Sundry Print Report

U.S. Department of the Interior BUREAU OF LAND MANAGEMENT

Well Name: GARTNER GAS COM A Well Location: T30N / R8W / SEC 27 /

SWNE / 36.783676 / -107.660126

County or Parish/State: SAN

JUAN / NM

Well Number: 1 Type of Well: OTHER Allottee or Tribe Name:

Lease Number: NMSF080597 Unit or CA Name: GARTNER GAS Unit of CA Name: GARTNER GAS

COM A

Unit or CA Number:

NMNM83972

US Well Number: 3004527539 Operator: SIMCOE LLC

Subsequent Report

Sundry ID: 2795249

Type of Submission: Subsequent Report

Type of Action: Temporary Abandonment

Date Sundry Submitted: 06/13/2024 Time Sundry Submitted: 11:00

Date Operation Actually Began: 05/30/2024

Actual Procedure: null

SR Attachments

Actual Procedure

 $Gartner_Gas_Com_A_001_TA_Procedure_20240613105955.pdf$

Gartner_GC_a001_MIT_and_BH_5.30.2024final_info_20240613105945.pdf

SR Conditions of Approval

Specialist Review

Gartner_Gas_Com_A_1_ID_2795249_TA_COAs_MHK_06.14.2024_20240614090244.pdf

Page 1 of 2

eceived by OCD: 7/15/2024 10:56:51 AM Well Name: GARTNER GAS COM A

Well Location: T30N / R8W / SEC 27 /

SWNE / 36.783676 / -107.660126

County or Parish/State: SAN 2 of

JUAN / NM

Well Number: 1

Type of Well: OTHER

Allottee or Tribe Name:

Lease Number: NMSF080597

Unit or CA Name: GARTNER GAS

COM A

Unit or CA Number:

NMNM83972

US Well Number: 3004527539

Operator: SIMCOE LLC

Operator

I certify that the foregoing is true and correct. 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. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: CHRISTY KOST Signed on: JUN 13, 2024 10:59 AM

Name: SIMCOE LLC Title: Permitting Agent

Street Address: 1199 MAIN AVE STE 101

City: DURANGO State: CO

Phone: (719) 251-7733

Email address: CHRISTY.KOST@IKAVENERGY.COM

Field

Representative Name:

Street Address:

City:

State:

Zip:

Phone:

Email address:

BLM Point of Contact

BLM POC Name: MATTHEW H KADE BLM POC Title: Petroleum Engineer

BLM POC Phone: 5055647736 BLM POC Email Address: MKADE@BLM.GOV

Disposition: Approved Disposition Date: 06/14/2024

Signature: Matthew Kade

Page 2 of 2

Form 3160-5 (June 2019)

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

FORM APPROVE	D
OMB No. 1004-013	7
Expires: October 31, 2	02

	5.	Lease	Serial	No
--	----	-------	--------	----

DOK	EAU OF LAND MANAGEMENT			
Do not use this t	IOTICES AND REPORTS ON Worm for proposals to drill or to Use Form 3160-3 (APD) for suc	o re-enter an	6. If Indian, Allottee or	Tribe Name
	TRIPLICATE - Other instructions on page		7. If Unit of CA/Agree	ment, Name and/or No.
1. Type of Well	TRIPLICATE - Other Instructions on pag	e 2		
Oil Well Gas W	Vell Other		8. Well Name and No.	
2. Name of Operator			9. API Well No.	
3a. Address	2h Phono No.	(include area code)	10. Field and Pool or E	Synloratory Area
Ja. Address	30. Filone No.	(inciuae area coae)	10. I leid and I ool of L	Apiolatory Area
4. Location of Well (Footage, Sec., T.,R	2.,M., or Survey Description)		11. Country or Parish,	State
12. CHE	CK THE APPROPRIATE BOX(ES) TO IN	DICATE NATURE OF NO	TICE, REPORT OR OTH	ER DATA
TYPE OF SUBMISSION		TYPE OF A	CTION	
Notice of Intent	Acidize Deep	pen Pro	oduction (Start/Resume)	Water Shut-Off
	Alter Casing Hydr	~ <u>=</u>	clamation	Well Integrity
Subsequent Report			complete	Other
Final Abandonment Notice		=	mporarily Abandon ater Disposal	
	peration: Clearly state all pertinent details,			J J
14. I hereby certify that the foregoing is	true and correct. Name (Printed/Typed)			
		Title		
Signature		Data		
Signature		Date		
	THE SPACE FOR FED	ERAL OR STATE O	FICE USE	
Approved by				
		Title		Pate
	ned. Approval of this notice does not warran equitable title to those rights in the subject led duct operations thereon.			
	3 U.S.C Section 1212, make it a crime for an ents or representations as to any matter with		illfully to make to any dep	partment or agency of the United States

