

RECEIVED: 9/11/2018	REVIEWER: MAN	TYPE: DHC	APP NO: DMAM18
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Geological & Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Applicant: Hilcorp Energy Company **OGRID Number:** 372171
Well Name: E H Pipkin 12E **API:** 30-045-23783
Pool: Wildcat MesaVerde **Pool Code:**

SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
 A. Location - Spacing Unit - Simultaneous Dedication
 NSL NSP (PROJECT AREA) NSP (PRORATION UNIT) SD
- B. Check one only for [I] or [II]
 [I] Commingling - Storage - Measurement
 DHC CTB PLC PC OLS OLM
 [II] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

DHC 4845

- 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. Notification and/or concurrent approval by BLM
 F. Surface owner
 G. For all of the above, proof of notification or publication is attached, and/or,
 H. No notice required

FOR OCD ONLY	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

- 3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Christine Brock
 Print or Type Name

9/10/2018
 Date

Christine Brock
 Signature

505-324-5155
 Phone Number

cbrock@hilcorp.com
 e-mail Address

District I
1625 N. French Drive, Hobbs, NM 88240

District II
811 S. First St., Artesia, NM 88210

District III
1000 Rio Brazos Road, Aztec, NM 87410

District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

Form C-107A
Revised August 1, 2011

APPLICATION TYPE
 Single Well
 Establish Pre-Approved Pools
EXISTING WELLBORE
 Yes No

APPLICATION FOR DOWNHOLE COMMINGLING

Hilcorp Energy Company 382 ROAD 3100, Aztec NM 87410
Operator Address
E H Pipkin 12E UL E (SWNW) - Sec. 12, T27N, R11W San Juan
Lease Well No. Unit Letter-Section-Township-Range County
OGRID No. 372171 Property Code 321863 API No. 30-045-23783 Lease Type: Federal State Fee

DATA ELEMENT	UPPER ZONE	INTERMEDIATE ZONE	LOWER ZONE
Pool Name	WILDCAT MESAVERDE (GAS)	KUTZ GALLUP (GAS)	BASIN DAKOTA (PRORATED GAS)
Pool Code		36550	71599
Top and Bottom of Pay Section (Perforated or Open-Hole Interval)	3315' - 3440' - Estimated	5492'-5796'	6290'- 6313'
Method of Production (Flowing or Artificial Lift)	NEW ZONE	Artificial Lift	Artificial Lift
Bottomhole Pressure (Note: Pressure data will not be required if the bottom perforation in the lower zone is within 150% of the depth of the top perforation in the upper zone)	1310 psi	1765 psi	2005 psi
Oil Gravity or Gas BTU (Degree API or Gas BTU)	BTU 1200	BTU 1200	BTU 1200
Producing, Shut-In or New Zone	NEW ZONE	PRODUCING	PRODUCING
Date and Oil/Gas/Water Rates of Last Production. (Note: For new zones with no production history, applicant shall be required to attach production estimates and supporting data.)	Date: Rates:	Date: 6/1/2018 Rates: 634 MCF - GAS	Date: 6/1/2018 Rates: 372 MCF - GAS
Fixed Allocation Percentage (Note: If allocation is based upon something other than current or past production, supporting data or explanation will be required.)	Oil Gas Will be supplied upon completion	Oil Gas Will be supplied upon completion	Oil Gas Will be supplied upon completion

ADDITIONAL DATA

Are all working, royalty and overriding royalty interests identical in all commingled zones? Yes No
If not, have all working, royalty and overriding royalty interest owners been notified by certified mail? Yes No

Are all produced fluids from all commingled zones compatible with each other? Yes No

Will commingling decrease the value of production? Yes No

If this well is on, or communitized with, state or federal lands, has either the Commissioner of Public Lands or the United States Bureau of Land Management been notified in writing of this application? Yes No

NMOCD Reference Case No. applicable to this well: _____

Attachments:

- C-102 for each zone to be commingled showing its spacing unit and acreage dedication.
- Production curve for each zone for at least one year. (If not available, attach explanation.)
- For zones with no production history, estimated production rates and supporting data.
- Data to support allocation method or formula.
- Notification list of working, royalty and overriding royalty interests for uncommon interest cases.
- Any additional statements, data or documents required to support commingling.

