



#### STATEWIDE RULES: WELL SPACING AND DENSITY EXCEPTIONS

David King July 2025













HORIZONTAL WELL- A well that contains 5 main parts: a) surface location b) penetration point c) first take point d) last take point, and e) terminus location.

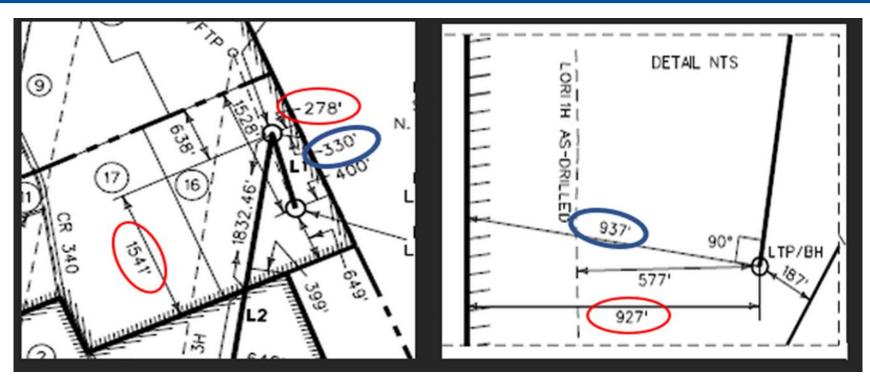
HORIZONTAL DRAINHOLE- Portion of the horizontal wellbore including, and between, the first and last take point.

TAKE POINT- Any open point on a horizontal wellbore that allows hydrocarbons to flow.



- For SWR 5 purposes the plat must show the perpendicular call 90 degrees from the lease line, to the part of the well being identified.
- For SWR 37 purposes the plat must show the perpendicular call 90 degrees from the productive part of the well to the lease line.
- In some instances, the distance identified could be the same, however, this is not always the case.





The distances circled in red satisfy the SWR 5 requirements of calls from the lease line to the part of the well being described. The distances circled in blue satisfy SWR 37 requirements to show that the well complies to spacing rules by showing distance from a take point to the lease line for those fields that have "Special" horizontal field rules.



- OFFSET- Refers to the operator, lessee, or un-leased mineral owner of a tract that is adjacent to the lease/unit the application is being applied for or to an interior unleased tract.
- WAIVER- A letter signed by an identified offset. In that letter the offset is requested to waive their right to protest the granting of the needed exception to a Statewide or Field Rule.
- AFFECTED PARTY- Determined by Statewide or Field Rules and reason for the notification or exception.

# NOTIFICATION



#### COMMISSION IS RESPONSIBLE

- The Railroad Commission will generate and distribute to all identified parties the applicant has provided for on the service list for a SWR 37 or SWR 38 exception.
- If a notice is returned the Railroad Commission will send out a Supplemental Notice to the new address the applicant must provide.

#### **OPERATOR IS RESPONSIBLE**

- The applicant will send out to affected parties for any request for an off-lease penetration point. Field Rule requirements must be adhered to. The applicant must wait for the prescribed period before submission of the permit application.
- Any party identified for a SWR 40 exception request



• Under SWR 3.86 the standard publication is for 4 consecutive weeks.

• Some fields have undergone a hearing to change the publication to 2 consecutive weeks.

- Field rule requirements must be adhered to.
  - Some fields have been updated and require additional information in the notice.



- Resolution is Own Offset or signed Waivers have been attached to filing.
- 21-Day Notice of Application has termed out and no protests have been received.
- Submitting the Publisher's Affidavit once the publication has run.



When filing an amended application with a previously approved exception:

- Provide all service lists, waivers, and/or publisher's affidavits that resolved any prior exceptions.
- Select the same resolution methods that previously resolved the exception.
- Add a comment requesting no additional notification
  - This is a request and will be reviewed by RRC DP staff
  - An additional notification may still be required based on the review



- New regulatory field on amended W-1.
- Producing points have moved closer to a lease line, and are not covered by subsurface tolerance
  - Heel/toe spacing is NOT covered by subsurface tolerance, only perpendicular spacing is covered (lateral drift)
- A new point of exception has been created with the amendment
- Offsets were not included on the previous service list

# **REASON FOR RE-NOTIFICATION (2 of 2)**



As you have an offsetting or affected operator, lessee and/or mineral interest ov	wner to your tract whom you
cannot locate, you must give "notice by publication". A copy of the Railroad C	Commission's notice, must be
published in a newspaper in the county where your tract is located. Such notice	e is your responsibility and
must be published once each week for two (2) consecutive weeks. If you cannot	t meet the 14-day requirement
due to newspaper filing deadlines it is your responsibility to contact the Drilling	g Permit Unit and request a
new term out date for your publication. If you don't meet the requirements as la	aid out in SWR 3.37 or SWR
3.38 you will be required to re-publish your notice. The first publication date n	nust be at least 14 days before
the termination date on the notice of application. Proof of publication must be	filed for the record. A
publisher's affidavit must be submitted. Mail a hard copy of the affidavit to Ra	ailroad Commission of Texas,
PO BOX 12967, Austin TX 78701. Or you may e-mail a scanned image of this	s affidavit to:
SWR37@RRC.TEXAS.GOV. The entire notice excluding the service list and	notice of protest letter must
be published. Upon receipt of the publisher's affidavit by the Drilling Pern	nit Unit, and there being no
protest received, a permit may be issued.	
RAILROAD COMMISSION OF	TEXAS
OIL AND GAS DIVISION	N
DISTRICT 06	Rule 37 Case No.
DATE OF ISSUANCE: Apr 10, 2018 NOTICE OF PROTEST DEADLINE: 5:00 PM, May 1, 2018	Status/Permit No.
Address: Railroad Commission of Texas	
Address: Railfoad Commission of Texas ATTN: Drilling Permit Unit,	
P. O. Box $12967$	

Austin, Texas 78711-2967

Fax:

(512) 463-6780 Email: SWR37@RRC.TEXAS.GOV

 Missing the prescribed period for publication because the first date of publication did not fall within seven days of the issuance date.

