1625 N French Dr , Hobbs, NM 88240 District II

1301 W Grand Avenue, 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, NM 87505

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office. For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

# Pit, Closed-Loop System, Below-Grade Tank, or

Proposed Alternative Method Permit or Closure Plan Application
Type of action:  Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method  Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method  Modification to an existing permit  Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method
Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, below-grade tank or alternative request Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the invironment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances
1. Operator: COLEMAN OIL & GAS, INC. OGRID #: 4838
Address: DRAWER 3337, FARMINGTON, NM 87499
Facility or well name: JUNIPER COM 21 #14
API Number: 30-045-33043 OCD Permit Number:
U/L or Qtr/Qtr SWSW Section 21 Township 24 N Range 10 W County: SAN JUAN
Center of Proposed Design: Latitude 36.2946218° N Longitude 107.9064823° W NAD: ☐1927 ☑ 1983
Surface Owner:   Federal  State  Private  Tribal Trust or Indian Allotment
2
✓ Pit: Subsection F or G of 19.15.17.11 NMAC
Temporary: ☑ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☑ Lined ☐ Unlined Liner type: Thickness 20 mil ☑ LLDPE ☐ HDPE ☐ PVC ☐ Other
⊠ String-Reinforced
Liner Seams: Welded Factory Other Volume: 4,511 bbl Dimensions: L 80' x W 50' x D 8'
Closed-loop System: Subsection H of 19.15.17.11 NMAC
Type of Operation: P&A Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Hauf-off Bins ☐ Other
☐ Lined ☐ Unlined Liner type: Thicknessmil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other
Liner Seams:  Welded Factory Other
4.
Below-grade tank: Subsection I of 19.15 17.11 NMAC
Volume:bbl Type of fluid:
Tank Construction material:
Secondary containment with leak detection   Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _
Liner type: Thickness mıl
5.
Alternative Method:

6. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)						
Chain link, six feet in height, two strands of barbed wire at top (Required of located within 1000 feet of a permanent residence, school, hospital, institution or church)						
Four foot height, four strands of barbed wire evenly spaced between one and four feet						
☐ Alternate. Please specify						
7.	-1187					
Netting: Subsection E of 19.15.17.11 NMAC (Applies to permanent pits and permanent open top tanks)						
Screen Notting Other						
Monthly inspections (If netting or screening is not physically feasible)						
8. Signs: Subsection C of 19.15.17 11 NMAC						
☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers						
Signed in compliance with 19.15.3.103 NMAC						
9. Administrative Approvals and Exceptions:						
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance  Please check a box if one or more of the following is requested, if not leave blank:						
Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau	office for					
consideration of approval. See italicized requests for alternate slopes on Page 3 of attachment  Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.						
10.						
Siting Criteria (regarding permitting): 19.15.17.10 NMAC	ntable source					
Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of accep material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appro						
office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of a Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to dry						
above-grade tanks associated with a closed-loop system.	T					
Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.  - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ⊠ No					
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa	☐ Yes ⊠ No					
lake (measured from the ordinary high-water mark).  - Topographic map; Visual inspection (certification) of the proposed site						
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	☐ Yes ⊠ No					
<ul> <li>(Applies to temporary, emergency, or cavitation pits and below-grade tanks)</li> <li>Visual inspection (certification) of the proposed site; Aerial photo; Satellite image</li> </ul>	∐ NA					
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.	⊠ Yes □ No					
(Applies to permanent pits)  - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	∐ NA					
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock	☐ Yes ☑ No					
watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.  - NM Office of the State Engineer - iWATERS database search, Visual inspection (certification) of the proposed site						
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	☐ Yes ☑ No					
adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approval obtained from the municipality						
Within 500 feet of a wetland.	D v M No					
- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	Yes No					
Within the area overlying a subsurface mine Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ⊠ No					
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geology &amp; Mineral Resources; USGS; NM Geological Society; Topographic map</li> </ul>	☐ Yes ☒ No					
Within a 100-year floodplain FEMA map	☐ Yes ☑ No					

