

API No. <u>42-283-37583</u> Drilling Permit # <u>896231</u> SWR Exception Case/Docket No. <u>0343676</u> (R37)		RAILROAD COMMISSION OF TEXAS OIL & GAS DIVISION APPLICATION FOR PERMIT TO DRILL, RECOMPLETE, OR RE-ENTER <i>This facsimile W-1 was generated electronically from data submitted to the RRC.</i> <i>A certification of the automated data is available in the RRC's Austin office.</i>				FORM W-1 07/2004 Permit Status: Approved	
1. RRC Operator No. <u>424176</u>		2. Operator's Name (as shown on form P-5, Organization Report) INEOS USA OIL & GAS LLC		3. Operator Address (include street, city, state, zip): ATTN: REGULATORY STE 600 1400 16TH STREET DENVER, CO 80202			
4. Lease Name BROKEN ARROW RANCH HC2		5. Well No. <u>E 3H</u>					
GENERAL INFORMATION							
6. Purpose of filing (mark ALL appropriate boxes): <input checked="" type="checkbox"/> New Drill <input type="checkbox"/> Recompletion <input type="checkbox"/> Reclass <input type="checkbox"/> Field Transfer <input type="checkbox"/> Re-Enter <input type="checkbox"/> Amended <input type="checkbox"/> Amended as Drilled (BHL) (Also File Form W-1D)							
7. Wellbore Profile (mark ALL appropriate boxes): <input type="checkbox"/> Vertical <input checked="" type="checkbox"/> Horizontal (Also File Form W-1H) <input type="checkbox"/> Directional (Also File Form W-1D) <input type="checkbox"/> Sidetrack							
8. Total Depth <u>12000</u>		9. Do you have the right to develop the minerals under any right-of-way ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		10. Is this well subject to Statewide Rule 36 (hydrogen sulfide area)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
SURFACE LOCATION AND ACREAGE INFORMATION							
11. RRC District No. <u>01</u>		12. County LA SALLE		13. Surface Location <input checked="" type="checkbox"/> Land <input type="checkbox"/> Bay/Estuary <input type="checkbox"/> Inland Waterway <input type="checkbox"/> Offshore			
14. This well is to be located <u>10.1</u> miles in a <u>SE</u> direction from <u>Cotulla</u> which is the nearest town in the county of the well site.							
15. Section <u>764 1/2</u>		16. Block		17. Survey BUNTON, MRS H		18. Abstract No. <u>A-1520</u>	
				19. Distance to nearest lease line: ft.		20. Number of contiguous acres in lease, pooled unit, or unitized tract: <u>1905.61</u>	
21. Lease Perpendiculars: <u>350</u> ft from the <u>N</u> line and <u>1444</u> ft from the <u>W</u> line. 22. Survey Perpendiculars: <u>350</u> ft from the <u>N</u> line and <u>1444</u> ft from the <u>W</u> line.							
23. Is this a pooled unit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		24. Unitization Docket No:		25. Are you applying for Substandard Acreage Field? <input type="checkbox"/> Yes (attach Form W-1A) <input checked="" type="checkbox"/> No			
FIELD INFORMATION List all fields of anticipated completion including Wildcat. List one zone per line.							
26. RRC District No.	27. Field No.	28. Field Name (exactly as shown in RRC records)		29. Well Type	30. Completion Depth	31. Distance to Nearest Well in this Reservoir	
01	27135700	EAGLEVILLE (EAGLE FORD-1)		Oil or Gas Well	12000	842.00	
BOTTOMHOLE LOCATION INFORMATION is required for DIRECTIONAL, HORIZONTAL, AND AMENDED AS DRILLED PERMIT APPLICATIONS (see W-1H attachment)							
Remarks See W1 Comments attached				Certificate: I certify that information stated in this application is true and complete, to the best of my knowledge.			
				Name of filer <u>Bill Spencer, Consultant</u> Date submitted <u>Jan 02, 2024</u>			
RRC Use Only Data Validation Time Stamp: Jan 8, 2024 11:26 AM('As Approved' Version)				<u>(512)9181062, x2</u> <u>bill@spencerconsulting.org</u> Phone E-mail Address (OPTIONAL)			

Permit Status: Approved

The RRC has not approved this application.
Duplication or distribution of information is
at the user's own risk.

