

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

**Michelle Lujan Grisham**  
 Governor

**Erin Taylor**  
 Acting Cabinet Secretary

**Ben Shelton**  
 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 – 9204**

**OXY USA, INC. [OGRID 16696]  
 Nugget 6 31 Federal Com Well No. 26H  
 API No. 30-015-56050**

Reference is made to your application received on November 19<sup>th</sup>, 2025.

**Proposed Location**

	<b>Footages</b>	<b>Unit/Lot</b>	<b>Sec.</b>	<b>Twsp</b>	<b>Range</b>	<b>County</b>
Surface	1263 FSL & 1453 FEL	O	06	24S	31E	Eddy
First Take Point	100 FSL & 295 FEL	P	06	24S	31E	Eddy
Last Take Point	100 FNL & 295 FEL	A	31	23S	31E	Eddy
Terminus	20 FNL & 295 FEL	A	31	23S	31E	Eddy

**Proposed NSL Horizontal Unit**

<b>Description</b>	<b>Acres</b>	<b>Pool</b>	<b>Pool Code</b>
E/2 Section 06, T24S, R30E	640.41	Cotton Draw; Bone Spring	13367
E/2 Section 31, T23S, R30E			

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,

1220 South St. Francis Drive, 3<sup>rd</sup> Floor • Santa Fe, New Mexico 87505

Phone (505) 476-3441 • [www.emnr.state.nm.us/ocd](http://www.emnr.state.nm.us/ocd)

Administrative Order NSL – 9204  
OXY USA, INC.  
Page 2 of 2

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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 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 295 feet to the eastern edge of the horizontal spacing unit. Encroachment will impact the following tracts.

Section 05, T24S, R31E, encroachment to the W/2 W/2  
Section 32, T23S, R31E, 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 understands you are seeking this unorthodox location for efficient spacing of wells within the Bone Spring formation underlying E/2 section 06, T24S, R30E and E/2 section 31, T23S, R30E, thereby preventing waste and protecting correlative rights.

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: 1/26/2026

ID NO. 527972

NSL - 9204

Revised March 23, 2017

RECEIVED: <b>11/19/25</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.](#)OGRID Number: [16696](#)Well Name: [NUGGET 6\\_31 FEDERAL COM 26H](#)API: [30-015-56050](#)Pool: [COTTON DRAW; BONE SPRING](#)Pool Code: [13367](#)

**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

**FOR OCD ONLY**

- Notice Complete
- 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.

11/7/2025

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**

November 19, 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  
Nugget 6\_31 Federal Com 26H – Cotton Draw; Bone Spring  
Surface – 1263' FSL 1453' FEL Unit O, Sec 06 T24S R31E  
First Take Point – 100' FSL 295' FEL Unit P, Sec 06 T24S R31E  
Last Take Point – 100' FNL 295' FEL Unit A, Sec 31 T23S R31E  
Bottom Hole – 20' FNL 295' FEL Unit A, Sec 31 T23S R31E  
Eddy County, New Mexico*

Dear Mr. Lowe:

OXY USA Inc. respectfully requests administrative approval of a non-standard location on the Nugget 6\_31 Federal Com #26H well, API Number 30-015-56050, Property Code 329887. The 26H well is proposed to be completed in the **Cotton Draw; Bone Spring Pool, Pool Code 13367**. 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 – 1263' FSL 1453' FEL Unit O, Sec 06 T24S R31E  
First Take Point – 100' FSL 295' FEL Unit P, Sec 06 T24S R31E  
Last Take Point – 100' FNL 295' FEL Unit A, Sec 31 T23S R31E  
Bottom Hole – 20' FNL 295' FEL Unit A, Sec 31 T23S R31E

The adjoining units towards which the unorthodox location encroaches are located to the East in T23S R31E and T24S R31E:

Section 32, T23S, R31E - Units D, E, L, and M  
Section 05, T24S, R31E - Units L4, E, L, and M

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 and an additional plat with offsetting well and affected spacing units.
2. Notice Letter to 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 <b>30-015-56050</b>	Pool Code <b>13367</b>	Pool Name <b>COTTON DRAW; BONE SPRING</b>
Property Code <b>329887</b>	Property Name <b>NUGGET 6_31 FED COM</b>	Well Number <b>26H</b>
OGRID No. <b>16696</b>	Operator Name <b>OXY USA INC.</b>	Ground Level Elevation <b>3457'</b>
Surface Owner: <input type="checkbox"/> State <input type="checkbox"/> Fee <input type="checkbox"/> Tribal <input checked="" 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 O	Section 06	Township 24S	Range 31E	Lot	Ft. from N/S 1263' FSL	Ft. from E/W 1453' FEL	Latitude (NAD83) 32.24258832	Longitude (NAD83) -103.81307326	County EDDY
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## Bottom Hole Location

