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[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

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Note: State	ement must be completed by an in	dividual with managerial and/or supervisory ca /	pacity.	
Jordan L. Kessler	CHA J.	Attorney	21412	
Print or Type Name	Signature	Title	Date	
	I	jlkessler@hollandhart.com		
		e-mail Address	· · · · ·	

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Jordan L. Kessler Associate Phone (505) 954-7286 Fax (505) 983-6043 JLKessler@hollandhart.com

May 12, 2015

VIA HAND DELIVERY

David Catanach Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 1220 South Saint Francis Dr. Santa Fe, New Mexico 87505 RECEIVED OCD 2015 MAY 1.2 P 4: 3.1

Re: Application of EOG Resources Inc. for administrative approval of a 200-acre non-standard project area in the Red Hills; Upper Bone Spring Shale Pool (97900) and approval of an unorthodox location, Sections 12 and 13, Township 25 South, Range 33 East, NMPM, Lea County, New Mexico. Lucky 13 Fed Com No. 2H Well

Dear Mr. Catanach:

EOG Resources, Inc. ("EOG") (OGRID 7377) seeks administrative approval of a nonstandard project area and an unorthodox location for its <u>Lucky 13 Fed Com No. 2H Well</u> (API number pending) to be completed in the Red Hills; Upper Bone Spring Shale Pool (Pool Code 97900) underlying portions of Sections 12 and 13, Township 25 South, Range 33 East, NMPM, Lea County, New Mexico. This well will be drilled from a surface location 2100 feet from the South line, 720 feet from the West line (Unit L) of Section 13. The upper most perforation will be located 2588 feet from the North line, 931 feet from the West line (Unit E) of Section 13 and the lower most perforation will be 1650 feet from the North line, 932 feet from the West line (Unit E) of Section 12. Since this acreage is governed by the Division's statewide rules which provide for wells to be located no closer than 330 feet to the outer boundary of the spacing unit, the completed interval for this well will be unorthodox because it is closer than 330 feet to the southern and southeastern boundaries of the project area. Accordingly, the well encroaches on the spacing units to the South and Southeast of the 200-acre project area.

In addition, EOG seeks approval of a 200-acre non-standard project area comprised of the W/2 NW/4 of Section 13 (Units D and E) and the W/2 SW/4 and SW/4 NW/4 of Section 12 (Units E, L, M). Since this proposed project area excludes the NW/4 NW/4 (Unit D) of Section 12, it is a non-standard project area pursuant to NMAC 19.15.16.7(M). EOG plans to develop the NW/4 NW/4 of Section 12 with a 1.25 mile length horizontal well that will extend into the W/2 W/2 of Section 1 to the North. Approval of the unorthodox completed interval and the non-standard project area will allow efficient length and spacing of horizontal wells, thereby . preventing waste.

HOLLAND&HART.

As support for this application, EOG provides the following additional information and exhibits:

Exhibit A is the Well Location and Acreage Dedication Plat (Form C-102), which shows the proposed non-standard project area and the non-standard location of the Lucky 13 Fed Com No. 2H Well.

Exhibit B is a land plat for Sections 12 and 13 and the surrounding sections that shows the Lucky 13 Fed Com No. 2H Well in relation to the adjoining units and existing wells.

Exhibit C is a list of the parties affected by EOG's request for a non-standard project area and an unorthodox location. Each of these parties has been provided a copy of this application and all attachments by certified mail, and has been advised that if they have an objection it must be filed in writing with the division within 20 days from the date the division receives this application. In addition, a courtesy copy of this application has been provided to the Bureau of Land Management-Carlsbad.

