

Office
 District I – (575) 393-6161
 1625 N. French Dr., Hobbs, NM 88240
 District II – (575) 748-1283
 811 S. First St., Artesia, NM 88210
 District III – (505) 334-6178
 1000 Rio Brazos Rd., Aztec, NM 87410
 District IV – (505) 476-3460
 1220 S. St. Francis Dr., Santa Fe, NM
 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 Revised July 18, 2013

OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

WELL API NO. 30-015-49788
5. Indicate Type of Lease STATE ☐ FEE ☒
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name Decimus Fed Com
8. Well Number 702H
9. OGRID Number 372098
10. Pool name or Wildcat Purple Sage; Wolfcamp (Gas)
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 3044'

SUNDRY NOTICES AND REPORTS ON WELLS (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)	
1. Type of Well: Oil Well ☐ Gas Well ☒ Other	
2. Name of Operator Marathon Oil Permian LLC	
3. Address of Operator 990 Town & Country Blvd. Houston, TX 77024	
4. Well Location Unit Letter L6 : 1770 feet from the SOUTH line and 303 feet from the WEST line Section 6 Township 23S Range 28E NMPM County EDDY	
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 3044'	

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:		SUBSEQUENT REPORT OF:	
PERFORM REMEDIAL WORK ☐	PLUG AND ABANDON ☐	REMEDIAL WORK ☐	ALTERING CASING ☐
TEMPORARILY ABANDON ☐	CHANGE PLANS ☒	COMMENCE DRILLING OPNS. ☐	P AND A ☐
PULL OR ALTER CASING ☐	MULTIPLE COMPL ☐	CASING/CEMENT JOB ☐	
DOWNHOLE COMMINGLE ☐			
CLOSED-LOOP SYSTEM ☐			
OTHER: variance - Break Testing ☒		OTHER: ☐	

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Marathon Oil Permian LLC respectfully request a variance for BOP Break Testing. Please see attached procedure.

Spud Date:

Rig Release Date:

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Terri Stathem TITLE Regulatory Manager DATE 10/31/2024

Type or print name Terri Stathem E-mail address: tstathem@marathonoil.com PHONE: 713-817/0224

For State Use Only

APPROVED BY: _____ TITLE _____ DATE _____

Conditions of Approval (if any):

BOP Break Test Variance Request

Executive Summary

- Request for a Variance allowing break testing of the blowout preventer equipment. Marathon requests to only test broken pressure seals on the BOP and function test BOP when skidding between wells on a pad
- Currently CFR Title 43 Part 3170 states that a test shall be performed “whenever any seal subject to test pressure is broken” and BLM interprets this as requiring a full BOP test
- API 53 states that for pad drilling operations, ONLY the connections that have a pressure seal broken are required to be tested
- Marathon feels break testing meets and or exceeds CFR Title 43 and API 53 required standards and is good drilling practice. It also may reduce wear and tear on BOP components.

BOP Break Test Variance Request

Background

- API Standard 53, “Well Control Equipment Systems for Drilling Wells 5th addition, Dec 2018, Annex C Table C.4) states “ For pad drilling operations, moving from one wellhead to another within the 21days, pressure testing is required for pressure – containing and pressure controlling connection when the integrity of a pressure seal is broken.
- Marathon’s rigs utilize quick connects to allow the release of the BOP from wellhead to wellhead without breaking any BOP stack components. This technology allows for break testing
- BLM has previously approved this variance of break testing for other operators in the area

