	UNITED STATE PARTMENT OF THE I JREAU OF LAND MANA	NTERIOR Art	OCD esia	OMB N	APPROVED O. 1004-0137 anuary 31, 2018
	NOTICES AND REPO			NMNM136870	
abandoned wel	s form for proposals to I. Use form 3160-3 (AF	D orill of to re-enter an D) for such proposals.		6. If Indian, Allottee of	or Tribe Name
SUBMIT IN 1	RIPLICATE - Other ins	tructions on page 2		7. If Unit or CA/Agre	ement, Name and/or No.
1. Type of Well Gas Well Oth	er	······································	•	8. Well Name and No. CORRAL CANYO	IN FEDERAL 221H
2. Name of Operator XTO ENERGY INC		KELLY KARDOS - os@xtoenergy.com		9. API Well No. 30-015-45593	· · · ·
3a. Address 6401 HOLIDAY HILL RD BLDO MIDLAND, TX 79707	3 5	3b. Phone No. (include area code Ph: 432-620-4374)	10. Field and Pool or WILLOW LAKE	Exploratory Area BONE SPRING
4: Location of Well (Footage, Sec., T.,	. R., M., or Survey Description	1)		11. County or Parish,	State
Sec 10 T25S R29E Mer NMP I	NWSE 1895FSL 2080FE	EL .		EDDY COUNT	(, NM
12. CHECK THE AP	PROPRIATE BOX(ES)	TO INDICATE NATURE O	F NOTICE	, REPORT, OR OTH	IER DATA
TYPE OF SUBMISSION		TYPEO	F ACTION	·	
Notice of Intent		Deepen		tion (Start/Resume)	□ Water Shut-Off
□ Subsequent Report	Alter Casing Casing Repair	Hydraulic Fracturing	🖸 Reclan		U Well Integrity
☐ Final Abandonment Notice	Casing Repair	New Construction Plug and Abandon		plete rarily Abandon	Other Change to Original
	Convert to Injection	-	U Water		PD
Attach the Bond under which the worl following completion of the involved testing has been completed. Final Abi determined that the site is ready for fir XTO Energy Inc., respectfully r	operations. If the operation re andonment Notices must be final inspection.	sults in a multiple completion or reco led only after all requirements, include	ompletion in a ling reclamation	new interval, a Form 316 on, have been completed a	0.4 mount ha filed amon
APD: 1. Shorten surface casing strin 2. Deepen Intermediate string f	g to 650' to 7400'	RECEIVED	άττα	CHED FOR	
Attachments: Drilling Program Multibowl Diagram/BOP/CK/FF	i J	UL 2 3 2019 CO	NDITI(ONS OF APP	ROVAL
	DISTRIC	TILARTESIAO.C.D.	•		
14. I hereby certify that the foregoing is Name (Printed/Typed) KELLY KA	Electronic Submission # For XTO Committed to AFMSS for	470039 verified by the BLM We ENERGY INC, sent to the Carl or processing by PRISCILLA PE Title REGUL	sbad REZ on 06/2	-	· · · · ·
Signature Electronic St	ubmission)	Date 06/21/2		APPROVED	
LI hCf	THIS SPACE FO	OR FEDERAL OR STATE	OFFICE Ų	SE	
the and T	NILOT		J	UN 28 2019	
Approved By -V V V V	-1 A /+ # -1/-	$\frac{1}{1}$ = $\frac{1}{1}$ Title BI	IDEALLOT	· · · · · · · · · · · · · · · · · · ·	Date
Conditions of approval, if any, are attached	Approval of this notice does table title to those rights in the	r fot warrant or esubject lease Office	ROSWE	LAND MANAGEME	NT
certify that the applicant holds legal or equi which would entitle the applicant to conduc	t operations thereon.				
Conditions of approval, if any, the attached certify that the applicant holds legal or equi which would entitle the applicant to conduc Title 18 U.S.C. Section 1001 and Title 43 L States any false, fictitious or fraudulent st	ISC Section 1212 make it a	crime for any person knowingly and	willfully to m		agency of the United

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Accepted Rul.	10-21-19
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Revisions to Operator-Submitted EC Data for Sundry Notice #470039

