Page 1 of 49

U.S. Department of the Interior BUREAU OF LAND MANAGEMENT

Well Name: POKER LAKE UNIT 15

TWR

Well Location: T24S / R31E / SEC 22 /

NENW / 32.208728 / -103.766951

County or Parish/State: EDDY /

NM

Well Number: 213H

Type of Well: OIL WELL

Allottee or Tribe Name:

Lease Number: NMNM0506A

Unit or CA Name: POKER LAKE UNIT

Unit or CA Number: NMNM71016X

US Well Number: 3001554180

Operator: XTO PERMIAN OPERATING

LLC

Notice of Intent

Sundry ID: 2823628

Type of Submission: Notice of Intent

Type of Action: APD Change

Date Sundry Submitted: 11/20/2024

Time Sundry Submitted: 12:43

Date proposed operation will begin: 12/04/2024

Procedure Description: XTO Permian Operating, LLC. respectfully requests approval to make the following changes to the approved APD. Changes to include SHL, KOP, FTP, LTP, BHL, Proposed total Depth, and Pool. There is no new surface disturbance. FROM: TO: SHL: 501' FNL & 2252' FWL OF SECTION 22-T24S-R31E 521' FNL & 2252' FWL OF SECTION 22-T24S-R31E 521' FNL & 2252' FWL OF SECTION 22-T24S-R31E 616' FSL & 2320' FEL OF SECTION 15-T24S-R31E FTP: 330' FNL & 1870' FWL OF SECTION 22-T24S-R31E 100' FNL & 2320' FEL OF SECTION 22-T24S-R31E LTP: 2540' FNL & 1870' FWL OF SECTION 34-T24S-R31E 100' FSL & 2320' FEL OF SECTION 27-T24S-R31E BHL: 2590' FNL & 1870' FWL OF SECTION 34-T24S-R31E 50' FSL & 2320' FEL OF SECTION 27-T24S-R31E The proposed total depth is changing from 24032' MD; 10863' TVD to 20539' MD; 9543' TVD. The pool code is changing from Wildcat; Bone Spring (96403) to Cotton Draw; Bone Spring, South (96546). See attached Drilling Plan for updated cement and casing program. A saturated salt brine will be utilized while drilling through the salt formations.

NOI Attachments

Procedure Description

PLU_15_TWR_213H_Sundry_Docs_Submitted_20241210091821.pdf

Received by OCD: WHIND POR PLOKER PAME UNIT 15

Well Location: T24S / R31E / SEC 22 / NENW / 32.208728 / -103.766951

County or Parish/State: EDDY /

Page 2 of 49

Well Number: 213H

Type of Well: OIL WELL

Allottee or Tribe Name:

Lease Number: NMNM0506A

Unit or CA Name: POKER LAKE UNIT

Unit or CA Number: NMNM71016X

US Well Number: 3001554180

Operator: XTO PERMIAN OPERATING

LLC

Conditions of Approval

Additional

PLU_15_TRW_213H_COA_20241211090415.pdf

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: TERRA SEBASTIAN Signed on: DEC 10, 2024 09:18 AM

Name: XTO PERMIAN OPERATING LLC

Title: Regulatory Advisor

Street Address: 6401 HOLIDAY HILL ROAD SUITE 200

City: MIDLAND State: TX

Phone: (432) 999-3107

Email address: TERRA.B.SEBASTIAN@EXXONMOBIL.COM

Field

Representative Name:

Street Address:

City: State: Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Title: Petroleum Engineer **BLM POC Name: CHRISTOPHER WALLS**

BLM POC Phone: 5752342234 BLM POC Email Address: cwalls@blm.gov

Disposition: Approved Disposition Date: 02/04/2025

Signature: Chris Walls

Page 2 of 2

Form 3160-5 (June 2019)

UNITED STATES DEPARTMENT OF THE INTERIOR

FORM APPROVED
OMB No. 1004-0137
Expires: October 31, 2021

(June 2015)	DEF	PARTMENT OF THE INT	ERIOR		EX	pires: C	October 31, 2021
	BUR	EAU OF LAND MANAG	EMENT		5. Lease Serial No.	NMNM	0506A
	SUNDRY N	IOTICES AND REPORT	S ON WEL	LS	6. If Indian, Allottee or Tribe	Name	
		form for proposals to d Use Form 3160-3 (APD					
<i>a</i> pan		•		noposais.	7. If Unit of CA/Agreement,	Name a	and/or No
	SUBMIT IN	TRIPLICATE - Other instructio	ns on page 2		POKER LAKE UNIT/NMNM71016		mu/or ivo.
1. Type of Well	🗆	g II			8. Well Name and No.		
✓ Oil W		_			POKER LAKE UNIT 15 TWR/213H		
2. Name of Operator	XTO PERMIAN	OPERATING LLC			9. API Well No. 300155418	80	
3a. Address 6401 H	HOLIDAY HILL R	OND DEDG O, MIDENIND,	Phone No. <i>(incl</i> 2) 683-2277	ude area code)	10. Field and Pool or Explora Wildcat; Bone Spring	atory Aı	rea
4. Location of Well (SEC 22/T24S/R3		R.,M., or Survey Description)			11. Country or Parish, State EDDY/NM		
	12. CHE	CK THE APPROPRIATE BOX(I	ES) TO INDICA	TE NATURE	OF NOTICE, REPORT OR OT	HER D	ATA
TYPE OF SUI	BMISSION			TYP	E OF ACTION		
✓ Notice of Inte	nt	Acidize	Deepen		Production (Start/Resume)) [Water Shut-Off
Trouble of fine		Alter Casing	Hydraulic	Fracturing	Reclamation		Well Integrity
Subsequent R	eport	Casing Repair	New Cons		Recomplete		Other
		✓ Change Plans	Plug and		Temporarily Abandon		
Final Abandon		Convert to Injection	Plug Back		Water Disposal		approximate duration thereof. If
KOP, FTP, LT FROM: TO: SHL: 501' FN KOP: 501 FN FTP: 330' FN LTP: 2540' FI BHL: 2590' FI	Departing, LLC. FP, BHL, Propose L & 2252' FWL C L & 2252 FWL O L & 1870' FWL C NL & 1870' FWL NL & 1870' FWL H total depth is ch	respectfully requests approvated total Depth, and Pool. Ther OF SECTION 22-T24S-R31E 5 OF SECTION 22-T24S-R31E 1 OF SECTION 34-T24S-R31E OF SECTION 34-T24S-R31E of SECTION 34-T24S-R31E anging from 24032 MD; 10863	e is no new su 521' FNL & 225 16 FSL & 2320 00' FNL & 232 100' FSL & 23 50' FSL & 232	rface disturba 52' FWL OF S 0 FEL OF SE 0' FEL OF SE 20' FEL OF SE 0' FEL OF SE	ECTION 22-T24S-R31E CTION 15-T24S-R31E ECTION 22-T24S-R31E ECTION 27-T24S-R31E ECTION 27-T24S-R31E	Change	s to include SHL,
	page 3 additiona		(T)				
		true and correct. Name (Printed	(Typed)	Regulatory	Advisor		
TERRA SEBASTIA	411 / PH. (432) 98	99-310 <i>1</i>	Titl				
Signature (Elec	ctronic Submissic	on)	Dat	e	12/10/	2024	
		THE SPACE FO	OR FEDER	AL OR STA	ATE OFICE USE		
Approved by							
CHRISTOPHER \	WALLS / Ph: (57	5) 234-2234 / Approved		Petrol Title	leum Engineer	Date	02/04/2025
certify that the applic	ant holds legal or e	hed. Approval of this notice does equitable title to those rights in the		Office CAF	RLSBAD		
				_			

Title 18 U.S.C Section 1001 and Title 43 U.S.C Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c)and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

(Form 3160-5, page 2)

Additional Information

Additional Remarks

The pool code is changing from Wildcat; Bone Spring (96403) to Cotton Draw; Bone Spring, South (96546).

See attached Drilling Plan for updated cement and casing program.

A saturated salt brine will be utilized while drilling through the salt formations.

Location of Well

0. SHL: NENW / 501 FNL / 2252 FWL / TWSP: 24S / RANGE: 31E / SECTION: 22 / LAT: 32.208728 / LONG: -103.766951 (TVD: 0 feet, MD: 0 feet)
PPP: NENW / 330 FNL / 1870 FWL / TWSP: 24S / RANGE: 31E / SECTION: 22 / LAT: 32.209196 / LONG: -103.768186 (TVD: 10841 feet, MD: 11300 feet)
PPP: NENW / 330 FNL / 1870 FWL / TWSP: 24S / RANGE: 31E / SECTION: 27 / LAT: 32.190942 / LONG: -103.759258 (TVD: 10850 feet, MD: 16600 feet)
BHL: SENW / 2590 FNL / 1870 FWL / TWSP: 24S / RANGE: 31E / SECTION: 34 / LAT: 32.173946 / LONG: -103.768125 (TVD: 10863 feet, MD: 24032 feet)

PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME: XTO
LEASE NO.: NMNM0506A
LOCATION: Sec. 22, T.24 S, R 31 E

COUNTY: Eddy County, New Mexico

WELL NAME & NO.: Poker Lake Unit 15 TWR 231H
SURFACE HOLE FOOTAGE: 521'/N & 2252'/W
BOTTOM HOLE FOOTAGE: 50'/S & 2320'/E

Changes approved through engineering via **Sundry 2823628** on 12-11-2024_. Any previous COAs not addressed within the updated COAs still apply.

COA

H_2S	•	No	O	Yes
Potash /	None	Secretary	C R-111-Q	Open Annulus
WIPP	Choose	e an option (including bla	nk option.)	□ WIPP
Cave / Karst	C Low	Medium	் High	Critical
Wellhead	Conventional	• Multibowl	Both	Diverter
Cementing	Primary Squeeze	Cont. Squeeze	EchoMeter	DV Tool
Special Req	Capitan Reef	Water Disposal	□ COM	Unit
Waste Prev.	C Self-Certification	C Waste Min. Plan	APD Submitted p	rior to 06/10/2024
Additional	Flex Hose	Casing Clearance	Pilot Hole	Break Testing
Language	Four-String	Offline Cementing	Fluid-Filled	

A. HYDROGEN SULFIDE

Hydrogen Sulfide (H2S) monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet 43 CFR 3176 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.

B. CASING

- 1. The 9-5/8 inch surface casing shall be set at approximately 775 feet (a minimum of 70 feet (Eddy County) into the Rustler Anhydrite, above the salt, and below usable fresh water) and cemented to the surface.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with

- surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.
- b. Wait on cement (WOC) time for a primary cement job will be a minimum of <u>8 hours</u> or <u>500 pounds compressive strength</u>, whichever is greater. (This is to include the lead cement)
- c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
- d. If cement falls back, remedial cementing will be done prior to drilling out that string.
- 2. The minimum required fill of cement behind the **7-5/8** inch intermediate casing is: Operator has proposed to cement in two stages by conventionally cementing the first stage and performing a bradenhead squeeze on the second stage, contingent upon no returns to surface.
 - a. First stage: Operator will cement with intent to reach the top of the Brushy Canyon at 7008'
 - b. **Second stage:** Operator will perform bradenhead squeeze and top-out. Cement to surface. If cement does not reach surface, the appropriate BLM office shall be notified. **Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst.**
 - ❖ In Medium Cave/Karst Areas if cement does not circulate to surface on the first two casing strings, the cement on the 3rd casing string must come to surface.