RAILROAD COMMISSION OF TEXAS
OIL & GAS DIVISION

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Form W-1H
Supplemental Horizontal Well Information

07/2004

Permit # 896231

Approved Date: Jan 08, 2024

1. RRC Operator No. 424176	2. Operator's Name (exactly as shown on form P-5, Organization Report) INEOS USA OIL & GAS LLC	3. Lease Name BROKEN ARROW RANCH HC2	4. Well No. E 3H
Lateral Drainhole Location Information			
5. Field as shown on Form W-1 EAGLEVILLE (EAGLE FORD-1) (Field # 27135700, RRC District 01)			
6. Section	7. Block	8. Survey LEAL, J A	9. Abstract 560
10. County of BHL LA SALLE			
11. Terminus Lease Line Perpendiculars 100 ft. from the S line. and 2684 ft. from the E line			
12. Terminus Survey Line Perpendiculars 4980 ft. from the NW line. and 2020 ft. from the NE line			
13. Penetration Point Lease Line Perpendiculars 50 ft. from the N line. and 1836 ft. from the E line			

Permit Status:	Approved
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**RAILROAD COMMISSION OF TEXAS
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APPLICATION FOR PERMIT TO DRILL, RECOMPLETE, OR RE-ENTER

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W-1 Comments

Permit #	896231
Approved Date:	Jan 08, 2024

[Jan 2, 2024 1:20 PM]: Commission Staff expresses no opinion as to whether a 100% ownership interest in each of the leases alone or in combination with a "production sharing agreement" confers the right to drill across lease/unit lines or whether a pooling agreement is also required. However, until that issue is directly addressed and ruled upon by a Texas court of competent jurisdiction it appears that a 100% interest in each of the leases and a production sharing agreement constitute a sufficient colorable claim to the right to drill a horizontal well as proposed to authorize the removal of the regulatory bar and the issuance of a drilling permit by the Commission, assuming the proposed well is in compliance with all other relevant Commission requirements.

Issuance of the permit is not an endorsement or approval of the applicant's stated method of allocating production proceeds among component leases or units. All production must be reported to the Commission as production from the lease or pooled unit on which the wellhead is located and reported production volume must be determined by actual measurement of hydrocarbon volumes prior to leaving that tract and may not be based on allocation or estimation. Payment of royalties is a contractual matter between the lessor and lessee. Interpreting the leases and determining whether the proposed proceeds allocation comports with the relevant leases is not a matter within Commission jurisdiction but a matter for the parties to the lease and, if necessary, a Texas court of competent jurisdiction.

The foregoing statements are not, and should not be construed as, a final opinion or decision of the Railroad Commission.; [RRC STAFF Jan 3, 2024 3:31 PM]: There have been problems identified with this permit (see problem letter attachment). Notification sent.; [RRC STAFF Jan 5, 2024 9:31 AM]: Problems identified with this permit are resolved.; [RRC STAFF Jan 5, 2024 9:31 AM]: Filer submitted revised plat and P-16. Per Bill Spencer "The SL lease calls need to be corrected to 350' FNL and 1444' FWL The PP lease calls need to be corrected to 50 FNL' and 1836' FEL The FTP lease calls need to be corrected to 500' FNL and 1836' FEL"; [RRC STAFF Jan 5, 2024 10:30 AM]: There have been problems identified with this permit (see problem letter attachment). Notification sent.; [RRC STAFF Jan 5, 2024 2:48 PM]: Problems identified with this permit are resolved.; [RRC STAFF Jan 5, 2024 2:48 PM]: filer submitted revised P-16; [RRC STAFF Jan 8, 2024 10:03 AM]: SHL W SL call, LTP/BHL E LL calls corrected per plat. Off lease SHL marked no per plat.