	Operator Submitted	BLM Revised (AFMSS)
Sundry Type:	APDCH NOI	APDCH NOI
Lease:	NMNM136870	NMNM136870
Agreement:		
Operator:	XTO ENERGY INC 6401 HOLIDAY HILL RD BLDG 5 MIDLAND, TX 79707 Ph: 432-620-4374	XTO ENERGY INCORPORATED 6401 HOLIDAY HILL ROAD BLDG 5 MIDLAND, TX 79707 Ph: 432.683 2277
Admin Contact:	KELLY KARDOS REGULATORY COORDINATOR E-Mail: kelly_kardos@xtoenergy.com	KELLY KARDOS REGULATORY COORDINATOR E-Mail: kelly_kardos@xtoenergy.com
	Ph: 432-620-4374	Ph: 432-620-4374
Tech Contact:	KELLY KARDOS REGULATORY COORDINATOR E-Mail: kelly_kardos@xtoenergy.com	KELLY KARDOS REGULATORY COORDINATOR E-Mail: kelly_kardos@xtoenergy.com
	Ph: 432-620-4374	Ph: 432-620-4374
Location: State: County:	NM EDDY	NM EDDY
Field/Pool.	WILLOW LAKE BONE SPRING	WILLOW LAKE-BONE SPRING, SE
Well/Facility:	CORRAL CANYON FEDERAL 221H Sec 10 T25S R29E Mer NMP NWSE 1895FSL 2080FEL	CORRAL CANYON FEDERAL 221H Sec 10 T25S R29E NWSE 1895FSL 2080FEL 32.142540 N Lat, 103.970467 W Lon

DRILLING PLAN (SUNDRY): BLM COMPLIANCE (Supplement to BLM 3160-3)

XTO Energy Inc. Corral Canyon Fed 221H Projected TD: 17015' MD / 8862' TVD SHL: 1895' FSL & 2080' FEL , Section 10, T25S, R29E BHL: 50' FNL & 1980' FEL , Section 3, T25S, R29E-Eddy County, NM

1. Geologic Name of Surface Formation A Quaternary

2. Estimated Tops of Geological Markers & Depths of Anticipated Fresh Water, Oil or Gas:

Formation	Well Depth (TVD)	Water/Oil/Gas
Rustler	509'	Water
Top of Salt	880'	Water
Base of Salt	2892'	Water
Delaware	3104'	Water
Bone Spring Lm	6866'	Water/Oil/Gas
1st Bone Spring Ss	7802'	Water/Oil/Gas
2nd Bone Spring Ss	8634'	Water/Oil/Gas
Target/Land Curve	8862'	Water/Oil/Gas

No other formations are expected to yield oil, gas or fresh water in measurable volumes. The surface fresh water sands will be protected by setting 13-3/8 inch casing @ 650' (100' into the Rustler) and circulating cement back to surface. The salt will be isolated by setting 9-5/8 inch casing at 7400'. A DV tool will be set @ 725' (100' below the surface shoe). Cement will be circulated to surface. An 8-3/4 inch curve and 8-1/2 inch lateral hole will be drilled to MD/TD and 5-1/2 inch casing will be set at TD and cemented back at least 500' into the intermediate casing. , per Parker Hewitt

3. Casing Design

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Hole Size	Depth	OD Csg	Weight	Collar	Grade	/ New/Used	SF Burst	SF Collapse	SF Tension
17-1/2"	0' – 650'	13-3/8"	54.5	STC	J-55	New	1.23	3.89	14.51
12-1/4"	0' – 7400'	9-5/8"	40	LTC	HC1=5-50	New	1.66	1.14	1.90
8-3/4" x 8-1/2"	0' - 17015'	5-1/2"	17	BTC	P-110	New	1.12	.1.73	2.74

· XTO requests to utilize centralizers only in the curve after the KOP and only a minimum of one every other joint.

· 9-5/8" Collapse analyzed using 50% evacuation based on regional experience.

5-1/2" tension calculated using vertical hanging weight plus the lateral weight multiplied by a friction factor of 0.35

WELLHEAD:

Permanent Wellhead - GE RSH Multibowl System

A. Starting Head: 13-5/8" 5M top flange x 13-3/8" SOW bottom

B. Tubing Head: 13-5/8" 5M bottom flange x 7-1/16" 10M top flange

· Wellhead will be installed by manufacturer's representatives.