UL A	Section 31	Township 23S	Range 31E	Lot	Ft. from N/S 20' FNL	Ft. from E/W 295' FEL	Latitude (NAD83) 32.26812140	Longitude (NAD83) -103.80931075	County EDDY
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Dedicated Acres <b>640.41</b>	Infill or Defining Well <b>INFILL</b>	Defining Well API <b>30-015-56039</b>	Overlapping Spacing Unit (Y/N) <b>YES</b>	Consolidation Code <b>C</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 A	Section 07	Township 24S	Range 31E	Lot	Ft. from N/S 300' FNL	Ft. from E/W 295' FEL	Latitude (NAD83) 32.23829013	Longitude (NAD83) -103.80933940	County EDDY
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## First Take Point (FTP)

UL P	Section 06	Township 24S	Range 31E	Lot	Ft. from N/S 100' FSL	Ft. from E/W 295' FEL	Latitude (NAD83) 32.23938966	Longitude (NAD83) -103.80933836	County EDDY
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## Last Take Point (LTP)

UL A	Section 31	Township 23S	Range 31E	Lot	Ft. from N/S 100' FNL	Ft. from E/W 295' FEL	Latitude (NAD83) 32.26790150	Longitude (NAD83) -103.80931049	County EDDY
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Unitized Area or Area of Uniform Interest <b>N/A</b>	Spacing Unit Type: <input checked="" type="checkbox"/> Horizontal <input type="checkbox"/> Vertical	Ground Floor Elevation <b>3457'</b>
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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*

7/1/2025

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.