#### LET IT SINK IN





# Overview

- Triggers
- Non-Perforation Zone (NPZ) Requirements
- Drilling Permit Exception Checks
- Plat Requirements
- SWR Resolutions & Notification Parameters
- NOA by Publication Requirements

### **STATEWIDE RULE EXCEPTIONS**





#### **FIELD RULES- STATEWIDE RULES**



#### Field Rules for Field: WILDCAT Field Number: 00002001 District Name: 01

Oil Field Rules:	:						
County Reg Schedule Rema Comme	arks:	alt Dome: N Fi	ield Location:	LAND Don't Pe	rmit: N		
Rule Type	Depth	Lease Spacing	Well Spacing	Acres per Unit	Tolerance Acres	<b>Diagonal Code</b>	Diagonal Max Length
Statewide rules	All Depths	467	1200	40.0	20.0		0

Gas Field Rules:	:									
Schedule Rema	County Regular: N Salt Dome: N Field Location: LAND Don't Permit: N Schedule Remarks: WELLS IN THIS FLD. NOT ELIGIBLE FOR ALLOWABLE.									
Comme Rule Type		Lease Spacing	Well Spacing	Acres per Unit	Tolerance Acres	Diagonal Code	Diagonal Max Length			
Statewide rules	-		1200	40.0	20.0	Diagonal Code	0			

#### **FIELD RULES- SPECIAL RULES**



#### Field Rules for Field: SPRABERRY (TREND AREA) Field Number: 85279200 District Name: 7C

Oil Field Rules:											
County R	egular: N	Salt Dome: N	Field Locatio	n: LAND Don't	Permit: N						
Schedule Re	marks: FIE	LD. EFFECTIVE	4/12/16.								
Com	ments: R3	8 OK W/O DATA,	P-15'S,ACLIST	& LEASE PLAT O	R PRO PLAT						
Rule Type	Depth	Lease Spacing	Well Spacing	Acres per Unit	<b>Tolerance Acres</b>	Diagonal Code	<b>Diagonal Max Length</b>				
Special Rules	Special Rules All Depths 330 0 80.0 80.0 Corner to Corner 0										

Gas Field Ru	les:						
County R	egular: N	Salt Dome:	N Field L	ocation: LAND	Don't Permit	t: N	
Schedule Re	marks: PE	R DOCKET 01-02	99858, THIS FI	IELD HAS BEEN D	DESIGNATED AS A	UFT	
Com	ments: R3	8 OK W/O DATA,	P-15'S,ACLIST	& LEASE PLAT O	R PRO PLAT		
Rule Type	Depth	Lease Spacing	Well Spacing	Acres per Unit	<b>Tolerance Acres</b>	<b>Diagonal Code</b>	<b>Diagonal Max Length</b>
Special Rules	All Depths	330	0	80.0	80.0		0

# FIELD RULES- SPECIAL HORIZONTAL RULES

Special Horizontal Field Rules: For informational purposes only. Th	e Final Order controls all field rules.
	Illustration Screen Help
Unconventional Fracture Treated (UFT): Yes	UFT Effective Date: 05/10/2016
Correlative Interval: From 6865 to 10605 feet	Established by API Number: 32931029
Dual Lease Line Take Point Spacing	
First/Last Take Points (Heel and Toe) to Lease Line: 100 feet	
Perpendicular Spacing from All Take Points to Lease Line: 330 fee	t
Between-Well Spacing	Subsurface Tolerance Box: 50 feet
Horizontal to Vertical: 0 feet	
Horizontal to Horizontal: 0 feet	
nonzontal to horizontal: 0 feet	
Overlap Distance: N/A	
Overlap Distance: N/A	
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details)	60 feet
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision	60 feet
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Lower: 20 acres	60 feet
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Notification Radius: 60	60 feet
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Lower: 20 acres Comments for the Special Field Rules	
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Lower: 20 acres	
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Lower: 20 acres Comments for the Special Field Rules	AS 7C-0291169.
Overlap Distance: N/A Stacked Lateral Rules: Yes (If yes, see Final Order for details) Special Rule 38 (Well Density) Provision Upper: 79 acres Lower: 20 acres Comments for the Special Field Rules Comments: DOCKET 7C-0291171 CONTAINS THE SAME INFORMATION	AS 7C-0291169. Iguage
Overlap Distance: N/A         Stacked Lateral Rules: Yes (If yes, see Final Order for details)         Special Rule 38 (Well Density) Provision         Upper: 79 acres         Lower: 20 acres         Comments for the Special Field Rules         Comments: DOCKET 7C-0291171 CONTAINS THE SAME INFORMATION A         History: Final Orders that contain special horizontal field rules land	AS 7C-0291169.

# WHAT AREN'T TRIGGERS





- Location of my Penetration Point, unless it is also a take point, to a lease line
- An Off-Lease Penetration Point
- An Off-Lease Surface Location
- Correct usage of a Non-Perforation Zone



What Can Trigger a SWR 37 Violation?

- Productive portion of my well is too close to an exterior lease line.
- Productive portion of my well is too close to an interior tract line within my pooled unit that is not completely leased or pooled.
- Productive portion of my well is too close to another well in the same field on my lease.



Non-Perforation Zone OR (NPZ)

NPZ's are sections of wellbore that will not be perforated until the permit is amended to remove the NPZ.

The NPZ is clearly labeled along the wellbore on the plat with a begin and end point.

The length of the NPZ must be clearly shown on the plat.

