
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## Last Take Point (LTP)

UL C	Section 19	Township 24S	Range 29E	Lot	Ft. from N/S 100' FNL	Ft. from E/W 1780' FWL	Latitude (NAD83) 32.21009790	Longitude (NAD83) -104.02647182	County EDDY
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Unitized Area or Area of Uniform Interest <b>N</b>	Spacing Unit Type: <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation 2906'
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## OPERATOR CERTIFICATIONS

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and, if the well is a vertical or directional well, that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of a working interest or unleased mineral interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

If this well is a horizontal well, I further certify that this organization has received the consent of at least one lessee or owner of a working interest or unleased mineral interest in each tract (in the target pool or formation) in which any part of the well's completed interval will be located or obtained a compulsory pooling order from the division.

Sara Guthrie

7/31/2025

Signature

Date

Sara Guthrie

Printed Name

sara\_guthrie@oxy.com

Email Address

## SURVEYOR CERTIFICATIONS

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief. Data used for underground measurements were provided by others for reference only and does not constitute field measurements performed by Delta Field Services



Signature and Seal of Professional Surveyor

Certificate Number

21653

Date of Survey

JULY 30, 2025

Note: 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.

## ACREAGE DEDICATION PLATS

AS-STAKED SORO CC 19 30 FED COM 12H



**LTP/BHL (NAD83)**  
X:636243.56' / Y:440303.18'  
LAT:32.21009790 / LON:-104.02647182

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**LTP/BHL (NAD27)**  
X:595059.74' / Y:440244.43'  
LAT:32.20997544 / LON:-104.02598193

**PPP-2 (NAD83)**  
X:636260.96' / Y:435089.30'  
LAT:32.19576547 / LON:-104.02646367

**PPP-2 (NAD27)**  
X:595077.02' / Y:435030.66'  
LAT:32.19564283 / LON:-104.02597424

**PPP-1 (NAD83)**  
X:636270.93' | Y:432433.37'  
LAT:32.18846456 | LON:-104.02645593

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**PPP-1 (NAD27)**  
X:595086.93' | Y:432747.79'  
LAT:32.18834184 | LON:-104.02596675

**FTP (NAD83)**  
X:636144.93' | Y:429870.46'  
LAT:32.18142040 | LON:-104.02688684

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**FTP (NAD27)**  
X:594960.87' | Y:429811.92'  
LAT:32.18129759 | LON:-104.02639787