PRE-APPROVED POOLS

If application is to establish Pre-Approved Pools, the following additional information will be required:

- List of other orders approving downhole commingling within the proposed Pre-Approved Pools
- List of all operators within the proposed Pre-Approved Pools
- Proof that all operators within the proposed Pre-Approved Pools were provided notice of this application.
- Bottomhole pressure data.

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Christine Brock TITLE Operation/Regulatory Tech DATE 9/10/2018

TYPE OR PRINT NAME Christine Brock TELEPHONE NO. (505) 324-5155

E-MAIL ADDRESS cbrock@hilcorp.com

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6181 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
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 478-3470 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**

Form C-102
 August 1, 2011
 Permit 257096

WELL LOCATION AND ACREAGE DEDICATION PLAT

1. API Number 30-045-23783	2. Pool Code	3. Pool Name WILDCAT ;MESAVERDE (G)
4. Property Code 321863	5. Property Name E H PIPKIN	6. Well No. 012E
7. OGRID No. 372171	8. Operator Name HILCORP ENERGY COMPANY	9. Elevation 5956

10. Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
E	12	27N	11W		1460	N	1160	W	SAN JUAN

11. Bottom Hole Location If Different From Surface

UL - Lot	Section	Township	Range	Lot Idn	Feet From	N/S Line	Feet From	E/W Line	County
12. Dedicated Acres 160.00				13. Joint or Infill		14. Consolidation Code		15. Order No.	

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

	OPERATOR CERTIFICATION	
	<i>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location(s) or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.</i>	
	E-Signed By: <i>Lehristine Brock</i> Title: Operations / Regulatory Tech Date: 9/10/2018	
	SURVEYOR CERTIFICATION	
<i>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.</i>		
Surveyed By: Neale C. Edwards Date of Survey: 9/10/2000 Certificate Number: 6857		

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

RECEIVED
MAY 09 2008
Bureau of Land Management
Farmington Field Office

Form C-102
Revised October 12, 2005
Submit to Appropriate District Office
Fee Lease - 3 Copies
State Lease - 4 Copies

WELL LOCATION AND ACREAGE DEDICATION PLAT

AMENDED REPORT

¹ API Number 30-045-23783	² Pool Code 36550	³ Pool Name Kutz Gallop Oil
⁴ Property Code 22853	⁵ Property Name EH PIPKIN	
⁶ OGRID No. 5380	⁷ Operator Name XTO Energy, Inc.	⁸ Well Number #12E ⁹ Elevation 5956'

10 U.I. or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County
E	12	27N	11W		1460'	NORTH	1160'	WEST	SAN JUAN

11 U.I. or lot no.	Section	Township	Range	Lot Ida	Feet from the	North/South line	Feet from the	East/West line	County

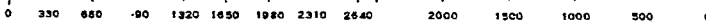
¹² Dedicated Acres DK 320 61P 40	¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.
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NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION

	¹⁷ OPERATOR CERTIFICATION I hereby certify that the information contained herein is true & complete to the best of my knowledge & belief and that this information either conveys a true legal interest or undivided mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of surface mineral or working interest or to a voluntary pooling agreement of a disposition pending under the evidence entered by the Bureau.
	<p><i>Lori D Bingham</i> Signature</p> <p>Lori D Bingham Printed Name</p> <p>Regulatory Compliance Tech Title</p> <p>5/8/08 Date</p>
	¹⁸ SURVEYOR CERTIFICATION I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true & correct to the best of my belief
	<p>MARCH 21, 2000 Date of Survey</p> <p>Original Survey Signed By NEALE C. WEWARDS</p> <p>6857 Certificate Number</p>

