

CCCC

30-015-39584

July 22, 2011

New Mexico Oil Conservation Division
1301 Grand Avenue
Artesia, New Mexico 88210
Attn: Randy Dade

Re: H2S Rule 118 Contingency Plan. Federal Lease NMNM2748
Jackson A 39, Unit O, 110' FSL, 1650' FEL
Sec. 12, T17S, R30E- Eddy County, New Mexico

Dear Mr. Dade:

Please accept this letter as our notice we do not believe the referenced plan is required for the referenced well. We have calculated the hazard volume as follows: highest H2S quantity 10,000 PPM, and using a production rate of 225 MCFGPD the 100 PPM radius is 181' and the 500 PPM radius is 83'. This footage does not give off our well locations.

Please contact Mr. Mark Jacoby or the undersigned if you require additional information.

Sincerely,



Mary Carter Starkey
Regulatory Coordinator

BURNETT OIL CO., INC. EMERGENCY NOTIFICATION LIST

Burnett's New Mexico Office (575) 677-2313
Belton Mathews BOCI District Superintendent CELL (575) 703-9601
BURNETT OIL HOME OFFICE (817) 332-5108
Mark Jacoby BOCI ENGINEERING MANAGER CELL (817) 312- 2751

EDDY COUNTY SHERIFF 911 OR (575) 746-9888
NEW MEXICO STATE POLICE (575) 746-2701

Loco Hills Fire Department (VOLUNTEER ONLY) 911 OR (575) 677 2349
For Medical and Fire (575) 746-2701 (ARTESIA)

Flight for Life Air Ambulance (LUBBOCK) (806) 743-9911
Aerocare Air Ambulance (LUBBOCK) (806) 747-8923
Med Flight Air Ambulance (ALBUQ) (505) 842-4433
S B Med Svc Air Ambulance (ALBUQ) (505) 842-4949

US Bureau of Land Management Carlsbad (575) 361-2822 (575) 234-5972
New Mexico Oil Conversation Division ARTESIA (575) 748-1283
New Mexico Emergency Response Commission 24 HR (575) 827-9126
New Mexico State Emergency Operation Center (575) 476-9635
Local Emergency Planning Committee (Artesia) (575) 746-2122
National Emergency Response Center (Washington, DC) (800) 424-8802

Boots & Coots IWC (800) 256-9688
Cudd Pressure Control (432) 570-5300
Halliburton Svc (575) 746-2757
B J Svc (575) 746-2293

THIS MUST BE POSTED AT THE RIG WHILE ON LOCATION.

Burnett Office 87 SQUARE LAKE ROAD (CR #220), Loco Hills, New Mexico 88255
(Loco Hills, New Mexico (2 MILES East of Loco Hills On US Hwy 82 TO C#220 Then North On CR# 220 Approx One Mile To Office.).

DRILLING EXHIBIT A

Jackson A 35

HYDROGEN SULFIDE (H2S) CONTINGENCY PLAN

ASSUMED 100 PPM ROE = 3000'

HOBBS OCD

OCT 25 2011

Emergency Procedures

In the event of a release of gas containing H2S, The first responder(s) must

- * Isolate the area and prevent entry by other persons into the 100 PPM ROE.
- * Evacuate any public places encompassed by 100 PPM ROE.
- * Be equipped with H2S monitors and air packs in order to control release.
- * Use the "buddy system" to ensure no injuries occur during the response.
- * Take precautions to avoid personal injury during this operation.
- * Have received training in the following:
 1. H2S detection
 2. Measures for protection against this gas
 3. Equipment used for protection and emergency response.

RECEIVED

Ignition of Gas Source

Should control of the well be considered lost and ignition considered, take care to protect against exposure to Sulfur Dioxide (SO2.) Intentional ignition must be coordinated with the NMOCD and local officials. Additionally the New Mexico State Police may become involved. NM State Police shall be the incident command on scene of any major release. Take care to protect downwind whenever there is an ignition of gas.

Characteristics of H2S and SO2

Common Name	Chemical Formula	Specific Gravity	Threshold Limit	Hazardous Limit	Lethal Concentration
Hydrogen Sulfide	H2S	1.189 Air = 1	10 ppm	100 ppm/hr	600 ppm
Sulfur Dioxide	SO2	2.21 Air = 1	2 ppm	NA	1000 ppm

Contacting Authorities

Burnett Oil Co., Inc. personal must liaison with local and state agencies to ensure a proper response to a major release. Additionally, the OCD must be notified of the release as soon as possible but no later than 4 hours. Agencies will ask for information such as type and volume of release, wind and direction, location of release, etc. **Be sure all is written down and ready to give to contact list (Drilling Exhibit A.) Directions to the site are below.** Burnett's response must be in coordination with the State of New Mexico's Hazardous Materials Emergency Response Plan.

