

EOG respectfully requests an exception to the following NMOCD rule

**19.15.16.10 Casing AND TUBING REQUIREMENTS**

**J (3):** “The operator shall set tubing as near the bottom as practical and tubing perforations shall not be more than 250 feet above top of pay zone.”

With horizontal flowing and gas lifted wells an end of tubing depth placed at or slightly above KOP is a conservative way to ensure the tubing stays clean from debris, plugging, and allows for fewer well interventions post offset completion. The deeper the tubulars are run into the curve, the higher the probability is that the tubing will become stuck in sand and or well debris as the well produces over time. An additional consideration for EOT placement during artificial lift installations is avoiding the high dog leg severity and inclinations found in the curve section of the wellbore to help improve reliability and performance. Dog leg severity and inclinations tend not to hamper gas lifted or flowing wells, but they do effect other forms of artificial lift like rod pump or ESP (electric submersible pump). Keeping the EOT above KOP is an industry best practice for those respective forms of artificial lift.

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CONDITIONS

Action 332381

**CONDITIONS**

Operator: EOG RESOURCES INC 5509 Champions Drive Midland, TX 79706	OGRID: 7377
	Action Number: 332381
	Action Type: [C-103] NOI Change of Plans (C-103A)

**CONDITIONS**

Created By	Condition	Condition Date
pkautz	None	4/11/2024