## **PROPER USAGE OF NON-PERFORATION ZONES**



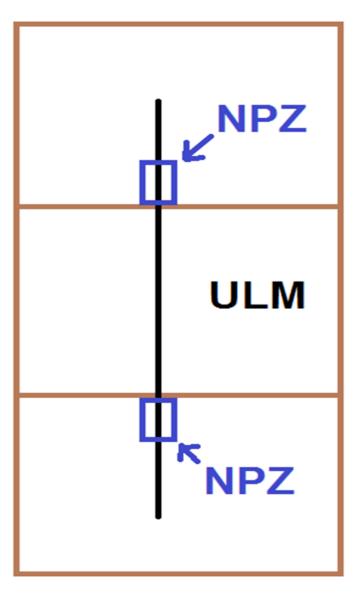
- NPZ's can be used for Lease Line SWR 37 exceptions only. NPZ's can't be used for SWR 37 between well and SWR 38.
- NPZ's need to be accompanied by the distance of the NPZ. Rules are different for every field, and we need to make sure you are using the appropriate distance.
- Make sure that if an Allocation or PSA well that the tracts isolating with an NPZ are also marked with ULM to reflect why you are using the NPZ.

#### **NPZ-ISOLATING ONE TRACT**



#### Field With or Without Special Horizontal Rules

- Wellbore
- Lease Line
- **NPZ's**

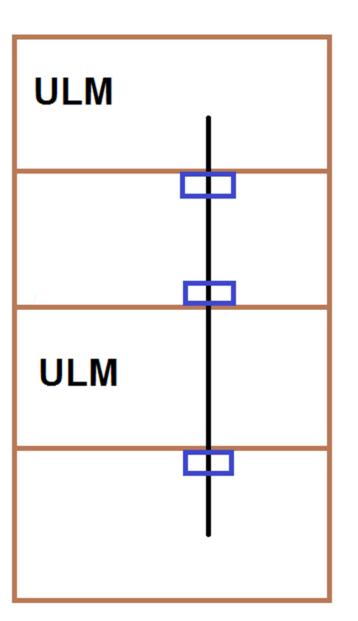




#### **NPZ-ISOLATING TWO TRACTS**

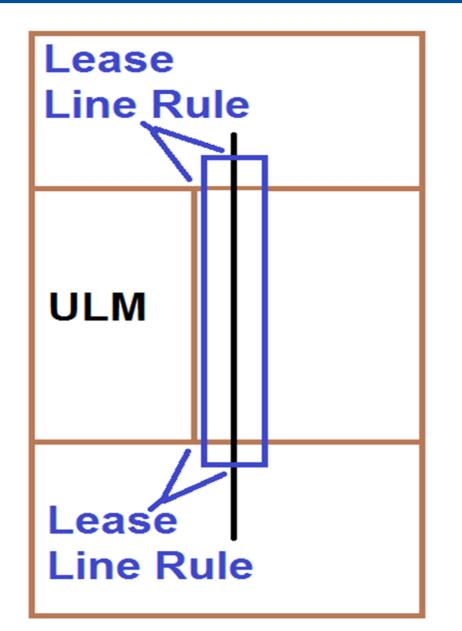
Field with and without special horizontal rules

- Wellbore
- Lease Line
- **NPZ's**



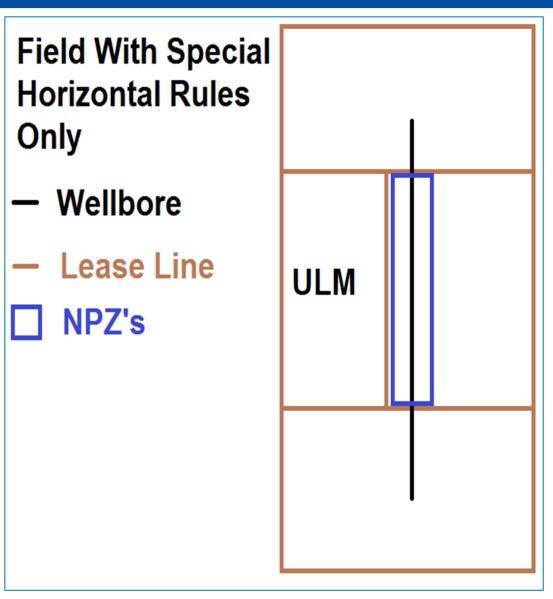
## NPZ - ISOLATING WHEN PARALLEL W/O SPECIAL RULES

- Field Without Special Horizontal Rules
- Wellbore
- Lease Line
- **NPZ's**





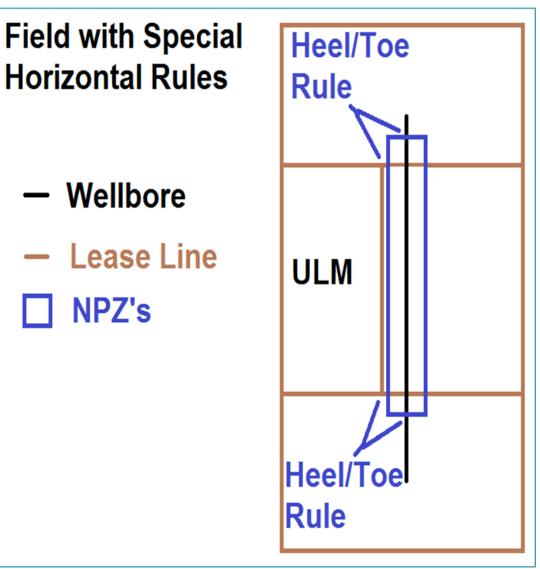
When your wellbore is *more* than the first/last take point distance from the tract with unleased minerals.



#### NPZ -ISOLATING WHEN PARALLEL W/SPECIAL RULES #2



When your wellbore is *less* than the first/last take point distance from the tract with unleased minerals.