All distances must be from the outer boundaries of the Section

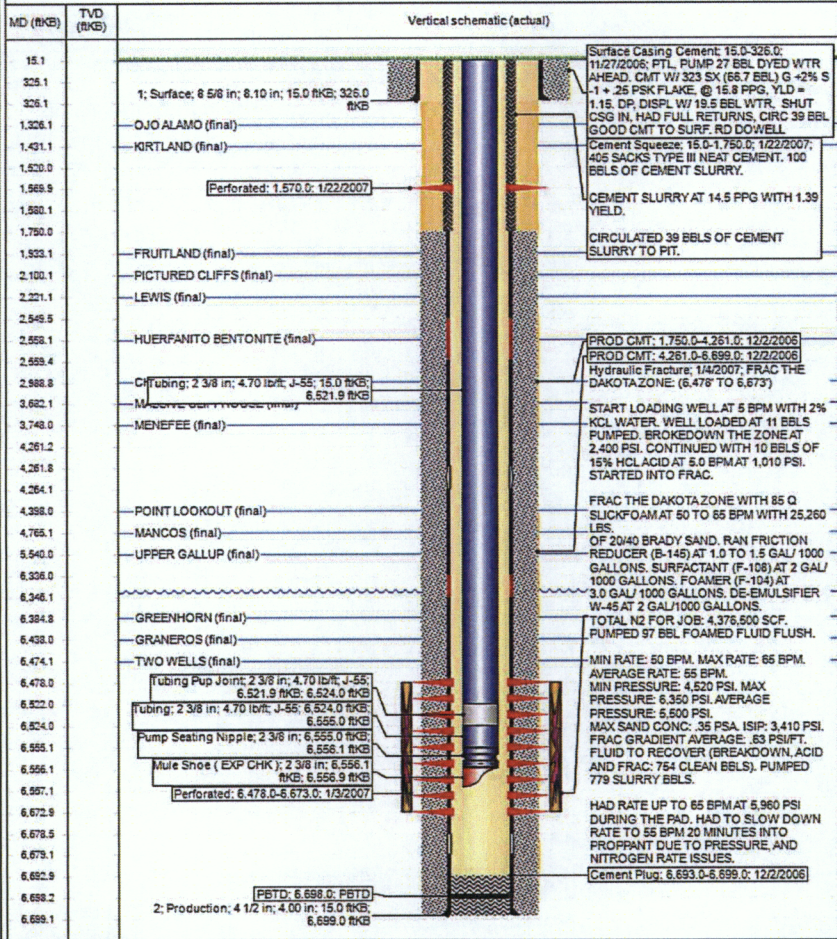
Operator ENERGY RESERVES GROUP		Lease E. H. PI-PKIN		Well No. 12E
Unit Letter E	Section 12	Township 27N	Range 11W	County San Juan
Actual Footage Location of Well: 1160 feet from the North line and 1160 feet from the West line				
Ground Level Elev. 5956	Producing Formation Dakota	Pool Basin Dakota	Dedicated Acreage: 320 (320) Acres	
<p>1. Outline the acreage dedicated to the subject well by colored pencil or hachure marks on the plat below.</p> <p>2. If more than one lease is dedicated to the well, outline each and identify the ownership thereof (both as to working interest and royalty).</p> <p>3. If more than one lease of different ownership is dedicated to the well, have the interests of all owners been consolidated by communitization, unitization, force-pooling, etc?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No If answer is "yes," type of consolidation _____</p> <p>If answer is "no," list the owners and tract descriptions which have actually been consolidated. (Use reverse side of this form if necessary.) _____</p> <p>No allowable will be assigned to the well until all interests have been consolidated (by communitization, unitization, forced-pooling, or otherwise) or until a non-standard unit, eliminating such interests, has been approved by the Commission.</p>				
			CERTIFICATION	
			<p>I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief.</p>	
			Name <i>[Signature]</i>	
			Position Field Services Administrator	
			Company Energy Reserves Group	
			Date August 22, 1979	
			<p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my knowledge and belief.</p>	
			Date Surveyed August 17, 1979	
			Registered Professional Engineer and/or Land Surveyor <i>[Signature]</i> Fred B. Kerr, Jr.	
			Certificate No. 3950	



Well Name: NEWSOM B #7N

API / UWI 3004533880	Surface Log Location 008-026N-008W-F	Field Name BASIN DAKOTA (PRORATED GAS)	License No.	State/Province NEW MEXICO	Well Configuration Type
Ground Elevation (ft) 6,329.00	Original KBRT Elevation (ft) 6,344.00	KB-Ground Distance (ft) 15.00	KB-Casing Flange Distance (ft)	KB-Tubing Hanger Distance (ft)	