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.  Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC  Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC  Previously Approved Design (attach copy of design) API Number:  or Permit Number:
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.  Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9  Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC  Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Previously Approved Design (attach copy of design) API Number:
Previously Approved Operating and Maintenance Plan API Number:(Applies only to closed-loop system that use
above ground steel tanks or haul-off bins and propose to implement waste removal for closure)
Permanent Pits Permit Application Checklist:  Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.  Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  Climatological Factors Assessment  Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  Quality Control/Quality Assurance Construction and Installation Plan  Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  Nuisance or Hazardous Odors, including H <sub>2</sub> S, Prevention Plan  Emergency Response Plan  Oil Field Waste Stream Characterization  Monitoring and Inspection Plan  Erosion Control Plan  Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
Proposed Closure: 19.15.17.13 NMAC Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.
Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Closed-loop System Alternative  Proposed Closure Method: Waste Excavation and Removal Waste Removal (Closed-loop systems only) On-site Closure Method (Only for temporary pits and closed-loop systems) In-place Burial On-site Trench Burial Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)
Maste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.    Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC   Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17 13 NMAC   Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)   Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC   Re-vegetation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Instructions: Please indentify the facility or facilities for the disposal of liquids facilities are required.							
Disposal Facility Name:	Disposal Facility Permit Number:						
Disposal Facility Name:							
Will any of the proposed closed-loop system operations and associated activities o  ☐ Yes (If yes, please provide the information below) ☐ No	occur on or in areas that will not be used for future serv	vice and operations?					
Required for impacted areas which will not be used for future service and operate  Soil Backfill and Cover Design Specifications based upon the appropriat  Re-vegetation Plan - based upon the appropriate requirements of Subsectio  Site Reclamation Plan - based upon the appropriate requirements of Subsection	te requirements of Subsection H of 19.15.17.13 NMAC n I of 19.15.17.13 NMAC	C .					
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC Instructions: Each siting criteria requires a demonstration of compliance in th provided below. Requests regarding changes to certain siting criteria may required an exception which must be submitted to the Santa Fe Environment demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC	ire administrative approval from the appropriate distr al Bureau office for consideration of approval.  Justi	rict office or may be					
Ground water is less than 50 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search, USGS; Database search, USG	ata obtained from nearby wells	☐ Yes ☑ No ☐ NA					
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Da	ata obtained from nearby wells	☐ Yes ⊠ No ☐ NA					
Ground water is more than 100 feet below the bottom of the buried waste.  - NM Office of the State Engineer - iWATERS database search; USGS; Database search; US	ata obtained from nearby wells	⊠ Yes □ No □ NA					
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other stake (measured from the ordinary high-water mark).  - Topographic map, Visual inspection (certification) of the proposed site	ignificant watercourse or lakebed, sinkhole, or playa	☐ Yes ⊠ No					
Within 300 feet from a permanent residence, school, hospital, institution, or churce - Visual inspection (certification) of the proposed site; Aerial photo; Satelli		☐ Yes ⊠ No					
Within 500 horizontal feet of a private, domestic fresh water well or spring that le watering purposes, or within 1000 horizontal feet of any other fresh water well or - NM Office of the State Engineer - iWATERS database; Visual inspection	spring, in existence at the time of initial application.	☐ Yes ⊠ No					
Within incorporated municipal boundaries or within a defined municipal fresh wa adopted pursuant to NMSA 1978, Section 3-27-3, as amended.  - Written confirmation or verification from the municipality; Written approximately	-	☐ Yes 🏻 No					
Within 500 feet of a wetland US Fish and Wildlife Wetland Identification map; Topographic map, Vis	ual inspection (certification) of the proposed site	☐ Yes ⊠ No					
Within the area overlying a subsurface mine.  - Written confirmation or verification or map from the NM EMNRD-Minim	ng and Mineral Division	☐ Yes ⊠ No					
<ul> <li>Within an unstable area.</li> <li>Engineering measures incorporated into the design; NM Bureau of Geolo Society; Topographic map</li> </ul>	gy & Mineral Resources; USGS; NM Geological	☐ Yes ⊠ No					
Within a 100-year floodplain FEMA map		☐ Yes ⊠ No					
18. On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the Contraction of the Contract	the following items must be attached to the closure of	an Plansa indicate					
by a check mark in the box, that the documents are attached.  Siting Criteria Compliance Demonstrations - based upon the appropriate requirements  Proof of Surface Owner Notice - based upon the appropriate requirements  Construction/Design Plan of Burial Trench (if applicable) based upon the  Construction/Design Plan of Temporary Pit (for in-place burial of a drying  Protocols and Procedures - based upon the appropriate requirements of 19.  Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of  Waste Material Sampling Plan - based upon the appropriate requirements of  Disposal Facility Name and Permit Number (for liquids, drilling fluids and  Soil Cover Design - based upon the appropriate requirements of Subsection  Re-vegetation Plan - based upon the appropriate requirements of Subsection  Site Reclamation Plan - based upon the appropriate requirements of Subsection	equirements of 19.15.17.10 NMAC of Subsection F of 19.15.17.13 NMAC See 10. on APL appropriate requirements of 19.15.17.11 NMAC pad) - based upon the appropriate requirements of 19.15.17.13 NMAC equirements of Subsection F of 19.15.17.13 NMAC of Subsection F of 19.15.17.13 NMAC drill cuttings or in case on-site closure standards cannot of 19.15.17.13 NMAC in 1 of 19.15.17.13 NMAC	O Page 7 (Exhibit L) 15.17.11 NMAC					

