

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

**RECEIVED**  
OCD Artesia  
JAN 30 2013  
NMOCD ARTESIA

FORM APPROVED  
OMB NO. 1004-0135  
Expires: July 31, 2010

**SUNDRY NOTICES AND REPORTS ON WELLS**  
Do not use this form for proposals to drill or to re-enter an abandoned well. Use form 3160-3 (APD) for such proposals.

Lease Serial No.  
NMN91078  
Indian, Allottee or Tribe Name

**SUBMIT IN TRIPLICATE - Other instructions on reverse side.**

1. Type of Well <input checked="" type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other	7. If Unit or CA/Agreement, Name and/or No.
2. Name of Operator RKI EXPLORATION & PRODUCTION Contact: CHARLES K AHN E-Mail: cahk@rkixp.com	8. Well Name and No. LONGVIEW FEDERAL 1 44
3a. Address 210 PARK AVENUE, SUITE 900 OKLAHOMA CITY, OK 73102	9. API Well No. 30-015-38070
3b. Phone No. (include area code) Ph: 405-996-5771 Fx: 405-996-5772	10. Field and Pool, or Exploratory S.CULEBRA BLUFF-BONE SPRG
4. Location of Well (Footage, Sec., T., R., M., or Survey Description) Sec 1 T23S R28E SESE 360FSL 330FEL	11. County or Parish, and State EDDY COUNTY, NM

12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input checked="" type="checkbox"/> Recomplete	<input type="checkbox"/> Other
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation (clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplete horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports shall be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 shall be filed once testing has been completed. Final Abandonment Notices shall be filed only after all requirements, including reclamation, have been completed, and the operator has determined that the site is ready for final inspection.)

The existing well bore of Longview Federal 1-44 well is currently completed in the first Bone Spring formation (7,424 feet to 7,454 feet). RKI intends to perforate and complete within the Delaware sands (approximately 5,972 feet to 6,482 feet) by January of 2013 and will immediately conduct production tests on that zone. The vertical extents of separation between completions in the subject formations is within 150 percent from the top of the upper interval to the bottom of the lower interval so crossflow is not anticipated. RKI will provide pressure data as it is available from any additional testing that may be conducted. Monthly well tests will be conducted and the wells may be separately metered in the future. Production from these pools is mature and predictable in the subject area. In summary, RKI intends to commingle both zones referenced above.

**SUBJECT TO LIKE  
APPROVAL BY STATE**

**SEE ATTACHED FOR  
CONDITIONS OF APPROVAL**

Ownership of the Longview Federal property is individually owned by the applicant or its wholly owned subsidiaries.

*Provide NMOCD: C-102*

Accepted for record

14: I hereby certify that the foregoing is true and correct.

Electronic Submission #187889 verified by the BLM Well Information System  
For RKI EXPLORATION & PRODUCTION, sent to the Carlsbad

Name (Printed/Typed) CHARLES K AHN	Title EH&S/REGULATORY MANAGER
Signature (Electronic Submission)	Date 01/22/2013

NMOCD  
JAN 13/2013

**APPROVED**  
JAN 23 2013  
BUREAU OF LAND MANAGEMENT  
CARLSBAD FIELD OFFICE

**THIS SPACE FOR FEDERAL OR STATE OFFICE USE**

Approved By _____	Title _____
Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.	Office _____

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.

**\*\* OPERATOR-SUBMITTED \*\* OPERATOR-SUBMITTED \*\* OPERATOR-SUBMITTED \*\***

**Additional data for EC transaction #187889 that would not fit on the form**

**32. Additional remarks, continued**

The surface is owned by the U.S. Bureau of Land Management and royalties to the federal government will not be reduced as a result of this commingling.



April 11, 2011

New Mexico Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

Attn: Ms. Jamie Bailey, Director

Re: Applications of RKI Exploration & Production, LLC to downhole commingle production in its Pinnacle State Well No.25 and Longview Federal Well Nos.1-14, 1-34, 1-44 and 6-11 from the South Culebra Bluff Bone Spring and East Hederra Bend Delaware pools.

Dear Ms. Bailey,

Please find enclosed the above-referenced application(s) for downhole commingling on Form C-107A and all supporting data.

RKI Exploration & Production seeks to continually optimize efficiency, both economically and operationally, of its operations. Approval of this application is consistent with that goal as well as the NMOCD's mission of preventing waste and protection of correlative rights.

