Michelle Lujan Grisham Governor

Sarah Cottrell Propst Cabinet Secretary

Todd E. Leahy, JD, PhD Deputy Cabinet Secretary Gabriel Wade, Acting Director Oil Conservation Division



March 28, 2019

Mr. Adam G. Rankin agrankin@hollandhart.com

NON-STANDARD LOCATION

Administrative Order NSL-7850

Percussion Petroleum Operating, LLC [OGRID 371755] Lakewood Federal Com Well No. 9H API No. 30-015-45677

Proposed Location

-	Footages	Unit/Lot	Sec.	Twsp	Range	County_
Surface	565.6 FSL & 2355 FEL	Ο	27	19S	25E	Eddy
First Take Point	100 FNL & 2609 FWL	С	34	19S	25E	Eddy
Last Take Point	100 FSL & 2628.6 FWL	L N	34	19S	25E	Eddy
Terminus	20 FSL & 2628.6 FWL	Ν	34	19S	25E	Eddy

Proposed Horizontal Spacing Unit

Description	Acres	Pool	Pool Code
E2 W2 of Section 34	160	N. Seven Rivers; Glorieta-Yeso	97565

Reference is made to your application received on March 7, 2019.

You have requested to drill this horizontal well at an unorthodox oil well location described above in the referenced pool or formation. Sub Paragraph (a) of Paragraph (1) of Subsection B of 19.15.16.15 NMAC governs this proposed well and provides that the operator shall dedicate to each horizontal oil well a standard horizontal spacing unit that comprises of one or more contiguous tracts that the horizontal oil well's completed interval penetrates, each of which consists of a governmental quarter-quarter section or equivalent.

This well's completed interval is as close as 12 feet to the eastern edge. Encroachments will impact the following tracts.

Section 34, W2 E2

Administrative Order NSL-7850 Percussion Petroleum Operating, LLC March 28, 2019 Page 2 of 2

The Division understands you have given notice of this application to all operators or owners who are "affected persons," as defined in Paragraph (8) Subsection A of 19.15.2.7 NMAC, in all adjoining units towards which the proposed location encroaches.

Division understands you seek this location as an efficient well spacing for horizontal wells to maximize the recovery of oil and gas reserves underlying the horizontal spacing unit located within the Glorieta-Yeso formation underlying the entire Section 34.

Your application has been filed under Subsection 6 of Paragraph of Section (C) of 19.15.16.15 NMAC, 19.15.15.13 NMAC and Paragraph (2) of Subsection A of 19.15.4.12 NMAC.

Per Subsection B of 19.15.15.13 NMAC, Division approves this unorthodox location.

The above approvals are subject to your following all other applicable Division rules.

Jurisdiction of this case is retained for the entry of further orders as Division deems necessary.

Gabriel Wade Acting Division Director

GW/mam

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