

RECEIVED: 4/6/20	REVIEWER:	TYPE: CTB	APP NO: pDM2009951023
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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: \_\_\_\_\_ OGRID Number: \_\_\_\_\_  
 Well Name: \_\_\_\_\_ API: \_\_\_\_\_  
 Pool: \_\_\_\_\_ 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

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

- ☐ Notice Complete
- ☐ 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.**

\_\_\_\_\_  
 Print or Type Name

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Phone Number

\_\_\_\_\_  
 Signature

\_\_\_\_\_  
 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 IV1220 S. St Francis Dr, Santa Fe, NM  
87505

State of New Mexico

Energy, Minerals and Natural Resources Department

Form C-107-B

Revised August 1, 2011

**OIL CONSERVATION DIVISION**1220 S. St Francis Drive  
Santa Fe, New Mexico 87505

Submit the original  
application to the Santa Fe  
office with one copy to the  
appropriate District Office.

**APPLICATION FOR SURFACE COMMINGLING (DIVERSE OWNERSHIP)**

OPERATOR NAME: Franklin Mountain Energy, LLC

OPERATOR ADDRESS: 2401 E 2nd Avenue, Suite 300, Denver, CO 80202

APPLICATION TYPE:

☐ Pool Commingling   ☐ Lease Commingling   ☒ Pool and Lease Commingling   ☒ Off-Lease Storage and Measurement (Only if not Surface Commingled)
LEASE TYPE:   ☐ Fee   ☒ State   ☐ FederalIs this an Amendment to existing Order?   ☐ Yes   ☒ No   If "Yes", please include the appropriate Order No. \_\_\_\_\_

Have the Bureau of Land Management (BLM) and State Land office (SLO) been notified in writing of the proposed commingling

☒ Yes   ☐ No**(A) POOL COMMINGLING**

Please attach sheets with the following information

(1) Pool Names and Codes	Gravities / BTU of Non-Commingled Production	Calculated Gravities / BTU of Commingled Production		Calculated Value of Commingled Production	Volumes
WC-025 G-09 S253502D; UPR WOLFCAMP (98187)	43.2° / 1234 BTU/CF	43.2° / 1234 BTU/CF		\$55/bbl oil (Dec19) \$0.00/MCF	450 BOPD 480 MCFD

(2) Are any wells producing at top allowables?   ☐ Yes   ☒ No(3) Have all interest owners been notified by certified mail of the proposed commingling?   ☒ Yes   ☐ No.(4) Measurement type:   ☒ Metering   ☐ Other (Specify)(5) Will commingling decrease the value of production?   ☐ Yes   ☒ No   If "yes", describe why commingling should be approved**(B) LEASE COMMINGLING**

Please attach sheets with the following information

(1) Pool Name and Code.

(2) Is all production from same source of supply?   ☐ Yes   ☐ No(3) Have all interest owners been notified by certified mail of the proposed commingling?   ☐ Yes   ☐ No(4) Measurement type:   ☐ Metering   ☐ Other (Specify)**(C) POOL and LEASE COMMINGLING**

Please attach sheets with the following information

(1) Complete Sections A and E.

**(D) OFF-LEASE STORAGE and MEASUREMENT**

Please attach sheets with the following information

(1) Is all production from same source of supply?   ☒ Yes   ☐ No

(2) Include proof of notice to all interest owners.

**(E) ADDITIONAL INFORMATION (for all application types)**

Please attach sheets with the following information

(1) A schematic diagram of facility, including legal location.

(2) A plat with lease boundaries showing all well and facility locations. Include lease numbers if Federal or State lands are involved.

(3) Lease Names, Lease and Well Numbers, and API Numbers.

