Form 3160-5 (August 2007)

UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT

OCD	Hobbs
~~~	TIVULES

FORM APPROVED OMB NO. 1004-0135 Expires: July 31, 2010

5. Lease Serial No. NMLC065710A

SUNDRY NOTICES AND REPORTS ON WELLS

	INO LICES WIND HELO			NVILCOOSTIOA	
Do not use thi abandoned we	is form for proposals to II. Use form 3160-3 (API	drill or to re-enter an D) for such proposals	-	6. If Indian, Allottee o	r Tribe Name
SUBMIT IN TRI	PLICATE - Other instruc	tions on reverse side		7. If Unit or CA/Agree • NMNM94514X	ement, Name and/or No.
Type of Well     Gas Well    □ Oth	ner			8. Well Name and No. LUSK WEST DEL	AWARE UNIT 010 /
Name of Operator .     SHACKELFORD OIL COMPA	Contact: . NY / E-Mail: CHOUSTO	CLAY HOUSTON 0N92083@YAHOO.COM		9. API Well No. 30-025-21488-0	0-S1 /
3a. Address 203 WEST WALL SUITE 200 MIDLAND, TX 79701		3b. Phone No. (include ar Ph: 432-682-9784	" HOBBS OC	D 10. Field and Pool, or W LUSK	Exploratory
4. Location of Well (Footage, Sec., T.	., R., M., or Survey Description	)	SEP 29 20	11. County or Parish,	and State
Sec 20 T19S R32E NWSE 19	80FSL 1980FEL /		DECENTE	LEA COUNTY,	NM
12. СНЕСК АРРЕ	ROPRIATE BOX(ES) TO	) INDICATE NATUR	***************************************	}	R DATA
TYPE OF SUBMISSION		· T	YPE OF ACTION		
Notice of Intent	☐ Acidize	Deepen	☐ Produ	ction (Start/Resume)	■ Water Shut-Off
_	□ Alter Casing	☐ Fracture Treat	□ Recla	mation	■ Well Integrity
☐ Subsequent Report	□ Casing Repair	☐ New Construct	ion <del>- 🖪 Reco</del> r	<del>nplete</del>	Other
☐ Final Abandonment Notice	□ Change Plans	Plug and Aban	don 🗖 Temp	orarily Abandon	
	☐ Convert to Injection	Plug Back	■ Water	r Disposal	
following completion of the involved testing has been completed. Final At determined that the site is ready for fill Proposed Procedures: LWDU  1. Set CIBP at 6412?. Spot 25 2. Tag top of cement at 6260? 3. Perforate squeeze holes at circulate fluid to surface, circul 4. Shut down POOH w/tbg wa 5. Perforate Upper Cherry Car 6. GIH w/tbg and packer set at 7. Swab test. Depending on te a) test good; prepare to frac. Fb) test not to frac, set CIBP at	# 10- Squeeze cement to sxs of cement on top to be witnessed by BLM 5520?. GIH w/tbg and celate 10 bbls. Pump 1920 sit 12 hours. Run CBL for 1yon at 4900-4910, 4956-t 4840? acidize w/1000 great: Frac w/75,000 gallons 4850? spot 25 sxs. Prepared	o surface and recomple  ment retainer set at 54 sxs of Class C cement top of cement 71 allons of 7 ? % acid	te to 4900? and  70?. Pump KCL circulate to surfa	ion, have been completed, i 4950? zone water ce	and the operator has