Table C.4—Initial Pressure Testing, Surface BOP Stacks

Component to be Pressure Tested	Pressure Test—Low Pressure ^{ac} psig (MPa)	Pressure Test—High Pressure ^{ac}	
		Change Out of Component, Elastomer, or Ring Gasket	No Change Out of Component, Elastomer, or Ring Gasket
Annular preventer ^b	250 to 350 (1.72 to 2.41)	RWP of annular preventer	MASP or 70% annular RWP, whichever is lower.
Fixed pipe, variable bore, blind, and BSR preventers ^{bd}	250 to 350 (1.72 to 2.41)	RWP of ram preventer or wellhead system, whichever is lower	ITP
Choke and kill line and BOP side outlet valves below ram preventers (both sides)	250 to 350 (1.72 to 2.41)	RWP of side outlet valve or wellhead system, whichever is lower	ITP
Choke manifold—upstream of chokes ^e	250 to 350 (1.72 to 2.41)	RWP of ram preventers or wellhead system, whichever is lower	ITP
Choke manifold—downstream of chokes ^e	250 to 350 (1.72 to 2.41)	RWP of valve(s), line(s), or MASP for the well program, whichever is lower	
Kelly, kelly valves, drill pipe safety valves, IBOPs	250 to 350 (1.72 to 2.41)	MASP for the well program	
^a Pressure test evaluation periods shall be a minimum of five minutes. No visible leaks. The pressure shall remain stable during the evaluation period. The pressure shall not decrease below the intended test pressure.			
^b Annular(s) and VBR(s) shall be pressure tested on the largest and smallest OD drill pipe to be used in well program.			
^c For pad drilling operations, moving from one wellhead to another within the 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken.			
^d For surface offshore operations, the ram BOPs shall be pressure tested with the ram locks engaged and the closing and locking pressure vented during the initial test. For land operations, the ram BOPs shall be pressure tested with the ram locks engaged and the closing and locking pressure vented at commissioning and annually.			
^e Adjustable chokes are not required to be full sealing devices. Pressure testing against a closed choke is not required.			