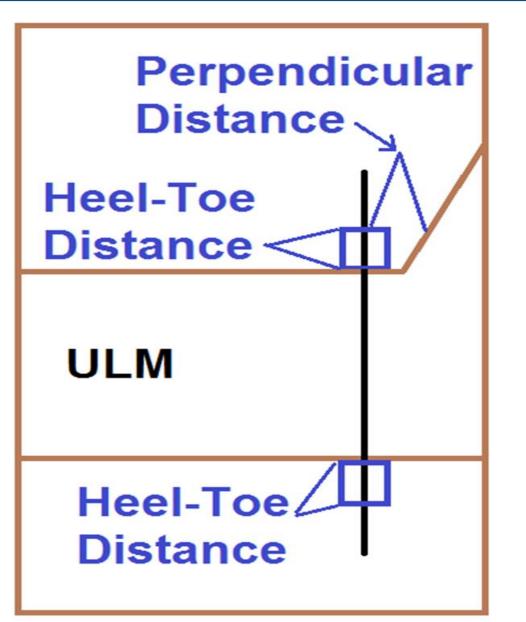
#### **NPZ-DUAL SPACING COMPLIANCE**

Field With Special Horizontal Rules Only

- Wellbore

Lease Line

**NPZ's** 

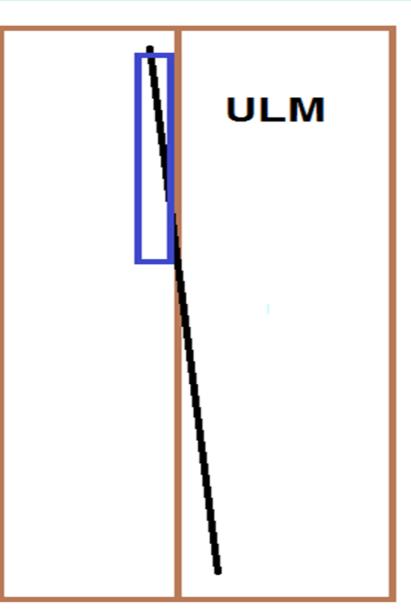


#### **NPZ-SPECIAL CASES**

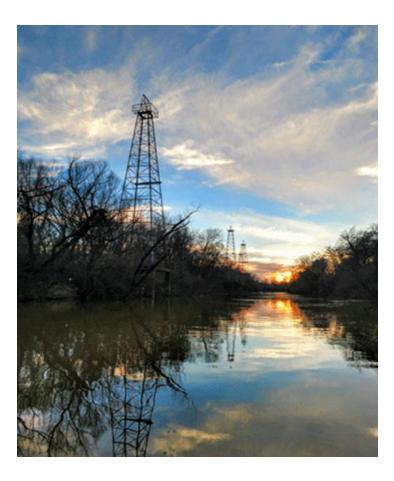


Field With or Without Special Horizontal Rules

- Wellbore
- Lease Line
- **NPZ's**



## **DRILLING PERMIT EXCEPTION CHECKS**



SWR 37 Lease Line Trigger Checks

- Vertical
- Directional
- Horizontal
- Horizontal with Special Rules

# **STATEWIDE RULE 37 NOTIFICATION- LEASE LINE**





# **Notification Parameters**

- Offsets within the greater of the lease line spacing or 1/2 of the between well spacing.
- Fields with special horizontal rules and between well spacing have the same notice area as above.
- If no between well spacing, the notice area is the same as the lease line spacing.

#### **VERTICAL WELL CHECK**

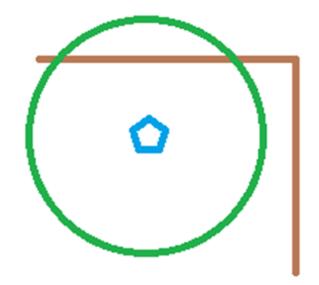


*Basic Details		_				_				
Lease name:	MCKNIGHT, M.	B.	Well	number:	506H	Di	istance to Neare	est Lease Line	from Surface Location:	5301.0
Total Acres in the Lease:	5760.0					C				
	Distance		Direction	Distance		Directio	on			
Surface Lease Line Perpendiculars:	5301.0 f	feet	from the SOUTH line	and 8337.0	) feet	from the	e WEST	line		
Pooled/Unitized:	Check if	yes	) Unitized Docket	Number:			(Required only	r if Unitized)		
Well Type:	Oil Well		✓ Completion	n Depth:	5043				Distance to Nearest Well:	2525.0
No. of Wells:	9		Tot	al Depth:	5043					

## **STATEWIDE RULE 37 LEASE LINE- VERTICAL**



- 🖒 SHL
- O BHL
- Wellbore
- **Take Points**
- Field Rules
- Lease Lines



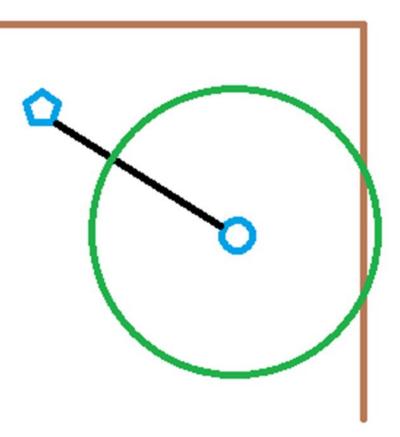
#### **DIRECTIONAL WELL CHECK**

Wellbore	e Profil	e								
				Bottomhole Loca			urvey, Se	ction, and Block ma	nually.	
	Section	on: 7		Block:		Su	rvey: PER	RRY, J F / AUSTIN, E M		
Abstr	ract #:	A- 110		County: BR	AZO	RIA V AU	ito-Populate	]	M	
Additiona	al inform	nation about	the locat	ion:						
Delete	Name	Profile		Distance (ft)		Direction		Distance (ft)	Direction	
	BH1	Bottomhole	Lease	1117.0 f	eet	from the NW	line	and 1354.0 feet	from the NE	ne
			Survey	1354.0 f	eet	from the NE	line	and 5696.0 feet	from the SE	ne