Operator has proposed to pump down Surface X Intermediate 1 annulus after primary cementing stage. Operator must run Echo-meter to verify Cement Slurry/Fluid top in the annulus OR operator shall run a CBL from TD of the Surface casing to tieback requirements listed above after the second stage BH to verify TOC. Submit results to the BLM. No displacement fluid/wash out shall be utilized at the top of the cement slurry between second stage BH and top out. Operator must use a limited flush fluid volume of 1 bbl following backside cementing procedures.

If cement does not reach surface, the next casing string must come to surface.

- 3. The minimum required fill of cement behind the 5-1/2 inch production casing is:
 - Cement should tie-back at least **200 feet** into previous casing string. Operator shall provide method of verification.

C. PRESSURE CONTROL

- 1. Variance approved to use flex line from BOP to choke manifold. Manufacturer's specification to be readily available. No external damage to flex line. Flex line to be installed as straight as possible (no hard bends).
 - 2. Operator has proposed a multi-bowl wellhead assembly. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be **5000 (5M)** psi.
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. If the cement does not circulate and one-inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
 - e. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172 must be followed.

D. SPECIAL REQUIREMENT (S)

Unit Wells

The well sign for a unit well shall include the unit number in addition to the surface and bottom hole lease numbers. This also applies to participating area numbers. If a participating area has not been established, the operator can use the general unit designation, but will replace the unit number with the participating area number when the sign is replaced.

Commercial Well Determination

A commercial well determination shall be submitted after production has been established for at least six months. (This is not necessary for secondary recovery unit wells)

BOPE Break Testing Variance

- BOPE Break Testing is ONLY permitted for intervals utilizing a 5M BOPE or less. (Annular preventer must be tested to a minimum of 70% of BOPE working pressure and shall be higher than the MASP.)
- BOPE Break Testing is NOT permitted to drilling the production hole section.
- Variance only pertains to the intermediate hole-sections and no deeper than the Bone Springs formation.
- While in transfer between wells, the BOPE shall be secured by the hydraulic carrier or cradle.
- Any well control event while drilling require notification to the BLM Petroleum Engineer (575-706-2779) prior to the commencement of any BOPE Break Testing operations.

- A full BOPE test is required prior to drilling the first deep intermediate hole section. If any subsequent hole interval is deeper than the first, a full BOPE test will be required. (200' TVD tolerance between intermediate shoes is allowable).
- The BLM is to be contacted (575-361-2822 Eddy County) 4 hours prior to BOPE tests.
- As a minimum, a full BOPE test shall be performed at 21-day intervals.
- In the event any repairs or replacement of the BOPE is required, the BOPE shall test as per 43 CFR 3172.
- If in the event break testing is not utilized, then a full BOPE test would be conducted.

Offline Cementing

Contact the BLM prior to the commencement of any offline cementing procedure.

Engineer may elect to vary this language. Speak with Chris about implementing changes and whether that change seems reasonable.

Casing Clearance

String does not meet 0.422" clearance requirement per 43 CFR 3172. Cement tieback requirement increased 100' for Production casing tieback. Operator may contact approving engineer to discuss changing easing set depth or grade to meet clearance requirement.

GENERAL REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)

Contact Eddy County Petroleum Engineering Inspection Staff:

Email or call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220; **BLM NM CFO DrillingNotifications@BLM.GOV**; (575) 361-2822

- 1. Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval.
 - a. In the event the operator has proposed to drill multiple wells utilizing a skid/walking rig. Operator shall secure the wellbore on the current well, after installing and testing the wellhead, by installing a blind flange of like pressure rating to the wellhead and a pressure gauge that can be monitored while drilling is performed on the other well(s).
 - b. When the operator proposes to set surface casing with Spudder Rig
 - i. Notify the BLM when moving in and removing the Spudder Rig.
 - ii. Notify the BLM when moving in the 2nd Rig. Rig to be moved in within 90 days of notification that Spudder Rig has left the location.
 - iii. BOP/BOPE test to be conducted per **43 CFR 3172** as soon as 2nd Rig is rigged up on well.
- 2. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works are located, this does not include the dog house or stairway area.
- 3. For intervals in which cement to surface is required, cement to surface should be verified with a visual check and density or pH check to differentiate cement from spacer and drilling mud. The results should be documented in the driller's log and daily reports.

A. CASING

1. Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.

- 2. Wait on cement (WOC) for Potash Areas: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi for all cement blends of both lead and tail cement, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 3. Wait on cement (WOC) for Water Basin: After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least 8 hours. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements. The casing integrity test can be done (prior to the cement setting up) immediately after bumping the plug.
- 4. Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.
- 5. No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.
- 6. On that portion of any well approved for a 5M BOPE system or greater, a pressure integrity test of each casing shoe shall be performed. Formation at the shoe shall be tested to a minimum of the mud weight equivalent anticipated to control the formation pressure to the next casing depth or at total depth of the well. This test shall be performed before drilling more than 20 feet of new hole.
- 7. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.
- 8. Whenever a casing string is cemented in the R-111-Q potash area, the NMOCD requirements shall be followed.

B. PRESSURE CONTROL

- 1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in 43 CFR 3172.
- 2. If a variance is approved for a flexible hose to be installed from the BOP to the choke manifold, the following requirements apply: The flex line must meet the requirements of API 16C. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's

requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor.

- 3. 5M or higher system requires an HCR valve, remote kill line and annular to match. The remote kill line is to be installed prior to testing the system and tested to stack pressure.
- 4. If the operator has proposed a multi-bowl wellhead assembly in the APD. The following requirements must be met:
 - i. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - ii. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - iii. Manufacturer representative shall install the test plug for the initial BOP test.
 - iv. Whenever any seal subject to test pressure is broken, all the tests in 43 CFR 3172.6(b)(9) must be followed.
 - v. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.
- 5. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.
 - i. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead cement), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).
 - ii. In potash areas, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. For all casing strings, casing cut-off and BOP installation can be initiated at twelve hours after bumping the cement plug. The BOPE test can be initiated after bumping the cement plug with the casing valve

- open. (only applies to single stage cement jobs, prior to the cement setting up.)
- iii. The tests shall be done by an independent service company utilizing a test plug not a cup or J-packer and can be initiated immediately with the casing valve open. The operator also has the option of utilizing an independent tester to test without a plug (i.e. against the casing) pursuant to 43 CFR 3172 with the pressure not to exceed 70% of the burst rating for the casing. Any test against the casing must meet the WOC time for 8 hours or 500 pounds compressive strength, whichever is greater, prior to initiating the test (see casing segment as lead cement may be critical item).
- iv. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- v. The results of the test shall be reported to the appropriate BLM office.
- vi. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- vii. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.
- viii. BOP/BOPE must be tested by an independent service company within 500 feet of the top of the Wolfcamp formation if the time between the setting of the intermediate casing and reaching this depth exceeds 20 days. This test does not exclude the test prior to drilling out the casing shoe as per 43 CFR 3172.

C. DRILLING MUD

Mud system monitoring equipment, with derrick floor indicators and visual and audio alarms, shall be operating before drilling into the Wolfcamp formation, and shall be used until production casing is run and cemented.

D. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be

disposed of on the well location or surrounding area. Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.

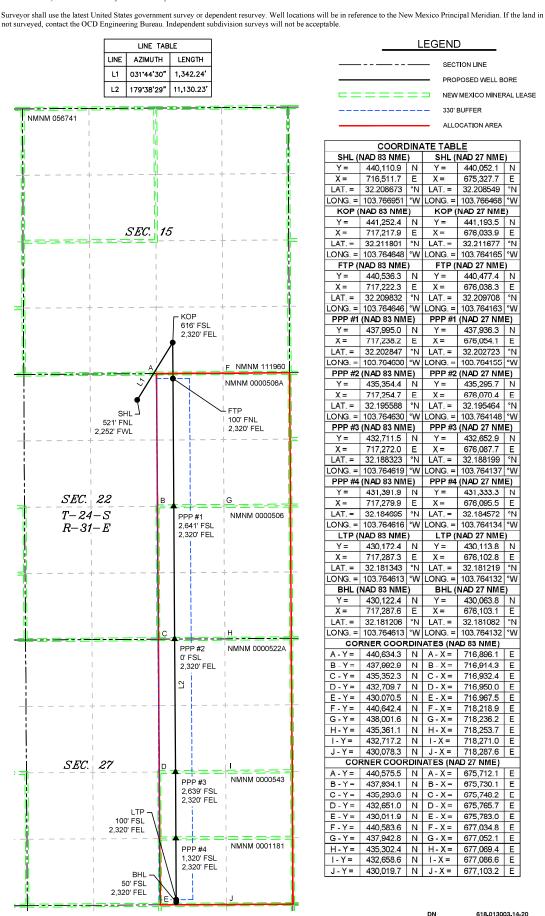
Approved by Zota Stevens on 12/11/2024 575-234-5998 / zstevens@blm.gov

	electronically					w Mexico al Resources Departmen ION DIVISION	t		Re	evised July, 09 202
Via OC	D Permitting								☐ Initial Sub	nittal
								Submital	X Amended 1	
								Type:		xeport
									☐ As Drilled	
			•		WELL LOCA	TION INFORMATION				
API Nu		E 54100	Pool Code		_	Pool Name	N DDAW.	DONE CO	DING COLL	F1.1
Propert		5- 54180	Property N	9654	ь	COTTO	N DRAW;	BONE SP	Well Number	
riopeii	y Code		Property is	vanne	POKER L	AKE UNIT 15 TWR				213H
OGRID	No.		Operator N	Name					Ground Level	Elevation
	37307	75			XTO PERMIA	N OPERATING, LLC	C		3	3,532'
Surface	Owner: 🗆 S	State □Fee □]Tribal ⊠Fe	deral		Mineral Owner:	State	□Tribal 🔯1	Federal	
T 77	Ta :	T.m. 1.	T _n	T		e Hole Location	Tron	Ι,		[a .
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude		ongitude	County
С	22	24S	31E		521 FNL	2,252 FWL	32.208	3673 - ⁻	103,766951	EDDY
					Botton	n Hole Location				
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	I	ongitude	County
О	27	248	31E		50 FSL	2,320 FEL	32.181	206 -	103,764613	EDDY
Dedicat	ted Acres	Infill or Def	ning Well	Definin	g Well API	Overlapping Spacing	Unit (Y/N)	Consolidati	on Code	
	40,00		FILL		0-015-54186	N	. ,		U	
		•								
Order N	Numbers.					Well Setbacks are und	der Common C	wnership:	☑ Yes ☐ No	
					Kick (Off Point (KOP)				
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	L	ongitude	County
0	15	24S	31E		616 FSL	2,320 FEL	32.211	801 -	103.764648	EDDY
UL	Section	Township	Range	Lot	Ft. from N/S	'ake Point (FTP) Ft from E/W	Latitude	Т.	ongitude	County
				Lot						-
В	22	24S	31E		100 FNL	2,320 FEL	32,209	9832 -	103.764646	EDDY
					Last T	ake Point (LTP)				
UL	Section	Township	Range	Lot	Ft. from N/S	Ft. from E/W	Latitude	I	ongitude	County
0	27	24S	31E		100 FSL	2,320 FEL	32.181	343 -	103.764613	EDDY
							1			
Unitize	d Area of Are	ea of Interest		Canaina I	Init Toma . MIII		Grou	nd Elevation		
	NMNN	1105422429	•	Spacing t	Jnit Type : Horiz	zontal U Vertical			3,532'	
OPERA	ATOR CERT	IFICATIONS				SURVEYOR CERTIFIC	ATIONS			
					and complete to the directional well,	I hereby certify that the actual surveys made by i				
that this	s organizatio	n either owns a	working inter	est or unlea	sed mineral interest s a right to drill this	correct to the best of my		•		
at this l	ocation pursi	uant to a contra	ct with an owi	ier of a wor	king interest or or a compulsory				DILLON	
		etofore entered			n a compuisory			JAP	WEX/O	42
		ontal well, I fur							W. S	
unlease	d mineral int	of at least one erest in each tr	act (in the targ	get pool or is	nformation) in			<u> </u>	23786	<u>«</u>
		e well's complet order from the		ll be located	l or obtained a			<i>े</i> ट्रू \		A VOR
•		•				1/	11/	Tro.	23786 S/ONAL 5	URIT
<		60/11/2	11/1	5/2024			1///		ONAL S	
Signatu	<i>nanTh</i> re	a Wei	Date	JIZUZ4		Signature and Seal of Pro	ofessional Surv	/eyor		
	antha We	eis				MARK DILLON HARP 237			10/31/2024	
Printed						Certificate Number		f Survey		
		artnik@exx	onmobil.	com						
Email A	Address					DN			618 01300	2 14 20

