

Jordan L. Kessler **Associate** Phone (505) 988-4421 Fax (505) 983-6043 jlkessler@hollandhart.com

November 6, 2017

### VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

TO AFFECTED PARTIES

Re: Application of RKI Exploration & Production, LLC for administrative approval of a 160-acre non-standard spacing and proration unit in the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

Ladies and Gentlemen:

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:

Ducter Draw 9-4 Jed Com 1 H 30-015. 44477 Aaron Young Jucker Draw 9-4 Jed Com 2H 30-015-44478 Sincerely, Jucker Draw 9-4 Jed Com 3 H 30-015-44486 Jucker Draw 9-4 Jed Com 4 H Jordan L. Kessler **RKI Exploration and Production** (539) 573-3531 Aaron. Young@wpxenergy.com Ducker Draw 9-4 Ded Com 5# ATTORNEY FOR RKI EXPLORATION AND **PRODUCTION** 30-015.44488

Ducter Draw 9-4 Jed Com 64 30-015-44479

Holland & Hart LLP

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

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

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REVIEWER:



NEW MEXICO OIL CONSERVATION	/ <b>/</b> • • • •
- Geological & Engineering B 1220 South St. Francis Drive, Santa F	
ADMINISTRATIVE APPLICATION	N CHECKLIST
THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION REGULATIONS WHICH REQUIRE PROCESSING AT THE DIV	ONS FOR EXCEPTIONS TO DIVISION RULES AND
Applicant: RKI Exploration & Production, LLC	OGRID Number: 246289
Vell Name: Tucker Draw 9-4 Fed Com No. 1H, 2H, 3H, 4H, 5H, 6H, and 7H Wells	API:
OOI: Purple Sage; Wolfcamp Gas Pool	Pool Code: 98220
SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRES INDICATED BELOW	
1) TYPE OF APPLICATION: Check those which apply for [A] A. Location – Spacing Unit – Simultaneous Dedication    NSL	ced Oil Recovery 듣 다
2) NOTIFICATION REQUIRED TO: Check those which apply.  A. Offset operators or lease holders  B. Royalty, overriding royalty owners, revenue owners.  C. Application requires published notice  D. Notification and/or concurrent approval by SLO  E. Notification and/or concurrent approval by BLM	POR OCD ONLY  Notice Complete  Application Content Complete
F. Surface owner G. For all of the above, proof of notification or public H. No notice required  CERTIFICATION: I hereby certify that the information submadministrative approval is accurate and complete to the	ication is attached, and/or, nitted with this application for
understand that <b>no action</b> will be taken on this application	

notifications are submitted to the Division.

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

	November 6, 2017
Jordan L. Kessler	Date
Print or Type Name	
	505-988-4421
An IZ	Phone Number
	jikessler@hollandhart.com
Signature	e-mail Address



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

November 6, 2017

### VIA HAND DELIVERY

David Catanach
Oil Conservation Division
New Mexico Department of Energy,
Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

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Re:

Application of RKI Exploration & Production, LLC for administrative approval of a 160-acre non-standard spacing and proration unit in the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico.

#### Dear Mr. Catanach:

Pursuant to Rule 3 of the Special Rules for the Purple Sage-Wolfcamp Gas Pool and NMAC 19.15.15.11.B(2), RKI Exploration & Production, LLC ("RKI") (OGRID 246289) seeks administrative approval of a 160-acre non-standard spacing and proration unit comprised of the SE/4 of Section 4, Township 26 South, Range 30 East, NMPM, Eddy County, New Mexico. The proposed non-standard spacing and proration unit will be combined with a standard 320-acre spacing unit in the E/2 of Section 9 to form a 480-acre project area dedicated the following horizontal wells:

- Tucker Draw 9-4 Fed Com No. 1H
- Tucker Draw 9-4 Fed Com No. 2H
- Tucker Draw 9-4 Fed Com No. 3H
- Tucker Draw 9-4 Fed Com No. 4H
- Tucker Draw 9-4 Fed Com No. 5H
- Tucker Draw 9-4 Fed Com No. 6H
- Tucker Draw 9-4 Fed Com No. 7H