Operator Application Certification:	
I hereby certify that the information submitted with this application is true, accurate and co	omplete to the best of my knowledge and belief.
Name (Print): BRIAN WOOD Title: CONSULTANT	•
Signature:	Date: 9-30-08
e-mail address: <u>brian@permitswest.com</u> Telephone: <u>(505) 466-8120</u>	
OCD Approval: Permit Application (including closure plan) Closure Plan (only)	OCD Conditions (see attachment)
OCD Representative Signature: Bel Dell	Approval Date: 10-6-08
Title: Ewiro/spec OCD P	Permit Number:
Closure Report (required within 60 days of closure completion): Subsection K of 19. Instructions: Operators are required to obtain an approved closure plan prior to implem The closure report is required to be submitted to the division within 60 days of the complete section of the form until an approved closure plan has been obtained and the closure action.	nenting any closure activities and submitting the closure report. Letion of the closure activities. Please do not complete this
	losure Completion Date:
22.  Closure Method:  Waste Excavation and Removal On-Site Closure Method Alternative Clos  If different from approved plan, please explain.	sure Method   Waste Removal (Closed-loop systems only)
23.  Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Ut Instructions: Please indentify the facility or facilities for where the liquids, drilling fluid	
two facilities were utilized.	
-	al Facility Permit Number:
	al Facility Permit Number:
Were the closed-loop system operations and associated activities performed on or in areas  Yes (If yes, please demonstrate compliance to the items below) No	that will not be used for future service and operations?
Required for impacted areas which will not be used for future service and operations:  Site Reclamation (Photo Documentation)	·
Soil Backfilling and Cover Installation	t .
Re-vegetation Application Rates and Seeding Technique	
Closure Report Attachment Checklist: Instructions: Each of the following items must mark in the box, that the documents are attached.	t be attached to the closure report. Please indicate, by a check
☐ Proof of Closure Notice (surface owner and division)	
☐ Proof of Deed Notice (required for on-site closure) ☐ Plot Plan (for on-site closures and temporary pits)	
Confirmation Sampling Analytical Results (if applicable)	
☐ Waste Material Sampling Analytical Results (required for on-site closure)	
Disposal Facility Name and Permit Number	
☐ Soil Backfilling and Cover Installation ☐ Re-vegetation Application Rates and Seeding Technique	
☐ Site Reclamation (Photo Documentation)	·
On-site Closure Location: Latitude Longitude	NAD: □1927 □ 1983
25. Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure report is to belief. I also certify that the closure complies with all applicable closure requirements and	
Name (Print): Tit	le:
Signature:	Date:
e-mail address:	elephone:

### Siting Criteria

1. Ground water is more than 700' below the bottom of the pit. This estimate is based on the closest water well (Exhibit A) which is  $\approx 1$  mile southwest in SWNENW 29-24n-10w (Exhibit B). Pit will be in the Nacimiento Formation.

6,724' graded ground - 8' deep pit 6,716' bottom of pit

≈6,590' water well ground elevation

- 595' depth to water

≈5.995' water level elevation

6,716' bottom of pit
<u>- 5,995' water level</u>
≈721' depth to water

- 2. Pit is not within 300' of a continuously flowing watercourse. Pit is not within 200' of any other significant watercourse as defined by OCD. Closest first order tributary of Coal Creek is many miles downstream (Exhibit C).
- 3. There are no buildings within 300'. Closest building is a metal storage building  $\approx$ 375' NNE of the pit. (Exhibit D).
- 4. Pit is not within 1,000' any fresh water well or spring (Exhibits A & C).
- 5. Pit is not within municipal boundaries or within a municipal fresh water well field (Exhibits A & C).
- 6. Pit is not within 500' of a wetland (Exhibit E).
- 7. Pit does not overly a mine (Exhibit F).
- 8. Pit is not in an unstable area. No evidence of earth movement was found during a September 29, 2008 inspection. Maximum grade is  $\approx$ 3%. Almost all of pit will be in cut. (Exhibits G)



- 9. Pit is not within a 100 year flood plain (Exhibit H).
- 10. C-102 is attached as Exhibit I.
- 11. Closure notice (e-mail to Howard Draper of the Navajo Land Department Project Review Office) to surface owner (Navajo Tribe) is attached as Exhibit J.