Note: No allowable will be assigned to this completion until all interest have been consolidated or a non-standard unit has been approved by the division.

ACREAGE DEDICATION PLATS

This grid represents a standard section. You may superimpose a non-standard section, or larger area, over this grid. Operators must outline the dedicated acreage in a red box clearly show the well surface location and bottom hole location, if it is a directionally drilled, with the dimensions from the section lines in the cardinal directions. If this is a horizontal wellbore show on this plat the location of the First Take Point and Last Take Point, and the point within the Completed interval (other then the First Take Point and Last Take Point) that is closest to any outer boundary of the tract.



15

Lake

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DRILLING PLAN: BLM COMPLIANCE (Supplement to BLM 3160-3)

XTO Energy Inc.

POKER LAKE UNIT 15 TWR 213H

Projected TD: 20539.45' MD / 9543' TVD

SHL: 521' FNL & 2252' FWL , Section 22, T24S, R31E

BHL: 50' FSL & 2320' FEL , Section 27, T24S, R31E

EDDY County, NM

1. Geologic Name of Surface Formation

A. Quaternary

2. Estimated Tops of Geological Markers & Depths of Anticipated Fresh Water, Oil or Gas

Formation	Well Depth (TVD)	Water/Oil/Gas
Rustler	656'	Water
Top of Salt	992'	Water
Base of Salt	4244'	Water
Delaware	4456'	Water
Brushy Canyon	7023'	Water/Oil/Gas
Bone Spring	8304'	Water
Ava l on	8410'	Water/Oil/Gas
1st Bone Spring	9042'	Water/Oil/Gas
Target/Land Curve	9543'	Water/Oil/Gas

^{***} Hydrocarbons @ Brushy Canyon

No other formations are expected to yield oil, gas or fresh water in measurable volumes. The surface fresh water sands will be protected by setting 9.625 inch casing @ 756' (236' above the salt) and circulating cement back to surface. The intermediate will isolate from the top of salt down to the next casing seat by setting 7.625 inch casing at 8800.67' and cemented to surface. A 6.75 inch curve and 6.75 inch lateral hole will be drilled to 20539.45 MD/TD and 5.5 inch production casing will be set at TD and cemented back up in the intermediate shoe (estimated TOC 8500.67 feet).

3. Casing Design

Hole Size	Depth	OD Csg	Weight	Grade	Collar	New/Used	SF Burst	SF Collapse	SF Tension
12.25	0' – 756'	9.625	40	J-55	втс	New	1.50	8.33	20.83
8.75	0' - 4000'	7.625	29.7	RY P-110	Flush Joint	New	4.00	2.57	2.13
8.75	4000' — 8800.67'	7.625	29.7	HC L-80	F l ush Joint	New	2.91	2.16	2.85
6.75	0' - 8700.67'	5.5	20	RY P-110	Semi-Premium / Freedom	New	1.05	2.73	2.33
6.75	8700.67' - 20539.45'	5.5	20	RY P-110	Semi-F l ush / Ta l on	New	1.05	2.49	2.33

[•] XTO requests the option to utilize a spudder rig (Atlas Copco RD20 or Equivalent) to set and cement surface casing per this Sundry

Wellhead:

Operator will utilize Multibowl System - See Attached

^{***} Groundwater depth 40' (per NM State Engineers Office).

4. Cement Program

Surface Casing: 9.625, 40 New BTC, J-55 casing to be set at +/- 756'

Lead: 150 sxs EconoCem-HLTRRC (mixed at 10.5 ppg, 1.87 ft3/sx, 10.13 gal/sx water) Tail: 130 sxs Class C + 2% CaCl (mixed at 14.8 ppg, 1.35 ft3/sx, 6.39 gal/sx water)

Top of Cement: Surface

Compressives: 12-hr = 900 psi 24 hr = 1500 psi

Intermediate Casing: 7.625, 29.7 New casing to be set at +/- 8800.67'

st Stage

Optional Lead: 380 sxs Class C (mixed at 10.5 ppg, 2.77 ft3/sx, 15.59 gal/sx water)

TOC: Surface

Tail: 160 sxs Class C (mixed at 14.8 ppg, 1.35 ft3/sx, 6.39 gal/sx water)

TOC: Brushy Canyon @ 7023

Compressives: 12-hr = 900 psi 24 hr = 1150 psi

2nd Stage

Lead: 0 sxs Class C (mixed at 12.9 ppg, 2.16 ft3/sx, 9.61 gal/sx water) Tail: 790 sxs Class C (mixed at 14.8 ppg, 1.33 ft3/sx, 6.39 gal/sx water)

Top of Cement: 0

Compressives: 12-hr = 900 psi 24 hr = 1150 psi

XTO requests to pump a two stage cement job on the 7-5/8" intermediate casing string with the first stage being pumped conventionally with the calculated top of cement at the Brush Canyon (7023') and the second stage performed as a bradenhead squeeze with planned cement from the Brushy Canyon to surface. If cement is not visually confirmed to circulate to surface, the final cement top after the second stage job will be verified by Echo-meter. If necessary, a top out consisting of 1,500 sack of Class C cement + 3% Salt + 1% PreMag-M + 6% Bentonite Gel (2.30 yld, 12.91 ppg) will be executed as a contingency. If cement is still unable to circulate to surface, another Echo-meter run will be performed for cement top verification.

XTO will report to the BLM the volume of fluid (limited to 5 bbls) used to flush intermediate casing valves following backside cementing procedures.

XTO requests to pump an Optional Lead if well conditions dictate in an attempt to bring cement inside the first intermediate casing. If cement reaches the desired height, the BLM will be notified and the second stage bradenhead squeeze and subsequent TOC verification will be negated.

XTO requests the option to conduct the bradenhead squeeze and TOC verification offline as per standard approval from BLM when unplanned remediation is needed and batch drilling is approved. In the event the bradenhead is conducted, we will ensure the first stage cement job is cemented properly and the well is static with floats holding and no pressure on the csg annulus as with all other casing strings where batch drilling operations occur before moving off the rig. The TA cap will also be installed per Cactus procedure and pressure inside the casing will be monitored via the valve on the TA cap as per standard batch drilling ops.

Production Casing: 5.5, 20 New Semi-Flush / Talon, RY P-110 casing to be set at +/- 20539.45

Lead: 20 sxs NeoCem (mixed at 11.5 ppg, 2.69 ft3/sx, 15.00 gal/sx water) Top of Cement: 8500.67 feet
Tail: 820 sxs VersaCem (mixed at 13.2 ppg, 1.51 ft3/sx, 8.38 gal/sx water) Top of Cement: 9000.67 feet
Compressives: 12-hr = 800 psi 24 hr = 1500 psi

XTO requests the option to offline cement and remediate (if needed) surface and intermediate casing strings where batch drilling is approved and if unplanned remediation is needed. XTO will ensure well is static with no pressure on the csg annulus, as with all other casing strings where batch drilling operations occur before moving off the rig. The TA cap will also be installed when applicable per Cactus procedure and pressure inside the casing will be monitored via the valve on the TA cap as per standard batch drilling ops. Offline cement operations will then be conducted after the rig is moved off the current well to the next well in the batch sequence.

5. Pressure Control Equipment

Once the permanent WH is installed on the casing, the blow out preventer equipment (BOP) will consist of 5M Hydril and 10M 3-Ram BOP.

All BOP testing will be done by an independent service company. Operator will test as per BLM CFR43-3172

A variance is requested to allow use of a flex hose as the choke line from the BOP to the Choke Manifold. .

XTO requests a variance to be able to batch drill this well if necessary. In doing so, XTO will set casing and ensure that the well is cemented properly (unless approval is given for offline cementing) and the well is static. With floats holding, no pressure on the csg annulus, and the installation of a 10K TA cap as per Cactus recommendations, XTO will contact the BLM to skid the rig to drill the remaining wells on the pad. Once surface and both intermediate strings are all completed, XTO will begin drilling the production

hole on each of the wells.

A variance is requested to **ONLY** test broken pressure seals on the BOP equipment when moving from wellhead to wellhead which is in compliance with API Standard 53. API standard 53 states, that for pad drilling operation, moving from one wellhead to another within 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken. We will request permission to **ONLY** retest broken pressure seals if the following conditions are met: 1. After a full BOP test is conducted on the first well on the pad 2. When skidding to drill an intermediate section that does not penetrate into the Wolfcamp.

6. Proposed Mud Circulation System

INTERVAL	Hole Size	Mud Type	MW	Viscosity	Fluid Loss	Additional
			(ppg)	(sec/qt)	(cc)	Comments
0' - 756'	12.25	FW/Native	8.4-8.9	35-40	NC	Fresh water or native water
756' - 4456'	8.75	Saturated brine	10.0-10.5	30-32	NC	Fully saturated salt across salado / salt
4456' - 8800.67'	8.75	Brine or Direct Emu l sion	10-10.5	30-32	NC	Depending on well conditions
8800.67' - 20539.45'	6.75	ОВМ	9-9.5	50-60	NC - 20	N/A

The necessary mud products for weight addition and fluid loss control will be on location at all times.

Spud with fresh water/native mud. Drill out from under surface casing with Saturated Salt. A saturated salt brine mud will be used while drilling through the salt formation. Use fibrous materials as needed to control seepage and lost circulation. Pump viscous sweeps as needed for hole cleaning. Pump speed will be recorded on a daily drilling report after mudding up. A Pason or Totco will be used to detect changes in loss or gain of mud volume. A mud test will be performed every 24 hours to determine: density, viscosity, strength, filtration and pH as necessary. Use available solids controls equipment to help keep mud weight down after mud up. Rig up solids control equipment to operate as a closed loop system.