**KOP (NAD83)**  
X:636149.91' Y:429835.26'  
LAT:32.18132360 / LON:-104.02687106

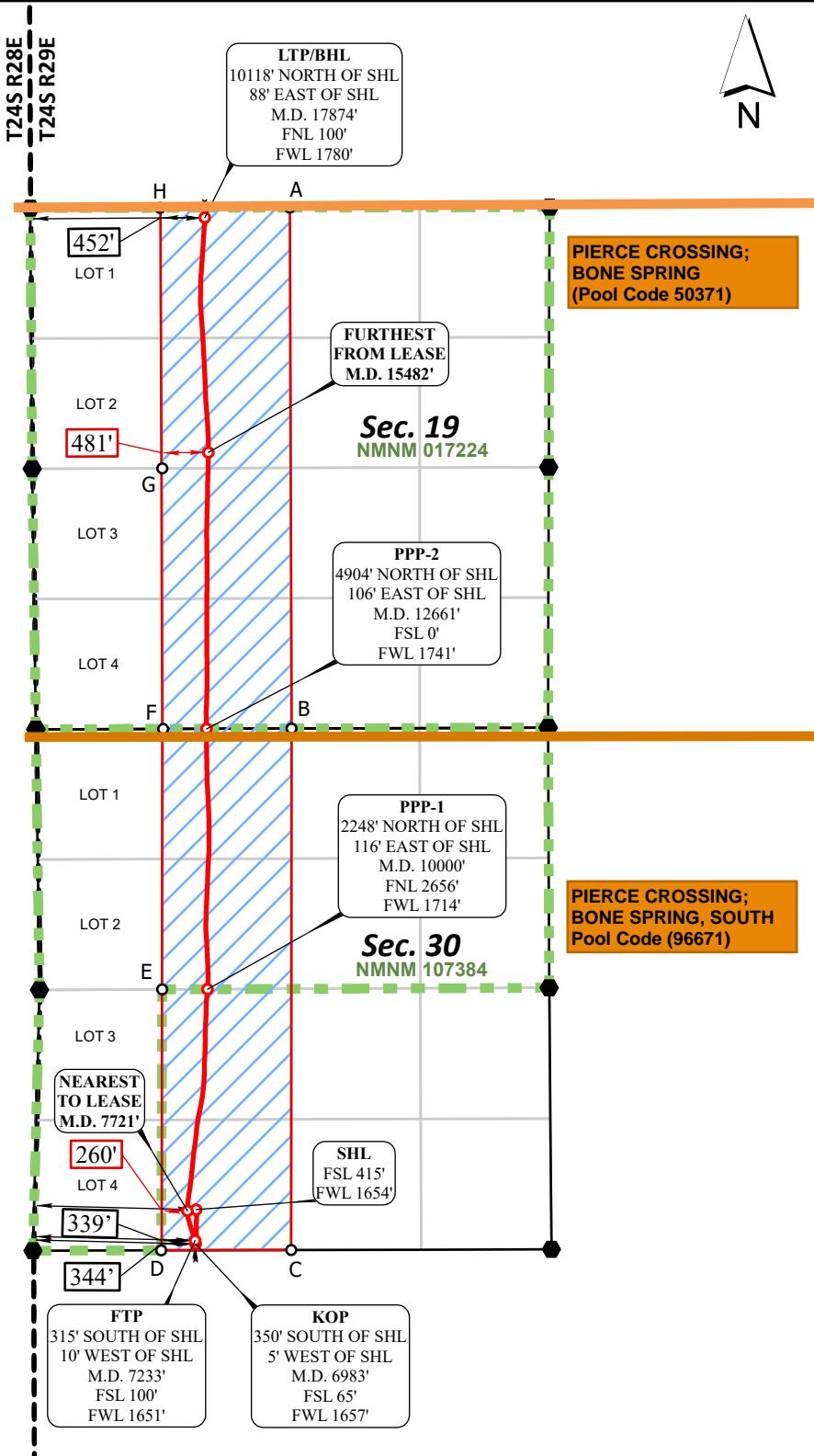
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**KOP (NAD27)**  
X:594965.85' Y:429776.73'  
LAT:32.18120079 / LON:-104.02638210

**SHL (NAD83)**  
X:636155.34' | Y:430185.02'  
LAT:32.18228500 | LON:-104.02685029

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**SHL (NAD27)**  
X:594971.29' | Y:430126.48'  
LAT:32.18216221 | LON:-104.02636130



**CORNER COORDINATES  
NAD 83, SPCS NM EAST**

A - X: 637110.97' / Y: 440404.95'  
 B - X: 637128.53' / Y: 435092.02'  
 C - X: 637125.41' / Y: 429773.15'  
 D - X: 635805.40' / Y: 429769.53'  
 E - X: 635806.97' / Y: 432431.45'  
 F - X: 635808.53' / Y: 435087.89'  
 G - X: 635799.75' / Y: 437745.68'  
 H - X: 635790.97' / Y: 440402.25'

**CORNER COORDINATES  
NAD 27, SPCS NM EAST**

- X: 595927.14' / Y: 440346.19'
- X: 595944.57' / Y: 435033.37'
- X: 595941.32' / Y: 429714.60'
- X: 594621.35' / Y: 429711.00'
- X: 594622.98' / Y: 432372.86'
- X: 594624.60' / Y: 435029.26'
- X: 594615.88' / Y: 437686.99'
- X: 594607.16' / Y: 440343.51'

*FTP TO LTP LEASE DISTANCES	
TRACT	DISTANCE
NMNM 107384	2658.03'
NMNM 017224	5218.12'
<b>TOTAL</b>	<b>7876.15'</b>



● Drill Line Events    ● Section Corners    — Drill Line    ← Dimension Lines     Federal Leases     HSU    ○ HSU Corners  
All bearings and coordinates refer to New Mexico State Plane Coordinate System, East Zone, U.S. Survey Feet.

JOB No. OXY\_0025\_SO15  
REV 0 NDS 7/30/2025

Distances/areas relative to NAD 83 grid measurements. Combined Scale Factor: 0.99978281 and a Convergence Angle: 0.16875833°

OXY USA Inc.