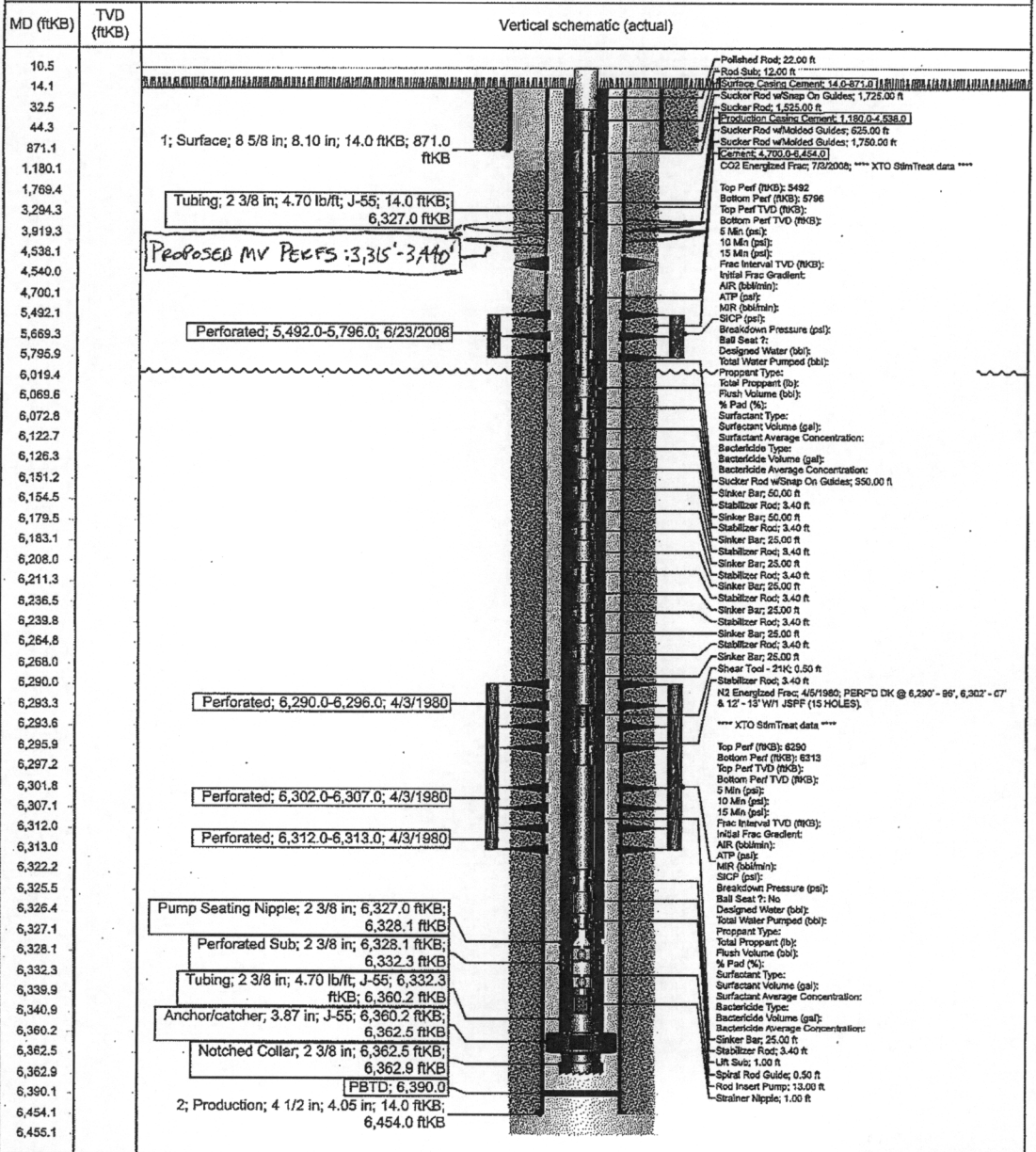
Original Hole, 9/7/2018 2:49:38 PM



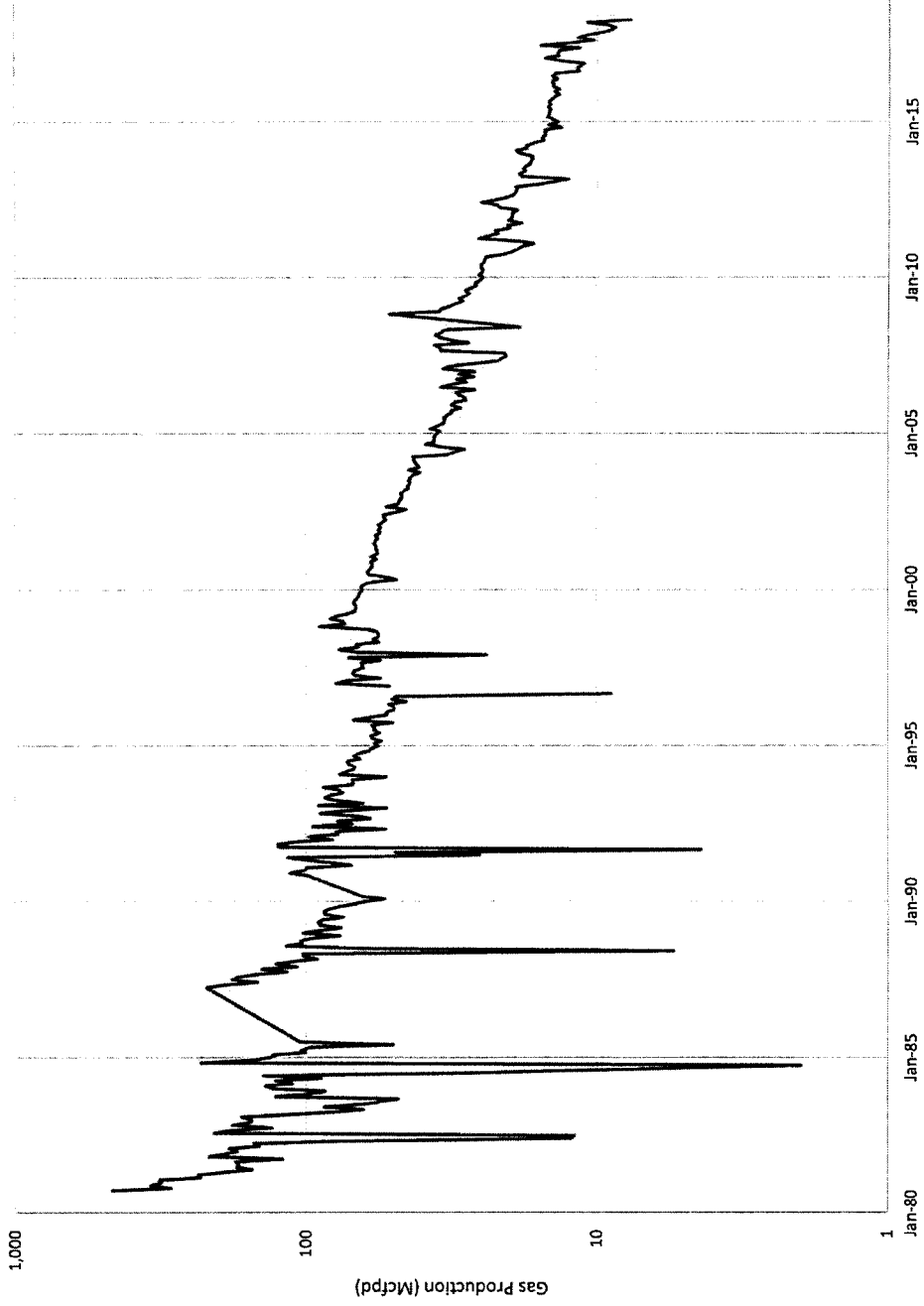
Well Name: EH PIPKIN 12E

API / UWI 3004523783	Surface Legal Location T27N-R11W-S12	Field Name Basin Dakota	License No.	State/Province New Mexico	Well Configuration Type Vertical
Ground Elevation (ft) 5,956.00	Original KB/RT Elevation (ft) 5,970.00	KB-Ground Distance (ft) 14.00	KB-Casing Flange Distance (ft)	KB-Tubing Hanger Distance (ft)	