# **STATEWIDE RULE 37 LEASE LINE : DIRECTIONAL**

# Directional

- SHL O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



#### **HORIZONTAL : NO SPECIAL RULES**

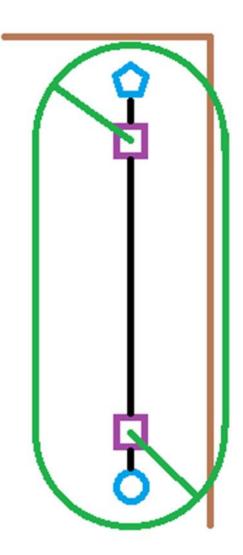
	e Profil	e					
Add	Additiona	al Terminus Locatio	n				
Nearest	Distanc	e from Any Take	Point to	a Lease Line: 467.	0		
Enter A	bstract	#, select the (	County a	and click Auto-Pop	oulate, or fill in Survey, Section	on, and Block manua	lly.
	Secti	ion: 101		Block: 16	Survey: H&TC	C RR CO	
Abs	tract #		1	County: HARDEM	Auto-Populate		MAR
			1	county.		1	
	al inform	nation about the	location	-			
Addition	al inforr	nation about the	location	:			
		Profile	location	: Distance (ft)	Direction	Distance (ft)	Direction
Delete			Lease	Distance (ft)			Direction from the west
	Name	Profile		Distance (ft) 467.0 feet	from the north line	and 1512.0 feet	
Delete	Name	Profile	Lease	Distance (ft) 467.0 feet 467.0 feet	from the north line	and 1512.0 feet and 1512.0 feet	from the west line
Delete	Name	Profile Terminus Point Last Take	Lease Survey	Distance (ft)           467.0         feet           467.0         feet           467.0         feet	from the north line from the north line from the north line	and 1512.0 feet and 1512.0 feet and 1512.0 feet	from the west line

# **STATEWIDE RULE 37 LEASE LINE : HORIZONTAL**



# Horizontal

- 🗘 SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines



		HOR	IZO	NTA	L : 9	SPECIA	L DU	AL LE	ASE	LINE	
/ellbore	Profile										
Add A	dditional Te	rminus Location									
learest D	vistance fr	om the First/Last T	ake Point (I	Heel/Toe) to a	Lease Lin	e: 100.0	Nearest Perpen	dicular Distance	from Any Ta	ke Point to a Lease Line:	330.0
							1.01.1				
nter Ab	stract #,	select the Count	y and click	Auto-Popul	ate, or fil	I in Survey, Section,	and Block ma	nually.			
	Sec	tion: 14	]	Block:	C20		Survey: PSL/A	NDERSON, LW			
Abstract #: A- 4345 County: REEVES V Auto-Populate											
Additiona	l informat	ion about the locati	on:								
Delete	Name	Profile		Distance (f	t)	Direction		Distance (ft)		Direction	
	TH1	Terminus Point	Lease	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
			Survey	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
		Last Take Point	Lease	100.0	feet	from the SOUTH	line	and 1830.0	feet	from the WEST	line
		First Take Point	Lease	330.0	feet	from the NORTHEAST	line	and 1830.0	feet	from the WEST	line
		Penetration			-						



## **SPECIAL HORIZONTAL FIELD RULES**

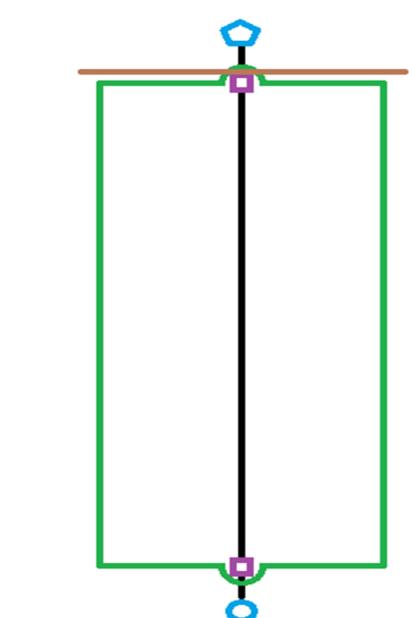
- SHL
- O BHL
- Wellbore
- **Take Points**
- Field Rules
- Lease Lines

## FIELD RULES : DUAL LEASE LINE RULES

Special Horizontal Field Rules: For informational purposes only. The Final Order controls all field rules. Illustration Screen Help									
Unconventional Fr	racture Treated (UFT): Ye	15	UFT Effective Date: 05/10/2016						
Correlative Interval: From 6865 to 10605 feet Established by API Number: 32931029									
Dual Lease Line Ta	ake Point Spacing								
First/Last Take F	Points (Heel and Toe) to	Lease Line: 100 feet							
Perpendicular Sp	pacing from All Take Poin	ts to Lease Line: 330 feet							
Between-Well Spa	icing		Subsurface Tolerance Box: 50 feet						
Horizontal to Ver	rtical: 0 feet		いたまたい アルビスを行われたいため、それを目的が行うため、いたいであり、このような話していた。 見ませい ひに						
Horizontal to Ho	rizontal: 0 feet								
Overlap Distan	ce: N/A								
	is a 2 - 4 - 3 - 1 - 2 - 2 - 2 - 2 - 2 - 7								
Stacked Lateral Ru	ules: Yes (If yes, see Final	Order for details)							
Special Rule 38 (	Well Density) Provision								
Upper: 79 acres		Notification Radius: 660 feet							
Lower: 20 acres									
Comments for the	e Special Field Rules								
connents for the	e opecial field Rules								
Comments: DOCKET 7C-0291171 CONTAINS THE SAME INFORMATION AS 7C-0291169.									
Histony Final Ord	tors that contain special	harizontal field wind innavage							
		horizontal field rules language							
	Final Order Effective Dat								
7c-0291169 7C-0297471	12/02/2014 03/08/2016	Click Here							
10-0297471	03/08/2010	Sucknere							