### <u>Hydrogeology</u>

Surface formation is the Nacimiento. According to Stone et al in <u>Hydrogeology and water resources of San Juan Basin, New Mexico</u>, the Nacimiento is mainly a mudstone. There are also medium to coarse grained sandstone layers in the Nacimiento. Transmissivities of 100 feet<sup>2</sup> per day can be found in the coarser continuous sandstones. Water in the more extensive sandstones has a specific conductance of 1,500  $\mu$ mhos. Specific conductance is >2,000  $\mu$ mhos in the finer grained sandstones.

The Nacimiento is above the Ojo Alamo sandstone. The Ojo Alamo top was found to be at 6,271' in the nearby Juniper Com 21 #44 well. That well is at 1100 FSL & 1200 FEL in this same Section 21. If the top of the Ojo Alamo is at the same elevation in the 21 #14, then it would be 455' below the bottom of the pit (6,716' - 6,271' = 445'). Based on the 21 #44 completion report, the Section 29 water well appear to produce from the Ojo Alamo.

# Alternative for 19.15.17.11 F. (2)

Coleman is proposing alternate (vertical) slopes for the 80' long sides of the pit. Alternate is requested to minimize well site footprint. This allows a smaller rig to be used. Rig must be close to the deep part of the pit since the pump is on the rig itself. Coleman will install extra liner to allow for some slack and avoid stress and strain. Coleman will also install two rope ladders - one on each of the long sides.



1100' FSL & 1165' FWL Sec. 21, T. 24 N., R. 10 W. San Juan County, New Mexico

API # 30-045-33043

## Alternative for 19.15.17.13 F. (1) (d)

If the well goes into production, then an alternate interim marking system will be used to allow for safer and more efficient operations. A minimum 4" O. D. steel pipe will be set at least 36" deep at the center of the pit. A threaded collar will be on the top of the pipe. A minimum 12" x 12" steel plate will welded atop the threaded collar. Top of the plate will be flush with ground level. The standard location information listed will be welded onto the plate, plus a notation that it marks an on site buried temporary pit. Upon plugging the well, the plate will be removed and the pit marked as described in 19.15.17.13 F. (1) (d).

Executed this 30th day of September, 2008.

Brian Wood, Consultant

Permits West, Inc.

37 Verano Loop, Santa Fe, NM 87508

(505) 466-8120

FAX: (505) 466-9682

Cellular: (505) 699-2276

Coleman's field representative will be:

Mike Hanson Coleman Oil & Gas, Inc. Drawer 3337 Farmington, NM 87499 (505) 327-0356

## NMOCD\_Rules

#### 19.15.17.11 DESIGN AND CONSTRUCTION SPECIFICATIONS:

A. General specifications. An operator shall design and construct a pit, <del>closed-loop-system, below-grade tank or sump</del> to contain liquids and solids and prevent contamination of fresh



water and protect public health and the environment.

- B. Stockpiling of topsoil. Prior to constructing a pit or closed-looped system, except a pit constructed in an emergency, the operator shall strip and stockpile the topsoil for use as the final cover or fill at the time of closure.
- C. Signs. The operator shall post an upright sign not less than 12 inches by 24 inches with lettering not less than two inches in height in a conspicuous place on the fence surrounding the pit, closed-loop system or below-grade tank, unless the pit, closed-loop system or below-grade tank is located on a site where there is an existing well, signed in compliance with 19.15.3.103 NMAC, that is operated by the same operator. The operator shall post the sign in a manner and location such that a person can easily read the legend. The sign shall provide the following information: the operator's name; the location of the site by quarter-quarter or unit letter, section, township and range; and emergency telephone numbers.