7. Auxiliary Well Control and Monitoring Equipment

- A. A Kelly cock will be in the drill string at all times.
- B. A full opening drill pipe stabbing valve having appropriate connections will be on the rig floor at all times.
- C. H2S monitors will be on location when drilling below the 9.625 casing.

8. Logging, Coring and Testing Program

Open hole logging will not be done on this well.

9. Abnormal Pressures and Temperatures / Potential Hazards

None Anticipated. BHT of 160 to 180 F is anticipated. No H2S is expected but monitors will be in place to detect any H2S occurrences. Should these circumstances be encountered the operator and drilling contractor are prepared to take all necessary steps to ensure safety of all personnel and environment. Lost circulation could occur but is not expected to be a serious problem in this area and hole seepage will be compensated for by additions of small amounts of LCM in the drilling fluid.

10. Anticipated Starting Date and Duration of Operations

Anticipated spud date will be after BLM approval. Move in operations and drilling is expected to take 40 days.

Well Plan Report - PLU 15 Twin Wells Ranch-213H

	Pad 2	PLU 15 Twin Wells Ranch-213H							
Well Plan Report	Site:	Slot:							
Ranch-213H									
18/24, 9:41 AM Well Plan Report - PLU 15 Twin Wells Ra	20539.45 ft	9543.00 ft	New Mexico East - NAD 27	440052.10 ft	675327.70 ft	3564.00 ft	3532.00 ft	Grid	0.30 Deg
10/18/24, 9:41 AM Well Plan Report -	Measured Depth:	TVD RKB: Location	Cartographic Reference System:	Northing:	Easting:	RKB:	Ground Level:	North Reference:	Convergence Angle:
Released to	Imaging	g: 2/18/2	2025 9:	29:	36 A	M			

Plan Sections	PLL	PLU 15 Iwin Wells Ranch-213H	≺anch-213Н					
Measured			DVT			Build	Turn	Dogleg
Depth	Inclination	Azimuth	RKB	Y Offset	X Offset	Rate	Rate	Rate
(#)	(Deg)	(Deg)	(#)	(ft)	(ft)	(Deg/100ft)	(Deg/100ft)	(Deg/100ft) Target
00.0	00:00	00.00	00.00	0.00	0.00	00.00	00:00	0.00
1100.00	00.00	00.00	1100.00	0.00	0.00	00.00	00.00	0.00
1878.58	15.57	31.74	1869.03	89.42	55.32	2.00	00:00	2.00
6095.29	15.57	31.74	5930.97	1052.06	650.82	00.00	00.00	0.00
6873.87	00:00	00:00	6700.00	1141.48	706.14	-2.00	00:00	2.00
29.0006	00.00	00.00	8826.80	1141.48	706.14	00.00	00.00	0.00
10125.67	90.00	179.64	9543.00	425.30	710.60	8.00	00.00	8.00 FTP 12
20489.47	00'06	179.64	9543.00	-9938.30	775.10	00.00	00.00	0.00 LTP 12
20539.45	00.06	179.64	9543.00	-9988.28	775.41	0.00	0.00	0.00 BHL 12

	Semi-minor Tool
	Semi-minor
	Semi-major
	Magnitude
	Vertical
:213H	Lateral
PLU 15 Twin Wells Ranch-213l	TVD Highside
Position Uncertainty	Measured

	-30.014 MWD+IFR1+MS	-31.855 MWD+IFR1+MS	-33.442 MWD+IFR1+MS	-34.798 MWD+IFR1+MS	-35.948 MWD+IFR1+MS	-36.915 MWD+IFR1+MS	-37.725 MWD+IFR1+MS	-38.484 MWD+IFR1+MS	-38.551 MWD+IFR1+MS	-38.729 MWD+IFR1+MS	-38.952 MWD+IFR1+MS	-39.172 MWD+IFR1+MS	-39.391 MWD+IFR1+MS	-39.608 MWD+IFR1+MS	-39.823 MWD+IFR1+MS	-40.037 MWD+IFR1+MS	-40.248 MWD+IFR1+MS	-40.458 MWD+IFR1+MS	-40.667 MWD+IFR1+MS	-40.873 MWD+IFR1+MS	-41.078 MWD+IFR1+MS	-41.280 MWD+IFR1+MS	-41.481 MWD+IFR1+MS	-41.681 MWD+IFR1+MS	-41.878 MWD+IFR1+MS	-42.074 MWD+IFR1+MS	-42.268 MWD+IFR1+MS	-42.460 MWD+IFR1+MS	-42.651 MWD+IFR1+MS	-42.841 MWD+IFR1+MS	129.521 MWD+IFR1+MS	109.311 MWD+IFR1+MS	103.187 MWD+IFR1+MS
	23.910	24.302	24.683	25.052	25.409	25.755	26.089	26.333	26.418	26.741	27.064	27.389	27.714	28.040	28.367	28.695	29.023	29.352	29.682	30.012	30.343	30.675	31.007	31.339	31.673	32.006	32.340	32.675	33.010	33,348	33.784	34.266	34.563
	24.559	25.021	25.476	25.924	26.363	26.793	27.213	27.474	27.553	27.860	28.175	28.491	28.808	29.126	29.446	29.766	30.087	30.409	30.731	31.055	31.379	31.704	32.030	32.357	32.684	33.012	33.340	33.669	33.999	34 332	34.758	35.962	37.157
port	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Well Plan Report	9.143 0.000	9.321 0.000	9.487 0.000	9.644 0.000	9.793 0.000	9.935 0.000	10.071 0.000	10.168 0.000	10.203 0.000	10.335 0.000	10.470 0.000	10.609 0.000	10.750 0.000	10.893 0.000	11.040 0.000	11.190 0.000	11.343 0.000	11.499 0.000	11.658 0.000	11.820 0.000	11.985 0.000	12.153 0.000	12.324 0.000	12.498 0.000	12.676 0.000	12.856 0.000	13.040 0.000	13.227 0.000	13.417 0.000	13.611 0.000	13.814 0.000	14.121 0.000	14.632 0.000
	0.000	0.000	0.000	0000	0.000	0.000	0.000	0.000	0.000	0000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0000	0.000	0.000	0.000	0.000	000.0	0.000	0000	-0.000	-0.000	-0.000
	24.057	24.446	24.824	25.192	25.549	25.895	26.230	27.038	27.118	27.427	27.741	28.056	28.373	28.690	29.008	29.327	29.647	29.968	30.290	30.613	30.936	31.260	31.585	31.911	32.237	32,564	32.892	33,220	33.549	33.881	34.188	34.462	34.711
	0.000	0.000	0.000	000.0	000.0	0.000	0.000	0.000	0.000	000.0	000.0	000.0	000.0	0.000	000.0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	000.0	0.000	0.000	000.0	0.000	000.0	0.000	000.0	0.000	000.0	0.000
	24.898	25.382	25.826	26.230	26.593	26.916	27.197	26.781	26.865	27.184	27 509	27 834	28.160	28.487	28.815	29.143	29.472	29.802	30.132	30.463	30.795	31.127	31 460	31.793	32.127	32.462	32.797	33.132	33.468	33 807	33.534	33 699	33,366
	6032.327	6129.960	6228.288	6327.190	6426.547	6526.237	6626.138	6700.000	6726.130	6826.130	6926.130	7026.130	7126.130	7226.130	7326.130	7426.130	7526.130	7626.130	7726.130	7826.130	7926.130	8026.130	8126.130	8226.130	8326.130	8426.130	8526.130	8626.130	8726.130	8826.803	8925.812	9023.567	9117.492
	31.742	31.742	31.742	31 742	31.742	31.742	31.742	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	179.643	179 643	179.643
	13.477	11.477	9.477	7.477	5.477	3.477	1.477	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	7.946	15.946	23.946
10/18/24, 9:41 AM	6200.000	6300.000	6400.000	000.0059	000.0099	6700.000	6800.000	6873.870	000.0069	7000.000	7100.000	7200.000	7300.000	7400.000	7500.000	7600.000	7700.000	7800.000	7900.000	8000.000	8100.000	8200.000	8300.000	8400.000	8500.000	8600.000	8700.000	8800.000	8900.000	9000.673	9100.000	9200.000	9300.000
	leas	ed to	o Im	agii	ng:	2/18	3/202	25 9.	:29:	36 A	1 <i>M</i>																						

	100.708 MWD+IFR1+MS	99.529 MWD+IFR1+MS	98.982 MWD+IFR1+MS	98.812 MWD+IFR1+MS	98.903 MWD+IFR1+MS	99.182 MWD+IFR1+MS	99.585 MWD+IFR1+MS	100.032 MWD+IFR1+MS	100.132 MWD+IFR1+MS	100,443 MWD+IFR1+MS	100.910 MWD+IFR1+MS	101.429 MWD+IFR1+MS	102.004 MWD+IFR1+MS	102.644 MWD+IFR1+MS	103.358 MWD+IFR1+MS	104.157 MWD+IFR1+MS	105.055 MWD+IFR1+MS	106.069 MWD+IFR1+MS	107.218 MWD+IFR1+MS	108.526 MWD+IFR1+MS	110.019 MWD+IFR1+MS	111.730 MWD+IFR1+MS	113.692 MWD+IFR1+MS	115.943 MWD+IFR1+MS	118.514 MWD+IFR1+MS	121.427 MWD+IFR1+MS	124.682 MWD+IFR1+MS	128.243 MWD+IFR1+MS	132.030 MWD+IFR1+MS	-44.075 MWD+IFR1+MS	-40.214 MWD+IFR1+MS	-36.520 MWD+IFR1+MS	-33.096 MWD+IFR1+MS
	34.801	35.000	35.167	35.303	35.412	35.495	35.554	35.589	35.592	35.608	35.651	35.715	35.799	35.902	36.024	36.163	36.321	36.494	36.684	36.887	37.103	37.329	37.564	37.805	38.048	38.290	38.526	38.751	38.962	39.156	39.329	39.481	39.614
	38.189	39.029	39.672	40.131	40.426	40.588	40.656	40.675	40.679	40.688	40.702	40.718	40.736	40.756	40.779	40.806	40.835	40.869	40.908	40.953	41.005	41.065	41.135	41.219	41.317	41,435	41.575	41.742	41.940	42.171	42.438	42.739	43.075
oort	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Well Plan Report	15.415 0.000	16.493 0.000	17.850 0.000	19.437 0.000	21.192 0.000	23.044 0.000	24.927 0.000	26.780 0.000	26.875 0.000	27.055 0.000	27.294 0.000	27.554 0.000	27.834 0.000	28.133 0.000	28.450 0.000	28.785 0.000	29.138 0.000	29.507 0.000	29.893 0.000	30.293 0.000	30.709 0.000	31.139 0.000	31.582 0.000	32.039 0.000	32.508 0.000	32.989 0.000	33.482 0.000	33.985 0.000	34.499 0.000	35.023 0.000	35.557 0.000	36.100 0.000	36.652 0.000
	34.932 -0.000	35.126 -0.000	35.293 -0.000	35.434 -0.000	35.551 -0.000	35.645 -0.000	35.717 -0.000	35.766 -0.000	35.773 -0.000	35.798 -0.000	35.857 -0.000	35.937 -0.000	36.040 -0.000	36.163 -0.000	36.307 -0.000	36.472 -0.000	36.658 -0.000	36.863 -0.000	37.089 -0.000	37.334 -0.000	37.597 -0.000	37.880 -0.000	38.180 -0.000	38.499 -0.000	38.835 -0.000	39.188 -0.000	39.557 -0.000	39.942 -0.000	40.343 -0.000	40.759 -0.000	41.189 -0.000	41.634 -0.000	42.092 -0.000
	32.600 0.000	31.502 0.000	30.204 0.000	28.869 0.000	27.690 0.000	26.875 0.000	26.612 0.000	27.025 0.000	26.875 0.000	27.055 0.000	27.294 0.000	27.554 0.000	27.834 0.000	28.133 0.000	28.450 0.000	28.785 0.000	29.138 0.000	29.507 0.000	29.893 0.000	30.293 0.000	30.709 0.000	31.139 0.000	31.582 0.000	32.039 0.000	32.508 0.000	32.989 0.000	33.482 0.000	33.985 0.000	34.499 0.000	35.023 0.000	35.557 0.000	36.100 0.000	36.652 0.000
	9205.759	9286.650	9358.591	9420.181	9470.221	9507.739	9532.002	9542.540	9543.000	9543,000	9543.000	9543.000	9543.000	9543,000	9543,000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000	9543.000	9543.000	9543.000	9543.000
	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179 643	179 643	179.643	179.643	179 643	179 643	179 643	179.643	179.643	179.643	179.643	179 643	179.643	179 643	179.643	179.643	179.643	179.643	179 643	179.643	179 643	179.643
	31.946	39.946	47.946	55.946	63.946	71.946	79.946	87.946	90.000	000.06	000 06	000 06	90,000	000.06	000.06	000 06	000 06	000 06	90.000	000 06	90.000	000 06	000 06	000 06	000 06	000.06	90.000	000.06	000 06	000 06	90.000	000 06	90.000
10/18/24, 9:41 AM	9400.000	9500.000	9600.000	9700.000	9800.000	000.0066	10000.000	10100.000	10125.673	10200.000	10300.000	10400.000	10500.000	10600.000	10700.000	10800.000	10900.000	11000.000	11100.000	11200.000	11300.000	11400.000	11500.000	11600.000	11700.000	11800.000	11900.000	12000.000	12100.000	12200.000	12300.000	12400.000	12500.000
	leas	ed to	o In	agi	ng:	2/18	3/202	25 9.	:29:	36 A	1 <i>M</i>																						