The Pinnacle State and Longview Federal properties are individually owned by the applicant or its wholly owned subsidiaries. The surface is owned by the State of New Mexico and U.S. Department of the Interior, Bureau of Land Management respectively. Royalties to the state or federal government will not be reduced as a result of this commingling. A copy of this application has been furnished to the Commissioner of Public Lands at the State Land Office as well as the Bureau of Land Management, Carlsbad office. **Please note that production between leases will not be commingled.**

The existing wellbores of the subject wells are currently completed in the Bone Spring formation and RKI intends to perforate and complete the Delaware portion by April 2011 and will immediately conduct production tests on that zone. The vertical extents of separation between completions in the subject formations is well within the 150-percent guideline however, RKI will provide pressure data as it is available from any additional testing that may be conducted. Monthly well tests will be conducted and the wells may be separately metered in the future.

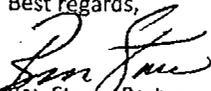
RECEIVED OGD  
2011 APR 11 11:11 AM

In the future, RKI further intends to apply for pre-approval for downhole commingling of production from additional Pinnacle wells from the East Hederra Bend Delaware and South Culebra Bluff Bone Spring pools. Production from these pools is mature and predictable in the subject area. Such pre-approval would also lend towards increased efficiencies for RKI as well as the NMOCD. This individual well application will be included as the initial dataset for a pre-approved downhole pool combination application. Due diligence for that effort is ongoing and all data in support of such application will be provided including notification to all operators with ownership in the subject pools.

Finally, RKI will provide recommended fixed allocation percentages for these wells after analysis of the data obtained from upcoming production tests.

I respectfully request that the processing of these applications proceed swiftly and if you or your staff requires additional information or has any questions, please do not hesitate to call or email me.

Best regards,



Ben Stone, Partner

SOS Consulting, LLC  
Agent for RKI E&P

Cc: State Land Office – Oil & Gas Division  
Bureau of Land Management – Carlsbad Office  
Application file

District I  
1633 N. French Drive, Hobbs, NM 87401

District II  
2304 W. Grand Avenue, Artesia, NM 87010

District III  
1600 Rio Grande Blvd., Aztec, NM 87410

District IV  
2220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-107A  
Revised June 10, 2003

Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505

APPLICATION TYPE  
 Single Well  
Establish Pre-Approved Pools  
EXISTING WELLBORE  
 Yes  No

APPLICATION FOR DOWNHOLE COMMINGLING

Operator **RKI Exploration & Production, LLC** Address **3817 NW Expressway, Suite 950, Oklahoma City, OK 73112**  
Lease **Longview '1' Federal Well No.44** Well No. **UL 'P', Section 1, Twp 23 South, Rng 28 East** County **Eddy County**  
OGRID No. **246289** Property Code **37873** API No. **30 - 015 - 38070** Lease Type:  Federal  State  Fee

DATA ELEMENT	UPPER ZONE <i>Hoxha-duva</i>	INTERMEDIATE ZONE	LOWER ZONE <i>LAIDES</i>
Pool Name	East Hedorra Bend; Delaware		South Culebra Bluff; Bone Spring
Pool Code	30670		15011
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	~5950' - ~6265' Perf		7424' - 7452' Perf
Method of Production (Flowing or Artificial Lift)	Artificial lift		Artificial lift
Bottomhole Pressure <small>(Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone)</small>			Not required per 150% rule
Oil Gravity or Gas BTU <small>(Degree API or Gas BTU)</small>	New zone (Inferred data) Oil ~42.5; Gas ~1215		Oil ~42.5; Gas ~1250
Producing, Shut-In or New Zone	New Zone		Producing
Date and Oil/Gas/Water Rates of Last Production <small>(Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data.)</small>	Date: <b>Estimates inferred (data attached)</b> Rates:	Date: Rates:	Date: <b>11/30/2010</b> Rates: <b>10 o / 68 g / 38 w Per day</b>
Fixed Allocation Percentage <small>(Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)</small>	Oil <b>TBD</b> % Gas <b>TBD</b> %	Oil % Gas %	Oil <b>TBD</b> % Gas <b>TBD</b> %

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones?  
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail? Yes  No   
Yes  No   
Are all produced fluids from all commingled zones compatible with each other? Yes  No   
Will commingling decrease the value of production? Yes  No   
If this well is on, or communitized with, state or federal lands, has either the Commissioner of Public Lands or the United States Bureau of Land Management been notified in writing of this application? Yes  No

NMOCD Reference Case No. applicable to this well: \_\_\_\_\_

NSL-6246

Attachments:

- C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
- Production curve for each zone for at least one year. (If not available, attach explanation.)
- For zones with no production history, estimated production rates and supporting data.
- Data to support allocation method or formula.
- Notification list of working, royalty and overriding royalty interests for uncommon interest cases.
- Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

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

SIGNATURE *Bon Stone* TITLE Agent for RKI E&P DATE 4/07/2011  
TYPE OR PRINT NAME Bon Stone TELEPHONE NO. ( 903 ) 488-9850  
E-MAIL ADDRESS ben@sosconsulting.us