	Electronic Submission #3	FORD OIL COMPANY, s cessing by LINDA JIMEN	ent to the Hobbs IEZ on 08/26/2015	•	
Manic(Transar) DON SHA	OKELI ORD	True P	RESIDENT		
Signature (Electronic S			6/23/2015		Kt
·	THIS SPACE FO	R FEDERAL OR ST	A E OFFICE	<del>ያ</del> ች D / \ / ୮ ୮	<b>`</b>
Approved By		Title	/\\	TROLEUM ENGINE	R Date
Conditions of approval, if any, are attached certify that the applicant holds legal or equivalent would entitle the applicant to condu	itable title to those rights in the	not warrant or subject lease Office	À.	SEP 2 2 2015	,
Title 18 U.S.C. Section 1001 and Title 43 States any false, fictitious or fraudulent s				enneth Renni	agency of the United
	SED ** BLM REVISED		BUREAU	OF LAND MANAGEN	MENT

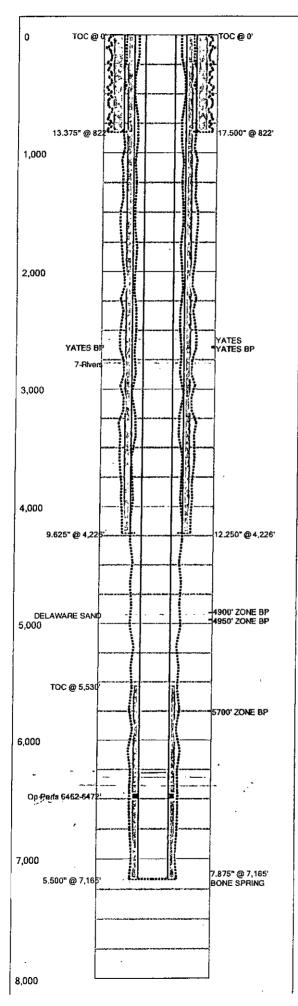
# Additional data for EC transaction #306242 that would not fit on the form

32. Additional remarks, continued

2647-54 8. If successful, remove from Unit and change name

Proposed Procedures: LWDU # 10- Squeeze cement to surface and recomplete to 4900' and 4950' zone

- 1. Set CIBP at 6412'. Spot 25 sxs of cement on top
- 2. Tag top of cement at 6260' to be witnessed by BLM
- 3. Perforate squeeze holes at 5520'. GIH w/tbg and cement retainer set at 5470'. Pump KCL water circulate fluid to surface, circulate 10 bbls. Pump 1920 sxs of Class C cement circulate to surface
- 4. Shut down POOH w/tbg wait 12 hours. Run CBL for top of cement
- 5. Perforate Upper Cherry Canyon at 4900-4910, 4956-71
- 6: GIH w/tbg and packer set at 4840' acidize w/1000 gallons of 7 1/2 % acid
- 7. Swab test. Depending on test:
  - a) test good; prepare to frac. Frac w/75,000 gallons
  - b) test not to frac, set CIBP at 4850' spot 25 sxs. Prepare to test Yates at 2634-40, 2647-54
- 8. If successful, remove from Unit and change name



Last Updated: 5/11/2015 03:14 PM

Field Nam	18			L	ease	Name		Well No.		
Lusk West	Del	aware Un	it	Li	Lusk West Delaware Unit					10
County	· .	State	+				APIN	ło.		