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c)and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

(Form 3160-5, page 2)

Additional Information

Location of Well

 $0. \ SHL: \ SWNE \ / \ 2258 \ FNL \ / \ 1739 \ FEL \ / \ TWSP: \ 30N \ / \ RANGE: \ 8W \ / \ SECTION: \ 27 \ / \ LAT: \ 36.783676 \ / \ LONG: \ -107.660126 \ (\ TVD: \ 0 \ feet, \ MD: \ 0 \ feet \)$ $BHL: \ SWNE \ / \ 2258 \ FNL \ / \ 1739 \ FEL \ / \ TWSP: \ 30N \ / \ SECTION: \ / \ LAT: \ 36.783676 \ / \ LONG: \ 107.660126 \ (\ TVD: \ 0 \ feet, \ MD: \ 0 \ feet \)$



United States Department of the Interior

BUREAU OF LAND MANAGEMENT Farmington District Office 6251 College Boulevard, Suite A Farmington, New Mexico 87402 http://www.blm.gov/nm



June 14, 2024

CONDITIONS OF APPROVAL

Sundry Notice of Intent ID # 2795249 Request for Temporary Abandonment Status

Operator: Simcoe LLC Lease: NMSF 080597 Agreement: NMNM 83972

Well(s): Gartner Gas Com A 1, API # 30-045-27539

Location: SWNE Sec 27 T30N R8W (San Juan County, NM)

The request for temporary abandonment (TA) is approved with the following conditions:

- 1. No well shall be TA without prior approval from the authorized officer or representative.
- 2. This approval is granted for a 12-month period until May 30, 2025. <u>Before this approval expires</u> one of the following shall be submitted:
 - a. A sundry notice (Notice of Intent Temporary Abandonment) to keep the well in TA status with engineering and/or economic justification for another 12-month period. Provide details on the future beneficial use for the well with proposed dates of when work would be completed. Dates do not have to be exact but should be reasonable.
 - b. A sundry notice (Notification Resume Production) reporting resumption of production within five business days after resuming production.
 - c. A sundry notice (Notice of Intent Plug and Abandonment) to plug and abandon (P&A) the well. The sundry should include plugging procedure, current wellbore diagram, proposed wellbore diagram, and a reclamation plan. While not necessary to P&A before May 30, 2025, a sundry notice must be submitted prior to that date. The P&A will have to occur within one year of the approval of the NOI.
- 3. This agency reserves the right to modify or rescind approval. A plug or produce order may still be issued at the discretion of the authorized officer.

4. The lease is currently held by production from other wells. Should production from the lease cease, the BLM may require this well be returned to production or P&A, regardless of the amount of time the TA status is still approved for.

For questions concerning this matter, please contact Matthew Kade, Petroleum Engineer at the BLM Farmington Field Office, at (505) 564-7736 or mkade@blm.gov.

Procedure - Temporary Abandonment

Gartner Gas Com A #1
(G) Sec 27, T30N, R8W
San Juan County
30-045-27539
CC # 1000116988-001
AFE # 240203
\$26,775

Well Prep:

MIRU service unit.

Pull 2-3/8" tubing and TIH 5-1/2" casing scraper to 2760'.

RIH and set 5-1/2" bridge plug at 2750'.

Fill casing with 2% KCl w/Packer Fluid additive supplied by Western Chemical.

Pressure test casing to 500 psi for 30 min with rig pump. Pressure shall not decrease more than 50 psi over the 30 min period

Open casing valves to check for flow or pressure change.