**Burnett Office 87 SQUARE LAKE ROAD (CR #220), Loco Hills, New Mexico 88255
(Loco Hills, New Mexico (2 MILES East of Loco Hills On US Hwy 82 TO C#220 Then North On CR# 220 Approx One Mile To Office**

BURNETT OIL CO., INC.

DRILLING EXHIBIT B

Jackson A 39

BURNETT OIL CO., INC. OPERATOR CERTIFICATION
ALL VERTICAL CEDAR LAKE YESO/ LOCO HILLS PADDOCK WELLS, GRAYBURG SAN
ANDRES WELLS

FEDERAL LEASE # LC029338A, LC029339A, LC030570A, LC055264, LC055958, NM2746,
NM2747 NM2748, NM05067 & NM074939

Section 1, 8, 11, 12, 13, 14, 23, 24 & 25, Township 17 South, Range 30 East, Eddy County, N.M

Operator's Representative:

Burnett Oil Co , Inc field representative responsible for compliance with the approved surface
use and operations plan is

Mr. Belton Mathews, District Supt
P O Box 188
Loco Hills, New Mexico 88255
Office phone (575) 677-2313
Home phone: (575) 746-8647
Cellular phone (575) 703-9601

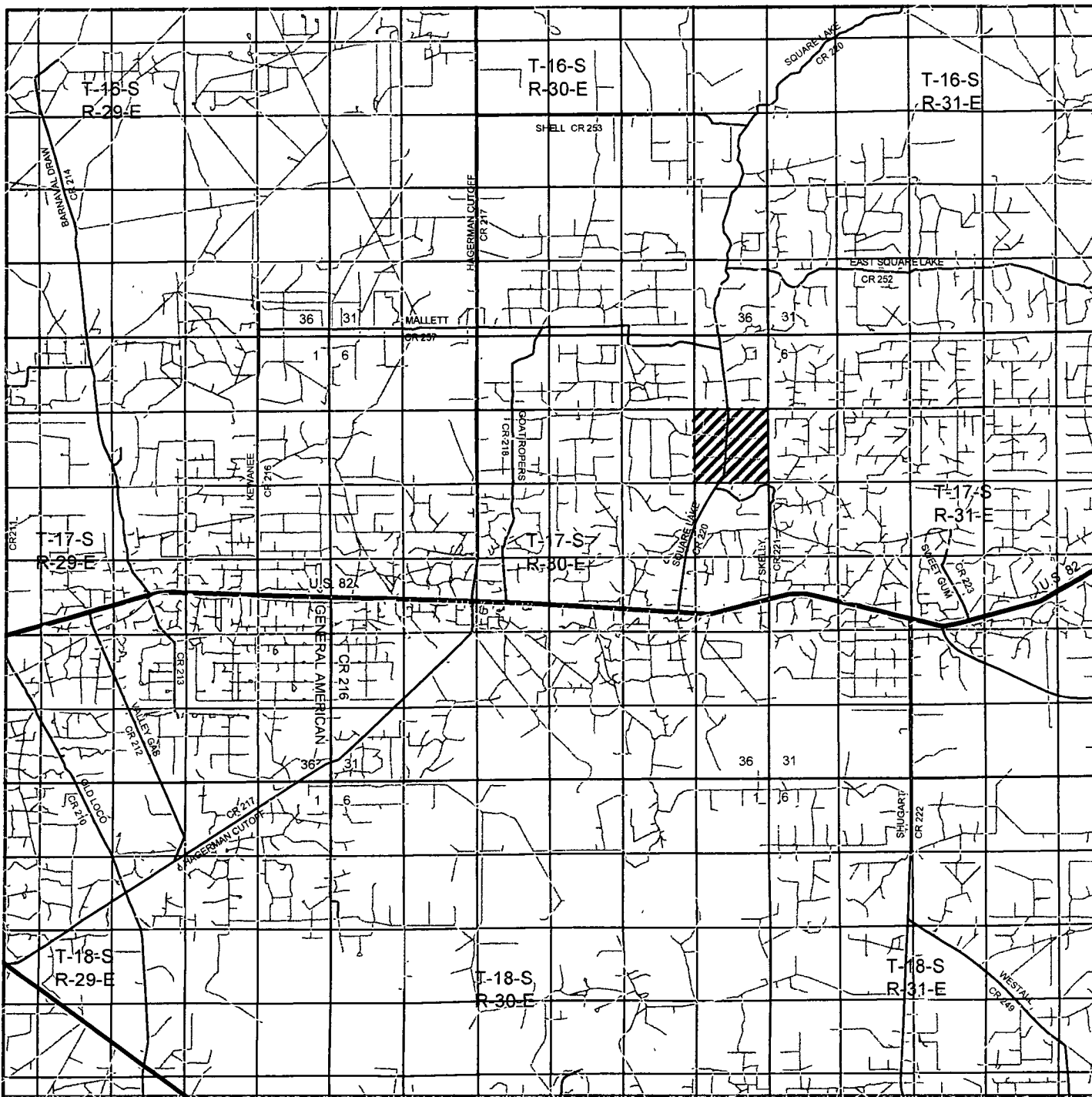
I hereby certify that I, or persons under my direct supervision have inspected the drill site and access
route, that I am familiar with the conditions that currently exist, that the statements made in this plan are
to the best of my knowledge, true and correct, and that the work associated with operations proposed
herein will be performed by Burnett Oil Co , Inc and its contractors and subcontractors in conformity with
this plan and the terms and conditions under which it is approved This statement is subject to the
provisions of 18 U S C 1001 for the filing of a false statement