Lea Ne					Mexic	0			3002	5214880000
Version		Version	Tag							
	1	Current					~~~~			
GL (ft)	KE	3 (ft)	Sec	tion	Tow	nship/	Block		Rang	e/Survey
3,572.0	1	3,589.0	20		195				32E	
Operator	•			Well	Statu	ıs	Latitu	ıde		Longitude
Shackelfor	d Oi	Compan	У	Prod	ucer					
Dist. N/S	(ft) [	N/S Line	D	ist E	₩ (fi	E/W	Line	Fo	otage	From
19	980	FSL	十		198	0 FEL				1
Prop Num						Spud	Date		Co	mp. Date
Additional	info	ormation							<u></u>	
Other 1		Othe	er 2			Other	3		Oti	ner 4
Prepared I	Эy		Upo	lated	Ву		<u> </u> Li	ast L	pdate	ed
Shackelford Shacke				ckelfo	ford				5/1	1/2015 3:14 PN

	Date	O.D. (in)	(MD ft)	Bottom (MD ft)	Comments
		17.500	0	822	
i		12.250	0	4,226	
		7.875	0	7,165	

Tubular Summary

Date	Description	O.D. (in)	Wt (lb/ft)	Grade	Top .(MD ft)	Bottom (MD ft)
	Surface Casing	13.375		j-55	0	822
	Intermediate Casing	9,625	47.00	j-55	Q	4,226
	Production Casing	5.500	15.50	j-55	0	7,165

Casing Cement Summary

C	Date	No. Sx	Csg. Q.D. (in)	Top (MD ft)	Bottom (MD ft)	Comments
П		1,180	13.375	O	822	circulated to surface
		2,365	9.625	0	4,226	circulated to surface
		500	5.500	5,530	7,165	toc orig est to be 5595' by temp svy. TOC @ 5530' CBL (1/12/15)

Perforation Summary

С	Date	Perf. Status	Formation	OA Top (MD ft)	OA Bottom (MD ft)	Shots
4		Open	delaware lower	6,462	6,472	10

Formation Tops Summary

Formation	Top (TVD ft)	Comments
YATES	2,577	
7-Rivers	2,780	
DELAWARE SAND	4,921	
BONE SPRING	7,188	

Current Schematic

### Last Updated: 5/11/2015 03:14 PM

Field Nan	ne		Leas	e Name		Well No.		Cour	ounty Sta		Stati	<b>)</b>		API No.	
Lusk Wes	t De	laware Unit	Lusk West D		are Unit	10			_	N		Mexico	co 30025214880000		
Version	on Version Tag					Spud Dat	6	Comp. Dat	te	GL (ft)	KB (ft)				
	1	Current												3,572.0	3,589
Section	To	ownship/Block		Range/Sur	/ey	Dist N/S (	ft)	N/S Li	ne	Dist. E/W	(ft)	E/W Line	Fo	otage From	
20	15	9S		32E		1,9	80	FSL		. 1	,980	FEL		_	<del></del>
Operator	Well Status Latitude				Longitude	Longitude Prop Num		lum							
Shackelfo	rd O	il Company			Producer									<i>i</i>	
Other 1			o	ther 2		Othe	г 3					Other	4		
Last Upda	ated			Prepared B	y					Updated	Ву	1			<del></del>
05/11/2015 3:14 PM Shackelfo.					elford				Shackelford						
Additiona	Inf	ormation								<del>,</del>					
Hole Sum	mar	у		<del></del>		-						•			
Date		D. (in) Top	Bottom						`omi	nents				·····	

Date	O.D. (in)		Bottom	Comments
	1 . 1	(MD ft)	(MD ft)	·
	17.500	. 0	822	
	12.250	0	4,226	
	7.875	٥	7,165	

### **Tubular Summary**

Date	Description	No. Jts	O.D. (In)	Wt (lb/ft)	Grade	Top (MD ft)	Bottom (MD ft)	Comments
	Surface Casing		13.375		j-55	0	822	
	Intermediate Casing	1	9.625	47.00	j-55	O		split string 47# and 53.5#