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

SIGNATURE: \_\_\_\_\_

TITLE: Director, Operations Planning and Regulatory DATE: 4/1/2020TYPE OR PRINT NAME: Rachael OverbeyTELEPHONE NO.: 303-570-4057E-MAIL ADDRESS: roverbey@fmellc.com



Well #1

Pool: WC-025 G-09 S253502D; UPR WOLFCAMP (98187)

Lease: PARADE BWY STATE

Well: PARADE BWY STATE 1H

API: 30-025-43108

Well #2

Pool: WC-025 G-09 S253502D; UPR WOLFCAMP (98187)

Lease: COUNTY FAIR BTY STATE

Well: COUNTY FAIR BTY STATE 1H

API: 30-025-43117

Well #3

Pool: WC-025 G-09 S253502D; UPR WOLFCAMP (98187)

Lease: PROXY WCA STATE COM

Well: PROXY WCA STATE COM 1H

API: 30-025-43922

## 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) 746-1283 Fax: (575) 746-9720

## DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone (505) 334-6176 Fax: (505) 334-6170

## DISTRICT IV

1225 S. St. Francis Dr., Santa Fe, NM 87505  
Phone (505) 476-3460 Fax: (505) 476-3462State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-102

Revised August 1, 2011

Submit one copy to appropriate  
District Office

## OIL CONSERVATION DIVISION

1225 South St. Francis Dr.  
Santa Fe, New Mexico 87505

## WELL LOCATION AND ACREAGE DEDICATION PLAT

☐ AMENDED REPORT

API Number 30-025-43108	Pool Code 98187	Pool Name WC-025 G-09 S253502D; UPR WOLFCAMP
Property Code	Property Name PARADE BWY STATE COM	Well Number 1H
OGRID No. 373910	Operator Name Franklin Mountain Energy, LLC	Elevation 3252'

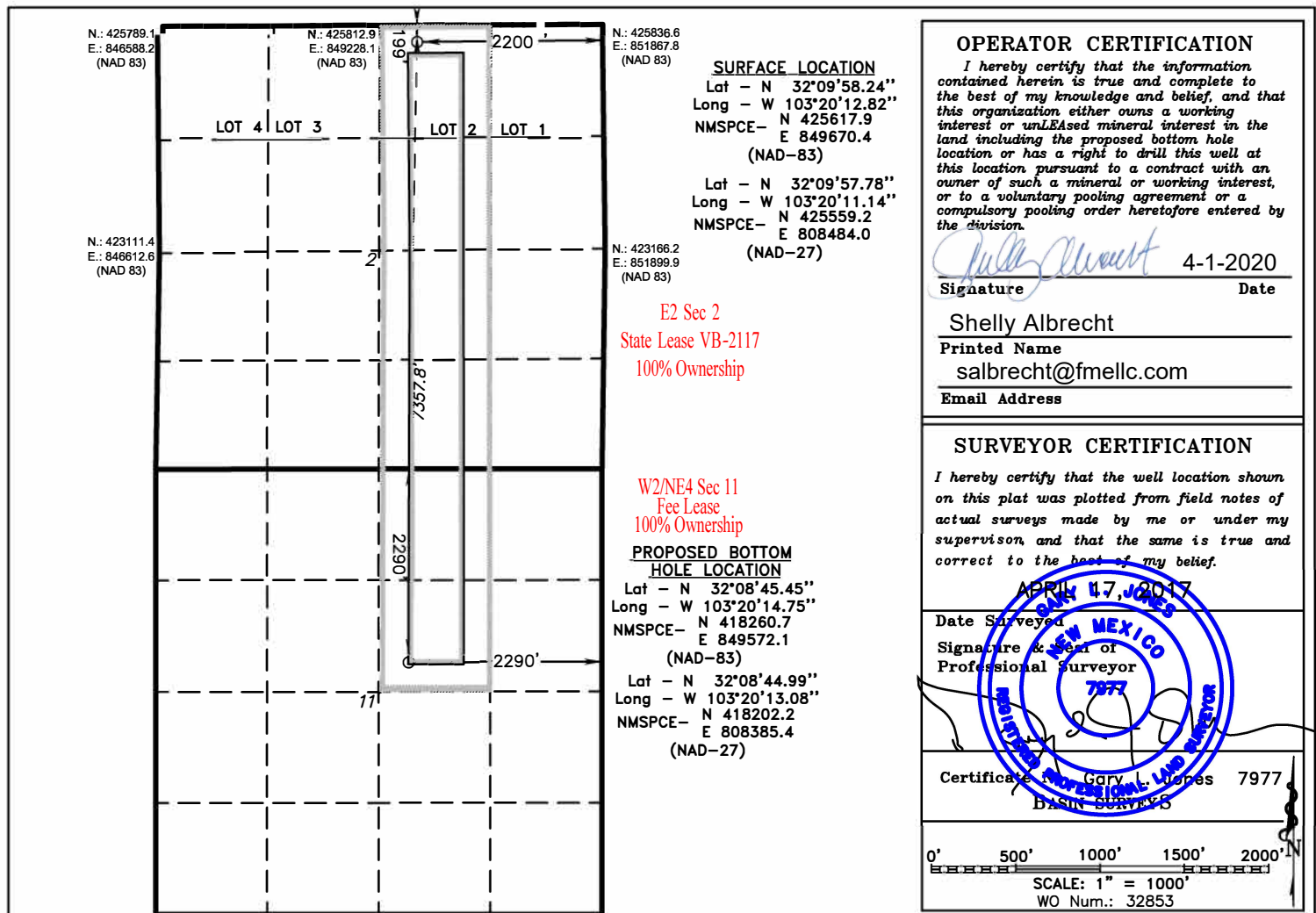
## Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
LOT 2	2	25 S	35 E		199	NORTH	2200	EAST	LEA

## Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
G	11	25 S	35 E		2290	NORTH	2290	EAST	LEA

Dedicated Acres	Joint or Infill	Consolidation Code	Order No.
240			

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

## DISTRICT I

1825 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) 748-1263 Fax: (575) 748-9720

## DISTRICT III

1000 Rio Brazos Rd., Aztec, NM 87410  
Phone (505) 334-6176 Fax: (505) 334-6170

## DISTRICT IV

1225 S. St. Francis Dr., Santa Fe, NM 87505  
Phone (505) 476-3480 Fax: (505) 476-3482State of New Mexico  
Energy, Minerals and Natural Resources Department

Form C-102

Revised August 1, 2011

Submit one copy to appropriate  
District Office

## OIL CONSERVATION DIVISION

1225 South St. Francis Dr.  
Santa Fe, New Mexico 87505☐ AMENDED REPORT

## WELL LOCATION AND ACREAGE DEDICATION PLAT

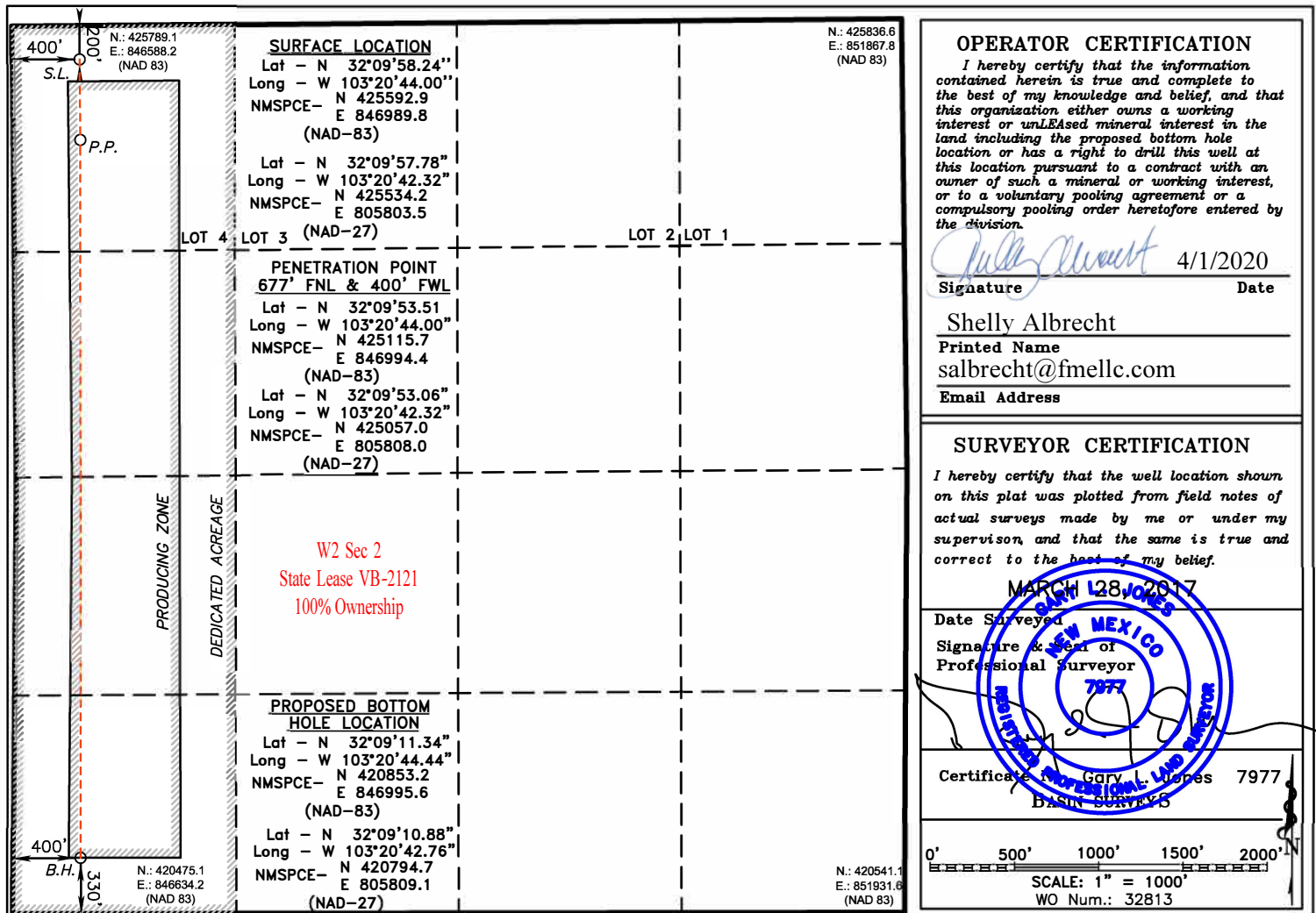
API Number 30-025-43117	Pool Code WC-98187	Pool Name WC-025 S-09 S253502D Wildcat; Upper Wolfacmp
Property Code	Property Name COUNTY FAIR BTY STATE	Well Number 1H
OGRID No. 373910	Operator Name Franklin Mountain Energy, LLC	Elevation 3254'

## Surface Location

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
Lot 4	2	25 S	35 E		200	NORTH	400	WEST	LEA