## **SPECIAL HORIZONTAL FIELD RULES : FTP & LTP**



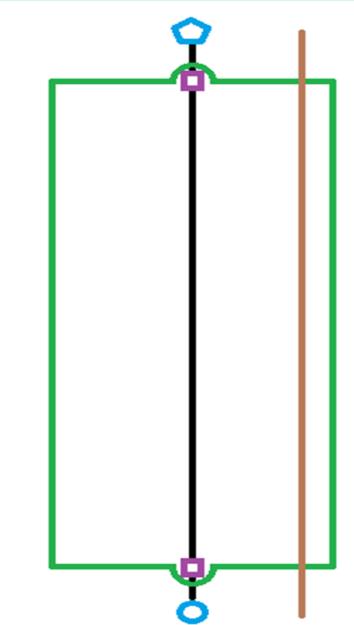




- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines

## **SPECIAL HORIZ. FIELD RULES : PERPENDICULAR**





- 🗘 SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines

## **SPECIAL HORIZ. FIELD RULES : DUAL COMPLIANCE**

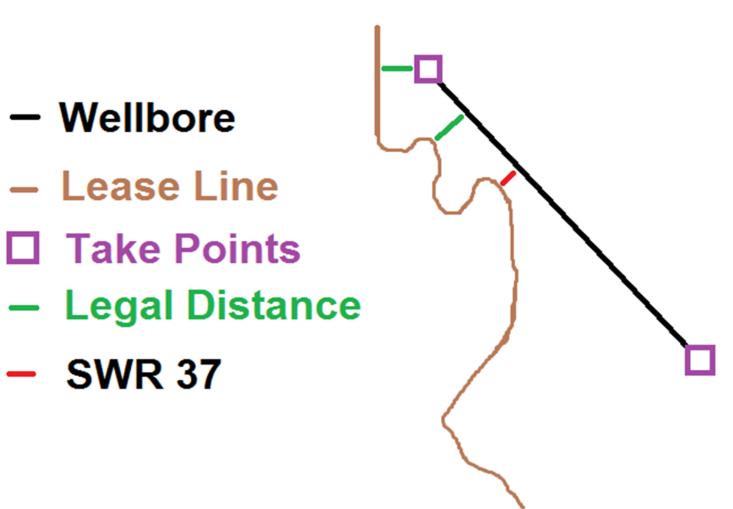


- 🗘 SHL
- O BHL
- Wellbore
- Take Points
- Field Rules
- Lease Lines

## **SPECIAL HORIZONTAL FIELD RULES : SPECIAL**



## **River Lease Lines**



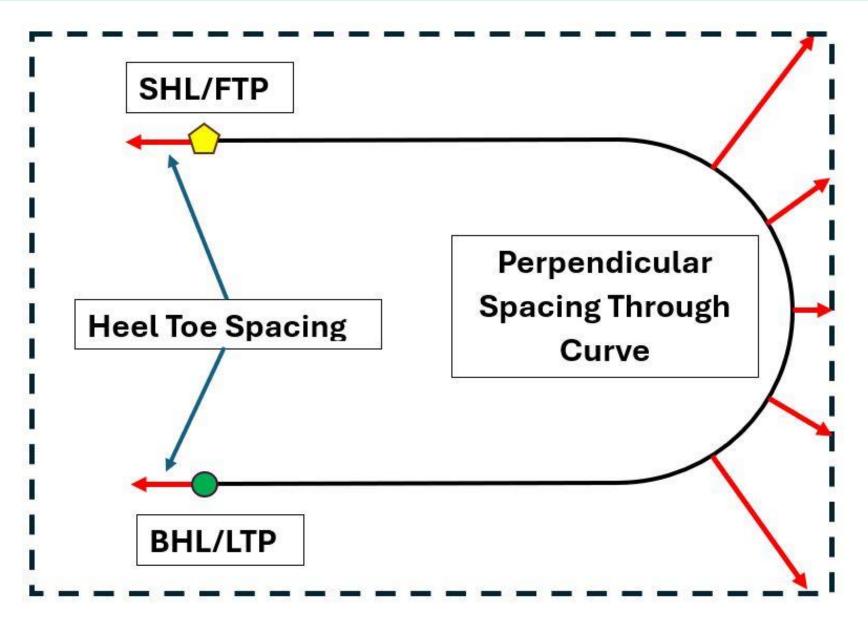
SPECIAL HORIZONTAL FIELD RULES: U-TURN WELL (1 of 2)

# "U-Turn" wells or "Horseshoe" wells

- Heel/Toe spacing applies to the end points of the well.
- Perpendicular spacing will apply throughout the curve of the well.
- If the curve is less than 330 feet from the lease line

   An NPZ would be required to cover the full section
   that is less than 330 feet.

## SPECIAL HORIZONTAL FIELD RULES: U-TURN WELL (2 of 2)



## **MULL IT OVER**

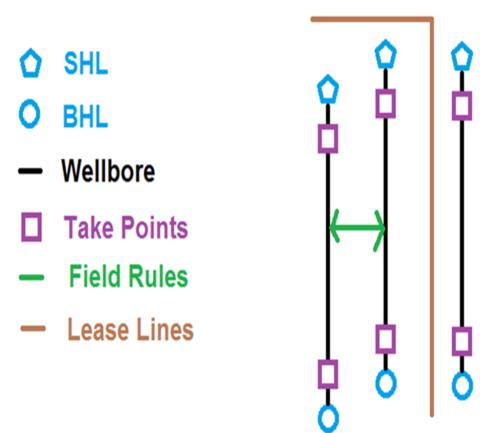




## **STATEWIDE RULE 37- BETWEEN WELL**



## **Between Well**



- Producing part of the well is too close to producing portion of another well in the same LEASE and FIELD
- Wells owned by other operators can be the nearest well if in the same LEASE and FIELD

## **STATEWIDE RULE 37 NOTIFICATION- BETWEEN WELL**



### **Notification Parameters**

- Offsets within the greater of the lease line spacing or 1/2 of the between well spacing AND each adjacent tract.
- It is possible to have an affected offset that is not adjacent but is still within the notification area.





## STATEWIDE RULE 37 NOTICE AREA- BETWEEN WELL Between Well & SWR 38 notice area



## **STATEWIDE RULE 38**



### TOO MUCH OIL NOT ENOUGH SPACE

- A SWR 38 is triggered when there are more wells on the lease than allowed for by the field rules.
- Is your field classified as "UFT"? If so, an exception may not be required.