	-30.000 MWD+IFR1+MS	-27.247 MWD+IFR1+MS	-24.828 MWD+IFR1+MS	-22.714 MWD+IFR1+MS	-20.871 MWD+IFR1+MS	-19.261 MWD+IFR1+MS	-17.852 MWD+IFR1+MS	-16.615 MWD+IFR1+MS	-15.523 MWD+IFR1+MS	-14.556 MWD+IFR1+MS	-13.694 MWD+IFR1+MS	-12.924 MWD+IFR1+MS	-12.232 MWD+IFR1+MS	-11.607 MWD+IFR1+MS	-11.041 MWD+IFR1+MS	-10.527 MWD+IFR1+MS	-10.057 MWD+IFR1+MS	-9.627 MWD+IFR1+MS	-9.232 MWD+IFR1+MS	-8.868 MWD+IFR1+MS	-8.532 MWD+IFR1+MS	-8.220 MWD+IFR1+MS	-7.930 MWD+IFR1+MS	-7.660 MWD+IFR1+MS	-7.408 MWD+IFR1+MS	-7.173 MWD+IFR1+MS	-6.952 MWD+IFR1+MS	-6.745 MWD+IFR1+MS	-6.550 MWD+IFR1+MS	-6.366 MWD+IFR1+MS	-6.192 MWD+IFR1+MS	-6.029 MWD+IFR1+MS	-5.873 MWD+IFR1+MS
	39.730	39.830	39.917	39,993	40.060	40.121	40.176	40.226	40.272	40.315	40.356	40.394	40.431	40.466	40.501	40.534	40.567	40.599	40.631	40.663	40.694	40.725	40.756	40.787	40.818	40.849	40.880	40.911	40.942	40.974	41.006	41.038	41.070
	43.442	43.838	44.260	44.705	45.171	45.656	46.158	46.675	47.207	47.752	48.310	48.879	49.459	50.050	50.650	51.259	51.877	52.503	53.138	53.780	54.429	55.085	55.747	56.416	57.091	57.772	58.459	59.150	59.847	60.549	61.256	61.968	62.684
port	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Well Plan Report	37.212 0.000	37.780 0.000	38.355 0.000	38.938 0.000	39.528 0.000	40.125 0.000	40.728 0.000	41.337 0.000	41.952 0.000	42.573 0.000	43.198 0.000	43.829 0.000	44.465 0.000	45.106 0.000	45.751 0.000	46.400 0.000	47.054 0.000	47.711 0.000	48.373 0.000	49.038 0.000	49.706 0.000	50.378 0.000	51.053 0.000	51.731 0.000	52.412 0.000	53.096 0.000	53.782 0.000	54.472 0.000	55.164 0.000	55.858 0.000	56.555 0.000	57.254 0.000	57.955 0.000
	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000
	42.564	43.048	43.545	44.054	44 575	45.107	45.649	46.202	46.765	47.338	47.920	48.511	49.111	49.719	50.335	50.959	51 590	52.229	52.874	53.527	54.185	54.850	55.521	56.198	56.880	57.568	58.261	58.959	59.662	60.369	61.081	61.798	62.518
	0.000	0.000	0.000	00000	0.000	0000	0.000	0.000	0.000	0.000	00000	0000	0.000	0.000	0.000	0.000	000.0	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0000	0000
	37.212	37.780	38 355	38 938	39.528	40 125	40 728	41.337	41.952	42.573	43 198	43.829	44.465	45.106	45.751	46.400	47.054	47.711	48.373	49.038	49.706	50.378	51.053	51.731	52.412	53.096	53.782	54.472	55.164	55.858	56 555	57 254	57.955
	9543.000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000	9543.000	9543.000	9543.000	9543,000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000
	179.643	179.643	179.643	179.643	179 643	179.643	179.643	179.643	179.643	179.643	179.643	179 643	179.643	179.643	179.643	179.643	179 643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643
	90.000	000 06	000 06	000 06	90.000	000 06	000 06	000'06	90.000	90.000	000 06	000 06	90.000	90.000	90.000	90.000	000 06	90.000	90.000	90.000	90.000	000 06	90.000	90.000	90.000	90.000	000 06	90.000	000 06	000.06	000 06	000 06	90.000
10/18/24, 9:41 AM	12600.000	12700.000	12800.000	12900.000	13000.000	13100.000	13200.000	13300.000	13400.000	13500.000	13600.000	13700.000	13800,000	13900.000	14000.000	14100.000	14200 000	14300.000	14400.000	14500.000	14600.000	14700.000	14800.000	14900.000	15000.000	15100.000	15200.000	15300.000	15400.000	15500.000	15600 000	15700.000	15800.000
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	-5.726 MWD+IFR1+MS	-5.587 MWD+IFR1+MS	-5.454 MWD+IFR1+MS	-5.328 MWD+IFR1+MS	-5.207 MWD+IFR1+MS	-5.093 MWD+IFR1+MS	4.983 MWD+IFR1+MS	4.879 MWD+IFR1+MS	4.779 MWD+IFR1+MS	4.683 MWD+IFR1+MS	-4.591 MWD+IFR1+MS	-4.503 MWD+IFR1+MS	-4.418 MWD+IFR1+MS	-4.337 MWD+IFR1+MS	-4.259 MWD+IFR1+MS	-4.184 MWD+IFR1+MS	-4.112 MWD+IFR1+MS	-4.042 MWD+IFR1+MS	-3.975 MWD+IFR1+MS	-3.910 MWD+IFR1+MS	-3.847 MWD+IFR1+MS	-3.787 MWD+IFR1+MS	-3.729 MWD+IFR1+MS	-3.672 MWD+IFR1+MS	-3.618 MWD+IFR1+MS	-3.565 MWD+IFR1+MS	-3.513 MWD+IFR1+MS	-3.464 MWD+IFR1+MS	-3.416 MWD+IFR1+MS	-3.369 MWD+IFR1+MS	-3.324 MWD+IFR1+MS	-3.280 MWD+IFR1+MS	-3.237 MWD+IFR1+MS
	41.102	41.135	41.168	41.202	41.236	41.270	41.304	41.339	41.374	41.410	41 446	41.482	41.518	41.556	41.593	41.631	41.669	41.708	41.747	41.786	41.826	41.866	41.907	41.948	41.989	42.031	42.073	42.116	42.159	42.202	42.246	42.291	42.335
	63.404	64.128	64.856	65.588	66.324	67.064	67.807	68.553	69.302	70.055	70.810	71 569	72.330	73.094	73.861	74 630	75.402	76.176	76.952	77.731	78.512	79.295	80.080	80.867	81.656	82.447	83.240	84.034	84.830	85.628	86.428	87.229	88.031
port	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Well Plan Report	58.658 0.000	59.364 0.000	60.071 0.000	000'0 082'09	61.491 0.000	62.204 0.000	62.919 0.000	63.635 0.000	64.352 0.000	65.072 0.000	65.793 0.000	66.515 0.000	67.239 0.000	67.964 0.000	000'0 069'89	69.418 0.000	70.147 0.000	70.877 0.000	71.608 0.000	72.340 0.000	73.074 0.000	73.808 0.000	74.544 0.000	75.280 0.000	76.017 0.000	76.756 0.000	77.495 0.000	78.235 0.000	78.976 0.000	79.718 0.000	80.461 0.000	81.205 0.000	81.949 0.000
	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000	-0.000
	63.243	63.971	64.703	65.439	66 179	66.922	67.668	68.417	69.170	69.925	70.683	71 445	72.208	72.975	73.744	74 515	75.289	990.92	76.844	77.625	78.408	79.193	79.979	80.768	81.559	82.351	83.146	83.942	84.739	85.539	86.339	87.142	87.946
	0.000	000.0	000.0	0.000	0.000	000.0	0.000	0.000	0.000	000'0	000'0	000.0	000.0	0.000	000.0	000.0	000.0	0.000	000.0	0.000	0.000	0.000	000.0	000.0	000.0	000'0	0.000	000'0	0.000	000.0	0.000	000.0	0.000
	58.658	59.364	60.071	60.780	61.491	62.204	62.919	63.635	64.352	65.072	65.793	66.515	67.239	67.964	68.690	69.418	70.147	70.877	71.608	72.340	73.074	73.808	74.544	75.280	76.017	76.756	77.495	78.235	78.976	79.718	80.461	81.205	81.949
	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000
	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643	179.643
	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	90.000	000.06	90.000	90.000	90.000	90.000	90.000	90.000	90.000
10/18/24, 9:41 AM	15900.000	16000.000	16100.000	16200.000	16300.000	16400.000	16500.000	16600.000	16700.000	16800.000	16900.000	17000.000	17100.000	17200.000	17300.000	17400.000	17500.000	17600.000	17700.000	17800.000	17900.000	18000.000	18100.000	18200.000	18300.000	18400.000	18500.000	18600.000	18700.000	18800.000	18900.000	19000.000	19100.000
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	-3.196 MWD+IFR1+MS	-3.155 MWD+IFR1+MS	-3.116 MWD+IFR1+MS	-3.078 MWD+IFR1+MS	-3.041 MWD+IFR1+MS	-3.005 MWD+IFR1+MS	-2.970 MWD+IFR1+MS	-2.936 MWD+IFR1+MS	-2.902 MWD+IFR1+MS	-2.870 MWD+IFR1+MS	-2.838 MWD+IFR1+MS	-2.807 MWD+IFR1+MS	-2.777 MWD+IFR1+MS	-2.751 MWD+IFR1+MS	-2.748 MWD+IFR1+MS	-2.736 MWD+IFR1+MS		TVD MSL Target Shape		CIRCLE	CIRCLE	CIRCLE
	42.381	42.426	42.472	42.518	42.565	42.613	42.660	42.708	42.757	42.806	42.855	42.904	42.955	43.000	43.005	43.025		TVD MSL	(ft)	5979.00	5979.00	5979.00
	88.835	89.641	90.448	91,256	95.066	92.877	93.689	94.503	95.317	96.133	96.950	97.768	98.587	99.321	99.407	99.729		Grid Easting	(ft)	676038.30	676102.80	676103.10
port	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000		Grid E		929	929	929
Well Plan Report	82.694 0.000	83.440 0.000	84.186 0.000	84.933 0.000	85.681 0.000	86.430 0.000	87.179 0.000	87.928 0.000	88.679 0.000	89.430 0.000	90.181 0.000	90.933 0.000	91.686 0.000	92.359 0.000	92.439 0.000	92.735 0.000		Grid Northing	(ff)	440477.40	430113.80	430063.80
	88.751 -0.000	89.558 -0.000	90.366 -0.000	91.176 -0.000	91.986 -0.000	92.799 -0.000	93.612 -0.000	94.426 -0.000	95.242 -0.000	96.059 -0.000	96.877 -0.000	97.696 -0.000	98.516 -0.000	99.250 -0.000	99.336 -0.000	99.659 -0.000		Gric				
	82.694 0.000	83.440 0.000	84.186 0.000	84.933 0.000	85.681 0.000	86.430 0.000	87.179 0.000	87.928 0.000	88.679 0.000	89.430 0.000	90.181 0.000	90.933 0.000	91.686 0.000	92.359 0.000	92.439 0.000	92.735 0.000	PLU 15 Twin Wells Ranch-213H	Measured Depth	(#)	10125.67	20489.47	20539.48
	9543.000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000	9543,000	9543.000	9543.000	9543,000	9543.000	9543,000	9543.000	'LU 15 Twin [\]	Ĕ				
	179 643	179.643	179 643	179.643	179.643	179.643	179 643	179.643	179 643	179.643	179.643	179 643	179 643	179 643	179 643	179.643	ш					
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₹ Re	leas	ed to	o In	agi	ng:	2/18	/202	25 9.	:29:	36 A	1 <i>M</i>											