## Bottom Hole Location If Different From Surface

UL or lot No.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
M	2	25 S	35 E		330	SOUTH	400	WEST	LEA
Dedicated Acres 160	Joint or Infill	Consolidation Code	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

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

Form C-102  
Revised August 1, 2011  
Submit one copy to appropriate  
District Office

☐ AMENDED REPORT

<sup>1</sup> API Number 30-025-43922	<sup>2</sup> Pool Code 98187	<sup>3</sup> Pool Name WC-025 G-09 S253502D; UPR WOLFCAMP	
<sup>4</sup> Property Code	<sup>5</sup> Property Name PROXY WCA STATE COM		<sup>6</sup> Well Number 1H
<sup>7</sup> OGRID No. 373910	<sup>8</sup> Operator Name Franklin Mountain Energy, LLC		<sup>9</sup> Elevation 3274.6

UL or lot no. M	Section 36	Township 24S	Range 35E	Lot 1dn	Feet from the 380	North/South line SOUTH	Feet from the 380	East/West line WEST	County LEA
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UL or lot no. D	Section 36	Township 24S	Range 35E	Lot Idn	Feet from the 380	North/South line NORTH	Feet from the 380	East/West line WEST	County LEA
<sup>12</sup> Dedicated Acres 160		<sup>13</sup> Joint or Infill		<sup>14</sup> Consolidation Code		<sup>15</sup> Order No.			