DATE: 4/14/11	SUSPENSE:	ENGINEER: WJ	LOGGED IN: 4/14/11	TYPE: DHC 4377	APP NO.: 1110453722
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KTGW

NEW MEXICO OIL CONSERVATION DIVISION  
- Engineering Bureau -  
1220 South St. Francis Drive, Santa Fe, NM 87505



RKI

Longview Fed #44

**ADMINISTRATIVE APPLICATION CHECKLIST** 30-015-38070

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Application Acronyms:**

- [NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication]
- [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling]
- [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement]
- [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion]
- [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase]
- [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]

[1] **TYPE OF APPLICATION** - Check Those Which Apply for [A]

- [A] Location - Spacing Unit - Simultaneous Dedication  
 NSL  NSP  SD

Check One Only for [B] or [C]

- [B] Commingling - Storage - Measurement  
 DHC  CTB  PLC  PC  OLS  OLM  
**COMMON OWNERSHIP**

- [C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery  
 WFX  PMX  SWD  IPI  EOR  PPR

- [D] Other: Specify \_\_\_\_\_

[2] **NOTIFICATION REQUIRED TO:** - Check Those Which Apply, or  Does Not Apply

- [A]  Working, Royalty or Overriding Royalty Interest Owners
- [B]  Offset Operators, Leaseholders or Surface Owner
- [C]  Application is One Which Requires Published Legal Notice
- [D]  Notification and/or Concurrent Approval by BLM or SLO  
U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
- [E]  For all of the above, Proof of Notification or Publication is Attached, and/or,
- [F]  Waivers are Attached

[3] **SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.**

[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.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Ben Stone, SOS Consulting  
 Print or Type Name

Signature

Agent for RKI E&P  
 Title

4/11/11  
 Date

ben@sosconsulting.us  
 e-mail Address



New Mexico Energy, Minerals and Natural Resources Department

**Susana Martinez**  
Governor

John H. Bemis  
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.  
Deputy Cabinet Secretary

JAMI BAILEY  
Division Director  
Oil Conservation Division



Administrative Order DHC-4377

Order Date: 5/21/2011

Application Reference Number: pTGW1110453722

RKI EXPLORATION & PRODUCTION, LLC  
3817 NW EXPRESSWAY, SUITE 950  
OKLAHOMA CITY, OK 73112

Attention: Ben Stone

LONGVIEW 1 FEDERAL Well No. 044  
API No: 30-015-38070  
Unit P, Section 1, Township 23 South, Range 28 East, NMPM  
Eddy County, New Mexico

Pool: UNDES. CULEBRA BLUFF; BONE SPRING, SOUTH Oil 15011  
Names: HERRADURA BEND; DELAWARE, EAST Oil 30670

Reference is made to your recent application for an exception to 19.15.12.9A NMAC of the Division Rules and Regulations to permit the above-described well to commingle production from the subject pools in the wellbore.

It appearing that the subject well qualifies for approval for such exception pursuant to the provisions of 19.15.12.11A NMAC, and that reservoir damage or waste will not result from such downhole commingling, and correlative rights will not be violated thereby, you are hereby authorized to commingle the production as described above and any Division Order which authorized the dual completion or otherwise required separation of the zones is hereby placed in abeyance.

In accordance with 19.15.12.11A.(6) NMAC, the production attributed to any commingled pool within the well shall not exceed the allowable applicable to that pool.

The production allocation percentages of oil and gas between these pools shall be supplied to the Division's Santa Fe office within 60 days following completion of this well or workover.

REMARKS: The operator shall notify the Division's district office upon implementation of commingling operations.

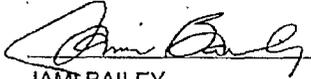
Oil Conservation Division \* 1220 South St. Francis Drive

\* Santa Fe, New Mexico 87505

\* Phone: (505) 476-3440 \* Fax (505) 476-3462\* <http://www.emnrd.state.nm.us>



Pursuant to 19.15.12.11B NMAC, the commingling authority granted herein may be rescinded by the Division Director if conservation is not being best served by such commingling.



JAMT BAILEY  
Director

JB/wvjj

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

**Longview Federal 1 44  
30-015-38070  
RKI Exploration & Production  
January 23, 2013  
Conditions of Approval**

- 1. Surface disturbance beyond the existing pad must have prior approval.**
- 2. Closed loop system required.**
- 3. Operator to have H2S monitoring on location as H2S is always a potential hazard.**
- 4. A minimum of a 5M BOP is required and must be tested prior to beginning work.**
- 5. Operator shall perform a production test on the Delaware prior to commingling.**
- 6. Subsequent sundry and completion report required. Completion report shall show production from each formation.**

**JAM 012313**