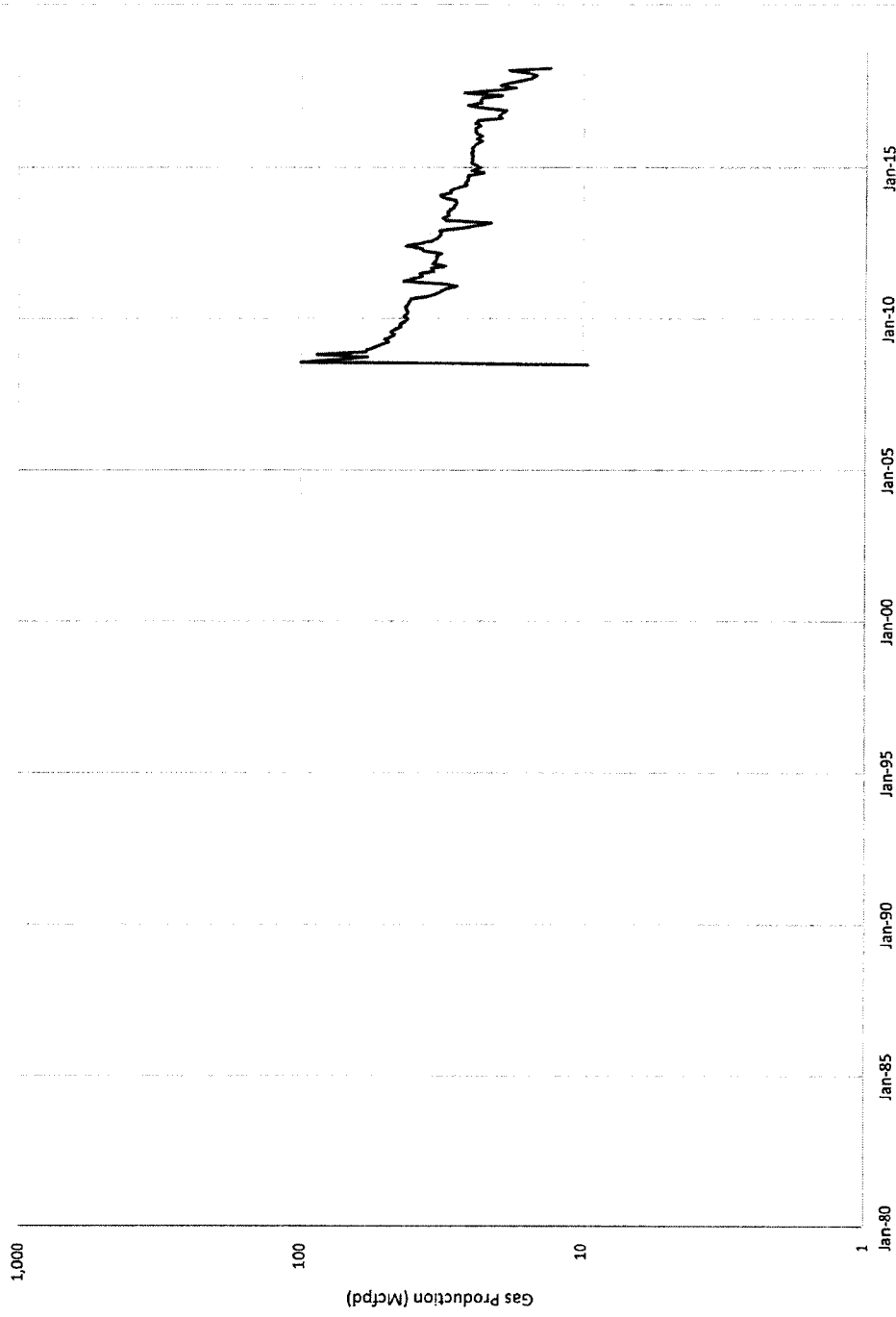
Vertical, Original Hole, 9/10/2018 12:19:18 PM



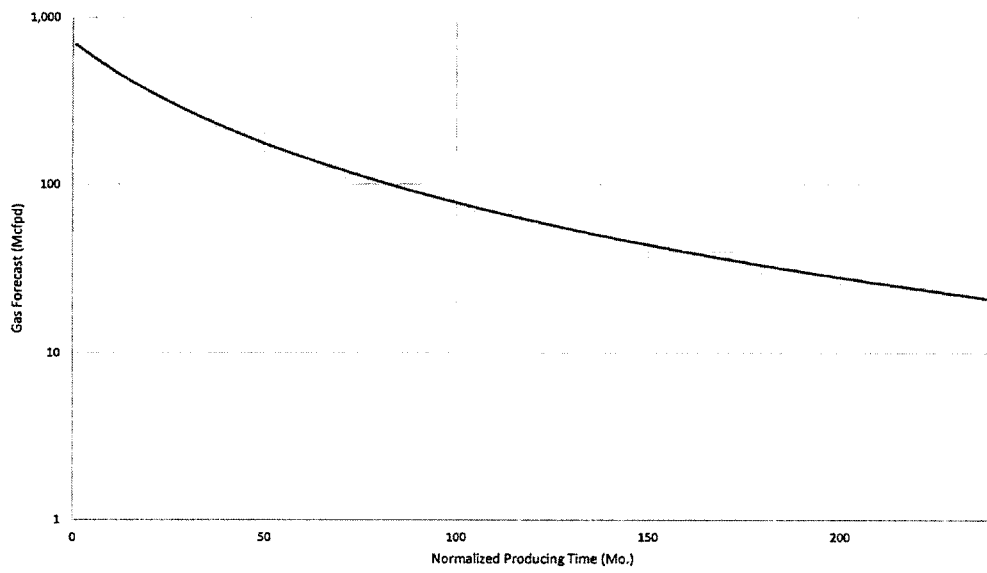
EH Pipkin 12E (Dakota)