	Production Casing		5,500	15.50	j-5 <b>5</b>	0	7,165	

### Casing Cement Summary

С	Date	No. Sx	Yield (ft3/sk)	Vol. (ft3)	Csg. O.D. (in)	Top (MD ft)	Bottom (MD ft)	Description	Comments
П		1,180	1.00	1,180	13.375	0	822	Class o	circulated to surface
П		2,365	1.00	2,365	9.625	O	4,226	Class o	circulated to surface
П		500	1.00	500	5.500	5,530	7,165	Class c	toc orig est to be 5595' by temp svy. TOC @ 5530' CBL (1/12/15)

## Tools/Problems Summary

Date	Tool Type	O.D.	I.D.	Тор	Bottom	Description	Comments
		(in)	(in)	(MD ft)	(MD ft)		
		1					····

# Perforation Summary

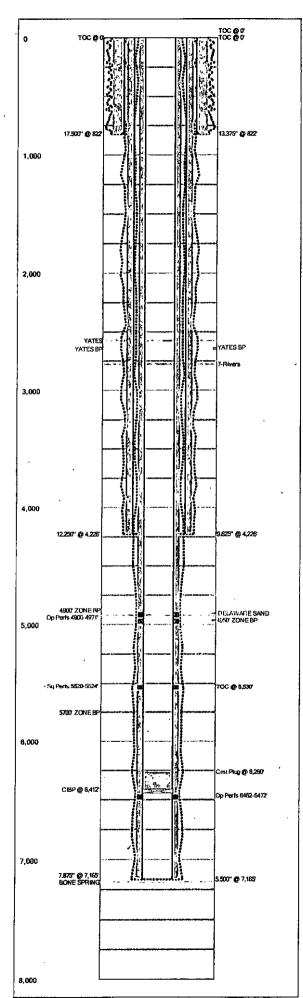
C Date	Date Perf. Status Formation				Comments
	Open	delaware low	er		
Top (MD ft)	Bottom (MD ft)	SPF	Shots	Phasing (deg)	Interval Comments
6,46	32 6,4	72 1	10		,

### Formation Top Summary

Formation Name	Top(TVD ft)	Comments
YATES	2,577	
7-Rivers	2,780	
DELAWARE SAND	4,921	
BONE SPRING	7,188	

### Behind Pipe Summary

C Formation Name	Top (MD ft)	Bottom (MD ft)	Net Pay (ft)	Drain. Area(Acre)	Res. Pres. (psi)	Water Sat. (%)	Eff. Por. (%)	EUR OII (MBO)	EUR Gas (MMCF)	Comments
YATES	2,634	2,640	O	a	0	0.0%	0.0%	0	0	
YATES	2,647	2,654	0	0	0	0.0%	0.0%	0	0	
4900' ZONE	4,900	4,910	0	0	0	45.9%	15.0%	0	Q	
4950' ZONE	4,956	4,971	0	0	Q	50.6%	17.0%	Ö	0	
5700' ZONE	5,743	5,757	o	0	O		0.0%	o	0	



# Last Updated: 6/23/2015 01:36 PM

Field Name	•			L	ease !	Name				Well No.
Lusk West	Del	aware Un	it	L	usk W	est De	laware	<b>U</b> ni	t	10
County				State				API N	ło.	
Lea				New	Mexic	0			3002	5214880000
Version Version Tag			Tag							•
	Ź	Propose	d							
GL (ft) KB (ft) Sec		Sec	tion	Tow	nship/	Block		Rang	je/Survey	
3,572.0 3,589.0 20			20		198				32E	
Operator				Well	Statu	15	s Latitude		Longitude	
Shackelford	Oi	Compar	ıy	Prod	ucer					
Dist. N/S (	ft)	N/S Line	D	ist. E	/W (fi	t) E/W	Line	Fo	otage	From
19	80	FS1			198	0 FEL	-	Т		
Prop Num						Spud	Date		Comp. Date	
									$\top$	
Additional	Info	rmation								
Other 1 Other 2					Other	3		Ot	her 4	
									1	
Prepared By Upo			dated By		Las		ast (	Updated		
Shackelford Sha			ickelford			_			3/2015 1:36 PM	

Date	O.D. (in)	Top (MD ft)	Bottom (MD ft)	Comments
	17.500	o	822	
	12.250	o	4,226	,
	7.875	q	7,165	

### Tubular Summary

Date	Description	O.D. (în)	Wt (lb/ft)	Grade	Top (MD ft)	Bottom (MD ft)
	Surface Casing	13.375		j-55	0	822
	Intermediate Casing	9.625	47.00	j-55	0	4,226
	Production Casing	5.500	15.50	J-55	0	7,165

## Casing Cement Summary

C	Date	No. Sx	Csg. O.D. (in)	Top (MD ft)	Bottom (MD ft)	Comments
П		1,180	13.375	0	822	circulated to surface
	·	2,365	9.625	0	4,226	circulated to surface
2	-112	1,920	5.500	0	5,530	circulate cement to surface
		500	5.500	5,530	7,165	toc orig est to be 5595' by temp svy. TOC @ 5530' CBL (1/12/15).