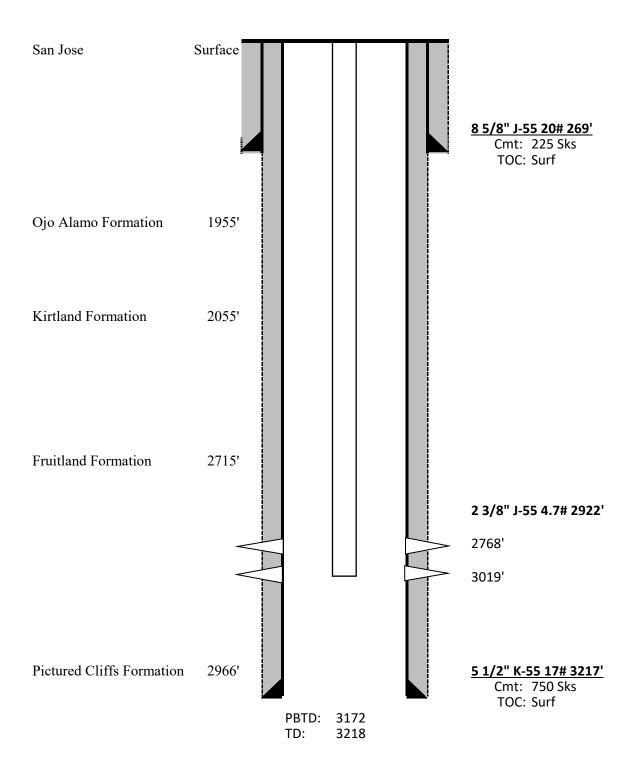
Test shall be recorded using a chart recorder with a maximum two hour clock and 1000 pound spring, calibrated within six months prior to MIT of casing

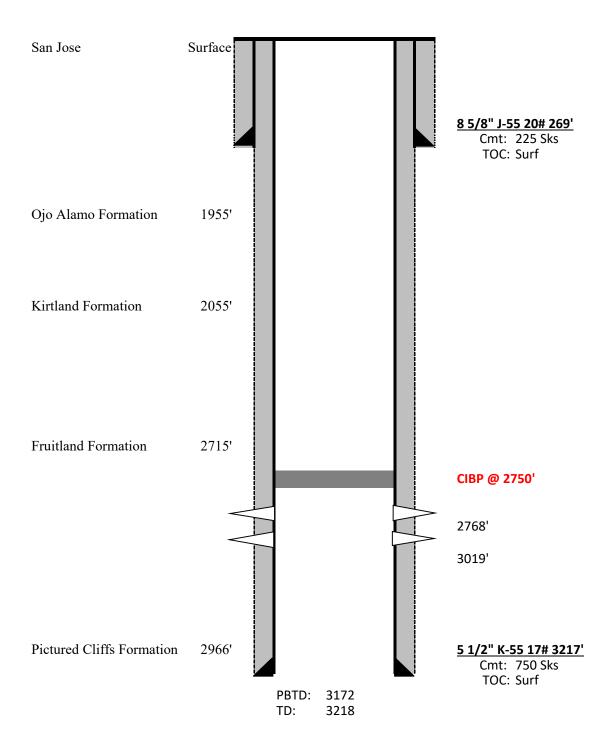
Submit chart, C-103, and wellbore diagram showing well details and plug set depth.