NE Cor.  
Sec. 25

SCALE  
2000'  
1000'  
0  
2000'

DRAWN BY: V.L.D. 07-18-17

● = SURFACE HOLE LOCATION  
○ = BOTTOM HOLE LOCATION  
▲ = SECTION CORNER LOCATED  
△ = SECTION CORNER RE-ESTABLISHED.  
(Not Set on Ground.)

NOTE:  
• Distances referenced on plat to section lines are perpendicular.  
• Basis of Bearing is a Transverse Mercator Projection with a Central Meridian of W103°53'00"

**NAD 83 (SURFACE HOLE LOCATION)**  
LATITUDE = 32°10'03.95" (32.167764)  
LONGITUDE = 103°19'42.82" (103.328561)  
**NAD 27 (SURFACE HOLE LOCATION)**  
LATITUDE = 32°10'03.49" (32.167636)  
LONGITUDE = 103°19'41.14" (103.328094)  
**STATE PLANE NAD 83 (N.M. EAST)**  
N: 426218.63 E: 852243.40  
**STATE PLANE NAD 27 (N.M. EAST)**  
N: 426159.83 E: 811057.01

**NAD 83 (BOTTOM HOLE LOCATION)**  
LATITUDE = 32°10'48.80" (32.180222)  
LONGITUDE = 103°19'42.90" (103.328583)  
**NAD 27 (BOTTOM HOLE LOCATION)**  
LATITUDE = 32°10'48.35" (32.180097)  
LONGITUDE = 103°19'41.22" (103.328117)  
**STATE PLANE NAD 83 (N.M. EAST)**  
N: 430751.68 E: 852194.12  
**STATE PLANE NAD 27 (N.M. EAST)**  
N: 430692.77 E: 811007.91

Diagram showing Section 36 (SWNW and E2/SW4 Sec 36) and Section 35 (N2/NW4 Sec 36). The diagram includes bearings and distances for the lease boundaries and section corners. Key features include:

- Section 36: SWNW and E2/SW4 Sec 36, State Lease V-9256, 100% Ownership.
- Section 35: N2/NW4 Sec 36, State Lease VB-9236, 100% Ownership.
- Lease Boundary: N89°52'40"E - 5288.54' (Meas.).
- Section Corners: T24S, T25S, T26S, T27S, T28S, T29S, T30S, T31S, T32S, T33S, T34S, T35S, T36S, T37S, T38S, T39S, T40S, T41S, T42S, T43S, T44S, T45S, T46S, T47S, T48S, T49S, T50S, T51S, T52S, T53S, T54S, T55S, T56S, T57S, T58S, T59S, T60S, T61S, T62S, T63S, T64S, T65S, T66S, T67S, T68S, T69S, T70S, T71S, T72S, T73S, T74S, T75S, T76S, T77S, T78S, T79S, T80S, T81S, T82S, T83S, T84S, T85S, T86S, T87S, T88S, T89S, T90S, T91S, T92S, T93S, T94S, T95S, T96S, T97S, T98S, T99S, T100S.