These wells will develop the Wolfcamp formation (Purple Sage; Wolfcamp Gas Pool (98220)). Pursuant to the Special Rules for the Purple Sage-Wolfcamp Gas Pool, set forth in Order No. R-14262, wells within the Purple Sage Pool must be spaced on 320-acres. Rule 3 of the Special Rules for Order R-14262 permit exceptions as allowed in Division rules. The Division rule 19.15.15.11.B(2) authorizes administrative approval of non-standard spacing units when the non-standard spacing unit consists of a single quarter-quarter section or lot or quarter-quarter sections or lots joined by a common side and the non-standard spacing unit lies wholly within a

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single half section if the well is in a pool for which 320 acres is the standard spacing unit size. The proposed non-standard spacing unit consists of adjoining units and is located wholly within a single half-section.

RKI seeks approval of this non-standard spacing unit to most efficiently develop the Wolfcamp in this area. All interest owners within the proposed 480-acre project area, include the proposed non-standard spacing unit, have previously been made aware of RKI's development plan.

**Exhibit A** is a copy of the Well Location and Acreage Dedication Plat (Form C-102) for the seven proposed wells.

**Exhibit B** is a copy showing the proposed wells and the proposed spacing unit in the SE/4 of Section 4 and the E/2 of Section 9. Tracts 1 and 2 are the area affected by the administrative application. The working interest owners, royalty owner, and overriding royalty owners in Tracts 1 and 2 have been provided notice of this application.

**Exhibit** C is a list of parties in Tracts 1 and 2. A copy of this application with all attachments has been sent by certified mail to each affected party advising them 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. A courtesy a copy of this application has also been provided to the Bureau of Land Management-Carlsbad.

Your attention to this matter is appreciated.

Sincerely,

Jordan L. Kessler

**ATTORNEY FOR RKI EXPLORATION AND** 

**PRODUCTION** 

cc: Bureau of Land Management 620 E. Green Street Carlsbad, NM 88220 7017 1450 0002 8377 5687 District.]
1625 N. French Dr., Hothe, NM 88240
Phone: (375) 393-6161 Fax: (575) 393-0720
District. II.
811 S. Fint St., Artenia, NM 88210
Phone: (575) 748-1281 Fax: (575) 748-9720
District. III.
1000 Rie Binzon Rond, Astee, NM 87410
Phone: (585) 334-6178 Fax: (505) 334-6170
District. IV.
1220 S. R. Francis Dr., Sento Fc., NM 87505

Phone: (305) 476-3460 Fex: (505) 476-3462

## State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

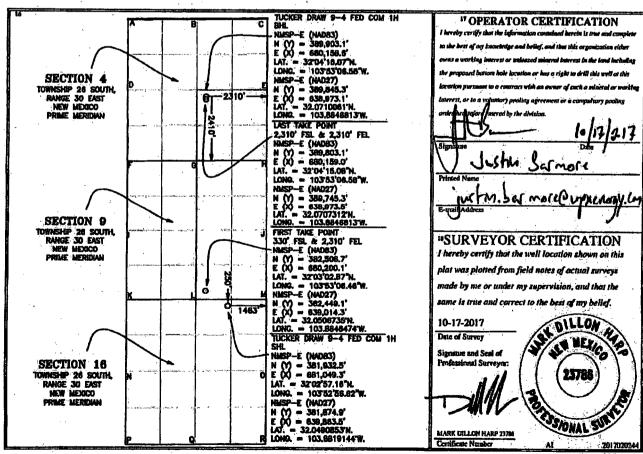
Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

■ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	<sup>2</sup> Poel Code 98220		<sup>3</sup> Pool Name AGE WOLFCAMP GAS POOL			
<sup>4</sup> Property Code		Property Name DRAW 9-4 FED COM	<sup>6</sup> Well Number 1 H			
7 OGRID No. 246289		Operator Name TION & PRODUCTION, LLC	Flevation 3089'			

"Surface Location UL or let no. Terrophio North/South line Reetlos Rong Let Ide Feet from the Rast/West list Peet from the County R 16 26.5 30 E 250 NORTH 1463 EAST EDDY "Bottom Hole Location If Different From Surface UL or let no. Township Lot Id Feet from the North/South Ho Feet from the **Rust/West line** County 26 S 30 E 2410 SOUTH 2310 EAST **EDDY** Joint or Infill 12 Dedicated Acres Consolidation Code II Order No.