#### D. Fencing.

- (1) The operator shall fence or enclose a pit or below-grade tank in a manner that prevents unauthorized access and shall maintain the fences in good repair. Fences are not required if there is an adequate surrounding perimeter fence that prevents unauthorized access to the well site or facility, including the pit or below-grade tank. During drilling or work over operations, the operator is not required to fence the edge of the pit adjacent to the drilling or work over rig.
- (2) The operator shall fence or enclose a pit or below-grade tank located within 1000 feet of a permanent residence, school, hospital, institution or church with a chain link security fence, at least six feet in height with at least two strands of barbed wire at the top. The operator shall ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site. During drilling or work over operations, the operator is not required to fence the edge of the temporary pit adjacent to the drilling or work over rig.
- (3) The operator shall fence any other pit or below grade tank to exclude livestock with a four foot fence that has at least four strands of barbed wire evenly spaced in the interval between one foot and four feet above ground level. The appropriate division district office may approve an alternative to this requirement if the operator demonstrates that an alternative provides equivalent or better protection. The appropriate division district office may impose additional fencing requirements for protection of wildlife in particular areas.
- E. Netting. The operator shall ensure that a permanent pit or a permanent open top tank is screened, netted or otherwise rendered non-hazardous to wildlife, including migratory birds. Where netting or screening is not-feasible, the operator shall on a monthly basis inspect for, and within 30 days



of discovery, report discovery of dead migratory birds or other wildlife to the appropriate wildlife agency and to the appropriate division district office in-order to facilitate assessment and implementation of measures to prevent incidents from reoccurring.

- F. Temporary pits. The operator shall design and construct a temporary pit in accordance with the following requirements.
- (1) The operator shall design and construct a temporary pit to ensure the confinement of liquids to prevent unauthorized releases.
- slopes consisting of a firm, unyielding base, smooth and free of rocks, debris, sharp edges or irregularities to prevent the liner's rupture or tear. The operator shall construct a temporary-pit so that the slopes are no steeper than two horizontal feet to one vertical foot (2H:1V). The short (50') side slopes will be no steeper than two horizontal feet to one vertical foot (2H:1V). The long (80') side slopes will be vertical. The appropriate division district office may approve an alternative to the slope requirement if the operator demonstrates that it can construct and operate the temporary pit in a safe manner to prevent contamination of fresh water and protect public health and the environment.
- (3) The operator shall design and construct a temporary pit with a geomembrane liner. The geomembrane liner shall consist of 20-mil string reinforced LLDPE or equivalent liner material that the appropriate division district office approves. The geomembrane liner shall be composed of an impervious, synthetic material that is resistant to petroleum hydrocarbons, salts and acidic and alkaline solutions. The liner material shall be resistant to ultraviolet light. Liner compatibility shall comply with EPA SW-846 method 9090A.
- (4) The operator shall minimize liner seams and orient them up and down, not across a slope. The operator shall use factory welded seams where possible. Prior to field seaming, the operator shall overlap liners four to six inches and orient seams parallel to the line of maximum slope, *i.e.*, oriented along, not across, the slope. The operator shall minimize the number of field seams in corners and irregularly shaped areas. Qualified personnel shall perform field seaming. The operator shall weld field liner seams.
  - (5) Construction shall avoid excessive stress-strain on the liner.
- (6) Geotextile is required under the liner where needed to reduce localized stress-strain or protuberances that may otherwise compromise the liner's integrity.



- (7) The operator shall anchor the edges of all liners in the bottom of a compacted earth-filled trench. The anchor trench shall be at least 18 inches deep.
- (8) The operator shall ensure that the liner is protected from any fluid force or mechanical damage at any point of discharge into or suction from the lined temporary pit by using an  $\approx 8$ " O. D. PVC pipe at a  $\approx 45$ ° angle.
- (9) The operator shall design and construct a temporary pit to prevent run-on of surface water. A berm, ditch, proper sloping or other diversion shall surround a temporary pit to prevent run-on of surface water. During drilling operations, the edge of the temporary pit adjacent to the drilling or work over rig is not required to have run-on protection if the operator is using the temporary pit to collect liquids escaping from the drilling or work over rig and run-on will not result in a breach of the temporary pit.
- (10) The volume of a temporary pit shall not exceed 10 acre-feet, including freeboard.
- (11) The part of a temporary pit used to vent or flare gas during a drilling or work over operation that is designed to allow liquids to drain to a separate temporary pit does not require a liner, unless the appropriate division district office requires an alternative design in order to protect surface water, ground water and the environment. The operator shall not allow freestanding liquids to remain on the unlined portion of a temporary pit used to vent or flare gas.