Date

7/21/11

By

Mark A. Jacoby
Mark A Jacoby
Engineering Manager



JACKSON "A" #39

SURFACE EXHIBIT A

Located 210' FSL and 1650' FEL
 Section 12, Township 17 South, Range 30 East,
 N.M.P.M., Eddy County, New Mexico.

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 in the oilfield

P.O. Box 1786
 1120 N. West County Rd.
 Hobbs, New Mexico 88241
 (575) 393-7316 - Office
 (575) 392-2206 - Fax
 basinsurveys.com

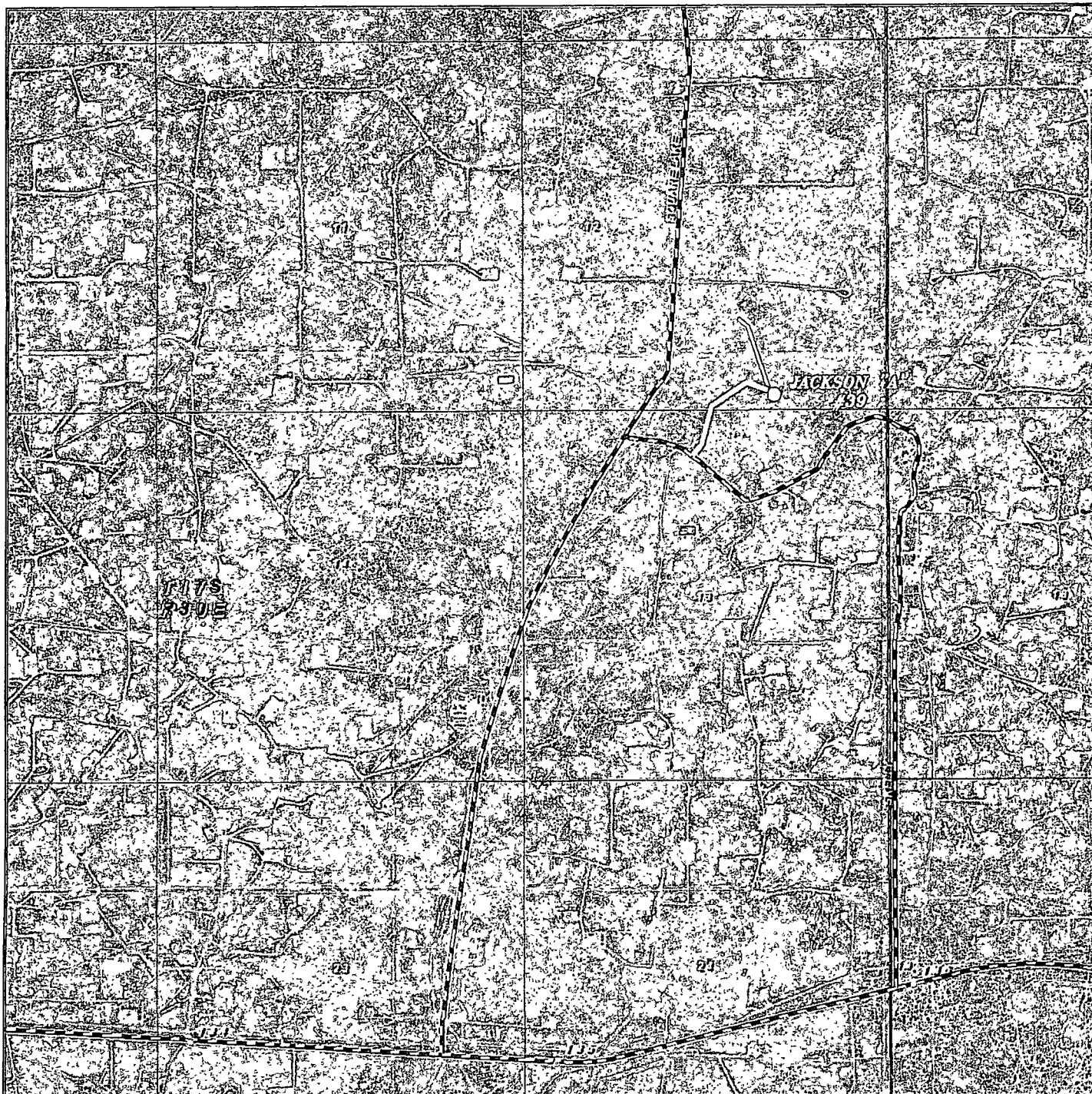
W.O. Number: JMS 24296