· Manufacturer will monitor welding process to ensure appropriate temperature of seal.

· Manufacturer will witness installation of test plug for initial test.

Operator will test the 9-5/8" casing per BLM Onshore Order 2

4. Cement Program

Surface Casing: 13-3/8", 54.5 New J-55, STC casing to be set at +/- 650'

 Lead: 260 sxs EconoCem-HLTRRC (mixed at 12.9 ppg, 1.87 ft3/sx, 10.13 gal/sx water)

 Tail: 300 sxs Halcem-C + 2% CaCl (mixed at 14.8 ppg, 1.35 ft3/sx, 6.39 gal/sx water)

 Compressives:
 12-hr =
 900 psi
 24 hr = 1500 psi

Intermediate Casing: 9-5/8", 40 New J-55, LTC casing to be set at +/- 7400'

First Stage

Lead: 2040 sxs Halcem-C + 2% CaCl (mixed at 12.9 ppg, 1.88 ft3/sx, 9.61 gal/sx water)

 Tail: 230 sxs Halcem-C + 2% CaCl (mixed at 14.8 ppg, 1.33 ft3/sx, 6.39 gal/sx water)

 Compressives:
 12-hr =
 900 psi
 24 hr = 1500 psi

If losses are severe, a DV tool will be set @ 725' (100' below the surface shoe).

Second Stage

Lead: 230 sxs Halcerr-C + 2% CaCl (mixed at 12.9 ppg, ft3/sx, 9.61 gal/sx water)

 Tail:
 180 sxs Halcem-C + 2% CaCl (mixed at 14.8 ppg, ft3/sx, 6.39 gal/sx water)

 Compressives:
 12-hr =
 900 psi
 24 hr = 1500 psi

Production Casing: 5-1/2", 17 New P-110, BTC casing to be set at +/- 17015'

Lead: 170 sxs.NeoCem (mixed at 10.5 ppg, 2.69 ft3/sx, 12.26 gal/sx water)

 Tail: 1710 sxs VersaCem (mixed at 13.2 ppg, 1.61 ft3/sx, 8.38 gal/sx water)

 Compressives:
 12-hr =
 1375 psi
 24 hr = 2285 psi

5. Pressure Control Equipment

The blow out preventer equipment (BOP) for this well consists of a 13-5/8" minimum 3M Hydril and a 13-5/8" minimum 3M Double Ram BOP. MASP should not exceed 2382 psi.

1.35 4.0

All BOP testing will be done by an independent service company: Annular pressure tests will be limited to 50% of the working pressure. When nippling up on the 13-5/8" 3M bradenhead and flange, the BOP test will be limited to 3000 psi. When nippling up on the 9-5/8", the BOP will be tested to a minimum of 3000 psi. All BOP tests will include a low pressure test as per BLM regulations. The 3M BOP diagrams are attached. Blind rams will be functioned tested each trip, pipe rams will be functioned tested each day.

A variance is requested to allow use of a flex hose as the choke line from the BOP to the Choke Manifold. If this hose is used, a copy of the manufacturer's certification and pressure test chart will be kept on the rig. Attached is an example of a certification and pressure test chart. The manufacturer does not require anchors.

6. Proposed Mud Circulation System

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	INTERVAL	Hole Size	Mud Type	MW (ppg)	Viscosity (sec/qt)	Fluid Loss (cc)
	0' to 650'	17-1/2"	FW/Native	8.4-8.8	35-40	NC
•	650' to 7400'	12-1/4"	Brine/Gel Sweeps	9.8-10.2	30-32	NC .
	7400' to 17015'	8-3/4" x 8-1/2"	FW / Cut Brine / Polymer / OBM	9.1 - 9.4	29-32	NC - 20

The necessary mud products for weight addition and fluid loss control will be on location at all times. Spud with fresh water/native mud. Drill out from under 13-3/8" surface casing with brine solution. A 9.8ppg-10.2ppg brine mud will be used while drilling through the salt formation. Use fibrous materials as needed to control seepage and lost circulation. Pump viscous sweeps as needed for hole cleaning. Pump speed will be recorded on a daily drilling report after mudding up. A Pason or Totco will be used to detect changes in loss or gain of mud volume. A mud test will be performed every 24 hours to determine: density, viscosity, strength, filtration and pH as necessary. Use available solids controls equipment to help keep mud weight down after mud up. Rig up solids control equipment to operate as a closed loop system.

