

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:

Aaron Young **RKI Exploration and Production** (539) 573-3531 Aaron. Young@wpxenergy.com

Jucker Draw 9-4 Jed Com 1H 30-015. 44477 Jucker Draw 9-4 Jed Com 2H 30-015-44478 Sincerely, Jucker Draw 9-4 Jed Com 3 H 30-015-44486 Al Ducker Draw 9-4 Jed Com 41 H Jordan L. Kessler

ATTORNEY FOR RKI EXPLORATION AND

PRODUCTION

Ducker Draw 9-4 Ded Com 5# 30-015.44488

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

Holland & Hart LLP

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

Ducker Draw 9-4 Jed Com 7H

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. &

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NEW MEXICO OIL CONSERVATI	ION DIVISION
- Geological & Engineering B	ureau –
1220 South St. Francis Drive, Santa F	
ADMINISTRATIVE APPLICATION	CHECKLIST
THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATION REGULATIONS WHICH REQUIRE PROCESSING AT THE DIV	NS FOR EXCEPTIONS TO DIVISION RULES AND ISION LEVEL IN SANTA FE
Applicant: RKI Exploration & Production, LLC	OGRID Number: 246289
Well Name: Tucker Draw 9-4 Fed Com No. 1H, 2H, 3H, 4H, 5H, 6H, and 7H Wells	API:
Pool: Purple Sage; Wolfcamp Gas Pool	Pool Code: 98220
SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED INDICATED BELOW	
1) TYPE OF APPLICATION: Check those which apply for [A] A. Location – Spacing Unit – Simultaneous Dedication NSL NSP(PROJECT AREA) NSP(PROJECT AREA)	RORATION UNIT) SD
B. Check one only for [1] or [1] [1] Commingling – Storage – Measurement DHC DTB PLC PC OLS [11] Injection – Disposal – Pressure Increase – Enhanc WFX PMX SWD PIPI EOR	OLM Sed Oil Recovery
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. Surface owner G. For all of the above, proof of notification or public H. No notice required	Content Complete
3) CERTIFICATION: I hereby certify that the information submit administrative approval is accurate and complete to the lunderstand that no action will be taken on this application notifications are submitted to the Division.	best of my knowledge. I also
Note: Statement must be completed by an Individual with man	nagerial and/or supervisory capacity.
Jordan L. Kessler	November 6, 2017 Date
Print or Type Name	
	505-988-4421
An I L	Phone Number
	jlkessler@hollandhart.com
Signalture	e-mail Address



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

ALA

cc: Bureau of Land Management 620 E. Green Street Carlsbad, NM 88220 7017 1450 0002 8377 5687 District.1
1623 N. French Dr., Hobbs, Nhd 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
District.II
811 S. First St., Artenia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
District.III
1000 Kin Beazon Rond. Aziec, NM 87410
Phone: (585) 334-6178 Fax: (505) 334-6170
District.IV
1220 S. St. Francis Dr., Santa Fc, 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. Santa Fe, NM 87505

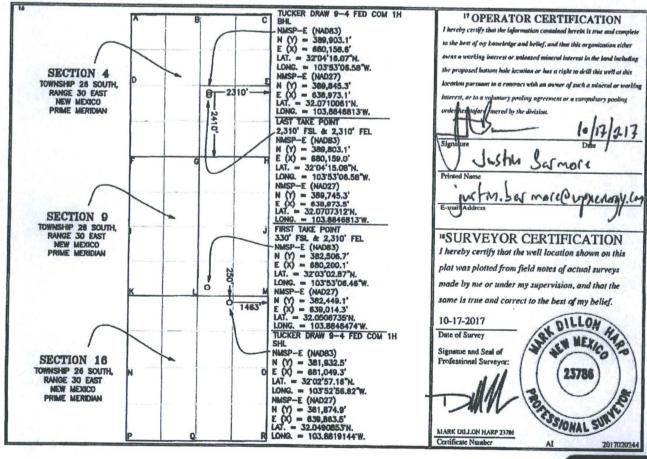
Form C-102
Revised August 1, 2011
Submit one copy to appropriate
District Office

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	² Pool Code 98220	³ Pool Name	
⁴ Property Code	5 Property TUCKER DRAW		MP GAS POOL 6 Well Number 1H
⁷ OGRID No. 246289	RKI EXPLORATION &		⁹ Elevation 3089'