Subject: Request for a Variance Allowing break Testing of the Blowout Preventer Equipment (BOPE)

XTO Energy requests a variance to ONLY test broken pressure seals on the BOPE and function test BOP when skidding a drilling rig between multiple wells on a pad.

### **Background**

Onshore Oil and Gas Order CFR Title 43 Part 3170, Drilling Operations, Sections III.A.2.i.iv.B states that the BOP test must be performed whenever any seal subject to test pressure is broken. The current interpretation of the Bureau of Land Management (BLM) requires a complete BOP test and not just a test of the affected component. CFR Title 43 Part 3170 states, "Some situation may exist either on a well-by- well basis or field-wide basis whereby it is commonly accepted practice to vary a particular minimum standard(s) established in this order. This situation can be resolved by requesting a variance...". XTO Energy feels the break testing the BOPE is such a situation. Therefore, as per CFR Title 43 Part 3170, XTO Energy submits this request for the variance.

### **Supporting Documentation**

CFR Title 43 Part 3170 became effective on December 19, 1988 and has remained the standard for regulating BLM onshore drilling operations for over 30 years. During this time there have been significant changes in drilling technology. BLM continues to use the variance request process to allow for the use of modern technology and acceptable engineering practices that have arisen since CFR Title 43 Part 3170 was originally released. The XTO Energy drilling rig fleet has many modern upgrades that allow the intact BOP stack to be moved between well slots on a multi-well pad, as well as, wellhead designs that incorporate quick connects facilitating release of the BOP from the wellhead without breaking any BOP stack components apart. These technologies have been used extensively offshore, and other regulators, API, and many operators around the world have endorsed break testing as safe and reliable.



Figure 1: Winch System attached to BOP Stack



Figure 2: BOP Winch System

American Petroleum Institute (API) standards, specification and recommended practices are considered the industry standard and are consistently utilized and referenced by the industry. CFR Title 43 Part 3170recognizes API recommended Practices (RP) 53 in its original development. API Standard 53, *Well Control Equipment Systems for Drilling Wells* (Fifth Edition, December 2018, Annex C, Table C.4) recognizes break testing as an acceptable practice. Specifically, API Standard 53, Section 5.3.7.1 states "A pressure test of the pressure containing component shall be performed following the disconnection or repair, limited to the affected component." See Table C.4 below for reference.

Tal	ole C.4—Initial Pressure Te	esting, Surface BOP Stacks					
	Pressure Test—Low	Pressure Test-	-High Pressureac				
Component to be Pressure Tested	Pressure ^{ac} psig (MPa)	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 chokese	250 to 350 (1.72 to 2.41)	RWP of ram preventers or wellhead system, whichever is lower	ITP				
Choke manifold—downstream of chokese	250 to 350 (1.72 to 2.41)	RWP of valve(s), line(s), or M whichever is lower	MASP for the well program,				
Kelly, kelly valves, drill pipe safety valves, IBOPs	250 to 350 (1.72 to 2.41)	MASP for the well program					
	during the evaluation period. The p	pressure shall not decrease below the allest OD drill pipe to be used in well					
	from one wellhead to another within when the integrity of a pressure se	n the 21 days, pressure testing is req	uired for pressure-containing an				
For surface offshore operations, the	ne ram BOPs shall be pressure tes land operations, the ram BOPs sha	ted with the ram locks engaged and all be pressure tested with the ram lo					

The Bureau of Safety and Environmental Enforcement (BSEE), Department of Interior, has also utilized the API standards, specification and best practices in the development of its offshore oil and gas regulations and incorporates them by reference within its regulations.

Break testing has been approved by the BLM in the past with other operators based on the detailed information provided in this document.

XTO Energy feels break testing and our current procedures meet the intent of CFR Title 43 Part 317 Oand often exceed it. There has been no evidence that break testing results in more components failing than seen on full BOP tests. XTO Energy's internal standards requires complete BOPE tests more often than that of CFR Title 43 Part 3170 (Every 21 days). In addition to function testing the annular, pipe rams and blind rams after

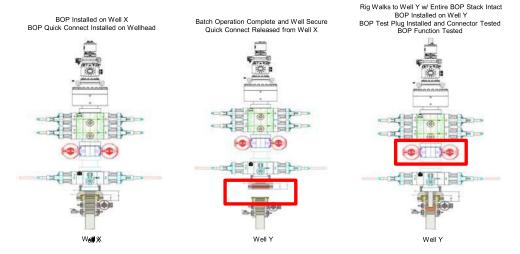
each BOP nipple up, XTO Energy performs a choke drill with the rig crew prior to drilling out every casing shoe. This is additional training for the rig crew that exceeds the requirements of the CFR Title 43 Part 3170.

### **Procedures**

- XTO Energy will use this document for our break testing plan for New Mexico Delaware basin.
  The summary below will be referenced in the APD or Sundry Notice and receive approval prior
  to implementing this variance.
- 2. XTO Energy will perform BOP break testing on multi-wells pads where multiple intermediate sections can be drilled and cased within the 21-day BOP test window.
  - a. A full BOP test will be conducted on the first well on the pad.
  - b. The first intermediate hole section drilled on the pad will be the deepest. All of the remaining hole sections will be the same depth or shallower.
    - i. Our Lower WC targets set the intermediate casing shoe no deeper than the Wolfcamp B.
    - ii. Our Upper WC targets set the intermediate casing shoe shallower than the Wolfcamp B.
  - c. A Full BOP test will be required if the intermediate hole section being drilled has a MASP over 5M.
  - d. A full BOP test will be required prior to drilling any production hole.
- 3. After performing a complete BOP test on the first well, the intermediate hole section will be drilled and cased, two breaks would be made on the BOP equipment.
  - a. Between the HCV valve and choke line connection
  - b. Between the BOP quick connect and the wellhead
- 4. The BOP is then lifted and removed from the wellhead by a hydraulic system.
- 5. After skidding to the next well, the BOP is moved to the wellhead by the same hydraulic system and installed.
- 6. The connections mentioned in 3a and 3b will then be reconnected.
- 7. Install test plug into the wellhead using test joint or drill pipe.
- 8. A shell test is performed against the upper pipe rams testing the two breaks.
- 9. The shell test will consist of a 250 psi low test and a high test to the value submitted in the APD or Sundry (e.g. 5,000 psi or 10,000psi).
- 10. Function test will be performed on the following components: lower pipe rams, blind rams, and annular.

- 11. For a multi-well pad the same two breaks on the BOP would be made and on the next wells and steps 4 through 10 would be repeated.
- 12. A second break test would only be done if the intermediate hole section being drilled could not be completed within the 21 day BOP test window.