EH Pipkin 12E (Gallup)



EH Pipkin 12E (Mesaverde)



E H Pipkin 12E – Production Allocation Method

Production for the downhole commingle will be allocated using the subtraction method in agreement with local agencies. The base formations are the Dakota and Gallup and the added formation to be commingled is the Mesaverde. The subtraction method applies an average monthly production forecast to the base formations using historic production. All production from this well exceeding the forecast will be allocated to the new formation. After 3 years production will stabilize. A production average will be gathered during the 4th year and will be utilized to create a fixed percentage based allocation. Oil production will be allocated based on average formation yields from offset wells. All documentation will be submitted to the Aztec NMOCD office.



September 11, 2018

New Mexico Oil Conservation Division
Attn: Heather Riley
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: EH Pipkin 012E (30-045-23783)
Common Ownership in All Depths
San Juan County, New Mexico

Mrs. Riley:

In the subject well, Hilcorp plans to downhole commingle existing pay from the Basin Dakota and Kutz Gallup formations with potential pay from a wildcat Mesaverde formation. In accordance with Subsection C of 19.15.12.11 New Mexico Administrative Code, we have concluded that ownership is the same between all three aforementioned pools. Therefore, this letter serves as Hilcorp Energy's statement that ownership is common throughout all depths in the subject well

This letter represents a good faith effort to adhere with applicable notification requirements. Hilcorp appreciates the opportunity to enhance production from the subject well.

Please contact Brad Pearson by email at bpearson@hilcorp.com or by phone at 713-289-2793 with any questions you may have.

Regards,

A handwritten signature in cursive script that reads 'Bradley W. Pearson'.

Landman
Hilcorp Energy Company
713-289-2793

Encl.

Submit 3 Copies To Appropriate District Office
 District.I
 1625 N French Dr., Hobbs, NM 87240
 District.II
 1301 W. Grand Ave., Artesia, NM 88210
 District.III
 1000 Rio Brazos Rd., Aztec, NM 87410
 District.IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
 Energy, Minerals and Natural Resources

Form C-103
 June 19, 2008

OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

WELL API NO. 30-045-23783
5. Indicate Type of Lease STATE <input type="checkbox"/> FEE <input type="checkbox"/>
6. State Oil & Gas Lease No.
7. Lease Name or Unit Agreement Name: EH PIPKIN
8. Well Number #12E
9. OGRID Number 5380
10. Pool name or Wildcat BASIN DAKOTA / KUTZ GALLUP
11. Elevation (Show whether DR, RKB, RT, GR, etc.) 5956'

SUNDRY NOTICES AND REPORTS ON WELLS
 (DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS)

1. Type of Well:
 Oil Well Gas Well Other

2. Name of Operator
 XTO Energy Inc.

3. Address of Operator
 382 CR 3100 AZTEC, NM 87410

4. Well Location
 Unit Letter E; 1460 feet from the NORTH line and 1160 feet from the WEST line
 Section 12 Township 27N Range 11W NMPM County SAN JUAN

11. Elevation (Show whether DR, RKB, RT, GR, etc.)
 5956'

12. Check Appropriate Box to Indicate Nature of Notice, Report, or Other Data

NOTICE OF INTENTION TO:

PERFORM REMEDIAL WORK PLUG AND ABANDON
 TEMPORARILY ABANDON CHANGE PLANS
 PULL OR ALTER CASING MULTIPLE COMPL
 DOWNHOLE COMMINGLE
 OTHER: DOWNHOLE COMMINGLE