#### 19.15.17.12 OPERATIONAL REQUIREMENTS:

- **A.** General specifications. An operator shall maintain and operate a pit, closed-loop system, below-grade tank or sump in accordance with the following requirements.
- (1) The operator shall operate and maintain a pit, closed-loop system, below-grade tank or sump to contain liquids and solids and maintain the integrity of the liner, liner system or secondary containment system, prevent contamination of fresh water and protect public health and the environment.
- (2) The operator shall recycle, reuse or reclaim or dispose of all drilling fluids in a manner, approved by division rules, that prevents the contamination of fresh water and protects public health and the environment. *Operator will haul such fluids to Basin Disposal's (OCD permit NM-01-005) evaporation pond in SENW 3-29n-11w*.



- (3) The operator shall not discharge into or store any hazardous waste in a pit, closed-loop system, below-grade tank or sump.
- (4) If any pit liner's integrity is compromised, or if any penetration of the liner occurs above the liquid's surface, then the operator shall notify the appropriate division district office within 48 hours of the discovery and repair the damage or replace the liner.
- (5) If a pit, below-grade tank, closed-loop system or sump develops a leak, or if any penetration of the pit liner, below-grade tank, closed-loop system or sump occurs below the liquid's surface, then the operator shall remove all liquid above the damage or leak line within 48 hours, notify the appropriate division district office within 48 hours of the discovery and repair the damage or replace the pit liner, below-grade tank, closed-loop system or sump.
- (6) The injection or withdrawal of liquids from a pit shall be accomplished through a header, diverter or other hardware that prevents damage to the liner by erosion, fluid jets or impact from installation and removal of hoses or pipes.
- (7) The operator shall operate and install a pit, below-grade tank or sump to prevent the collection of surface water run-on.
- (8) The operator shall install, or maintain on site, an oil absorbent boom or other device to contain and remove oil from a pit's surface.
- **B.** Temporary pits. An operator shall maintain and operate a temporary pit in accordance with the following additional requirements.
- (1) Only fluids used or generated during the drilling or work over process may be discharged into a temporary pit. The operator shall maintain a temporary pit free of miscellaneous solid waste or debris. The operator shall use a tank made of steel or other material, which the appropriate division district office approves, to contain hydrocarbon-based drilling fluids. Immediately after cessation of a drilling or work over operation, the operator shall remove any visible or measurable layer of oil from the surface of a drilling or work over pit.
  - (2) The operator shall maintain at least 2 feet of freeboard for a temporary pit.
- (3) The operator shall inspect a temporary pit containing drilling fluids at least daily while the drilling or work over rig is on-site. Thereafter, the operator shall inspect the temporary pit weekly so long as liquids remain in the temporary pit. The operator shall maintain a log of such inspections and make the log available for the appropriate division district office's



review upon request. The operator shall file a copy of the log with the appropriate division district office when the operator closes the temporary pit.

- (4) The operator shall remove all free liquids from a temporary pit within 30 days from the date that the operator releases the drilling or work over rig. The operator shall note the date of the drilling or work over rig's release on form C-105 or C-103 upon well or work over completion. The appropriate division district office may grant an extension of up to three months.
- (5) The operator shall remove any liquids from the temporary pit used for cavitation within 48 hours after completing cavitation. The operator may request and receive additional time to remove the liquids from the temporary pit used for cavitation if the operator demonstrates to the appropriate division district office's satisfaction that it is not feasible to access the location with 48 hours.

#### 19.15.17.13 CLOSURE REQUIREMENTS:

- A. Time requirements for closure. An operator shall close a pit, closed-loop system or below-grade tank within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.
- (1) An operator shall cease discharging into an existing unlined permanent pit that ispermitted by or registered with the division within two years after June 16, 2008. An operator shall close an existing unlined permanent pit that is permitted by or registered with the division within three-years after June 16, 2008.
- (2) An operator shall cease discharging into an existing, lined or unlined, permanent pit-that is not permitted by or registered with the division on or by June 16, 2008. An operator shall close an existing, lined or unlined, permanent pit that is not-permitted by or registered with the division within six months after June 16, 2008.
- (3) An operator shall close an existing unlined temporary pit within three months after-June 16, 2008.
- (4) An operator shall close an existing below-grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC.
- (5) An operator shall close any other permitted permanent pit within 60 days of cessation of operation of the permanent pit in accordance with a closure plan that the environmental bureau in the division's Santa Fe office approves.