Procedures

Procedural Steps

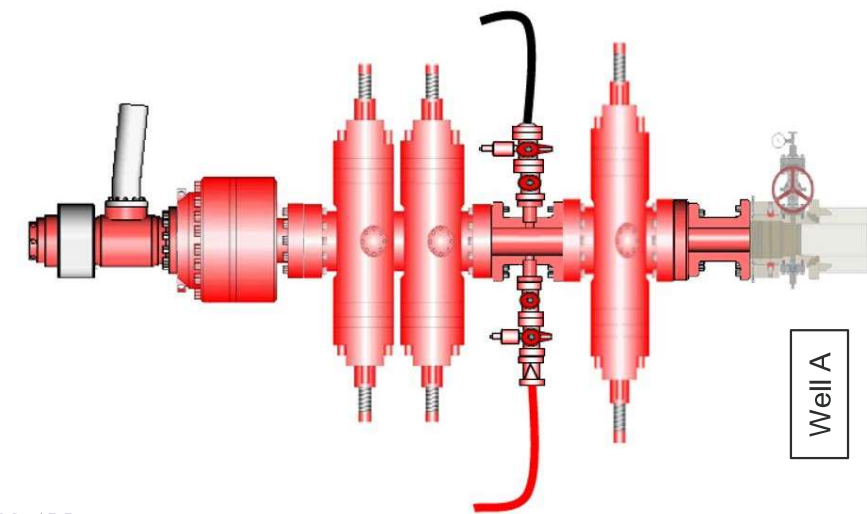
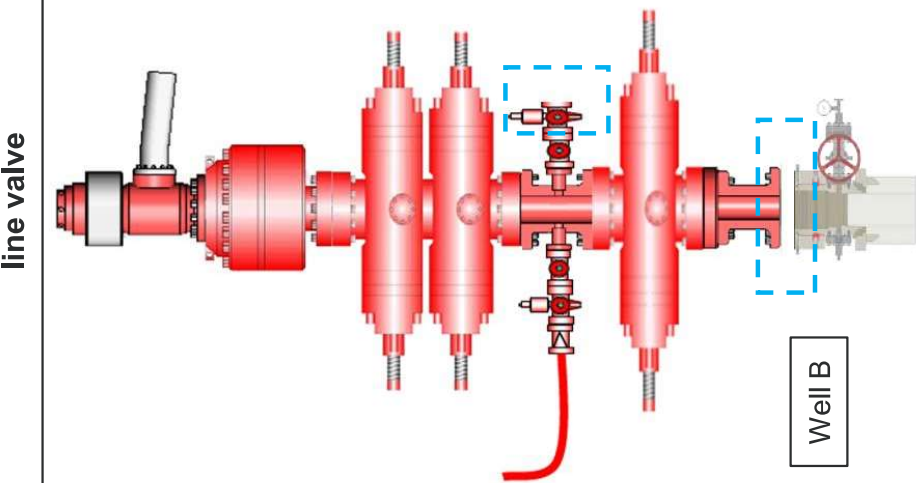
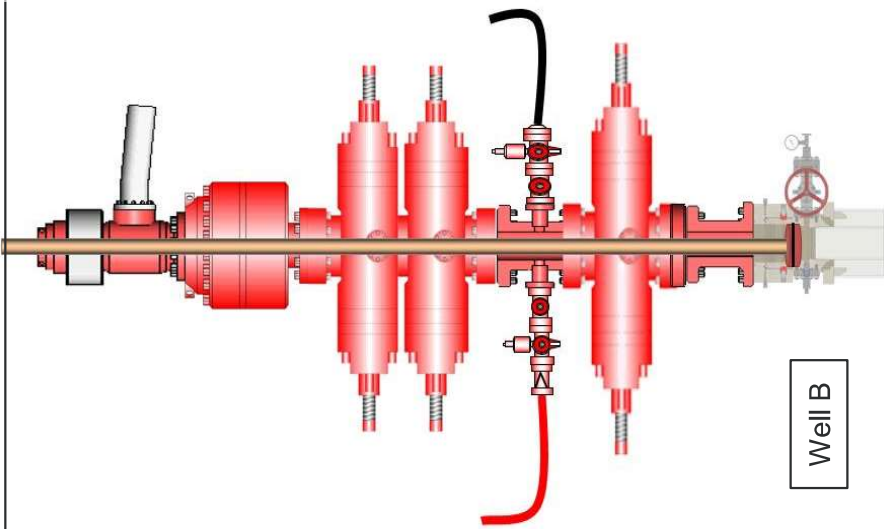
1. Marathon will use this document for break testing plan for New Mexico Delaware Basin.
2. Marathon will perform BOP break testing on well pads where multiple intermediate sections can be drilled and cased within the 21 day test window and will meet the following criteria:
 - a) A full BOP test will be conducted on the first well on the pad
 - b) The deepest intermediate well on the pad will be drilled first
 - c) A Full BOP test will be required prior to drilling any production hole
3. After completing the first full BOP test and drilling the intermediate section, two breaks will be performed on the BOP.
 - a) BOP quick connect and wellhead
 - b) HCV and Choke line connection
4. The BOP will be lifted from well A to well B
5. The two connections stated above will be reconnected
6. Test plug will be installed into wellhead utilizing drillpipe or test joint
7. Shell test will be performed against the upper pipe rams and testing the two breaks consisting of the following tests
 - a) 250psi low test and high test performed to 5,000 (well and sundry specific)
8. Function test will then be performed on the lower pipe rams, blind rams, and annular (performed each trip or every 7 days - whichever is more frequent)
9. This process will be repeated for other wells on the pad while being in the 21 day BOP test window