7. Auxiliary Well Control and Monitoring Equipment

- A. A Kelly cock will be in the drill string at all times.
- B. A full opening drill pipe stabbing valve having appropriate connections will be on the rig floor at all times.
- C. H2S monitors will be on location when drilling below the 13-3/8" casing.

8. Logging, Coring and Testing Program

Mud Logger: Mud Logging Unit (2 man) below intermediate casing.

Open hole logging will not be done on this well.

9. Abnormal Pressures and Temperatures / Potential Hazards

None Anticipated. BHT of 140 to 160 F is anticipated. No H2S is expected but monitors will be in place to detect any H2S occurrences. Should these circumstances be encountered the operator and drilling contractor are prepared to take all necessary steps to ensure safety of all personnel and environment. Lost circulation could occur but is not expected to be a serious problem in this area and hole seepage will be compensated for by additions of small amounts of LCM in the drilling fluid. The maximum anticipated bottom hole pressure for this well is 4332 psi.

10. Anticipated Starting Date and Duration of Operations

Road and location construction will begin after Santa Fe and BLM have approved the APD. Anticipated spud date will be as soon after Santa Fe and BLM approval and as soon as a rig will be available. Move in operations and drilling is expected to take 40 days. If production casing is run, an additional 30 days will be needed to complete well and construct surface facilities and/or lay flow lines in order to place well on production.





This drawing is the property of GE Oil & Gas Pressure Control LP and is considered confidential. Unless otherwise approved in writing, neither it nor its contents may be used, copied, transmitted or reproduced except for the sole purpose of GE Oil & Gas Pressure Control LP.	хто	ENERGY	, INC.
13-3/8" x 9-5/8" x 5-1/2" 10M RSH-2 Wellhead	DRAWN	VJK	16FEB17
	APPRV	KN	16FEB17
Assembly, With T-EBS-F Tubing Head	FOR REFERENCE	100	12842



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GATES E & S NORTH AMERICA, INC DU-TEX 134 44TH STREET CORPUS CHRISTI, TEXAS 78405

PHONE: 361-887-9807 FAX: 361-887-0812 EMAIL: crpe&s@gates.com WEB: www.gates.com

GRADE D PRESSURE TEST CERTIFICATE



Gates E & S North America, Inc. certifies that the following hose assembly has been tested to the Gates Oilfield Roughneck Agreement/Specification requirements and passed the 15 minute hydrostatic test per API Spec 7K/Q1, Fifth Edition, June 2010, Test pressure 9.6.7 and per Table 9 to 7,500 psi in accordance with this product number. Hose burst pressure 9.6.7.2 exceeds the minimum of 2.5 times the working pressure per Table 9.

bale : A/A 5/8/2014/1 Date: PRODUCTION.		//	• ·	
Date : A/L 6/8/2014 PRODUCTION Signature :	· . ·		· · · · · · · · · · · · · · · · · · ·	
	Date :		Date :	**************************************

Porai PTC - 01 Rev.0 2





PECOS DISTRICT DRILLING CONDITIONS OF APPROVAL

OPERATOR'S NAME:	XTO Permian Operating, LLC
	NMNM-136870
	Corral Canyon Federal 221H
SURFACE HOLE FOOTAGE:	
BOTTOM HOLE FOOTAGE	0050' FNL & 1980' FEL Sec. 03, T. 25 S., R 29 E.
LOCATION:	Section 10, T. 25 S., R 29 E., NMPM
COUNTY:	Eddy County, New Mexico

A. DRILLING OPERATIONS REQUIREMENTS

The BLM is to be notified in advance for a representative to witness:

- a. Spudding well (minimum of 24 hours)
- b. Setting and/or Cementing of all casing strings (minimum of 4 hours)
- c. BOPE tests (minimum of 4 hours)

Eddy County

Call the Carlsbad Field Office, 620 East Greene St., Carlsbad, NM 88220, (575) 361-2822