Surface Location UL or let no. Range Section Township Lot Idn Feet from the North/South line Feet from the East/West Has County B 16 26 S 250 NORTH 1463 EAST FDDY "Bottom Hole Location If Different From Surface UL or lot no. Sectio Township Range Lot Ide Feet from the North/South line Feet from the East/West line County 4 265 30 E 2410 SOUTH 2310 EAST EDDY 12 Dedicated Acres Joint or Infill didation Code 15 Order No. 480.0





District 1
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (573) 393-0720
District II
811 S. First St., Astesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
District III
1000 Rio Brazon Rond, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 134-6170
District IV
1220 S. St. Francia Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

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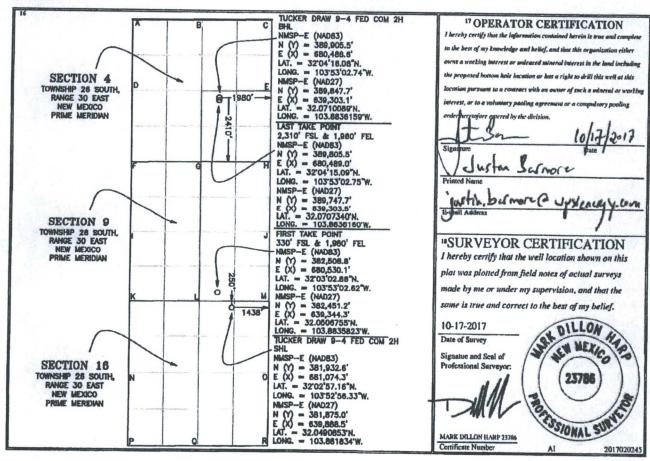
Form C-102 Revised August 1, 2011 Submit one copy to appropriate District Office

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WELL LOCATION AND ACREAGE DEDICATION PLAT

API Number	³ Pool Code 98220	Taria Minis	
⁴ Property Code	5 Propert TUCKER DRAV		⁶ Well Number 2H
⁷ OGRID No. 246289	8 Operate RKI EXPLORATION 8		9 Elevation 3090'

Surface Location UL or lot ne. Section Township Rang Lot Ide North/South Ho Feet from the East/West line B 16 26 S 30 E 250 NORTH 1438 EAST **EDDY** " Bottom Hole Location If Different From Surface UL or lot no. Section Township Range Lot Idn Feet from the North/South line Feet from the East/West line County 26 S 30 E 2410 SOUTH 1980 EAST **EDDY** 12 Dedicated Acres Consolidation Code 3 Joint or Infill 15 Order No. 480.0



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1625 N. French Dr., Hobbs, NM 88240
Phone: (375) 393-6161 Fax: (575) 393-0720
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811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Pax: (575) 748-9728
District III
1000 Rio Brazos Rosd, Aztec, 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 Pax: (505) 476-3462

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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County

EDDY

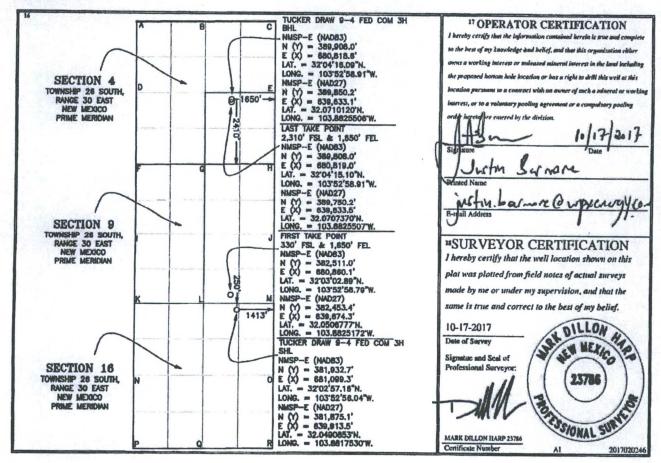
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API Number	¹ Pool Code 98220	³ Pool Name PURPLE SAGE WOLFCAMP GAS POOL			
⁴ Property Code	⁵ Propert TUCKER DRAV		⁶ Well Number		
4.1 M A L M		er Name & PRODUCTION, LLC	* Elevation 3091'		
		Location	3091		

UL or lot no. Rang Lot Idn North/South line Feet from the Feet from th **Knat/West He** Cou 16 26 S 30 E 250 NORTH 1413 EAST **EDDY** "Bottom Hole Location If Different From Surface