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 Brazoo Rond, Azice, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francia Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

Township

UL or lot no.

## State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

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#### WELL LOCATION AND ACREAGE DEDICATION PLAT

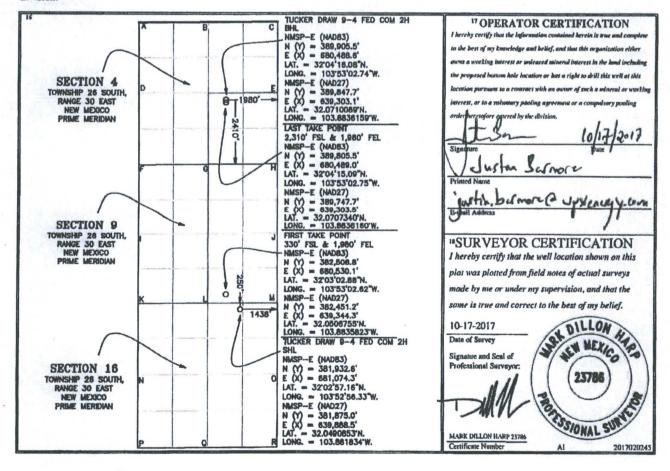
API Number	<sup>2</sup> Pool Code 98220				
<sup>4</sup> Property Code	5 Propert TUCKER DRAW		<sup>6</sup> Well Number 2H		
<sup>7</sup> OGRID No. 246289	* Operato RKI EXPLORATION &		9 Elevation 3090'		

Peet from the North/South line Feet from the East/West line
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Lot Idn

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District 1
1625 N. French Dr., Hobbs, NM \$8.240
Phone: (375) 393-6161 Fax: (375) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9728
District III
1000 Rio Brazos Rosd, Aziec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87503
Phone: (505) 476-3460 Fax: (503) 476-3462

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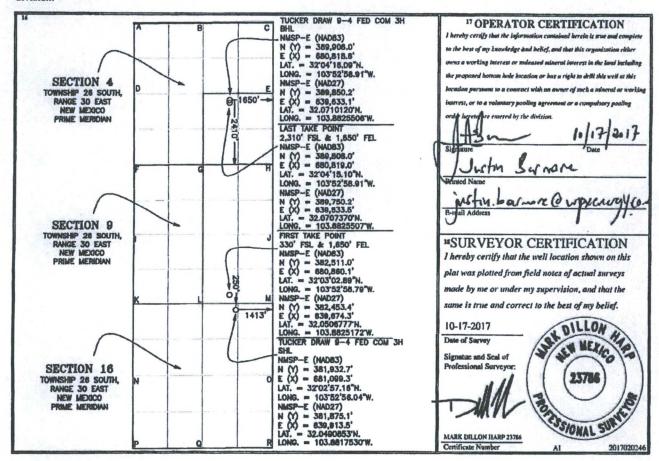
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API Number	<sup>2</sup> Pool Code 98220	<sup>3</sup> Pool Nat PURPLE SAGE WOLFO			
<sup>4</sup> Property Code		<sup>5</sup> Property Name TUCKER DRAW 9-4 FED COM			
<sup>7</sup> OGRID No. 246289	RKI EXPLORATION &	9 Elevation 3091'			

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District I
1623 N. French Dr., Hobbs, NN 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, Aztoc, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. R. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

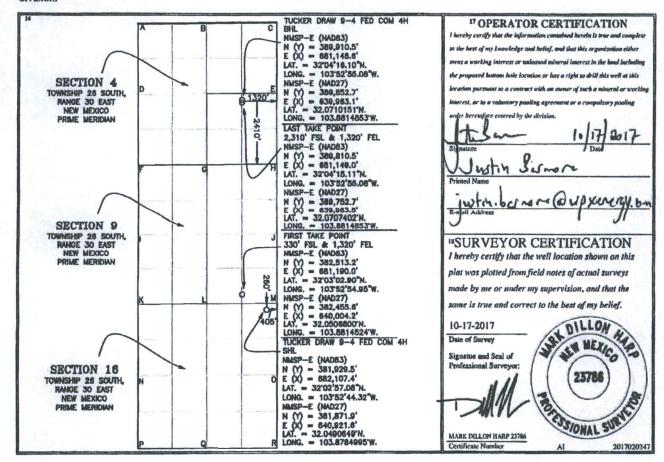
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#### WELL LOCATION AND ACREAGE DEDICATION PLAT