Signature and Seal of Professional Surveyor

Certificate Number

21653

Date of Survey

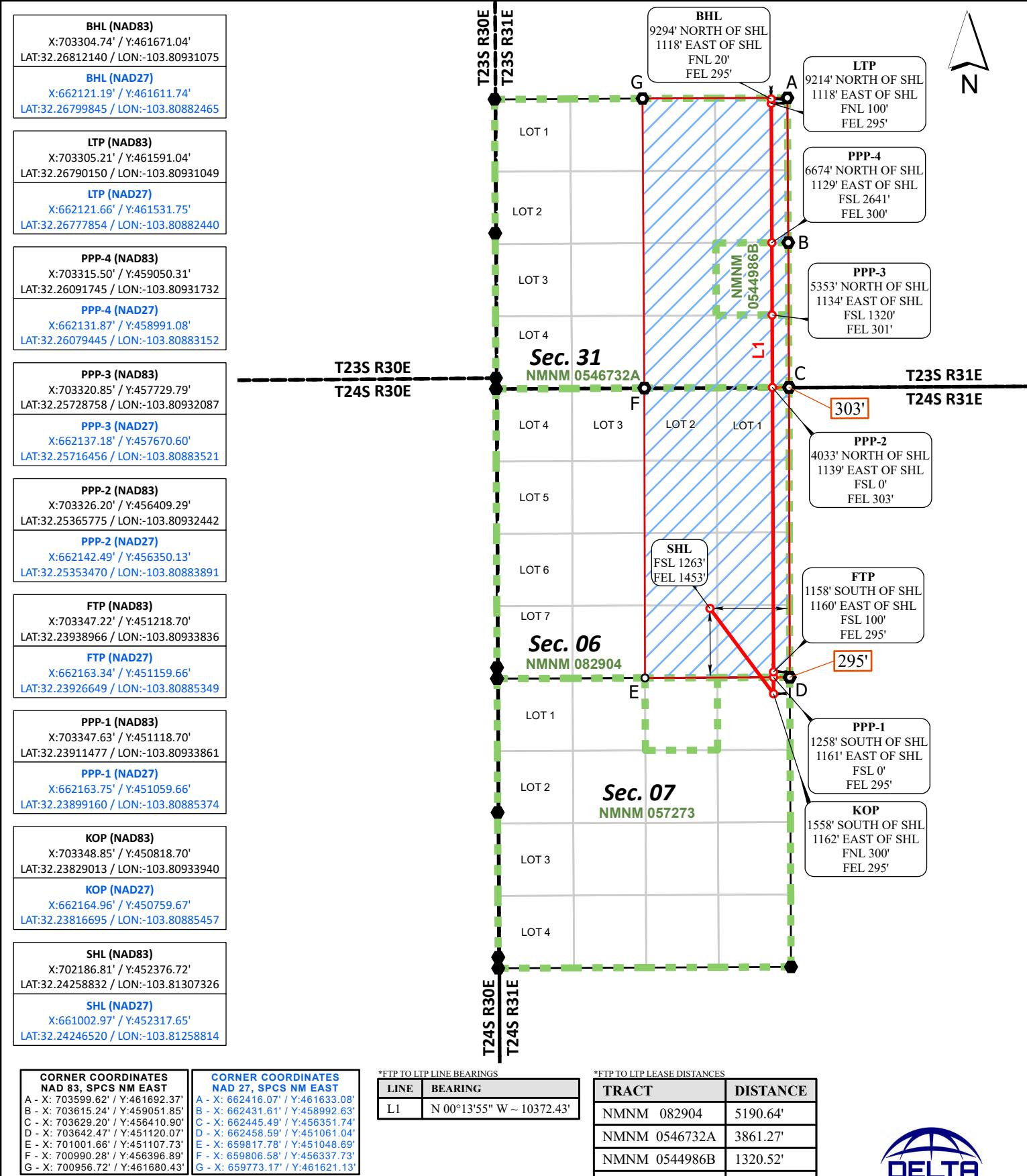
MAY 20, 2025

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

## NUGGET 6\_31 FED COM 26H

PAGE 2 OF 2



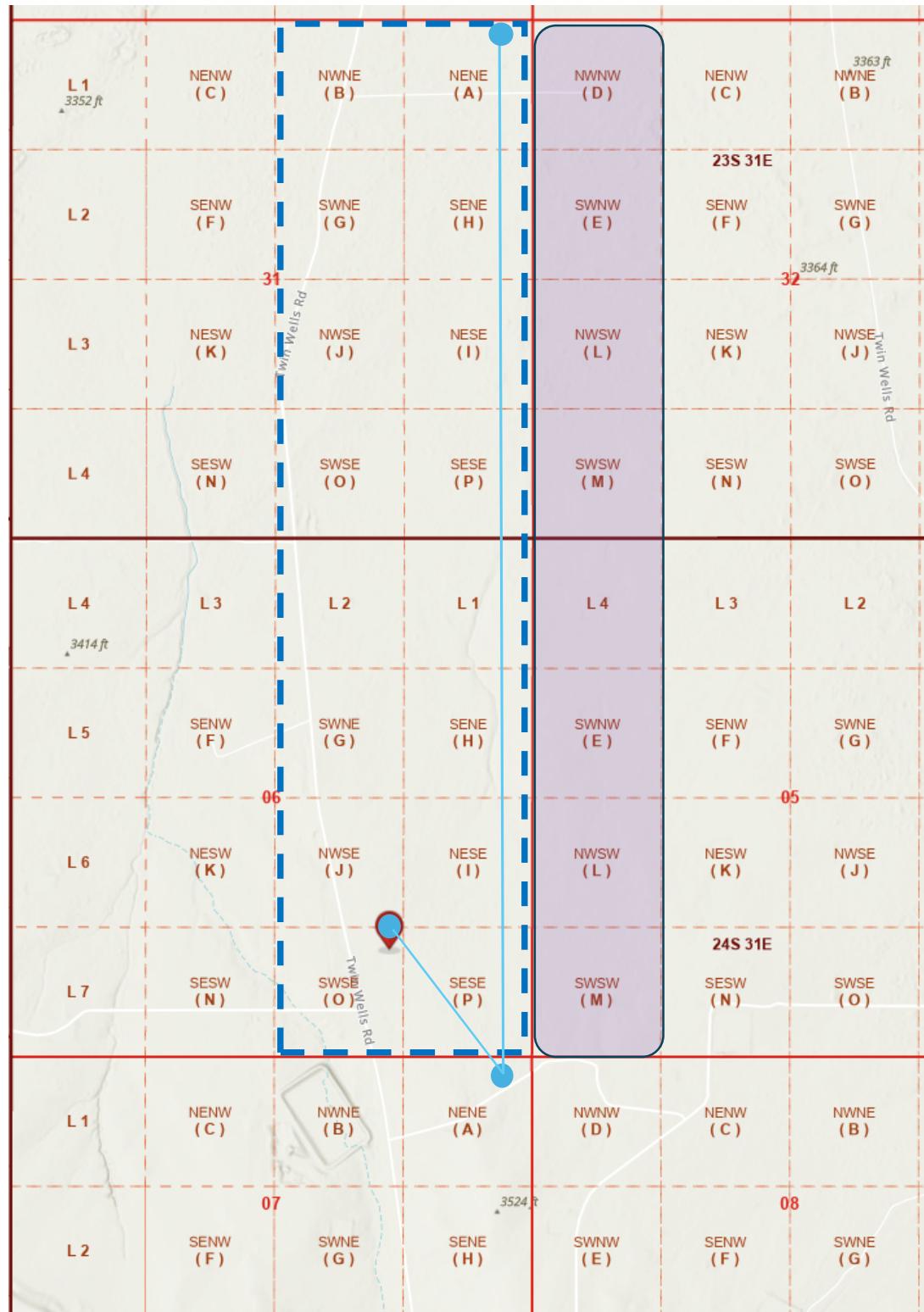
● Drill Line Events     ● Section Corners     — Drill Line     → Dimension Lines     ■ Federal Leases     □ HSU     ○ HSU Corners     JOB No. OXY\_0029\_JS05\_15461  
 All bearings and coordinates refer to New Mexico State Plane Coordinate System, East Zone, U.S. Survey Feet.