UL or lot no. Section Township Range Lot Idn Feet from the North/South line Feet from the Last/West line J 4 26 S 30 E 2410 SOUTH 1650 EAST

Dedicated Acres 13 Joint or InfBl 14 Consolidation Code 15 Order No. 480.0



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1220 S. Rt. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

12 Dedicated Acres

480.0

13 Joint or Intill

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

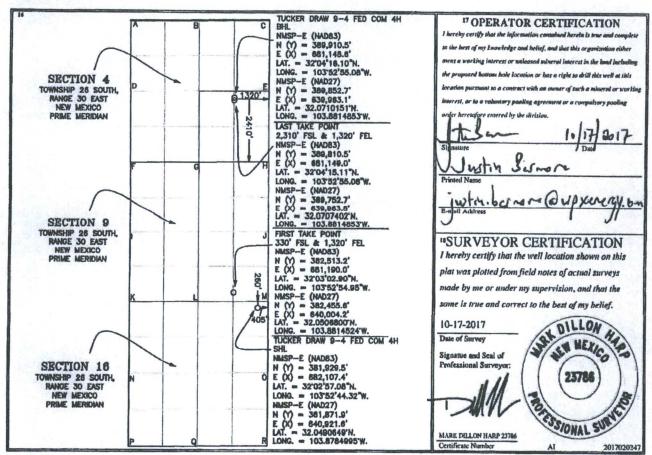
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WELL LOCATION AND ACREAGE DEDICATION PLAT

						HIOL DEDICE						
	API Numbe	r		² Pool Code 98220		³ Pool Name PURPLE SAGE WOLFCAMP GAS POOL						
Property Code 5 Property Name TUCKER DRAW 9-4 FED COM									⁶ Well Number 4H			
⁷ OGRID 24628		⁸ Operator Name ⁹ Ele							Elevation 3103'			
	22 - 7				* Surface Lo	ocation						
UL or let se.	Section 16	Township 26 S	Rauge 30 E	Lot Idn	Fect from the	North/South line NORTH	Feet from the 405	East/West line	County			
	1		" Bott	om Hole	Location If I	Different From	Surface					
UL or lot no.	Section 4	Township 26 S	Range 30 E	Lot Idn	Feet from the 2410	North/South line SOUTH	Feet from the	East/West line EAST	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.

15 Order No.



District. I 1625 N. French Dr., Hobbs, NM 88240 Phone: (575) 393-6161 Fax: (575) 393-0720 District. II 811 S., First St., Artenia, NM 88210 Phona: (575) 748-1283 Fax: (575) 748-9720 District III 1000 Kie Brazos Road, Artec, NM 87410 Phone: (505) 334-6178 Fax: (505) 334-6170 District IV 1220 S. S., Francis Dr., Seate Fe, NM 87505

Plume: (505) 476-3460 Fax: (505) 476-3462

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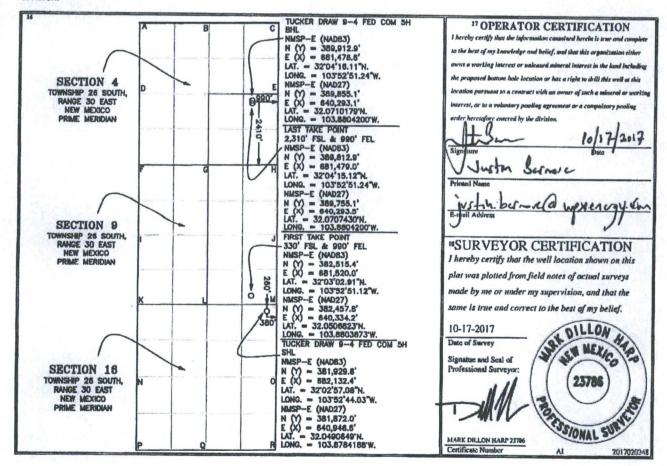
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WEL	L	LOCA	TION	AND	ACREAGE	DEDICATION PL	ΔT

1 API Number	² Pool Code 98220	1 out traine	
⁴ Property Code	Froperty TUCKER DRAW		⁶ Well Number 5H
⁷ OGRID No. 246289	8 Operato RKI EXPLORATION &		⁹ Elevation 3103'