	API Numbe	r		Pool Code 98220		PURPLI	<sup>3</sup> Pool Name E SAGE WOLFCA		
<sup>4</sup> Property	Code			TU	5 Property No CKER DRAW 9-			6 W	eli Number 4H
<sup>7</sup> OGRID 24628	0.70			RKI EXPI	OPERATION & PR	RODUCTION, LLC			Elevation 3103'
					» Surface L	ocation			
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11 Dedicated Acre	es 13 Joint o	r Infill 14 C	onsolidation Co	de 15 Orde	r No.	•			



District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
District II
811 S. First St., Artenin, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
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1000 Rio Birazos Rond, Artec, NM 87410
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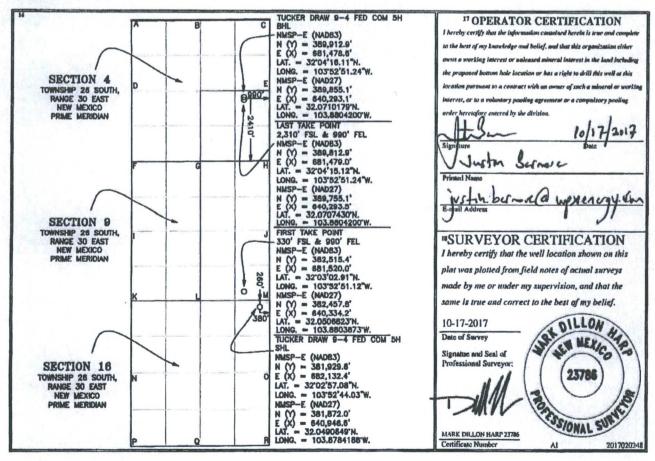
#### WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number	<sup>1</sup> Pool Code 98220	<sup>3</sup> Pool Name PURPLE SAGE WOLFCAMP GAS POOL				
<sup>4</sup> Property Code	5 Propert TUCKER DRAV		<sup>6</sup> Well Number 5H			
<sup>7</sup> OGRID No. 246289	RKI EXPLORATION 8		<sup>9</sup> Elevation 3103'			
	* Surface	Location	The state of the s			

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District 1
1625 M. French Dr., Hobbs, NM 88240
Prince: (575) 393-4141 Fez: (375) 393-6720
District II
811 S. Fleut St., Artesle, NM 88210
Phone: (575) 748-1283 Fez: (575) 748-9720
District III
1000 Rio Brazzos Road, Artes, NM 87410
Phone: (505) 334-6178 Fein: (505) 334-6170
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Phone: (505) 476-3460 Fez: (505) 476-3462

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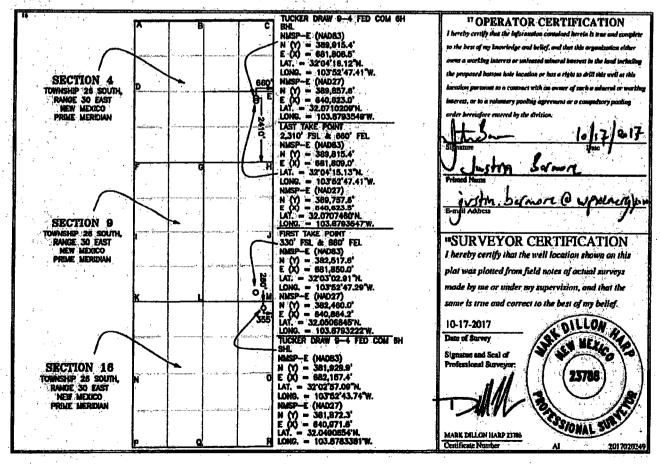
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### WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	<sup>2</sup> Pool Code 98220	<sup>5</sup> Pool No PURPLE SAGE WOLF	
<sup>4</sup> Property Code		operty Name RAW 9-4 ITED COM	Well Number
7 OGRID No. 246289		perator Name ON & PRODUCTION, LLC	Elevation 3103'