### Cement Plug Summary

Date	No. Sx	O.D. (in)	Top (MD ft)	Bottom (MD ft)	Comments
	25	5.500	6,260	6,412	

## Perforation Summary

С	Date	Perf. Status	Formation	OA Top (MD ft)	OA Bottom (MD ft)	Shots
		Open	Upper Cherry Canyon	4,900	4,971	100
		Squeezed		5,520	5,524	8
		Open	delaware lower	6,462	6,472	10

### Formation Tops Summary

Formation	Top (TVD ft)	Comments
YATES	2,577	,
7-Rivers	2,780	į
DELAWARE SAND	4,921	/
BONE SPRING	7,188	

Field Name	}		Lease	Na	ne			١	Well No. County				State		API No			
					sk West Delaware Unit					10 Lea			New N		Mexico	ico 300252148800		
Version	Vers	on Tag		•							•		Spud Date	}	Comp. Date	GL (ft)	KB	(ft)
-	2 Prop	osed														1 3	3,572.0	3,589
Section	Townsh	ip/Bloc	k		Ran	ge/Surve	у		E	Dist. N/S (fi	) N/S 1	Line	Dist. E/W	(ft)	E/W Line   F	ootage l	From	
20	195				32E					1,98	0 FSL		1,	980	FEL			
Operator		Well Status					Lati			ude	fe Longitude Prop Num				n			
Shackelford	Oil Com	рапу					Pro	ducer				1	• • • • • • • • • • • • • • • • • • • •		,			
Other 1				0	ther	2				Other	3				Other 4			-
Last Updat	æd				Pres	ared By							Updated	Ву				
06/23/2015 1:36 PM					Shackelford								Shackelford					
Additional	Informat	on				•							1	_				
																•	<del></del>	<del></del>
Hole Summ	narv														<del></del>			
Date	O.D. (in	Top		Bottom	_							Com	ments					
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	12.250		이	4,22	6		<del>-</del> -											
	7.875		d	7,1€	5													
Tubular Su	mmary																	·
Date	D	escripti	oπ	1	lo.	O.D. (in)	W	/t G	rade	Тор	Bott				Comi	nents		
		· .			lts		(lb			(MD ft)	(MD				<u>.</u>			
	Surface (				]	13.375	ш.		-55		ì	822						
	Intermed					9,625			-55		1	L	split string	47#	and 53.5#			
	Production		g			5.500	1:	5.50	j-55	(	<u> </u>	7,165						
Casing Cen	nent Sun	mary																
C Date	No.	Yield		ol.	Cs		Тор		ttom	ם	escript	ion			¢	omment	ts	
-	1,180	(ft3/sk		180	<u>0.0.</u>	(in) (i 3.375	VID fi	0 (177	D ft) 822					telur	ed to surface			
<del></del>	2.365	ii		365		9.625			4,226						ed to surface			
<u> </u>				,920				ol ol							e cement to su			
<u> </u>	1,920			500		5.500		7	5,530								TOC	- A EE20
	500	1.0	٩	500		5.500	5,5	30	7,165						est to be 559: 12/15)	b by term	p svy. TOC	, <del>(</del> (0 2330
Cement Plu	ıg Summ	ary				<u> </u>								<u> </u>				
Date	No.	.D. T	Тор	В	otton	n						c	omments					
	Sx	(in)	(MD t	t) (N	AD ft	) .												