Note: In some cases, the use of Stacked Lateral provisions approved for your field or under SWR 86 can negate the need for a SWR 38 exception for a lease being developed with horizontal wells.



## STATEWIDE RULE 38- DETERMINING NOTIFICATION AREA



## **Notification Parameters**

- Offsets within the lease line spacing AND each adjacent tract
- It is possible to have an affected offset that is not adjacent, but are still within the notification area
- Refer to your field rules or "UFT" rules for special notification areas



# STATEWIDE RULE 38- NOTICE AREA

## Between Well & SWR 38 notice area





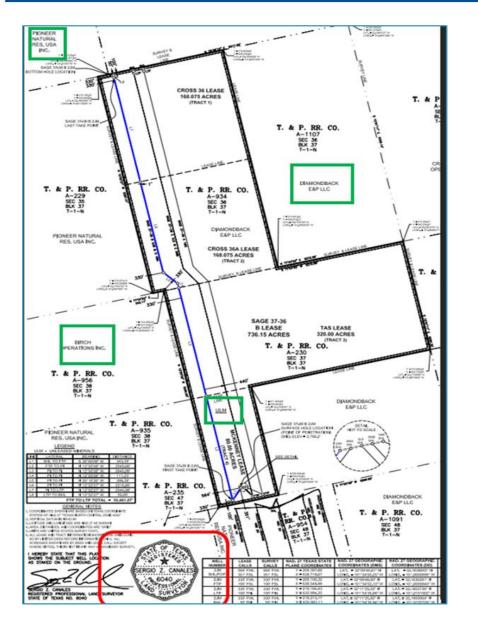
# **Non-Concurrent Production:**

For SWR 37 Between Well and SWR 38 a Non-Concurrent Production Restriction can be used.

- Restriction stating that the applied for well and any wells on the restriction will not produce from the same field at the same time
- All wells that trigger an exception must be included in the restriction

## **STATEWIDE RULE 37 & 38- PLATS**





- Plat must be certified with a signature or surveyor's stamp
- Plat must have offsets clearly labeled in the notification area
- If filing for a PSA or Allocation well the plat must show all tracts being developed

Note: Even if you are your choosing "Own Offset" as a resolution to the exception you must still clearly label your companies name in the appropriate area on the plat.



# **Entity for Density:**

 For SWR 37 Between Well an Entity for Density docket number can be used.

 Some approved dockets for EFD'S may have special lease line requirements that require the operator to send out notice.

## **RESOLVING WITHOUT NOTICE**



### Own Offset

- To qualify, all affected tracts identified must be 100% leased\* to the applicant.
- The plat must clearly be labeled with applicant's name in all affected tracts.

\*If less than 100% of the mineral tract is under lease then another resolution path will need to be taken for the rest of the mineral tract.

### Waiver

- All affected operators, lessees, or unleased mineral owners must sign the waiver.
- The plat must clearly be labeled with affected parties name in all affected tracts.
- Waivers from JOA partners may need more language concerning acreage assignments.

### WAIVER



DATE

#### EXAMPLE

RULE 37 AND/OR RULE 38 WAIVER

OFFSET INC P O BOX XXXXX XXXXX, TEXAS XXXXX

> RE: RULE 37 AND/OR RULE 38 LEASE NAME\_\_\_\_\_ COUNTY\_\_\_\_\_

THE APPLICANT IS REQUESTING AN EXCEPTION TO STATEWIDE RULE 37 AND/OR RULE 38 THE BELOW SIGNED HAS NO OBJECTIONS.

SIGNATURE\_\_\_\_\_

TITLE (OPTIONAL)\_\_\_\_\_

DATE:\_\_\_\_\_



 For SWR 37 and SWR 38 exceptions affected tracts located in another state or country can be classified as unaffected.

 For SWR 37 Between Well and SWR 38 any affected offsets that are greater than 1 mile from the producing portion of the well may be deemed unaffected.

RULE 38 OP	TIONAL NOTIFICATION PARAMETERS						
Queues General Information Field List Field Detai	is Exceptions Attachments Restrictions Payments Events Comments Review						
Save (please hit save to see errors on this page)							
	SWR 38 Exception Notification Parameters						
Field Exception	Yes Are you using different notification parameters than the ones in SWR 38 to determine the affected persons? (applies to fields designated as UFT, or with a notification radius specified in special field rules)						
SUGARKANE (EAGLE FORD) SWR 38							

- Some field rules allow for reduced notification parameters in identifying affected parties.
- Make sure that you check the box, if allowed, that you are using reduced notification.
- Unconventional Fracture Treated (UFT) fields for certain exceptions have reduced notification parameters in identifying affected parties

## **RESOLVING WITH NOTICE**



### **Notice of Application**

- Unleased affected parties are listed on the service list provided with the application.
- The plat must clearly be labeled with name of affected party in all affected tracts.
- Commission will generate a 21-day notice that will be sent to the parties identified on the service list.

### Publication

- Unleased affected parties are listed on the service list provided with the application
- The plat must clearly be labeled with name of affected party in all affected tracts
- A "Due Diligence" Letter provided with the application for publication concerning affected parties. Letter also explain steps taken to find those affected parties





	A	В	с	D	E	F	G	н	i (1	J
1	Name 1	Name 2	Name 3	Name 4	Address Line 1	Address Line 2	City	State	Zip	Country
2										
3	Name 1									
4 5	DO NOT USE COMMAS IN THIS FIEL	.D.						a:	· · · · ·	
6	45 Character maximum.									
7	USE THIS NAME FIELD FIRST.									
9	If you need additional space beyond	145				2				
10	If you need additional space beyond characters you will move to Name 2 Name 3, and then Name 4 if needed	l, then								
12										
13										
14										
15										
16							e	æ		

- New Service List format is required
  - Downloaded from <u>RRC Forms Library</u> as an Excel file
- Export or Save As a CSV file
- Instructions are available in the <u>RRC Forms Library</u>
  - Instructions cover entering information and saving out to a CSV file



- Drilling Permits staff no longer prints the notifications or stuffs the envelopes.
  - The Xerox Central Print Team handles this now.
- New Service List format was created to match exactly how their print system works for addresses.
- You may use either the Service from the <u>RRC Forms</u> <u>Library</u>, or the Built-In Utility on the Attachments tab of the W-1.
  - Do NOT use any other source to create the service list.



