Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary David R. Catanach, Division Director Oil Conservation Division



July 21, 2017

Oxy USA Inc. Attn: Ms. Sarah Mitchell

ADMINISTRATIVE NON-STANDARD LOCATION

Administrative Order NSL-7557

Oxy USA Inc. OGRID 16696 Sunrise MDP1 8-5 Federal Well No. 5H API No. 30-015-Pending

Non-Standard Location

Proposed Location:

| - | Footages | Unit/Lot | Sec. | Tsp | Rge | <u>County</u> |
|-------------------|----------------------|----------|------|-----|-----|---------------|
| Surface | 834` FSL & 1555` FEL | 0 | 8 | 24S | 31E | Eddy |
| Penetration Point | 340` FSL & 1260` FEL | Р | 8 | 24S | 31E | Eddy |
| Final perforation | 340` FNL & 1260` FEL | A/1 | 5 | 24S | 31E | Eddy |
| Terminus | 180` FNL & 1260` FEL | A/1 | 5 | 24S | 31E | Eddy |

Proposed Project Area:

| Description | Acres | Pool | Pool Code |
|----------------------|--------|--------------------------|-----------|
| E/2 E/2 of Section 8 | 320.29 | Cotton Draw; Bone Spring | 13367 |
| E/2 E/2 of Section 5 | | | |

Reference is made to your application received on June 30, 2017.

You have requested to drill this horizontal well at an unorthodox oil well location described above in the referenced pool or formation. This location is governed by statewide Rule 19.15.15.9.A NMAC, which provides for 40-acre units, with wells located at least 330 feet from a unit outer boundary, and Rule 19.15.16.14.B(2) NMAC concerning directional wells in designated project areas. This surface location is outside the project area, and is permitted by Rule 19.15.16.15.B (4) NMAC which allows for surface locations outside project area. This location is unorthodox because portions of the proposed completed interval are closer to outside boundaries Administrative Order NSL-7557 Oxy USA Inc. July 21, 2017 Page 2 of 2

of the proposed project area than any location that would be a standard location under the applicable pool rules.

Your application has been duly filed under the provisions of Division Rules 19.15.15.13 NMAC and 19.15.4.12.A (2) NMAC.

It is our understanding that the Applicant is seeking this location because they intend to increase their horizontal well spacing from four wells per section to six wells per section to effectively develop the Bone Spring and Wolfcamp formations. Next, increasing well density will optimize recoverable.

It is also understood that you have given due notice of this application to all operators or owners who are "affected persons," as defined in Rule 19.15.4.12 A (2) NMAC, in all adjoining units towards which the proposed location encroaches.

Pursuant to the authority conferred by Division Rule 19.15.15.13 (B) NMAC, the abovedescribed unorthodox location is hereby approved.

The above approvals are subject to your being in compliance with all other applicable Division rules, including, but not limited to Division Rule 19.15.5.9 NMAC.

Jurisdiction of this case is retained for the entry of such further orders as the Division may deem necessary.

DAVID R. CATANACH Director

DRC/lrl

cc: Oil Conservation Division – Artesia District Office Bureau of Land Management – Carlsbad Field Office