	25	5.500	6,	260	6,4	12												
Perforation	Summa	у																
C Date	Per	f. Statu	S	F	omi	ition							Comme	ents				
	Open		đ	elaware	low	er												
Тор		Botto		SP	FΠ	Shots	Ŀ	วไเลรากฐ	(deg)			-	inte	rval	Comments			
(MD ft)	6,462	(MD f	6,472		-4		10											
					<u></u> :	*1.	-14						C					
C Date		. Status	3	. F	omna	ition							Comme	nes				
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Top (MD ft)	.	Botton (MD fi		SPI	-	Shots	P	hasing	(deg)				Inter	rvai	Comments			
	5,520	(1412)	5,524				8						<del></del>					
C Date	Per	. Statu	s T	Ë	orma	tion	-+						Comme	ents				
	Open					Canyon	+											<del>:</del>
Тор	1	Bottor		SPI	_	Shots	-	hasing	(dea)				Inter	rval	Comments			
(MD ft)		(MD fi	t)						(0035)									
	4,900		4,910		4		40											
	4,956		4,971		4		60											
ormation 1	Top Sum	nary																
Forma	tion Nam	9	Top(	(VD ft)	Γ					_		Com	ments			•		
(ATT =					<u></u>													
ATES				2,577													<u> </u>	
-Rivers				2,780														
				4,921														
ONE SPRI				7,186	1							•						
Sehind Pipe	Summa	ry																
Formatio	n Name	To		Botto		Net Pay		rain.				Eff. Po			EUR Gas	T	Comme	nts
VA====		(MD	_	(MD		(ft)	-	a(Acre)			. (%)	(%)		(O)	(MMCF)			
YATES			2,634		2,640	l	1	- 0		o o	0.0%		0%		9	9		
			, u 71		,654	(	4	C	1	q	0.0%	O.	0%		o/	O.		
YATES			2,647		_								000		<del></del>			
YATES 4900' ZON		-	,900	4	,910	(	Ļ.,,	O			45.9%		0%		0	0		<del></del>
YATES	NE	4		4	_	(		0			45.9% 50.6% 0.0%	17.	0% 0%		0	0		

www.WeilShadow.com Page 2 of 2

# Lusk West Delaware Unit 010 30-025-21488 Shackelford Oil Company Conditions of Approval

Notify BLM at 575-393-3612 (Lea County) a minimum of 24 hours prior to commencing work.

# Work to be completed by December 23, 2015.

- 1. Operator approved to set a CIBP at 6412-feet and spot 25-sxs of cement. Tagged is to be witnessed by BLM.
- 2. Must conduct a casing integrity test before perforating and fracturing. Test should be run for 30 minutes. Submit results to BLM. The CIT is to be performed on the production casing to max treating pressure. Notify BLM if test fails. Document the pressure test on a one hour full rotation calibrated recorder chart registering within 25 to 85 per cent of its full range. Greater than 10% pressure leakoff will be viewed as a failed tested. Less than 10% pressure leakoff will be evaluated site specifically and may restrict injection approval.
- 3. Approved to perforate the proposed interval starting at 5520-feet as well as squeeze cement to obtain circulation to surface.
- 4. Provide BLM with an electronic copy (Adobe Acrobat Document) of the Cement Bond Log (CBL) record that will be run as proposed in Step #4 of the submitted Sundry. This electronic copy must be submitted before perforating the Delaware (Step #6). The address that may be use is pswartz@blm.gov. For additional questions on this request, the CFO BLM on call engineer may be reached at 575-706-2779.
- 5. Approved to perforate the Upper Cherry Canyon as proposed.
- 6. If successful by indication of swab test, request removal from Unit and change well name by sending in Subsequent reports and updated Completion report.
- 7. If not successful, approved to set CIBP at 4850-feet and spot 25-sxs of cement. Must be tagged which shall be witnessed by BLM. Then test the Yates as proposed. Still send Subsequent reports and updated Completion report afterwards to request removal from Unit and change well name.

- 8. Before casing or a liner is added or replaced, prior BLM approval of the design is required. Use notice of intent Form 3160-5.
- 9. Closed loop system required.