Your attention to this application is appreciated

Sincerely,

Jordan L. Kessler ATTORNEY FOR EOG RESOURCES, INC.

cc: Bureau of Land Management- Carlsbad 620 E. Green Street Carlsbad, NM 88220

Exhibit C

Non-standard location:

Yates Petroleum Corporation ATTN: Land Manager 105 S. Fourth Street Artesia, NM 88210

Non-standard project area:

Chevron Mid-Continent, LP ATTN: NOJV Group P.O. Box 2100 Houston, TX 77252

Roden Associates, LTD ATTN: Ben Kinney 2603 Augusta Drive, STE. 740 Houston, TX 77057

Roden Participants, LTD ATTN: Ben Kinney 2603 Augusta Drive, STE. 740 Houston, TX 77057

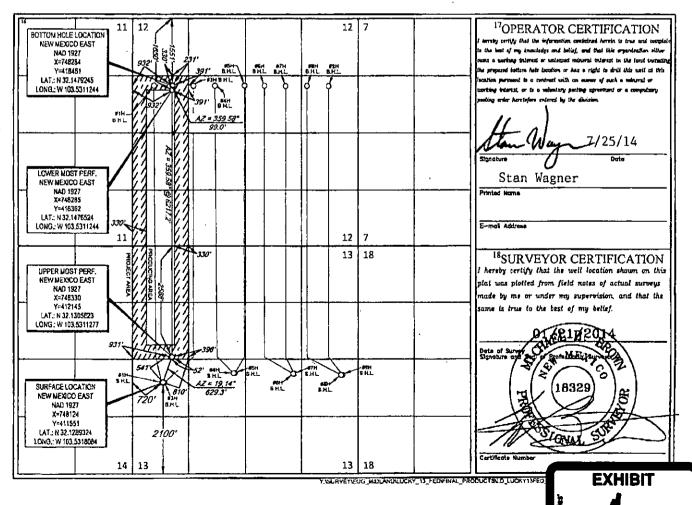
Sydhan, LP 111 Congress Ave., Suite 1050 Austin, TX 78701

Judith A. West P.O. Box 1948 Cullman, AL 35056 District 1 1625 N. French Dr., Hobbs. NM 88240 Phone: (575) 393-6161 Fax: (575) 393-0720 District II 811 S. First St., Artesia, NM 88210 Phone: (575) 748-1283 Fax: (575) 748-9720 District III 1000 Rio Brazos Road, Aztec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170 District IV 1220 S. E. Francis Dr., Sante Fe, NM 87505 Phone: (505) 476-3460 Fax: (505) 476-3462 State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Sante Fe, NM 87505 FORM C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT ¹API Number Pool Code Pool Name 97900 RED HILLS; UPPER BONE SPRING SHALE 30 - 025 -Property Code Property Name Well Number LUCKY 13 FED COM #2H **OGRID No.** ³Operator Name Elevation . . EOG RESOURCES, INC. 3350 7377 ¹⁰Surface Location Feet from the East/West line County UL or lot no. Fownship Lot Ida Feet from the North/South line Section Range L 13 25 - S33-E 2100' SOUTH 720' WEST LEA East/West line UL or lot no. Sectio Towashin Range Lot Ida Feet from the North/South line Feet from the Conniv 12 25-S 33-E 1551 932' WEST NORTH LEA Ε ²Dedicated Acres ³Joint or Infill *Consolidation Code Order No. 200.00

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



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Jordan L. Kessler Associate Phone (505) 988-4421 Fax (505) 983-6043 jikessler@holiandhart.com

May 12, 2015

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO: AFFECTED PARTIES

Re: Application of EOG Resources Inc. for administrative approval of a 200-acre nonstandard project area in the Red Hills; Upper Bone Spring Shale Pool (97900) and approval of an unorthodox location, Sections 12 and 13, Township 25 South, Range 33 East, NMPM, Lea County, New Mexico. Lucky 13 Fed Com No. 2H Well

Ladies and Gentleman:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Dan McCright EOG Resources, Inc. (432) 686-3741 Dan_McCright@eogresources.com

Sincerely,

Jordan L. Kessler ATTORNEY FOR EOG RESOURCES, INC.

Phone [505] 988-4421 Fax (505] 983-6043 www.hollandhart.com

110 North Guadalupe Suite 1 Santa Fe, New Mexico 87501 Mailing Address P.O. Box 2208 Santa Fe, NM 87504-2208

Aspen Boulder Carson City Colorado Springs Denver Denver Tech Center Billings Boise Cheyenne Jackson Hole Las Vegas Reno Sait Lake City Santa Fe Washington, D.C. @