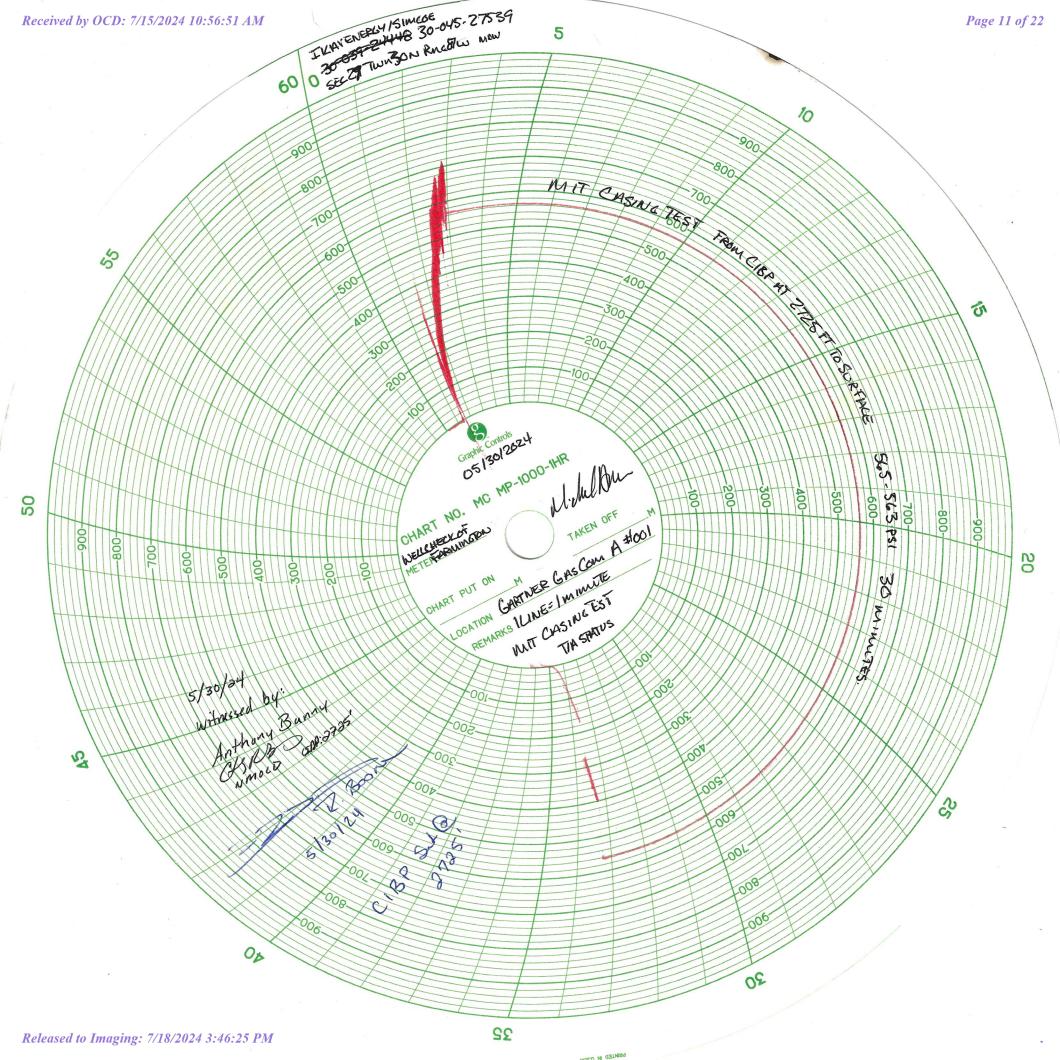
Air gap and blind flange production flow lines.

After a period not to exceed 5 years after the temporary abandoment has been completed, a workover rig will remove the cast iron bridge plug and monitor pressure buildup of the well for a two week period to determine if the well will return to a production status. If the decision is made to not produce the well, a request for plugging and abandonment will be submitted.

If the decision is made to produce the well, all necessary flow and production lines will be reinstalled for a flow ready status up to and including any removed flowmeters and well ties. Surface facilities will be placed for production puroposes.









NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

MECHANICAL INTEGRITY TEST REPORT

(TA OR UIC)

Date of Test	5/30/24	Operator Simcoe	LLC	API#30-0 <u>45</u> - 33 -2753
Property Name	Gartner Gas	Com A Well #	1	Location: Unit G_Sec 27 Twn 3 MRge Ow
Fe Pr	Statederal ivateadian		Well Ty	water Injection Salt Water Disposal Gas Injection Producing Oil/Gas Pressure obervation
Temporarily A	bandoned Well	N):	TA Exp	ires:
Bradenhead Pro Tubing Pres. Int. Casing Pre	/	Tbg. SI Pres. Tbg. Inj. Pres	/	
				mins. Test passed/failed
REMARKS:	onsite for MI	Twitness. Pressu Pressured down to	red up	for 1 minute, Test
CIBP: 2725	5' 5/23/24.	5.5"		
Last Con: 41				
1000 psi 1 hr	chart / 1000 p	rsi spring		
By (Open	rator Representative	Booke Witness		(NMOCD)
Drilling (Posit	Supervisor		•	Revised 02 11 02