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District. 1
1625 N. French Dr., Hobbs, NM 88240
Phone: (375) 393-6161 FEX: (375) 393-0720
District II.
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1220 S. St. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fex: (505) 476-3462

12 Dedicated Acres

480.0

13 Joint or Infill

14 Consolidation Code

# State of New Mexico Energy, Minerals & Natural Resources Department OIL CONSERVATION DIVISION 1220 South St. Francis Dr. Santa Fe, NM 87505

Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

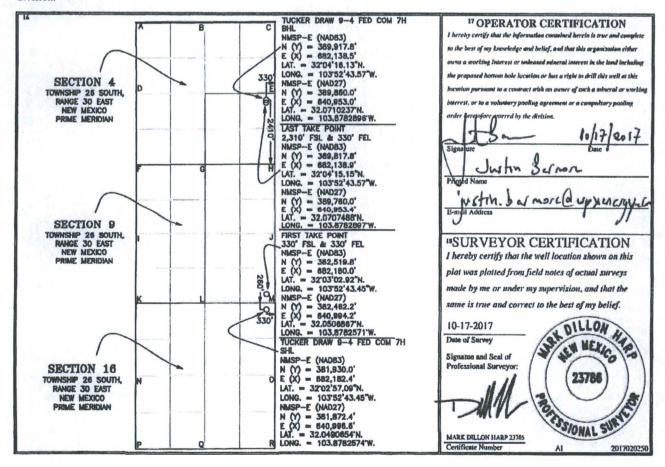
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WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number		r		<sup>2</sup> Pool Code 98220		<sup>3</sup> Pool Name PURPLE SAGE WOLFCAMP GAS POOL				
4 Property	Code	Froperty Name TUCKER DRAW 9-4 FED COM						6W	<sup>6</sup> Well Number 7H	
<sup>7</sup> OGRID No. 246289			A STATE OF THE STA	RKI EXPLORATION & PRODUCTION, LLC					<sup>9</sup> Elevation 3103'	
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UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County	

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.

Order No.



Tract 1  Tract 2  Eddy  Tucker Draw Project Area 450 acres				
Tract 1  Tract 1  Eddy  Tucker Draw Project Area 480 acres			al.	
Tract 1  Tract 1  Eddy  Tucker Draw Project Area 480 acres		Tucker Dr	aw Notice P	at
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### **Exhibit** C

### Tract 1

Chevron USA Inc. 6301 Deauville Midland, Texas 79706 7017 1450 0002 1697 1986

Chevron USA Inc. 1400 Smith Street Houston, Texas 77002 7017 1450 0002 1697 2044

CTV O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5540

CTV-LMB I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5557

CTV-LMB II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5564

CTV-CTAM BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5571

CTB-SRB I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5588

CTV-SRB II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 5595

Keystone O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6790



Keystone (RMB) BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6783

Keystone (CTAM) BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6776

LMBI O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6769

SRBI O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6752

SRBI I BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6745

SRBI II BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6738

Thru Line O&G NM LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6721

BOPCO, L.P. 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6714

Goliad O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6707

WD O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6899 Delbasin Corporation 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6882

BMT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6875

RMB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6868

820 MT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6851

SRBMT O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6844

Fine Line O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6837

CMB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6820

TRB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6813

ACB O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6806

MBL O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6691 SSB 1193C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6684

PRB II 1993C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6677

RFB 1993C O&G NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6660

Capital Partnership O&G, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6653

BEPCO, LP 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6615

Thru Line BPEOR NM, LLC 201 Main Street, Suite 2700 Fort Worth, Texas 76102 7017 1450 0002 1697 6622

XTO Energy Inc. 810 Houston Street Fort Worth, Texas 76102 7017 1450 0002 1697 6639

801 LLC EOG A Resources Inc EOG M Resources Inc EOG Y Resources Inc 105 S. 4th Street Artesia, New Mexico 88102 7017 1450 0002 1697 6646

EOG A Resources Inc EOG M Resources Inc EOG Y Resources Inc 5509 Champions Drive Midland, Texas 79706 7017 1450 0002 1697 1887