- (6) An operator shall close any other permitted temporary pit within six months from the date that the operator releases the drilling or work over rig. The appropriate division district office may grant an extension not to exceed three months.
- B. Closure methods for temporary pits. The operator of a temporary pit shall remove all liquids from the temporary pit prior to closure and dispose of the liquids in a division-approved facility or recycle, reuse or reclaim the liquids in a manner that the appropriate division district office approves. The operator shall close the temporary pit by one of the following methods.

#### (1) Waste excavation and removal.

- (2) On-site burial. The operator shall demonstrate and comply with the siting requirements in Subsection C of 19.15.17.10 NMAC and the closure requirements and standards of Subsection F of 19.15.17.13 NMAC if the proposed closure method of a temporary pit involves on-site burial.
- F. On-site closure methods. The following closure requirements and standards apply if the operator proposes a closure method for a drying pad associated with a closed-loop system or a temporary pit pursuant to Paragraph (2) of Subsection D of 19.15.17.13 NMAC or Paragraph (2) of Subsection B of 19.15.17.13 NMAC that involves on-site burial, or an alternative closure method pursuant to Paragraph (3) of Subsection D of 19.15.17.13 NMAC or Paragraph (3) of Subsection B of 19.15.17.13 NMAC and Subsection B of 19.15.17.15 NMAC.
  - (1) General requirements.
- (a) Any proposed on-site closure method shall comply with the siting criteria specified in Subsection C of 19.15.17.10 NMAC.
- (b) The operator shall provide the surface owner notice of the operator's proposal of an on-site closure method. The operator shall attach the proof of notice to the permit application.
- (c) The operator shall comply with the closure requirements and standards of Paragraphs (2) and (3), as applicable, of Subsection F of 19.15.17.13 NMAC if the proposed closure method for a drying pad associated with a closed-loop system or for a temporary pit involves on-site burial pursuant to Paragraph (2) of Subsection D of 19.15.17.13 NMAC or Paragraph (2) of Subsection B of 19.15.17.13 NMAC, or involves an alternative closure method



pursuant to Paragraph (3) of Subsection D of 19.15.17.13 NMAC or Paragraph (3) of Subsection B of 19.15.17.13 NMAC.

burial. The steel marker shall be not less than four inches in diameter and shall be cemented in a three-foot deep hole at a minimum. The steel marker shall extend at least four feet above mean ground level and at least three feet below ground level. The operator name, lease name and well number and location, including unit letter, section, township and range, and that the marker designates an on-site burial location shall be welded, stamped or otherwise permanently engraved into the metal of the steel marker. A person shall not build permanent structures over an on-site burial without the appropriate division district office's written approval. A person shall not remove an on-site burial marker without the division's written permission.

If the well goes into production, then an alternate interim marking system will be used to allow for safer and more efficient operations. A minimum 4" O. D. steel pipe will be set at least 36" deep at the center of the pit. A threaded collar will be on the top of the pipe. A minimum 12" x 12" steel plate will welded atop the threaded collar. Top of the plate will be flush with ground level. The same information listed in the preceding paragraph will be welded onto the plate, plus a notation that it marks an on site buried temporary pit. Upon plugging the well, the plate will be removed and the pit marked as described in the preceding paragraph.

- (e) The operator shall report the exact location of the on-site burial on form C-105 filed with the division.
- (f) The operator shall file a deed notice identifying the exact location of the on-site burial with the county clerk in the county where the on-site burial occurs.
  - (2) In-place burial.
- (a) Where the operator meets the siting criteria specified in Paragraphs (2) or (3) of Subsection C of 19.15.17.10 NMAC and the applicable waste criteria specified in Subparagraphs (c) or (d) of Paragraph (2) of Subsection F of 19.15.17.13 NMAC, an operator may use in-place burial (burial in the existing temporary pit) for closure of a temporary pit or bury the contents of a drying pad associated with a closed-loop system in a temporary pit that the operator constructs in accordance with Paragraphs (1) through (6) and (10) of Subsection F of 19.15.17.11 NMAC for closure of a drying pad associated with a closed loop system.