NEW MEXICO ENERGY, MOMERALS & NATURAL RESOURCES DEPARTMENT

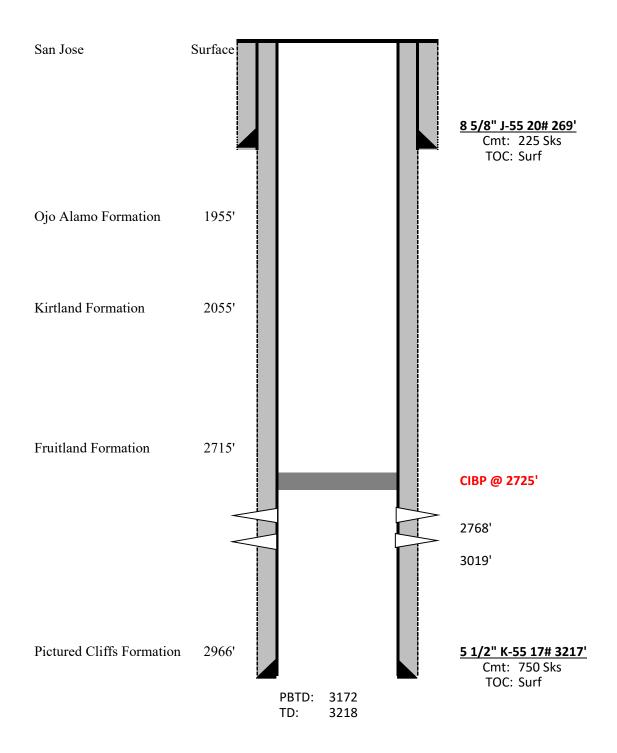
OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC NM 87410
(505) 334-6178 FAX: (505) 334-6170
http://emnrd.state.nm.us/ocd/District.lll/3distric.htm

BRADENHEAD TEST REPORT

(submit 1 copy to above address)

Date of Test 5/30/24 Operator	Sincue LLC API#30-045-27539
	/ Location: Unit G Section 27 Township 30N Range 8W
	ping Nh Intermediate Nh Casing & Bradenhead &
OPEN BRADENHEAD AND INTERMEDIATE T	O ATMOSPHERE INDIVIDUALLY FOR 15 MINUTES EACH
PRESSURE Testing Bradenhead INTERM BH Int Csg Int Csg	FLOW CHARACTERISTICS BRADENHEAD INTERMEDIATE
TIME 5 min Θ	Steady Flow
10 min 6 6	Surges
15 min 🔌 🔑	Down to Nothing
20 min	Nothing
25 min	Gas_
30 min	Gas & Water
	Water
If bradenhead flowed water, check all of the descriptions	s that apply below:
CLEAR FRESH SALTY	SULFURBLACK
5 MINUTE SHUT-IN PRESSURE BRADENHEA	D O INTERMEDIATE NA
REMARKS: Onsite to witness BHT Op	si on initial Reading, Nothing when youred.
Nothing during the 15 minutes tos	Ling, Nothing after 5 minute shut in.
	Jonau - saus-14.
By Z. Boon W	itness CRIP
Drilling Supervisor (Position)	
E-mail address Michard . boom @ 1 KAvenerg	y.com.