Sequence Diagram

Well A: BOP installed on Well A

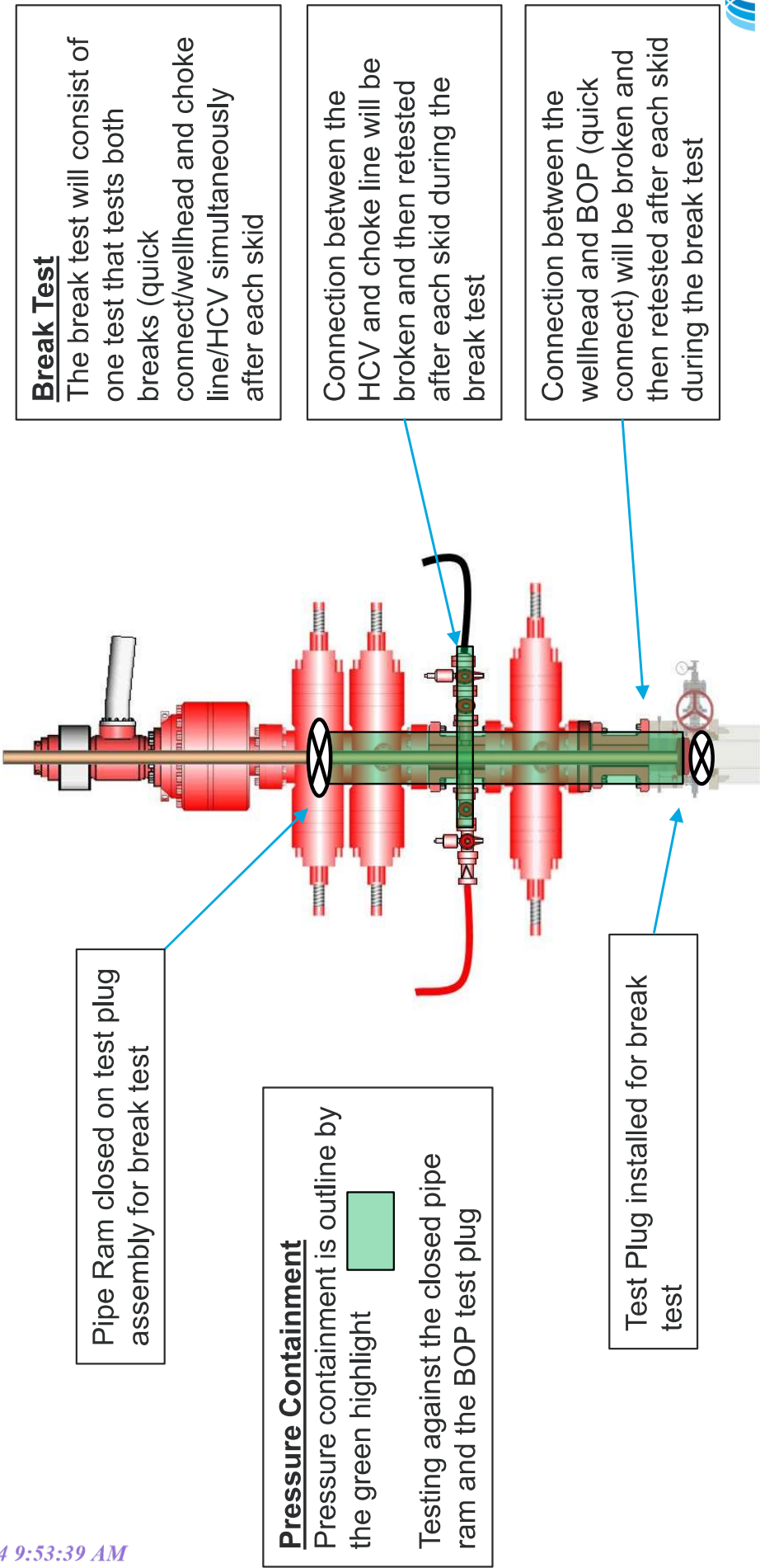
BOP picked up and moved from Well A to Well B.
Disconnected at the quick connect and the choke
line valve

Well B: Quick connect and choke line
reconnected. Test plug installed.



Procedures

Diagram



Summary

- A variance is requested to only test the broken pressure seals on the BOP equipment when moving from wellhead to wellhead. This is in full compliance with API Standard 53
- Marathon will meet the following criteria when break testing:
 - Time of last BOP test was less than 21 days
 - A full BOP test was conducted on the first well on the pad
 - The first intermediate hole section on the pad will be the deepest intermediate hole section.
 - Break testing will not occur on intermediate sections of over 5000 psi MASP

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CONDITIONS

Action 397732

CONDITIONS

Operator: MARATHON OIL PERMIAN LLC 990 Town & Country Blvd. Houston, TX 77024	OGRID: 372098
	Action Number: 397732
	Action Type: [C-103] NOI Change of Plans (C-103A)

CONDITIONS

Created By	Condition	Condition Date
ward.rikala	All original COA's still apply. Additionally, if cement is not circulated to surface during cementing operations, then a CBL is required.	10/31/2024