Surface Location

UL or let nu.	Section 16	Township 26 S	Range 30 E	Let Idn	Feet from the 260	North/South line NORTH	Feet from the	East/West line EAST	County EDDY
			" Bott	om Hole	Location If I	Different From	Surface		
UL or let no. I	Section 4	Township 26 S	Range 30 E	Lot Idn	Feet from the 2410	North/South line SOUTH	Feet from the	East/West line EAST	County
12 Dedicated Acre 480.0	13 Joint or	r Infill 14 Co	onsolidation Co	de 15 Orde	r No.				LODI



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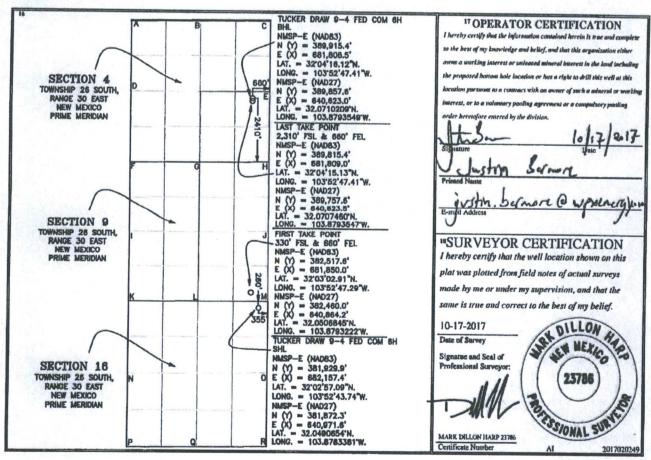
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WELL LOCATION AND ACREAGE DEDICATION PLAT

•	API Numbe	r		Pool Code 98220	MP GAS POOL				
⁴ Property Code ⁵ Property N TUCKER DRAW 9							6 W	'ell Number 6H	
⁷ OGRID 24628	2.5			RKI EXPI	* Operator Na ORATION & PR	ODUCTION, LLC	,	Elevation 3103'	
					"Surface Lo	ocation			
or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County

A	16	26 S	30 E		260	NORTH	355	EAST	EDDY
			u Bott	om Hole	Location If I	Different From	Surface		
UL or lot no.	Section 4	Township 26 S	Range	Lot Idn	Feet from the 2410	North/South line SOUTH	Feet from the	East/West line EAST	County
12 Dedicated Acre 480.0	Joint o	r Infill	14 Consolidation Co	ode 15 Orde	er No.				



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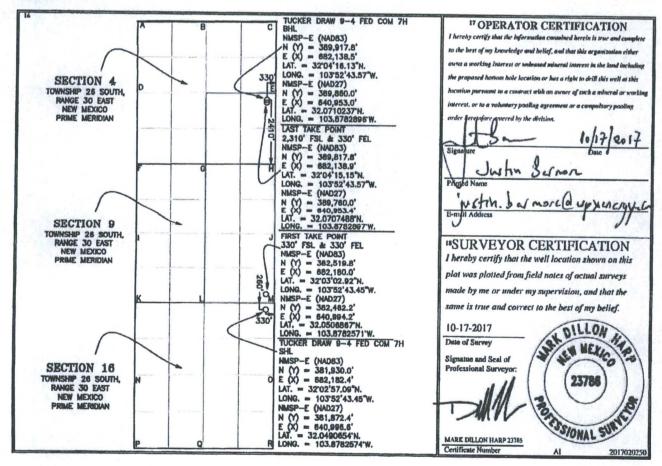
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WELL LOCATION AND ACREAGE DEDICATION PLAT

1 API Number	¹ Pool Code 98220	³ Pool Name PURPLE SAGE WOLFCAMP GAS POOL	
⁴ Property Code	⁵ Property Name TUCKER DRAW 9-4 FED COM		⁶ Well Number 7H
7 OGRID Na. 246289	8 Operator Name RKI EXPLORATION & PRODUCTION, LLC		⁹ Elevation 3103'

10 Surface Location UL or let no. Section Township Rang Lot Idn Feet from the North/South line Feet from the Enst/West line A 16 26.8 30 E 260 NORTH 330 FAST **EDDY** "Bottom Hole Location If Different From Surface

UL or lot no. Section Township Range Lot Idn Feet from the North/South lin Feet from the East/West line County 26 S 30 E 2410 SOUTH 330 EAST EDDY 12 Dedicated Acres Joint or Infill Consolidation Code Order No. 480.0



	9			
32	Tucker Di	raw Notice F	at	34
		Tract 1		
S -1	Tract 2			3
	Eddy	Tucker Draw Project Area 480 acres		
8				10
				EXHIBIT

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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