Distances/areas relative to NAD 83 grid measurements. Combined Scale Factor: 0.99977581 and a Convergence Angle: 0.27195833°



OXY USA Inc.

Nugget 6\_31 Federal Com #26H

Section 06 Township 24 South, Range 31 East, N.M.P.M.  
Eddy County, New Mexico



Occidental Oil and Gas Corporation  
ATTN: Pablo Cabal  
5 Greenway Plaza, Suite 110  
Houston, TX 77046  
713-215-7433  
[pablo\\_cabal@oxy.com](mailto:pablo_cabal@oxy.com)

November 7, 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.*  
*Nugget 6\_31 Federal Com 26H*  
*Section 06 T24S R31E & Section 31 T23S R31E – East 1/2, Eddy County*

Dear Mr. Lowe:

Oxy USA Inc. respectfully seeks approval for a non-standard location for the Nugget 6\_31 Federal Com 26H well to be drilled within 330' of the HSU boundary. It is Oxy's responsibility as a prudent operator to optimize the section's well spacing and minimize reserves left in the ground. Placing the well within the setback, allows for a horizontal well spacing of 6 wells per section, optimizing the recoverable reserves. Any reduction in well spacing will result in untapped reserves being left in the reservoir resulting in waste of a resource that will not be developed otherwise.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Cabal'.

Pablo Cabal  
Development Engineer



# OXY USA Inc

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

November 18, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Re: *Application for Administrative Approval of Non-Standard Location  
Nugget 6\_31 Federal Com 26H – Cotton Draw; Bone Spring  
Surface – 1263' FSL 1453' FEL Unit O, Sec 06 T24S R31E  
First Take Point – 100' FSL 295' FEL Unit P, Sec 06 T24S R31E  
Last Take Point – 100' FNL 295' FEL Unit A, Sec 31 T23S R31E  
Bottom Hole – 20' FNL 295' FEL Unit A, Sec 31 T23S R31E  
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 – 1263' FSL 1453' FEL Unit O, Sec 06 T24S R31E  
First Take Point – 100' FSL 295' FEL Unit P, Sec 06 T24S R31E  
Last Take Point – 100' FNL 295' FEL Unit A, Sec 31 T23S R31E  
Bottom Hole – 20' FNL 295' FEL Unit A, Sec 31 T23S R31E

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 Leslie Mullin at 713-497-2647 or myself at 713-497-2851.

Thank you,

*Sara Guthrie*

Sara Guthrie  
Regulatory Advisor  
OXY USA Inc.

**Application Non-Standard Location - Service List**  
**OXY USA Inc.**  
**Nugget 6\_31 Federal Com 26H**

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

**Certified Mail #\_9407 1118 9876 5473 8884 40**  
Bureau of Land Management Carlsbad  
620 E. Greene Street  
Carlsbad, NM 88220-6292

**Certified Mail #\_9407 1118 9876 5473 8884 95**  
New Mexico State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501

**Offset Tracts Section 31 (T23S-R31E) - Units D, E, L, M**  
**Offset Tracts Section 06 (T24S-R31E) - Units L4, E, L, M**

Type	Affected Party	Certified Mail #
Working Interest	Occidental Petroleum Corp. P.O. Box 4294 Houston, TX 77210	NA
Working Interest	Sunset Production Company P.O. Box 2239 Georgetown, TX 78627-2239	<b>9407 1118 9876 5473 8884 88</b>

Copies of this application were mailed to the individuals, companies and organizations  
on or before November 19, 2025

*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 527972

**CONDITIONS**

Operator:  OXY USA INC P.O. Box 4294 Houston, TX 772104294	OGRID: 16696
	Action Number: 527972
	Action Type: [UF-NSL] Non-Standard Location (NSL)

**CONDITIONS**

Created By	Condition	Condition Date
llowe	None	11/24/2025