SE Cor.  
Sec. 31

NE Cor.  
Sec. 13





April 1, 2020

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

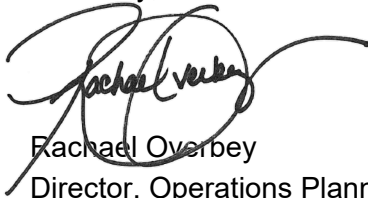
Re: C-107B Application for Surface Commingling (diverse ownership) for Franklin Mountain Energy, LLC

To Whom It May Concern:

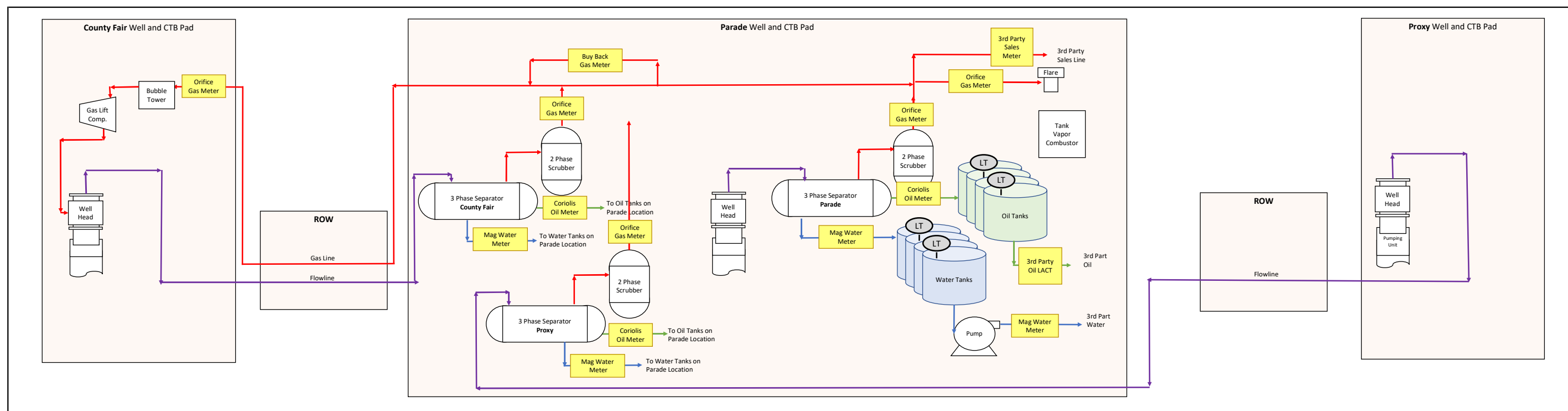
Franklin Mountain Energy, LLC, OGRID No. 373910, requests to commingle current oil and gas production from pool number 98187. All wells will go through individual three-phase separators and each stream (oil, gas, water) will be measured as it exits the three-phase separator. Oil will be measured at the three-phase separator with a Coriolis meter, Gas will be measured with an orifice meter, and water will be measured with a mag meter.

Commingling will happen after the three-phase separator. The gas stream will flow into a common line and then into an additional two-phase separator to remove any excess water. Gas from the heater treater and the vapor recovery tower will also flow into the two-phase separator before being sent to our gas gathering pipeline system. The oil will flow into a common line after the three-phase separator then into a heater treater and vapor recovery tower to remove any remaining water and gas in the oil stream. The oil will then flow to lined oil tanks to be either trucked off or piped into a crude gathering system. The water will be commingled after the three-phase separator into a common line then flow into a gun barrel before it is pumped into our water pipeline system. Oil and gas sales will be allocated against sales meter volumes. All meters will be calibrated according to manufacturer's recommendations.

Sincerely,



Rachael Overbey  
Director, Operations Planning and Regulatory  
roverbey@fmcenergy.com  
Main: 720-414-7868  
Mobile: 303-570-4057







www.permianls.com  
575.397.3713 2609 W Marland Hobbs NM 88240

## C6+ Gas Analysis Report

7510G	8123456789	Parade Bwy 1H Ck Meter	
Sample Point Code	Sample Point Name	Sample Point Location	
Laboratory Services	2019025117	1735	J Hernandez - Spot
Source Laboratory	Lab File No	Container Identity	Sampler
USA	USA	USA	New Mexico
District	Area Name	Field Name	Facility Name
Nov 14, 2019 13:00	Nov 14, 2019 13:00	Nov 19, 2019 13:57	Nov 20, 2019
Date Sampled	Date Effective	Date Received	Date Reported
55.00	Torrance	138 @ 67	
Ambient Temp (°F)	Flow Rate (Mcf)	Analyst	Press PSI @ Temp °F Source Conditions
Franklin		NG	
Operator		Lab Source Description	