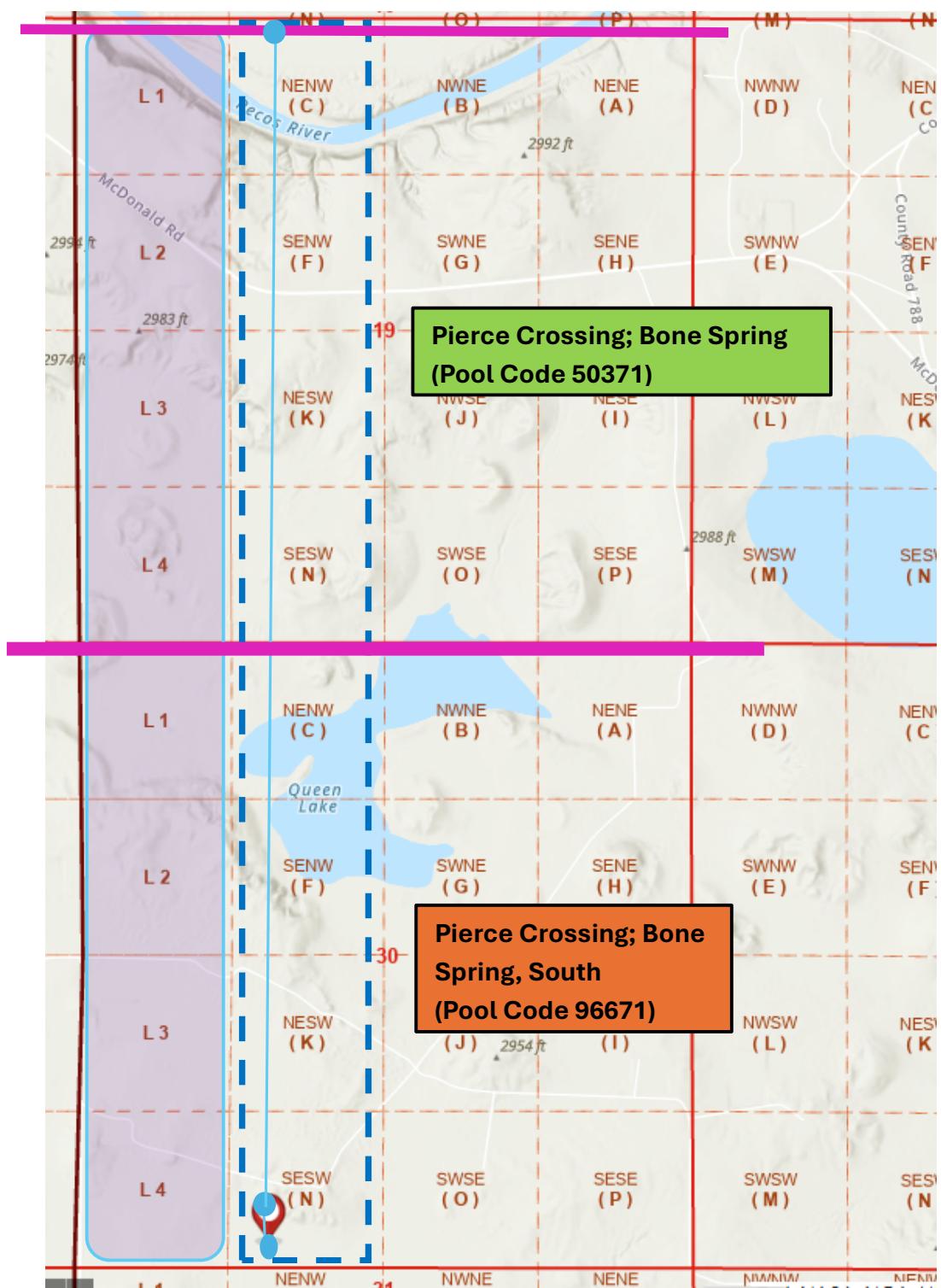
Soro CC 19\_30 Federal Com #12H

Section 30 Township 24 South, Range 29 East, N.M.P.M.