- 10. All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of work over operations shall be safely contained and disposed of properly at a waste disposal facility. No waste material or fluid shall be disposed of on the well location or surrounding area. Porto-johns and trash containers will be on-location during fracturing operations or any other crew-intensive operations.
- 11. Operator to have H2S monitoring equipment on location.
- 12. A minimum of a 2000 (2M) BOP to be used. All blowout preventer (BOP) and related equipment (BOPE) shall comply with reasonable well control requirements. A two ram system with a blind ram and a pipe ram designed for the size of the work string shall be adequate. Tapered work strings will require an additional pipe ram. The manifold shall comply with Onshore Oil and Gas Order #2 Attachment I (2M Diagrams of Choke Manifold Equipment). The accumulator system shall have an immediately available power source to close the rams and retain 200 psi above pre-charge. The pre-charge test shall follow requirements in Onshore Order #2.
- 13. Subsequent sundry required detailing work done, a C-102 form, and completion report for the new formations. Operator to include well bore schematic of current well condition when work is complete.
- 14. See attached for General Plugback Guidelines

KGR 09222015

# BURÉAU OF LAND MANAGEMENT Carlsbad Field Office 620 East Greene Street Carlsbad, New Mexico 88220 575-234-5972

# Permanent Abandonment of Production Zone Conditions of Approval

Failure to comply with the following Conditions of Approval may result in a Notice of Incidents of Noncompliance (INC) in accordance with 43 CFR 3163.1.

1. Plugging operations shall commence within <u>ninety (90)</u> days from this approval.

If you are unable to plug back the well by the 90th day provide this office, prior to the 90th day, with the reason for not meeting the deadline and a date when we can expect the well to be plugged back. Failure to do so will result in enforcement action.

- 2. <u>Notification:</u> Contact the appropriate BLM office at least 24 hours prior to the commencing of any plug back operations. For wells in Eddy County, call 575-361-2822. For wells in Lea County, call 575-393-3612
- 3. <u>Blowout Preventers</u>: A blowout preventer (BOP), as appropriate, shall be installed before commencing any plugging operation. The BOP must be installed and maintained as per API and manufacturer recommendations. The minimum BOP requirement is a 2M system for a well not deeper than 9,090 feet; a 3M system for a well not deeper than 13,636 feet; and a 5M system for a well not deeper than 22,727 feet.
- 4. <u>Mud Requirement:</u> Mud shall be placed between all plugs. Minimum consistency of plugging mud shall be obtained by mixing at the rate of 25 sacks (50 pounds each) of gel per 100 barrels of **brine** water. Minimum nine (9) pounds per gallon.
- 5. <u>Cement Requirement</u>: Sufficient cement shall be used to bring any required plug to the specified depth and length. Any given cement volumes on the proposed plugging procedure are merely estimates and are not final. Unless specific approval is received, no plug except the surface plug shall be less than 25 sacks of cement. Any plug that requires a tag will have a minimum WOC time of 4 hours.

In lieu of a cement plug across perforations in a cased hole (not for any other plugs), a bridge plug set within 50 feet to 100 feet above the perforations shall be capped with 25 sacks of cement. If a bailer is used to cap this plug, 35 feet of cement shall be sufficient. **Before pumping or bailing cement on top of CIBP, tag will be required to verify depth.** 

Unless otherwise specified in the approved procedure, the cement plug shall consist of either **Neat Class "C"**, for up to 7,500 feet of depth or **Neat Class "H"**, for deeper than 7,500 feet plugs.

6. <u>Subsequent Plug back Reporting:</u> Within 30 days after plug back work is completed, file one original and three copies of the Subsequent Report, Form 3160-5 to BLM. The report should give in detail the manner in which the plug back work was carried out, the extent (by depths) of cement plugs placed, and the size and location (by depths) of casing left in the well. <u>Show date work was completed.</u>

7. <u>Trash:</u> All trash, junk and other waste material shall be contained in trash cages or bins to prevent scattering and will be removed and deposited in an approved sanitary landfill. Burial on site is not permitted.