Component	Normalized Mol %	Un-Normalized Mol %	GPM
H2S (H2S)	0.0600	0.06	
Nitrogen (N2)	1.7120	1.7133	
CO2 (CO2)	0.7070	0.70786	
Methane (C1)	74.9180	74.96174	
Ethane (C2)	12.9400	12.94751	3.4600
Propane (C3)	6.3900	6.39346	1.7600
I-Butane (IC4)	0.6570	0.65731	0.2150
N-Butane (NC4)	1.6070	1.60842	0.5060
I-Pentane (IC5)	0.3200	0.3206	0.1170
N-Pentane (NC5)	0.2970	0.29737	0.1080
Hexanes Plus (C6+)	0.3920	0.39242	0.1700
TOTAL	100.0000	100.0600	6.3360

Method(s): Gas C6+ - GPA 2261, Extended Gas - GPA 2286, Calculations - GPA 2172

Gross Heating Values (Real, BTU/ft³)			
14.696 PSI @ 60.00 °F		14.73 PSI @ 60.00 °F	
Dry	Saturated	Dry	Saturated
1,269.8	1,249.2	1,272.7	1,252.1

Calculated Total Sample Properties	
GPA2145-16 *Calculated at Contract Conditions	
Relative Density Real	Relative Density Ideal
0.7506	0.7480
Molecular Weight	
21.6649	

C6+ Group Properties		
Assumed Composition		
C6 - 60.000%	C7 - 30.000%	C8 - 10.000%

Field H2S
600 PPM

**PROTREND STATUS:** Meets ProTrend Criteria on Nov 20, 2019 Imported  
**DATA SOURCE:**

Analyzer Information			
Device Type:	Gas Chromatograph	Device Make:	Shimadzu
Device Model:	GC-2014	Last Cal Date:	Nov 14, 2019

**VALIDATOR COMMENTS:**



www.permianls.com  
575.397.3713 2609 W Marland Hobbs NM 88240

## C6+ Gas Analysis Report

7513G	10003	County Fair 1-H Ck Meter	
Sample Point Code	Sample Point Name	Sample Point Location	
Laboratory Services	2019025119	1748	J Hernandez - Spot
Source Laboratory	Lab File No	Container Identity	Sampler
USA	USA	USA	New Mexico
District	Area Name	Field Name	Facility Name
Nov 14, 2019 11:20	Nov 14, 2019 11:20	Nov 19, 2019 14:01	Nov 20, 2019
Date Sampled	Date Effective	Date Received	Date Reported
55.00	Torrance	146 @ 63	
Ambient Temp (°F)	Flow Rate (Mcf)	Analyst	Press PSI @ Temp °F Source Conditions
Franklin	NG		
Operator	Lab Source Description		

Component	Normalized Mol %	Un-Normalized Mol %	GPM
H2S (H2S)	0.0130	0.013	
Nitrogen (N2)	1.6470	1.64686	
CO2 (CO2)	0.4940	0.49437	
Methane (C1)	76.0800	76.08948	
Ethane (C2)	12.9160	12.91798	3.4530
Propane (C3)	6.0870	6.08788	1.6770
I-Butane (IC4)	0.5750	0.5754	0.1880
N-Butane (NC4)	1.3740	1.37393	0.4330
I-Pentane (IC5)	0.2420	0.24216	0.0880
N-Pentane (NC5)	0.2320	0.23188	0.0840
Hexanes Plus (C6+)	0.3400	0.34006	0.1480
TOTAL	100.0000	100.0130	6.0710