Survey Date: 03-23-2011

Scale: 1" = 2 Miles

Date: 03-28-2011

BURNETT OIL
COMPANY, INC.



JACKSON "A" #39

SURFACE EXHIBIT A2

Located 210' FSL and 1650' FEL

**Section 12, Township 17 South, Range 30 East,
N.M.P.M., Eddy County, New Mexico.**

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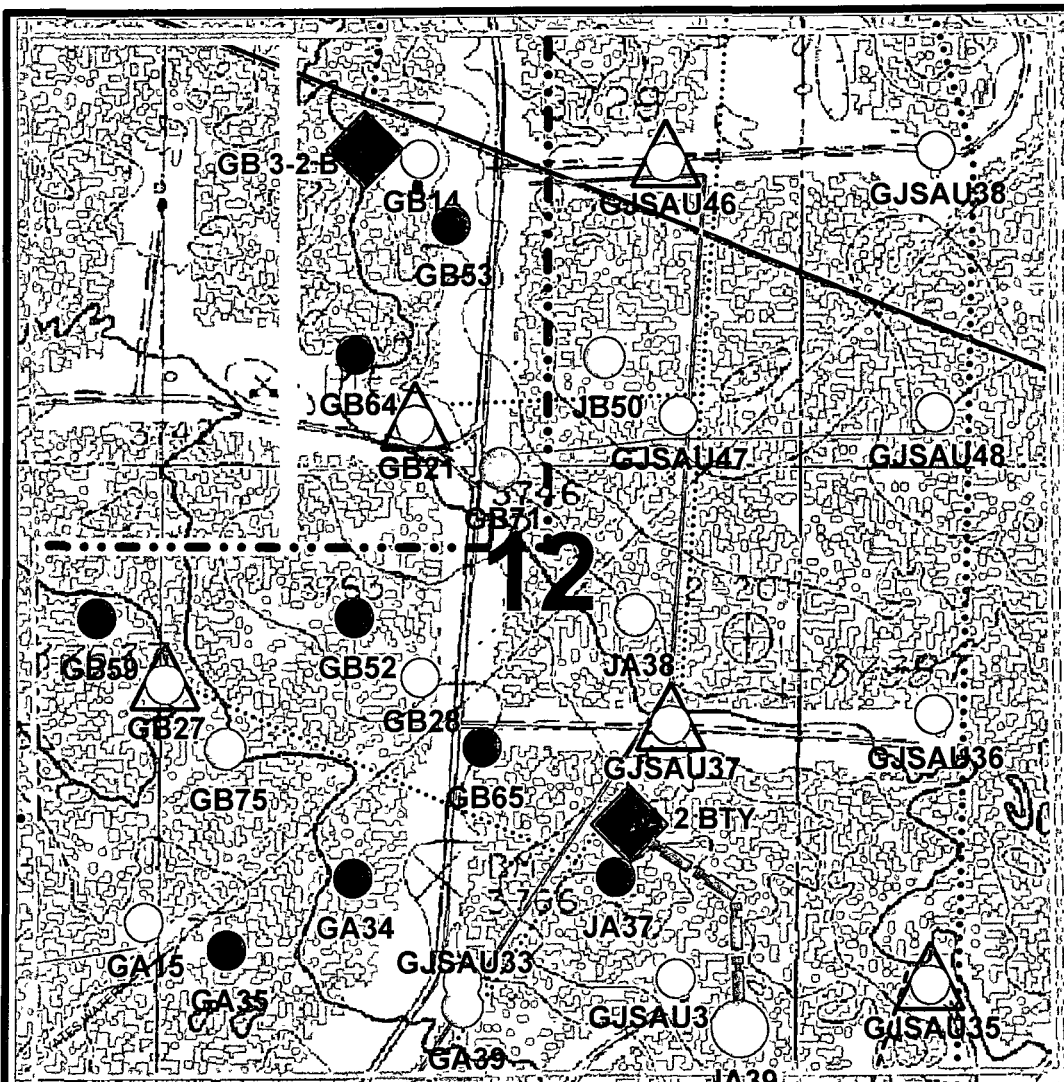
P.O. Box 1786
1120 N. West County Rd.
Hobbs, New Mexico 88241
(575) 393-7316 - Office
(575) 392-2206 - Fax
basinsurveys.com