- Working Interests or NPRI's aren't required to be noticed for SWR 37 or SWR 38.
- If you do notice them however, and they do protest, then you will have to go through the process and if necessary, a hearing.
- If we get returned envelopes and you aren't publishing the notice, then you will have to provide a new address.



 Make sure the subject line has the status number only.

• Attach one affidavit only to the email.

## **RESOLUTIONS- SWR 38 DATA REVIEW (1 OF 2)**



### SWR 38 Data

 Not required for SWR 38 exceptions in UFT fields unless applicant chooses to provide.

 Not required for SWR 38 exceptions in fields with approved special rules unless applicant chooses to provide.

### Information that may be requested

Railroad Commission of Texas Oil and Gas Division - Permitting Services

GEOLOGICAL AND ENGINEERING DATA REQUIRED FOR STATEWIDE RULE 38 ADMINISTRATIVE EXCEPTIONS

Applicants for exceptions to Statewide Rule 38 density provisions are required to submit the following engineering and geological information for each applied-for field in support of the request when seeking administrative approval.

#### FOR ALL APPLICATIONS

- 1. Area map showing mineral ownership of offsetting wells, offsetting leases, and unleased tracts.
- 2. Cross section(s) indicating continuity or discontinuity of reservoir.
- 3. Structure map and/or isopach map indicating limits of reservoir (if relevant).
- Recoverable reserve calculations for subject lease, pooled unit, or unitized tract, with supporting data.
- with supporting data.
- Cumulative production from wells on subject lease, pooled unit, or unitized tract that ever produced from each applied-for field.
- Estimated of remaining recoverable reserves from existing wells on subject lease, pooled unit, or unitized tract, with supporting data.

WHEN THE REQUESTED EXCEPTION IS TO PREVENT WASTE

#### 7. Items 1-6, above.

- 8. Estimate of remaining recoverable reserves from offset wells affective subject lease, pooled unit, or unitized tract, with supporting data.
- Cumulative production from offset wells affecting subject lease, pooled unit, or unitized tract.
- Amount of recoverable reserves which will not be recovered by wells on or affecting the subject lease, pooled unit, or unitized tract.

Other relevant information may be required to evaluate the request. If any of the above required data cannot be submitted, the applicant must include a written explanation.



Original Recoverable Oil & EUR Comparison Three Rivers Operating Company II, LLC Louis 3112 - Upton County, TX Spraberry (Trend Area) Field

#### EUR for Entire 640 Acres:

Average Porosity =	12%
Average Water Saturation =	25%
Bo =	1.4 bbl/STB
Acres =	640
Estimated Net Pay =	240
Oil in Place =	76,604,709 STBs
Recovery Factor =	3%
Original Recoverable Oil =	2,298,141 STBs

Three Rivers has rights to produce from depths below the base of the Spraberry. These volumetrics and EURs apply only to the interval for which Three Rivers has rights to produce. There are 4 wells currently producing in the same interval:

	Cum. Oil (STBs)	EUR (STBs)
Louis 3142	7,760	145,542
Louis 3131	24,009	72,826
Louis 3114	7,539	30,098
Louis 3133	7,294	50,758
Total	46,602	299,224

## FORM W-1A

RAILROAD COMMISSION OF TE Dil and Gas Division PO Box 12967 Austin, Texas 78711-2967 www.rrc.state.tx.us	CER	DARD ACREAGE TIFICATION ised 05/2001		W-1A
1. Operator Name		2. Operator P-5 Number	3. RRC Distr	rict Number
<ol> <li>Lease, Pooled Unit or Unitized Tract</li> <li>Total Acres in Lease, Pooled Unit or</li> </ol>		5. Lease/ID Number (# ass 8. Well Number	iigned) 6. Purpose c	1
9. County		10. API Number	Other     Docket #	nueage
11. Field 1		RRC use only Disc. Date	Rules Eff. Date	Rules Amd. Date
12. Field 2		Disc. Date	Rules Eff. Date	Rules Amd. Date
13. Field 3		Disc. Date	Rules Eff Date	Rules Amd. Date
SUBSTANDARD A	ERATOR SEEKING A PERMIT CREAGE AS DEFINED BY EITH r unitized tract was establis	HER STATEWIDE RULE 38 OR shed as a separate tract in	BY SPECIAL FIELD	D RULES. and shape on
(mmddyy) 3. The ownership in this lea	es unitized tract or the dri	Il site tract of a pooled unit	has not	
	as or common to the owne			er the date set for
	r pooled with any adjoini	<ul> <li>A second state of the second stat</li></ul>	a single tract	for any Commis

approved development or allowable purpose.

• If the system is requiring you to use a W-1A date and you aren't trying to use the W-1A date, then place the date you are entering the application into the system. Attach all necessary documentation to resolve a SWR 38 exception.



## **CONTACT INFORMATION**



Drilling Permit Main Phone Line	512-463-6751
General Questions (and corrections not related to a problem email)	drillingpermits-info@rrc.texas.gov
Publisher's Affidavits and Tear Sheets	SWR37@rrc.texas.gov
General Hearing Requests and Complaints (NOT resulting from a protest problem email)	OGHearingRequest@rrc.texas.gov
Protest Hearing Request (resulting from a protest problem email)	SWR37@rrc.texas.gov (or reply to the problem email)
Problem Responses	Reply to the problem email that was received
Manager: David King	David.King@rrc.texas.gov
SWR 37/38 Questions: Chris Houston	512-475-0193