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Received by Opp Po Appropriate 110:56:	State of New Mexico	Form 6-103 of 22
<u>District I</u> – (575) 393-6161	Energy, Minerals and Natural Resources	Revised July 18, 2013
1625 N. French Dr., Hobbs, NM 88240 <u>District II</u> – (575) 748-1283	OH, CONCEDIVATION DIVIDION	WELL API NO. 30-045-27539
811 S. First St., Artesia, NM 88210 District III – (505) 334-6178	OIL CONSERVATION DIVISION 1220 South St. Francis Dr.	5. Indicate Type of Lease
1000 Rio Brazos Rd., Aztec, NM 87410	Santa Fe, NM 87505	STATE FEE
<u>District IV</u> – (505) 476-3460 1220 S. St. Francis Dr., Santa Fe, NM	Salita Fe, Nivi 67303	6. State Oil & Gas Lease No.
87505		SF-080597
	ICES AND REPORTS ON WELLS SALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A	7. Lease Name or Unit Agreement Name
DIFFERENT RESERVOIR. USE "APPLI	CATION FOR PERMIT" (FORM C-101) FOR SUCH	Gartner Gas Com A
PROPOSALS.) 1. Type of Well: Oil Well	Gas Well 🗹 Other	8. Well Number 1
2. Name of Operator SIMCOE LLC		9. OGRID Number
3. Address of Operator		10. Pool name or Wildcat
1199 Main Ave, Suite 101, Dui	ango, CO 81301	Basin Fruitland Coal
4. Well Location		
Unit Letter G:	2,250 feet from the North line and	1,960 feet from the East line
Section 27	Township 30N Range 8W	NMPMSan Juan County
	11. Elevation (Show whether DR, RKB, RT, GR, etc. 6,186', GL	c.)
	0,100,02	
12. Check	Appropriate Box to Indicate Nature of Notice	e, Report or Other Data
NOTICE OF IN	ITENTION TO:	
NOTICE OF II' PERFORM REMEDIAL WORK □	ITENTION TO: SUI PLUG AND ABANDON □ REMEDIAL WO	BSEQUENT REPORT OF: RK □ ALTERING CASING □
TEMPORARILY ABANDON	_	RILLING OPNS. P AND A
PULL OR ALTER CASING	MULTIPLE COMPL CASING/CEME	NT JOB
DOWNHOLE COMMINGLE		
CLOSED-LOOP SYSTEM OTHER:	□ OTHER: Tem	porary Abandonment
	oleted operations. (Clearly state all pertinent details, a	nd give pertinent dates, including estimated date
	ork). SEE RULE 19.15.7.14 NMAC. For Multiple C	ompletions: Attach wellbore diagram of
proposed completion or rec	completion.	
5/22/24 – 5/28/24		
MOB SERVICE UNIT/EQUIPME	ENT AND RU SAME, PULL PLUNGER AND BHF	S WITH SLICKLINE UNIT. RU BOP
	ING AND TIH WITH 5-1/2" CASING SCRAPER TILS 2% KCL W/BIOCIDE AND CORROSION INF	
560 PSI, TEST GOOD. RDMO S		IIDITOR. I REGOORE TEOT ORGING TO
5/30/24	SI, SIBHP @ 0 PSI. TEST BRADENHEAD, TEST	COOD PRESS TEST PILLINES TO
800 PSI. TOP OFF CASING AN	D PERFORM MIT @ 565 PSI FOR 30 MIN. TES	T GOOD. RELEASE PRESS AND RDMO
TEST UNIT. MIT AND BRADEN	HEAD TEST WITNESSED BY NMOCD.	
Spud Date:	Rig Release Date:	
L		
I have been a set if a that the information	about it to and accordate to the best of our line and all	d-h-1!£
I hereby certify that the information	above is true and complete to the best of my knowled	ge and belief.
signature Christy	Kost TITLE Regulatory An	alystDATE7/15/2024
Type or print name Christy Ko		kavenergy.com PHONE: 970-822-8931
For State Use Only		
APPROVED BY:	TITLE	DATE
Conditions of Approval (if any):		