SUBSEQUENT REPORT OF:

REMEDIAL WORK ALTERING CASING
 COMMENCE DRILLING OPNS. P AND A
 CASING/CEMENT JOB RCVD OCT 16 '08
 OIL CONS. DIV.
 DIST. 3

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

XTO Energy proposes to DHC production from the Basin Dakota (71599) and the Kutz Gallup (36550) upon approval of this . Allocations are based on production and are calculated as follows:
 Kutz Gallup: Oil: 92% Water: 90% Gas: 63% Basin Dakota: Oil: 8% Water: 10% Gas: 37%
 Both pools are in the pre-approved pool combinations for SJ County. Ownership is common; therefore, notification to owners was not necessary. DHC will offer economical production while protecting against reservoir damage, waste of reserves and violation of correlative rights. The BLM was notified of our intent to DHC by submission of Form 3160-5 on October 14, 2008. Supporting documents are attached.

DHC 2943A2

Spud Date: Rig Release Date:

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Lorri D. Bingham TITLE REGULATORY COMPLIANCE TECH DATE 10/14/08
 Type or print name LORRI D. BINGHAM E-mail address: Lorri_bingham@xtoenergy.com PHONE 505-333-3100

For State Use Only
 APPROVED BY [Signature] TITLE Deputy Oil & Gas Inspector, District #3 DATE OCT 24 2008
 Conditions of Approval (if any):

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB NO. 1004-0137
Expires July 31, 2010

RECEIVED

OCT 16 2008

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.

5. Lease Serial No. NMSF-078019

6. If Indian, Allottee or Tribe Name

Bureau of Land Management
Field Office

SUBMIT IN TRIPLICATE - Other instructions on page 2

7. If Unit or CA/Agreement, Name and/or No.

1. Type of Well
 Oil Well Gas Well Other

8. Well Name and No.
EH PIPKIN #12E

2. Name of Operator
XTO Energy Inc.

9. API Well No.
30-045-23783

3a. Address **382 CR 3100 AZTEC, NM 87410**
3b. Phone No (include area code) **505-333-3204**

10. Field and Pool, or Exploratory Area
BASIN DAKOTA

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)
1460' FNL & 1160' FWL Sec 12E-T27N-R11W

W. KUTZ GALLUP

11. County or Parish, State

SAN JUAN NM

12. CHECK APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT, OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
<input checked="" type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Fracture Treat	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input checked="" type="checkbox"/> Other <u>DOWNHOLE</u>
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	<u>COMMINGLE</u>
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation (clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplete horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports shall be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 shall be filed once testing has been completed. Final Abandonment Notices shall be filed only after all requirements, including reclamation, have been completed, and the operator has determined that the final site is ready for final inspection.)

XTO Energy Inc. proposes to downhole commingle production from the Basin Dakota (71599) and the Kutz Gallup (36550) upon approval of this application. Allocations are based on production and are calculated as follows:

RCVD OCT 22 '08
OIL CONS. DIV.
DIST. 3

Kutz Gallup	Oil: 92%	Water: 90%	Gas: 63%
Basin Dakota	Oil: 8%	Water: 10%	Gas: 37%

Both pools are in the pre-approved pool combinations for San Juan County. Ownership is common; therefore, owner notification was not necessary. Downhole commingling will offer economical production while protecting against reservoir damage, waste of reserves and violation of correlative rights. The NMOCD was notified of our intent to DHC by submission of Form C103 on October 14, 2008. Supporting documents are attached.

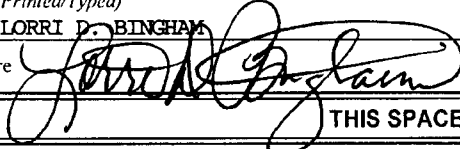
No DHC 10/22/08

14. I hereby certify that the foregoing is true and correct
Name (Printed/Typed)

LORRI D. BINGHAM

Title **REGULATORY COMPLIANCE TECH**

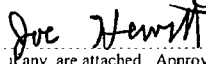
Signature



Date **10/14/2008**

THIS SPACE FOR FEDERAL OR STATE OFFICE USE

Approved by



Title **Geo**

Date **10-21-08**

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office **FFO**

RECEIVED