Note: Picture below highlights BOP components that will be tested during batch operations



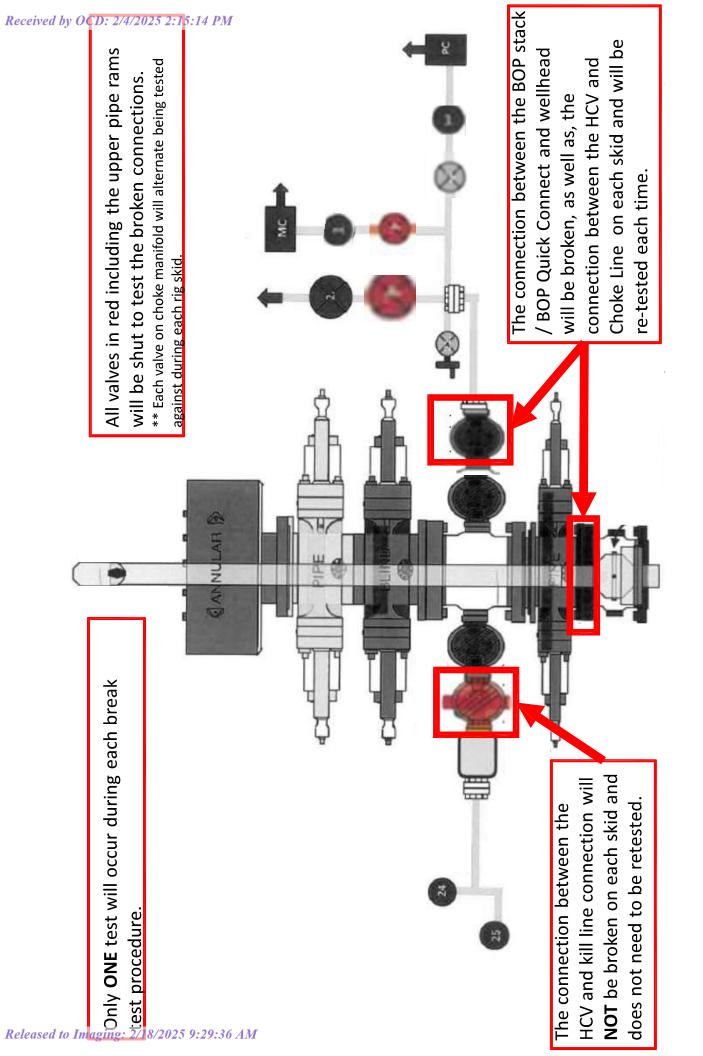
### **Summary**

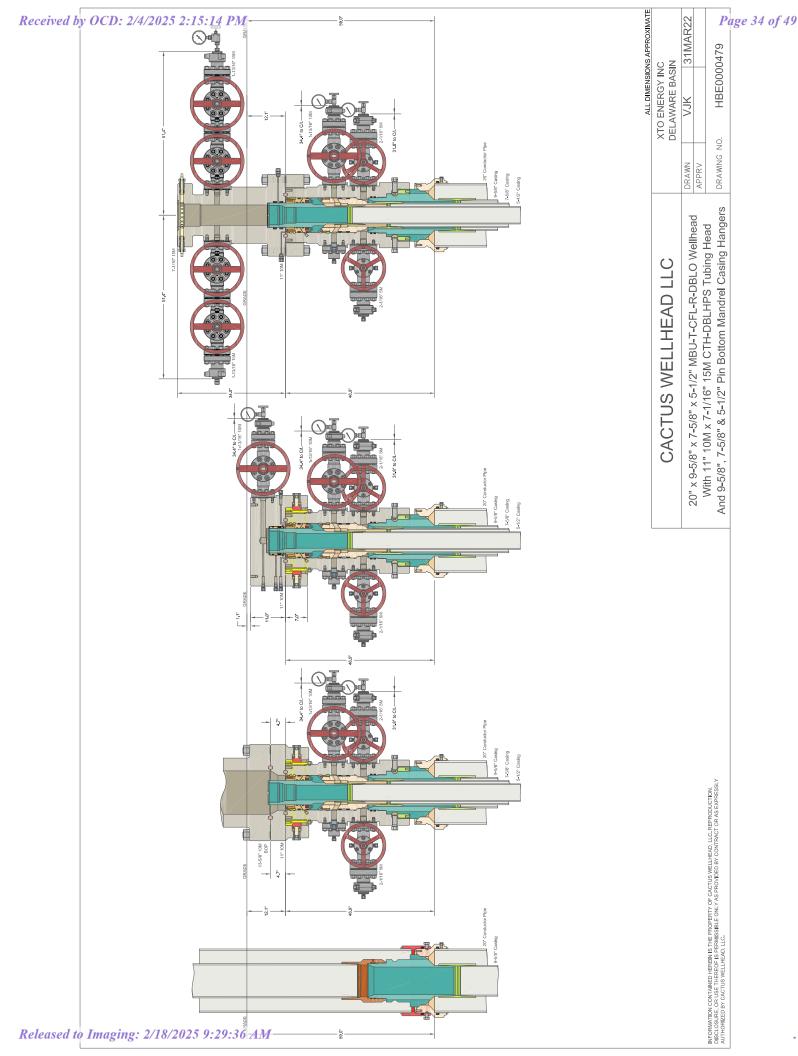
A variance is requested to **ONLY** test broken pressure seals on the BOP equipment when moving from wellhead to wellhead which is in compliance with API Standard 53. API Standard 53 states, that for pad drilling operation, moving from one wellhead to another within 21 days, pressure testing is required for pressure-containing and pressure-controlling connections when the integrity of a pressure seal is broken.

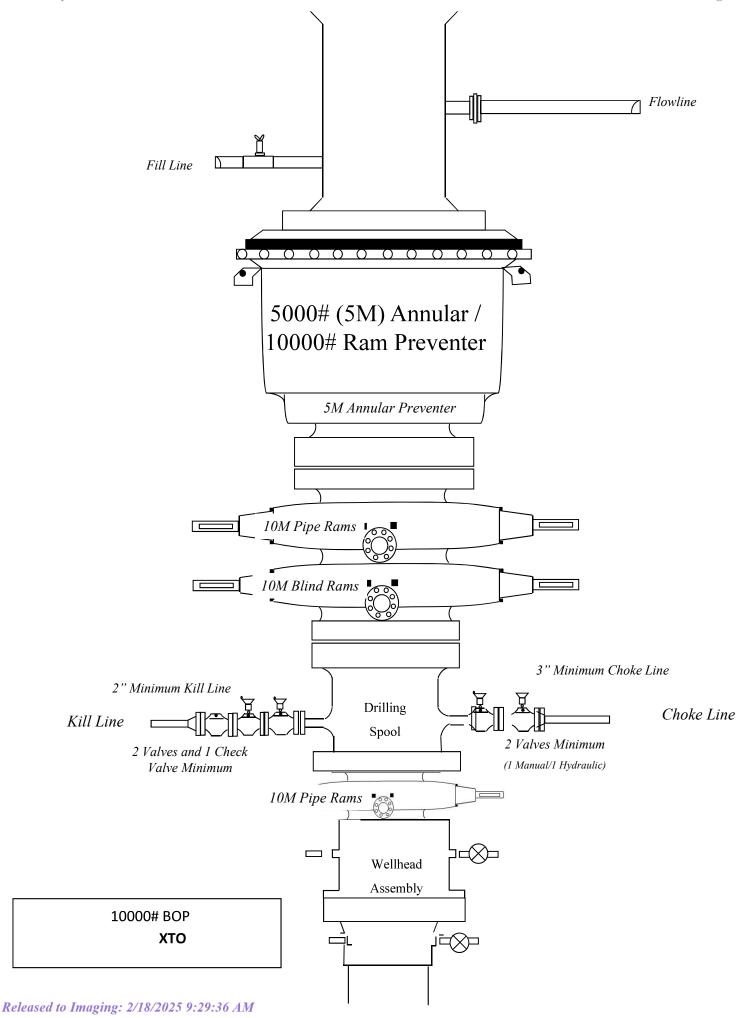
The BOP will be secured by a hydraulic carrier or cradle. The BLM will be contacted if a Well Control event occurs prior to the commencement of a BOPE Break Testing operation.

Based on discussions with the BLM on February 27th 2020 and the supporting documentation submitted to the BLM, we will request permission to ONLY retest broken pressure seals if the following conditions are met:

- 1. After a full BOP test is conducted on the first well on the pad.
- 2. The first intermediate hole section drilled on the pad will be the deepest. All of the remaining hole sections will be the same depth or shallower.
- 3. Full BOP test will be required if the intermediate hole section being drilled has a MASP over 5M.
- 4. Full BOP test will be required prior to drilling the production hole.







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# **U. S. Steel Tubular Products** 5.500" 20.00lb/ft (0.361" Wall) P110 RY USS-FREEDOM HTQ®

MECHANICAL PROPERTIES	Pipe	USS-FREEDOM HTQ $^{ m  ext{ iny B}}$	
Minimum Yield Strength	110,000		psi
Maximum Yield Strength	125,000		psi
Minimum Tensile Strength	125,000		psi
DIMENSIONS	Pipe	USS-FREEDOM HTQ [®]	
Outside Diameter	5.500	6.300	in.
Wall Thickness	0.361		in.
Inside Diameter	4.778	4.778	in.
Standard Drift	4.653	4.653	in.
Alternate Drift			in.
Nominal Linear Weight, T&C	20.00		lb/ft
Plain End Weight	19.83		lb/ft
SECTION AREA	Pipe	USS-FREEDOM HTQ [®]	
Critical Area	5.828	5.828	sq. in.
Joint Efficiency		100.0	%
PERFORMANCE	Pipe	USS-FREEDOM HTQ [®]	
Minimum Collapse Pressure	11,100	11,100	psi
Minimum Internal Yield Pressure	12,640	12,640	psi
Minimum Pipe Body Yield Strength	641,000		lb
Joint Strength		641,000	lb
Compression Rating		641,000	lb
Reference Length [4]		21,370	ft
Maximum Uniaxial Bend Rating [2]		91.7	deg/100 ft
MAKE-UP DATA	Pipe	USS-FREEDOM HTQ [®]	
Make-Up Loss		4.13	in.
Minimum Make-Up Torque [3]		15,000	ft-lb
Maximum Make-Up Torque [3]		21,000	ft-lb
Maximum Operating Torque[3]		29,500	ft-lb

# **Notes**

- 1. Other than proprietary collapse and connection values, performance properties have been calculated using standard equations defined by API 5C3 and do not incorporate any additional design or safety factors. Calculations assume nominal pipe OD, nominal wall thickness, and Specified Minimum Yield Strength (SMYS).
- 2. Uniaxial bending rating shown is structural only, and equal to compression efficiency.
- 3. Torques have been calculated assuming a thread compound friction factor of 1.0 and are recommended only. Field make-up torques may require adjustment based on actual field conditions (e.g. make-up speed, temperature, thread compound, etc.).
- 4. Reference length is calculated by joint strength divided by plain end weight with 1.5 safety factor.

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> U. S. Steel Tubular Products 460 Wildwood Forest Drive, Suite 300S Spring, Texas 77380

1-877-893-9461 connections@uss.com www.usstubular.com

## **XTO Permian Operating, LLC Offline Cementing Variance Request**

XTO requests the option to cement the surface and intermediate casing strings offline as a prudent batch drilling efficiency of acreage development.

# 1. Cement Program

No changes to the cement program will take place for offline cementing.

# 2. Offline Cementing Procedure

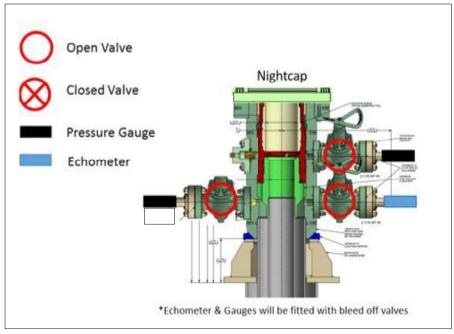
The operational sequence will be as follows. If a well control event occurs, the BLM will be contacted for approval prior to conducting offline cementing operations.

- 1. Run casing as per normal operations. While running casing, conduct negative pressure test and confirm integrity of the float equipment (float collar and shoe)
- 2. Land casing with mandrel
- 3. Fill pipe with kill weight fluid, do not circulate through floats and confirm well is static
- 4. Set annular packoff shown below and pressure test to confirm integrity of the seal. Pressure ratings of wellhead components and valves is 5,000 psi.
- 5. After confirmation of both annular barriers and internal barriers, nipple down BOP and install cap flange.
  - a. If any barrier fails to test, the BOP stack will not be nippled down until after the cement job is completed with cement 500ft above the highest formation capable of flow with kill weight mud above or after it has achieved 50-psi compressive strength if kill weight fluid cannot be verified.