Gross Heating Values (Real, BTU/ft³)			
14.696 PSI @ 60.00 °F		14.73 PSI @ 60.00 °F	
Dry	Saturated	Dry	Saturated
1,254.6	1,234.1	1,257.5	1,237.0000

Calculated Total Sample Properties	
GPA2145-16 *Calculated at Contract Conditions	
Relative Density Real	Relative Density Ideal
0.7360	0.7336
Molecular Weight	
21.2478	

C6+ Group Properties		
Assumed Composition		
C6 - 60.000%	C7 - 30.000%	C8 - 10.000%

Field H2S
130 PPM

**PROTREND STATUS:** Meets ProTrend Criteria on Nov 20, 2019 Imported  
**DATA SOURCE:**

Method(s): Gas C6+ - GPA 2261, Extended Gas - GPA 2286, Calculations - GPA 2172

Analyzer Information			
Device Type:	Gas Chromatograph	Device Make:	Shimadzu
Device Model:	GC-2014	Last Cal Date:	Nov 14, 2019

**VALIDATOR COMMENTS:**



www.permianls.com  
575.397.3713 2609 W Marland Hobbs NM 88240

## C6+ Gas Analysis Report

7511G	Proxy 1H Ck Meter	Proxy 1H Ck Meter	
Sample Point Code	Sample Point Name	Sample Point Location	
Laboratory Services	2019025118	0076	J Hernandez - Spot
Source Laboratory	Lab File No	Container Identity	Sampler
USA	USA	USA	New Mexico
District	Area Name	Field Name	Facility Name
Nov 14, 2019 13:45	Nov 14, 2019 13:45	Nov 19, 2019 13:59	Nov 20, 2019
Date Sampled	Date Effective	Date Received	Date Reported
55.00	Torrance	140 @ 72	
Ambient Temp (°F)	Flow Rate (Mcf)	Analyst	Press PSI @ Temp °F Source Conditions
Franklin	NG		
Operator	Lab Source Description		

Component	Normalized Mol %	Un-Normalized Mol %	GPM
H2S (H2S)	0.6000	0.6	
Nitrogen (N2)	1.4770	1.486	
CO2 (CO2)	2.7240	2.74	
Methane (C1)	72.8470	73.288	
Ethane (C2)	11.4130	11.482	3.0510
Propane (C3)	5.8550	5.89	1.6130
I-Butane (IC4)	0.8430	0.848	0.2760
N-Butane (NC4)	1.8020	1.813	0.5680
I-Pentane (IC5)	0.5210	0.524	0.1900
N-Pentane (NC5)	0.4560	0.459	0.1650
Hexanes Plus (C6+)	1.4620	1.471	0.6340
TOTAL	100.0000	100.6010	6.4970

Method(s): Gas C6+ - GPA 2261, Extended Gas - GPA 2286, Calculations - GPA 2172

## Analyzer Information

Device Type: Gas Chromatograph      Device Make: Shimadzu  
Device Model: GC-2014      Last Cal Date: Nov 14, 2019

## Gross Heating Values (Real, BTU/ft³)

14.696 PSI @ 60.00 °F		14.73 PSI @ 60.00 °F	
Dry	Saturated	Dry	Saturated
1,293.7	1,272.6	1,296.7	1,275.5

## Calculated Total Sample Properties

GPA2145-16 \*Calculated at Contract Conditions

Relative Density Real	Relative Density Ideal
0.8015	0.7984
Molecular Weight	
23.1218	

## C6+ Group Properties

Assumed Composition

C6 - 60.000%	C7 - 30.000%	C8 - 10.000%
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Field H2S  
6000 PPM

## PROTREND STATUS:

Passed By Validator on Nov 21, 2019

## DATA SOURCE:

Imported

## PASSED BY VALIDATOR REASON:

Close enough to be considered reasonable.

## VALIDATOR:

Dustin Armstrong

## VALIDATOR COMMENTS:

OK