- 1. Hydrogen Sulfide (H2S) monitors shall be installed prior to drilling out the surface shoe. If H2S is detected in concentrations greater than 100 ppm, the Hydrogen Sulfide area shall meet Onshore Order 6 requirements, which includes equipment and personnel/public protection items. If Hydrogen Sulfide is encountered, provide measured values and formations to the BLM.
- Unless the production casing has been run and cemented or the well has been properly plugged, the drilling rig shall not be removed from over the hole without prior approval. If the drilling rig is removed without approval an Incident of Non-Compliance will be written and will be a "Major" violation.
- 3. Floor controls are required for 3M or Greater systems. These controls will be on the rig floor, unobstructed, readily accessible to the driller and will be operational at all times during drilling and/or completion activities. Rig floor is defined as the area immediately around the rotary table; the area immediately above the substructure on which the draw works is located, this does not include the dog house or stairway area.
- 4. The record of the drilling rate along with the GR/N well log run from TD to surface (horizontal well vertical portion of hole) shall be submitted to the BLM office as well as all other logs run on the borehole 30 days from completion. If available, a digital copy of the logs is to be submitted in addition to the paper copies. The Rustler top and top and bottom of Salt are to be recorded on the Completion Report.

B. CASING

Changes to the approved APD casing program need prior approval if the items substituted are of lesser grade or different casing size or are Non-API. The Operator can exchange the components of the proposal with that of superior strength (i.e. changing from J-55 to N-80, or from 36# to 40#). Changes to the approved cement program need prior approval if the altered cement plan has less volume or strength or if the changes are substantial (i.e. Multistage tool, ECP, etc.). The initial wellhead installed on the well will remain on the well with spools used as needed.

Centralizers required on surface casing per Onshore Order 2.III.B.1.f.

Wait on cement (WOC) for Water Basin:

After cementing but before commencing any tests, the casing string shall stand cemented under pressure until both of the following conditions have been met: 1) cement reaches a minimum compressive strength of 500 psi at the shoe, 2) until cement has been in place at least <u>8 hours</u>. WOC time will be recorded in the driller's log. See individual casing strings for details regarding lead cement slurry requirements.

Provide compressive strengths including hours to reach required 500 pounds compressive strength prior to cementing each casing string. Have well specific cement details onsite prior to pumping the cement for each casing string.

No pea gravel permitted for remedial or fall back remedial without prior authorization from the BLM engineer.

Medium Cave/Karst

Possibility of water flows in the Salado and Castile. Possibility of lost circulation in the Red Beds, Rustler, and Delaware. Abnormal pressure may be encountered in the 3rd Bone Spring and all subsequent formations.

- 1. The 13-3/8 inch surface casing shall be set at approximately 650 feet (a minimum of 25 feet into the Rustler Anhydrite and above the salt) and cemented to the surface. If salt is encountered, set casing at least 25 feet above the salt.
 - a. If cement does not circulate to the surface, the appropriate BLM office shall be notified and a temperature survey utilizing an electronic type temperature survey with surface log readout will be used or a cement bond log shall be run to verify the top of the cement. Temperature survey will be run a minimum of six hours after pumping cement and ideally between 8-10 hours after completing the cement job.

- b. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry.
- c. Wait on cement (WOC) time for a remedial job will be a minimum of 4 hours after bringing cement to surface or 500 pounds compressive strength, whichever is greater.
- d. If cement falls back, remedial cementing will be done prior to drilling out that string.

Intermediate casing shall be kept fluid filled while running into hole to meet BLM minimum collapse requirements.

2. The minimum required fill of cement behind the 9-5/8 inch intermediate casing is:

Operator has proposed DV tool at depth of 725', but will adjust cement proportionately if moved. DV tool shall be set a minimum of 50' below previous shoe and a minimum of 200' above current shoe. Operator shall submit sundry if DV tool depth cannot be set in this range. If an ECP is used, it is to be set a minimum of 50' below the shoe to provide cement across the shoe. If it cannot be set below the shoe, a CBL shall be run to verify cement coverage.

a. First stage to DV tool:

Cement to circulate. If cement does not circulate, contact the appropriate BLM office before proceeding with second stage cement job. Operator should have plans as to how they will achieve circulation on the next stage.

b. Second stage above DV tool:

Cement to surface. If cement does not circulate, contact the appropriate BLM office. Wait on cement (WOC) time for a primary cement job is to include the lead cement slurry due to cave/karst.