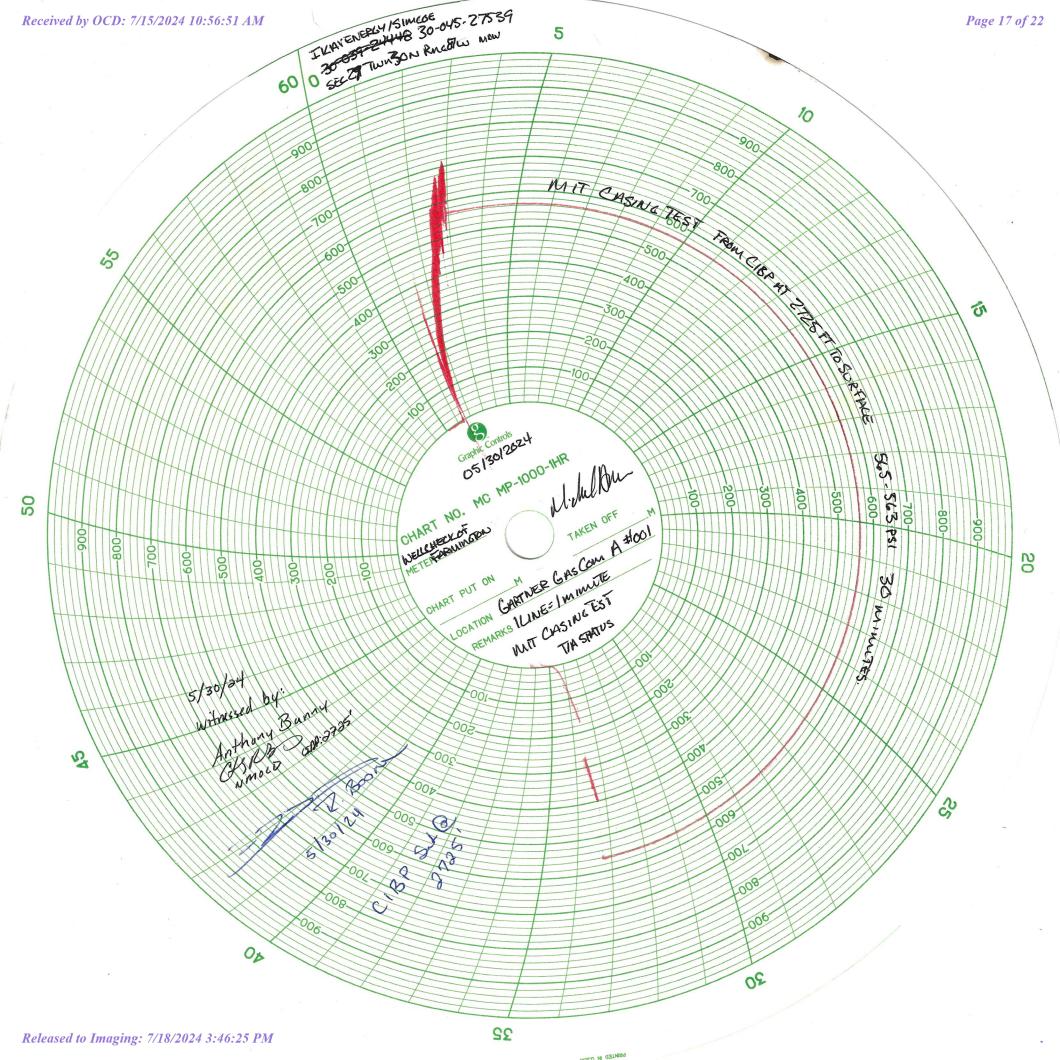
GARTNER GC A 001 Subsequent Report

5/22/24 - 5/28/24

MOB SERVICE UNIT/EQUIPMENT AND RU SAME, PULL PLUNGER AND BHPS WITH SLICKLINE UNIT. RU BOP AND PULL PRODUCTION TUBING AND TIH WITH 5-1/2" CASING SCRAPER TO 2760'. RIH TO SET 5-1/2" CIBP @ 2725'. LOAD WELL W/63 BBLS 2% KCL W/BIOCIDE AND CORROSION INHIBITOR. PRESSURE TEST CASING TO 560 PSI, TEST GOOD. RDMO SERVICE UNIT.

5/30/24

MIRU TEST UNIT. SICP @ 0 PSI, SIBHP @ 0 PSI. TEST BRADENHEAD, TEST GOOD. PRESS TEST PU LINES TO 800 PSI. TOP OFF CASING AND PERFORM MIT @ 565 PSI FOR 30 MIN. TEST GOOD. RELEASE PRESS AND RDMO TEST UNIT. MIT AND BRADENHEAD TEST WITNESSED BY NMOCD.





NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

MECHANICAL INTEGRITY TEST REPORT

(TA OR UIC)

Date of Test	5/30/24	Operator Simcoe	LLC	API#30-0 <u>45</u> - 33 -2753
Property Name	Gartner Gas	Com A Well #	1	Location: Unit G_Sec 27 Twn 3 MRge Ow
Fe Pr	Statederal ivateadian		Well Ty	water Injection Salt Water Disposal Gas Injection Producing Oil/Gas Pressure obervation
Temporarily A	bandoned Well	N):	TA Exp	ires:
Bradenhead Pro Tubing Pres. Int. Casing Pre	/	Tbg. SI Pres. Tbg. Inj. Pres	/	
				mins. Test passed/failed
REMARKS:	onsite for MI	Twitness. Pressu Pressured down to	red up	for 1 minute, Test
CIBP: 2725	5' 5/23/24.	5.5"		
Last Con: 41				
1000 psi 1 hr	chart / 1000 p	rsi spring		
By (Open	rator Representative	Booke Witness		(NMOCD)
Drilling (Posit	Supervisor		•	Revised 02 11 02