Eddy County, New Mexico

Section 19 = Pierce Crossing; Bone Spring (50371)

Section 30 = Pierce Crossing; Bone Spring, South (96671)





Occidental Oil and Gas Corporation  
ATTN: John Prudhomme  
5 Greenway Plaza, Suite 110  
Houston, TX 77046  
713-215-7433  
[John\\_Prudhomme@oxy.com](mailto:John_Prudhomme@oxy.com)

August 14, 2025

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

RE: *Application for Nonstandard Location—Engineering Justification*  
*OXY USA Inc.*  
*Soro CC 19\_30 Federal Com #12H*  
*T24S R29E, Section 19 & 30 East 1/2 of the West 1/2, Eddy County*

Dear Mr. Lowe:

Oxy USA Inc. respectfully seeks approval for a non-standard location for the Soro CC 19\_30 Federal Com 12H well that has been drilled within 330' of the HSU boundary within Section 30 East 1/2 of the West 1/2. While the well was being drilled, Oxy veered outside of the 50' tolerance and are within the HSU as a result of formation push, which was resolved as quickly as possible. Oxy was attempting to manage anti-collision risks to the East with the MWJ State #001Y well. If this NSL application is denied, Oxy would need to adjust well spacing. This could result in untapped reserves being left in the reservoir that will not be developed.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Prudhomme".

John Prudhomme  
Development Engineer

**Application Non-Standard Location - Service List****OXY USA Inc.****Soro CC 19\_30 Federal Com 12H****Online Submission**

New Mexico Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

**Certified Mail #** \_9407 1118 9876 5475 1204 56  
 Bureau of Land Management Carlsbad  
 620 E. Greene Street  
 Carlsbad, NM 88220-6292

**Certified Mail #** \_9407 1118 9876 5475 1525 32  
 New Mexico State Land Office  
 310 Old Santa Fe Trail  
 Santa Fe, NM 87501

**Offset Tracts Section 19 (T24S-R29E) - Units L1, L2, L3, L4****Offset Tracts Section 30 (T24S-R29E) - Units L1, L2, L3, L4**

Type	Affected Party	Certified Mail #
Working Interest	Occidental Petroleum Corp. P.O. Box 4294 Houston, TX 77210	NA
Working Interest	Ridge Runner Resources II, LLC P.O.Box 692229 Houston, TX 77269-2229	9407 1118 9876 5475 1224 29
Working Interest	Mewbourne Oil Company 414 W. Texas Ave. Midland, TX 79703	9407 1118 9876 5475 1224 05

Copies of this application were mailed to the individuals, companies and organizations  
 on or before August 6, 2025



Sara Guthrie, Regulatory Advisor  
 OXY USA Inc.



# OXY USA Inc

5 Greenway Plaza, Suite 110  
Houston, TX 77046-0521

August 7, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Re: *Application for Administrative Approval of Non-Standard Location*  
*Soro CC 19\_30 Federal Com 12H – Pierce Crossing; Bone Spring & Pierce Crossing; Bone Spring, South*  
*Surface – 415' FSL 1654' FWL Unit N, Sec 30 T24S R29E*  
*First Take Point – 100' FSL 1651' FWL Unit N, Sec 30 T24S R29E*  
*Last Take Point – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E*  
*Bottom Hole – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E*  
*Eddy County, New Mexico*

To Whom it May Concern:

Enclosed is a copy of an application, filed with the New Mexico Oil Conservation Division by OXY USA Inc., requesting administrative approval for a non-standard location. As an affected party, notice is being provided to you pursuant to Rule 19.15.4.12(A)(2)(a), 19.15.15.9(A) and 19.15.16.15(B). The well is located as follows:

Surface – 415' FSL 1654' FWL Unit N, Sec 30 T24S R29E  
First Take Point – 100' FSL 1651' FWL Unit N, Sec 30 T24S R29E  
Last Take Point – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E  
Bottom Hole – 100' FNL 1780' FWL Unit C, Sec 19 T24S R29E

If you object to the well's location, you must notify the Division in writing no later than 20 days from the date the application is received by the NMOCD (1220 South St. Francis Drive, Santa Fe, NM 87505; Attention: Leonard Lowe).

If you need any additional information, you can contact Jonathan Gonzales at 713-366-5576 or myself at 713-497-2851.

Thank you,

*Sara Guthrie*

Sara Guthrie  
Regulatory Advisor  
OXY USA Inc.

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

CONDITIONS

Action 502545

**CONDITIONS**

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 502545
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	9/11/2025