W.O. Number: JMS 24296

Scale: 1" = 2000'

YELLOW TINT - USA LAND
BLUE TINT - STATE LAND
NATURAL COLOR - FEE LAND

**BURNETT OIL
COMPANY, INC.**



750 0 750 1500 2250 ft

Well Names

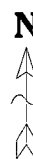
GA = Gissler A
 GB = Gissler B
 JA = Jackson A
 JB = Jackson B
 SA = Stevens A
 SB = Stevens B
 GJSA = Grayburg Jackson San Andres

Burnett Oil Co., Inc.

6666

Jackson A39 Proposed Well Location
 (Map Reflects Burnett Operated Wells Only)
 Eddy County, New Mexico

Author C. K. Eng Tech	Date April 6, 2011
Scale 1" = 750'	



SURFACE EXHIBIT B

Jackson A39

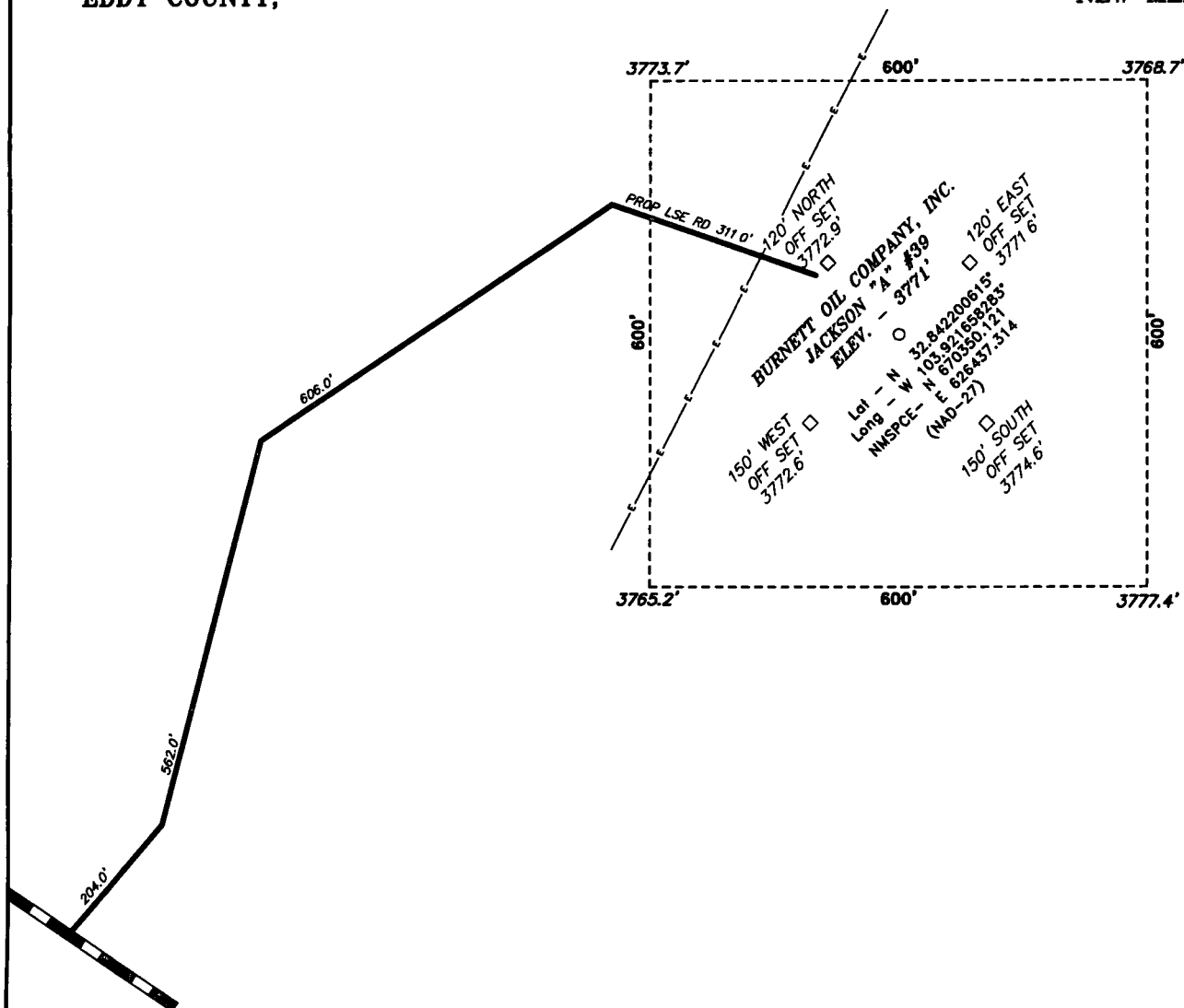
T17S, R30E, Sect 12, Unit O, NMNM029339A

210' FSL, 1650' FEL, JA 2 Battery

Lat/Long: 32.842260, -103.921696

PROPOSED FLOWLINE

SECTION 12, TOWNSHIP 17 SOUTH, RANGE 30 EAST, N.M.P.M.,
EDDY COUNTY, NEW MEXICO.



SURFACE EXHIBIT C

200 0 200 400 FEET
SCALE: 1" = 200'

Directions to Location:

FROM THE JUNCTION OF THE SQUARE LAKE AND
SKELLY, GO EAST ON SKELLY GO EAST 0.2 MILES TO
OLD LEASE ROAD AND PROPOSED LEASE ROAD

BASIN SURVEYS P.O. BOX 1786-HOBBS, NEW MEXICO

W.O. Number: 24296 Drawn By: J. SMALL

Date: 03-28-2011 Disk: JMS 24296

BURNETT OIL COMPANY, INC.

REF: JACKSON "A" #39 / WELL PAD TOPO

THE JACKSON "A" #39 LOCATED 210'

FROM THE SOUTH LINE AND 1650' FROM THE EAST LINE OF

SECTION 12, TOWNSHIP 17 SOUTH, RANGE 30 EAST,

N.M.P.M., EDDY COUNTY, NEW MEXICO.

Survey Date: 03-23-2011 Sheet 1 of 1 Sheets



JACKSON "A" #39

Located 210' FSL and 1650' FEL

Section 12, Township 17 South, Range 30 East,
N.M.P.M., Eddy County, New Mexico.