NEW MEXICO ENERGY, MONERALS & NATURAL RESOURCES DEPARTMENT

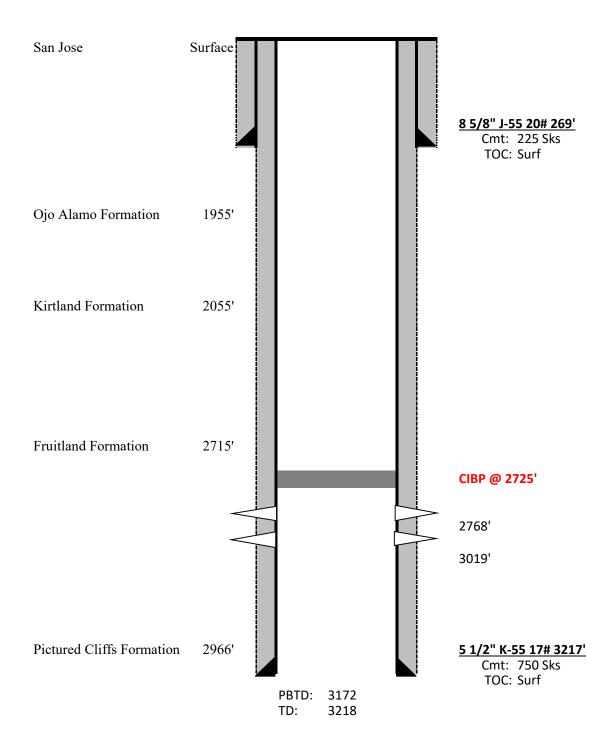
OIL CONSERVATION DIVISION
AZTEC DISTRICT OFFICE
1000 RIO BRAZOS ROAD
AZTEC NM 87410
(505) 334-6178 FAX: (505) 334-6170
http://emnrd.state.nm.us/ocd/District.lll/3distric.htm

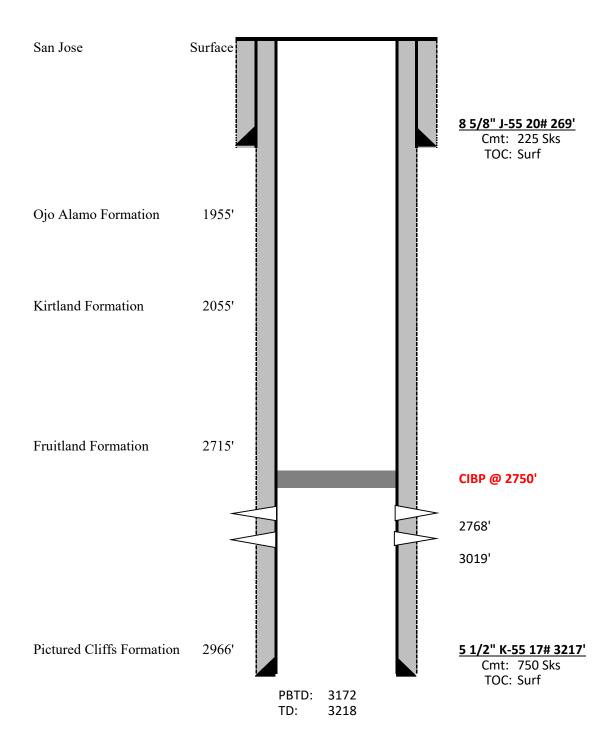
BRADENHEAD TEST REPORT

(submit 1 copy to above address)

Date of Test_5/30/24 Operator_	Since LLC API#30-0 45-27539
Property Name Gartner Gas Com Well No. 4 -	Location: Unit G Section 27 Township 30N Range 8W
Well Status(Shut-In or Producing) Initial PSI: Tub	ing Nh Intermediate Nh Casing & Bradenhead
OPEN BRADENHEAD AND INTERMEDIATE TO	O ATMOSPHERE INDIVIDUALLY FOR 15 MINUTES EACH
PRESSURE Testing Bradenhead INTERM BH Int Csg Int Csg	FLOW CHARACTERISTICS BRADENHEAD INTERMEDIATE
TIME 5 min & O	Steady Flow
10 min 6 6	Surges
15 min 🔑 🔑	Down to Nothing
20 min	Nothing
25 min	Gas
30 min	Gas & Water
	Water
If bradenhead flowed water, check all of the descriptions	that apply below:
CLEAR FRESH SALTY	SULFURBLACK
5 MINUTE SHUT-IN PRESSURE BRADENHEAD	D_ O INTERMEDIATE_NA
REMARKS:	i on initial Reading, Nothing when greved.
Nothing during the 15 minutes tes	ling, Nothing after 5 minute shut in.
Jan	Jimes shut In.
By Z. Boon Wi	tness CRIC
Drilling Supervisor (Position)	
E-mail address Michard boom @ 1 KAVEn erg	y.com.

Released to Imaging: 7/18/2024 3:46:25 PM





District I
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 Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 364006

CONDITIONS

Operator:	OGRID:
SIMCOE LLC	329736
1199 Main Ave., Suite 101	Action Number:
Durango, CO 81301	364006
	Action Type:
	[C-103] Sub. Temporary Abandonment (C-103U)

CONDITIONS

Created By		Condition Date
mkuehling	MIT required prior to 5/30/2029	7/18/2024