Annular packoff with both external and internal seals

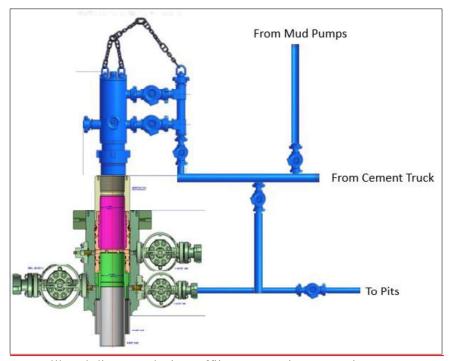
## XTO Permian Operating, LLC Offline Cementing Variance Request



Wellhead diagram during skidding operations

- 6. Skid rig to next well on pad.
- 7. Confirm well is static before removing cap flange, flange will not be removed and offline cementing operations will not commence until well is under control. If well is not static, casing outlet valves will provide access to both the casing ID and annulus. Rig or third party pump truck will kill well prior to cementing or nippling up for further remediation.
  - a. Well Control Plan
    - i. The Drillers Method will be the primary well control method to regain control of the wellbore prior to cementing, if wellbore conditions do not permit the drillers method other methods of well control may be used
    - ii. Rig pumps or a 3rd party pump will be tied into the upper casing valve to pump down the casing ID
    - iii. A high pressure return line will be rigged up to lower casing valve and run to choke manifold to control annular pressure
    - iv. Once influx is circulated out of the hole, kill weight mud will be circulated
    - v. Well will be confirmed static
    - vi. Once confirmed static, cap flange will be removed to allow for offline cementing operations to commence
- 8. Install offline cement tool
- 9. Rig up cement equipment

# XTO Permian Operating, LLC Offline Cementing Variance Request



Wellhead diagram during offline cementing operations

- 10. Circulate bottoms up with cement truck
  - a. If gas is present on bottoms up, well will be shut in and returns rerouted through gas buster to handle entrained gas
  - b. Max anticipated time before circulating with cement truck is 6 hrs
- 11. Perform cement job taking returns from the annulus wellhead valve
- 12. Confirm well is static and floats are holding after cement job
- 13. Remove cement equipment, offline cement tools and install night cap with pressure gauge for monitoring.

XTO respectfully requests approval to utilize a spudder rig to pre-set surface casing.

# Description of Operations:

- 1. Spudder rig will move in to drill the surface hole and pre-set surface casing on the well.
  - a. After drilling the surface hole section, the spudder rig will run casing and cement following all of the applicable rules and regulations (OnShore Order 2, all COAs and NMOCD regulations).
  - The spudder rig will utilize fresh water-based mud to drill the surface hole to TD.
     Solids control will be handled entirely on a closed loop basis. No earth pits will be used.
- 2. The wellhead will be installed and tested as soon as the surface casing is cut off and WOC time has been reached.
- 3. A blind flange at the same pressure rating as the wellhead will be installed to seal the wellbore. Pressure will be monitored with needle valves installed on two wing valves.
  - a. A means for intervention will be maintained while the drilling rig is not over the well.
- 4. Spudder rig operations are expected to take 2-3 days per well on the pad.
- 5. The BLM will be contacted and notified 24 hours prior to commencing spudder rig operations.
- 6. Drilling Operations will begin with a larger rig and a BOP stack equal to or greater than the pressure rating that was permitted will be nippled up and tested on the wellhead before drilling operations resume on each well.
  - a. The larger rig will move back onto the location within 90 days from the point at which the wells are secured and the spudder rig is moved off location.
  - b. The BLM will be notified 24 hours before the larger rig moves back on the pre-set locations
- 7. XTO will have supervision on the rig to ensure compliance with all BLM and NMOCD regulations and to oversee operations.
- 8. Once the rig is removed, XTO will secure the wellhead area by placing a guard rail around the cellar area.

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# **U. S. Steel Tubular Products** 5.500" 20.00lb/ft (0.361" Wall) P110 RY USS-TALON HTQ™ RD

MECHANICAL PROPERTIES	Pipe	USS-TALON HTQ™ RD		[6]
Minimum Yield Strength	110,000		psi	
Maximum Yield Strength	125,000		psi	
Minimum Tensile Strength	125,000		psi	
DIMENSIONS	Pipe	USS-TALON HTQ™ RD		
Outside Diameter	5.500	5.900	in.	
Wall Thickness	0.361		in.	
Inside Diameter	4.778	4.778	in.	
Standard Drift	4.653	4.653	in.	
Alternate Drift			in.	
Nominal Linear Weight, T&C	20.00		lb/ft	-
Plain End Weight	19.83		lb/ft	
SECTION AREA	Pipe	USS-TALON HTQ™ RD		
Critical Area	5.828	5.828	sq. in.	
Joint Efficiency		100.0	%	[2]
PERFORMANCE	Pipe	USS-TALON HTQ™ RD		
Minimum Collapse Pressure	11,100	11,100	psi	
Minimum Internal Yield Pressure	12,640	12,640	psi	
Minimum Pipe Body Yield Strength	641,000		lb	
Joint Strength		641,000	<b>l</b> b	
Compression Rating		641,000	lb	
Reference Length		21,370	ft	[5]
Maximum Uniaxial Bend Rating		91.7	deg/100 ft	[3]
MAKE-UP DATA	Pipe	USS-TALON HTQ™ RD		
Make-Up Loss		5.58	in.	
Minimum Make-Up Torque		17,000	ft-Ib	[4]
Maximum Make-Up Torque		20,000	ft-Ib	[4]
Maximum Operating Torque		39,500	ft-lb	[4]

## **Notes**

- 1. Other than proprietary collapse and connection values, performance properties have been calculated using standard equations defined by API 5C3 and do not incorporate any additional design or safety factors. Calculations assume nominal pipe OD, nominal wall thickness, and Specified Minimum Yield Strength (SMYS).
- 2. Joint efficiencies are calculated by dividing the connection critical area by the pipe body area.
- 3. Uniaxial bend rating shown is structural only.
- 4. Torques have been calculated assuming a thread compound friction factor of 1.0 and are recommended only. Field make-up torques may require adjustment based on actual field conditions (e.g. make-up speed, temperature, thread compound, etc.).
- 5. Reference length is calculated by Joint Strength divided by Nominal Linear Weight, T&C with a 1.5 Safety factor.
- 6. Coupling must meet minimum mechanical properties of the pipe.

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NEW CHOKE HOSE

INSTRUED 02-10-2024

# CERTIFICATE OF CONFORMANCE

This is to verify that the items detailed below meet the requirements of the Customer's Purchase Order referenced herein, and are in Conformance with applicable specifications, and that Records of Required Tests are on file and subject to examination. The following items were inspected and hydrostatically tested at **Gates Engineering & Services North America** facilities in Houston, TX, USA.

CUSTOMER:

NABORS DRILLING TECHNOLOGIES USA DBA NABORS DRILLING USA

CUSTOMER P.O.#:

15582803 (TAG NABORS PO #15582803 SN 74621 ASSET 66-1531)

CUSTOMER P/N:

IMR RETEST SN 74621 ASSET #66-1531

PART DESCRIPTION:

RETEST OF CUSTOMER 3" X 45 FT 16C CHOKE & KILL HOSE ASSEMBLY C/W 4 1/16" 10K

FLANGES

SALES ORDER #:

529480

QUANTITY:

1

SERIAL #:

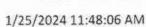
74621 H3-012524-1

SIGNATURE: F. CUSTUSE

TITLE: QUALITY ASSURANCE

DATE: 1/25/2024







# **TEST REPORT**

CUSTOMER

Company:

Nabors Industries Inc.

**TEST OBJECT** Serial number:

H3-012524-1

Production description:

74621/66-1531

Lot number:

74621/66-1531

Sales order #:

529480

Description:

Customer reference:

FG1213

Hose ID:

3" 16C CK

Part number:

**TEST INFORMATION** 

Test procedure:

GTS-04-053

Fitting 1:

3.0 x 4-1/16 10K

Test pressure:

15000.00 3600.00

Part number:

Test pressure hold: Work pressure:

sec

Description:

Work pressure hold:

10000.00 900.00

psi sec

psi

Fitting 2:

3.0 x 4-1/16 10K

Length difference: Length difference: 0.00 0.00 % inch

Part number: Description:

Visual check: Pressure test result:

PASS

Length measurement result:

Length:

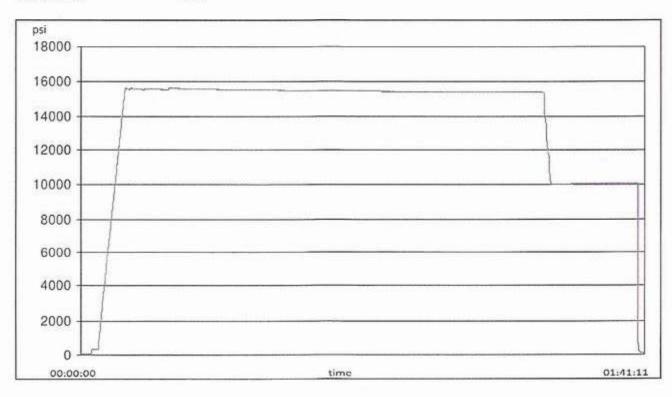
45

feet

D. ... 15

Test operator:

Travis





H3-15/16

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# **TEST REPORT**

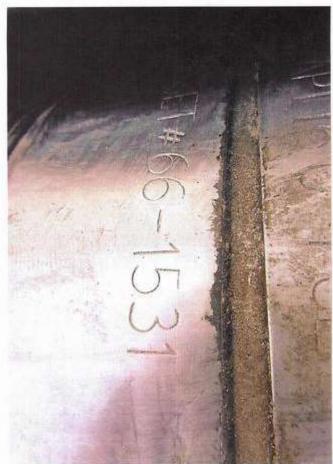
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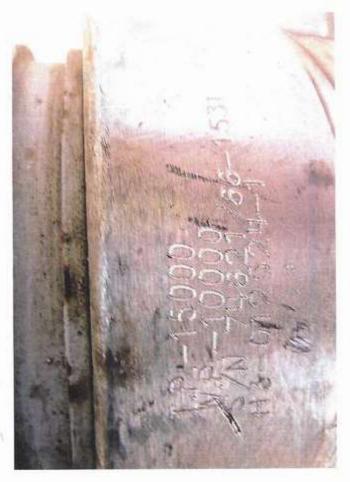
Serial number	Calibration date	Calibration due date
110D3PHO	2023-06-06	2024-06-06
110IQWDG	2023-05-16	2024-05-16
	110D3PHO	110D3PHO 2023-06-06



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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 428189

## **CONDITIONS**

Operator:	OGRID:
XTO PERMIAN OPERATING LLC.	373075
6401 HOLIDAY HILL ROAD	Action Number:
MIDLAND, TX 79707	428189
	Action Type:
	[C-103] NOI Change of Plans (C-103A)

## CONDITIONS

Created By		Condition Date
ward.rikala	Administrative order required for non-standard spacing unit prior to production.	2/18/2025
ward.rikala	Any previous COA's not addressed within the updated COA's still apply.	2/18/2025