If cement does not circulate to surface on the intermediate casing, the cement on the production casing must come to surface.

Centralizers required on horizontal leg, must be type for horizontal service and a minimum of one every other joint.

3. The minimum required fill of cement behind the 5-1/2 inch production casing is:

Cement should tie-back at least 200 feet into previous casing string. Operator shall provide method of verification.

4. If hardband drill pipe is rotated inside casing, returns will be monitored for metal. If metal is found in samples, drill pipe will be pulled and rubber protectors which have a larger diameter than the tool joints of the drill pipe will be installed prior to continuing drilling operations.

C. PRESSURE CONTROL

- 1. All blowout preventer (BOP) and related equipment (BOPE) shall comply with well control requirements as described in Onshore Oil and Gas Order No. 2 and API 53.
- 2. Variance approved to use flex line from BOP to choke manifold. Check condition of flexible line from BOP to choke manifold, replace if exterior is damaged or if line fails test. Line to be as straight as possible with no hard bends and is to be anchored according to Manufacturer's requirements. The flexible hose can be exchanged with a hose of equal size and equal or greater pressure rating. Anchor requirements, specification sheet and hydrostatic pressure test certification matching the hose in service, to be onsite for review. These documents shall be posted in the company man's trailer and on the rig floor. If the BLM inspector questions the straightness of the hose, a BLM engineer will be contacted and will review in the field or via picture supplied by inspector to determine if changes are required (operator shall expect delays if this occurs).
- 3. Operator has proposed a multi-bowl wellhead assembly. This assembly will only be tested when installed on the surface casing. Minimum working pressure of the blowout preventer (BOP) and related equipment (BOPE) required for drilling below the surface casing shoe shall be 3000 (3M) psi.
 - a. Wellhead shall be installed by manufacturer's representatives, submit documentation with subsequent sundry.
 - b. If the welding is performed by a third party, the manufacturer's representative shall monitor the temperature to verify that it does not exceed the maximum temperature of the seal.
 - c. Manufacturer representative shall install the test plug for the initial BOP test.
 - d. Operator shall perform the intermediate casing integrity test to 70% of the casing burst. This will test the multi-bowl seals.
 - e. If the cement does not circulate and one inch operations would have been possible with a standard wellhead, the well head shall be cut off, cementing operations performed and another wellhead installed.

4. The appropriate BLM office shall be notified a minimum of 4 hours in advance for a representative to witness the tests.

- a. In a water basin, for all casing strings utilizing slips, these are to be set as soon as the crew and rig are ready and any fallback cement remediation has been done. The casing cut-off and BOP installation can be initiated four hours after installing the slips, which will be approximately six hours after bumping the plug. For those casing strings not using slips, the minimum wait time before cut-off is eight hours after bumping the plug. BOP/BOPE testing can begin after cut-off or once cement reaches 500 psi compressive strength (including lead when specified), whichever is greater. However, if the float does not hold, cut-off cannot be initiated until cement reaches 500 psi compressive strength (including lead when specified).
- b. The tests shall be done by an independent service company utilizing a test plug **not a cup or J-packer**.
- c. The test shall be run on a 5000 psi chart for a 2-3M BOP/BOP, on a 10000 psi chart for a 5M BOP/BOPE and on a 15000 psi chart for a 10M BOP/BOPE. If a linear chart is used, it shall be a one hour chart. A circular chart shall have a maximum 2 hour clock. If a twelve hour or twenty-four hour chart is used, tester shall make a notation that it is run with a two hour clock.
- d. The results of the test shall be reported to the appropriate BLM office.
- e. All tests are required to be recorded on a calibrated test chart. A copy of the BOP/BOPE test chart and a copy of independent service company test will be submitted to the appropriate BLM office.
- f. The BOP/BOPE test shall include a low pressure test from 250 to 300 psi. The test will be held for a minimum of 10 minutes if test is done with a test plug and 30 minutes without a test plug. This test shall be performed prior to the test at full stack pressure.

D. DRILL STEM TEST

If drill stem tests are performed, Onshore Order 2.III.D shall be followed.

E. WASTE MATERIAL AND FLUIDS

All waste (i.e. drilling fluids, trash, salts, chemicals, sewage, gray water, etc.) created as a result of drilling operations and completion 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.

JAM 062719