SURFACE EXHIBIT A1

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P.O. Box 1786
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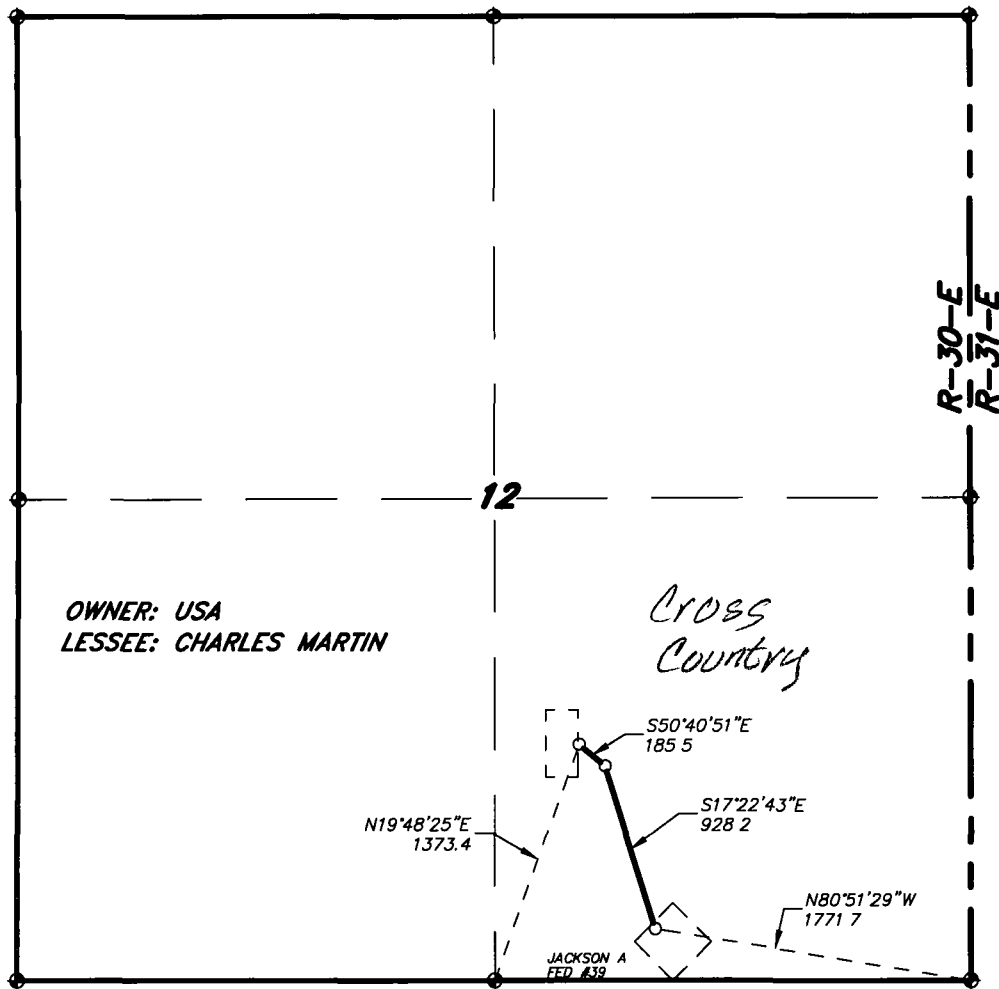
Survey Date: 03-23-2011

Scale: 1" = 2000'

Date: 03-28-2011

BURNETT OIL
COMPANY, INC.

SECTIONS 12, TOWNSHIP 17 SOUTH, RANGE 30 EAST, N.M.P.M.,
EDDY COUNTY, NEW MEXICO.



LEGAL DESCRIPTION

A STRIP OF LAND 30.0 FEET WIDE, LOCATED IN SECTION 12, TOWNSHIP 17 SOUTH, RANGE 30 EAST, N.M.P.M., EDDY COUNTY, NEW MEXICO AND BEING 15.0 FEET LEFT AND RIGHT OF THE ABOVE PLATTED CENTERLINE SURVEY.

SECTION 12 = 1113.7 FEET = 67.50 RODS = 0.21 MILES = 0.77 ACRES

SURFACE EXHIBIT C2

I HEREBY CERTIFY THAT THIS PLAT WAS PREPARED FROM FIELD NOTES OF AN ACTUAL SURVEY AND MEETS OR EXCEEDS ALL REQUIREMENTS FOR LAND SURVEYS AS SPECIFIED BY THIS STATE.

GARY L. JONES
REGISTERED PROFESSIONAL LAND SURVEYOR
TEXAS P.L.S. No 7977 No 5074

1000 0 1000 2000 FEET

BURNETT OIL COMPANY, INC.

REF: PROPOSED FLOWLINE TO THE JACKSON "A" #39

A FLOWLINE CROSSING USA LAND IN
SECTION 12, TOWNSHIP 17 SOUTH, RANGE 30 EAST,
N.M.P.M., EDDY COUNTY, NEW MEXICO.

Basin Surveys P.O. BOX 1786-HOBBS, NEW MEXICO

W.O. Number. 24296 Drawn By. J. M. SMALL

Date. 03-28-2011 Disk: JMS 24296

Survey Date. 03-23-2011 Sheet 1 of 1 Sheets