- (b) Prior to closing an existing temporary pit or to placing the contents from a drying pad associated with a closed-loop system into a temporary pit that the operator constructs for disposal, the operator shall stabilize or solidify the contents to a bearing capacity sufficient to support the temporary pit's final cover. The operator shall not mix the contents with soil or other material at a mixing ratio of greater than 3:1, soil or other material to contents.
- (c) Where ground water will be between 50 and 100 feet below the bettom of the buried waste, the operator shall collect at a minimum, a five point, composite sample of the contents of the drying pad associated with a closed loop system or the contents of a temporary pit after treatment or stabilization, if treatment or stabilization is required, to demonstrate that benzene, as determined by EPA SW-846 method 8021 B or 8260B, does not exceed 0.2 mg/kg; total BTEX, as determined by EPA SW-846 method 418.1 or other EPA method approved that the division approves, does not exceed 2500 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, does not exceed 500 mg/kg; and chlorides, as determined by EPA method 300:1, do not exceed 500 mg/kg or the background concentration, whichever is greater. The operator may collect the composite sample prior to treatment or stabilization to demonstrate that the contents do not exceed these concentrations. However, if the contents collected prior to treatment or stabilization exceed the specified concentrations the operator shall collect a second five point, composite sample of the contents after treatment or stabilization to demonstrate that the contents do not exceed these concentrations.
- (d) Where the ground water will be more than 100 feet below the bottom of the buried waste, the operator shall collect at a minimum, a five point, composite sample of the contents of the drying pad associated with a closed-loop system or the contents of a temporary pit after treatment or stabilization, if treatment or stabilization is required, to demonstrate that benzene, as determined by EPA SW-846 method 8021B or 8260B, does not exceed 0.2 mg/kg; total BTEX, as determined by EPA SW-846 method 8021B or 8260B, does not exceed 50 mg/kg; the GRO and DRO combined fraction, as determined by EPA SW-846 method 8015M, does not exceed 500 mg/kg; TPH, as determined by EPA method 418.1 or other EPA method that the division approves, does not exceed 2500 mg/kg; and chlorides, as determined by EPA method 300.1, do not exceed 1000 mg/kg or the background concentration, whichever is greater. The operator may collect the composite sample prior to treatment or stabilization to demonstrate that the contents do not exceed these concentrations. However, if the contents collected prior to treatment or stabilization exceed the specified concentrations the operator shall collect a second five point, composite sample of the contents after treatment or stabilization to demonstrate that the contents do not exceed these concentrations.



- (e) Upon closure of a temporary pit, or closure of a temporary pit that the operator constructs for burial of the contents of a drying pad associated with a closed-loop system, the operator shall cover the geomembrane lined, filled, temporary pit with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and revegetate the site. The division-prescribed soil cover, recontouring and revegetation shall comply with Subsections G, H and I of 19.15.17.13 NMAC.
  - **G.** Reclamation of pit locations, on-site burial locations and drying pad locations.
- (1) Once the operator has closed a pit or trench or is no longer using a drying pad, below-grade tank or an area associated with a closed-loop system, pit, trench or below-grade tank, the operator shall reclaim the pit location, drying pad location, below-grade tank location or trench location and all areas associated with the closed-loop system, pit, trench or below-grade tank including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. The operator shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, recontour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and revegetate according to Subsection I of 19.15.17.13 NMAC.
- (2) The operator may propose an alternative to the revegetation requirement if the operator demonstrates that the proposed alternative effectively prevents erosion, and protects fresh water, human health and the environment. The proposed alternative shall be agreed upon by the surface owner. The operator shall submit the proposed alternative, with written documentation that the surface owner agrees to the alternative, to the division for approval.
  - H. Soil cover designs.
- (1) The soil cover for closures where the operator has removed the pit contents or remediated the contaminated soil to the division's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.
- (2) The soil cover for burial-in-place or trench burial shall consist of a minimum of four feet of compacted, non-waste containing, earthen material. The soil cover shall include either the background thickness of topsoil or one foot of suitable material to establish



vegetation at the site, whichever is greater.

- (3) The operator shall construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover material.
  - I. Re-vegetation.
- (1) The first growing season after the operator closes a pit or trench or is no longer using a drying pad, below-grade tank or an area associated with a closed-loop system, pit or below-grade tank including access roads, the operator shall seed or plant the disturbed areas.
- (2) The operator shall accomplish seeding by drilling on the contour whenever practical or by other division-approved methods. The operator shall obtain vegetative cover that equals 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
- (3) The operator shall repeat seeding or planting until it successfully achieves the required vegetative cover.
- (4) When conditions are not favorable for the establishment of vegetation, such as periods of drought, the division may allow the operator to delay seeding or planting until soil moisture conditions become favorable or may require the operator to use additional cultural techniques such as mulching, fertilizing, irrigating, fencing or other practices.
- (5) The operator shall notify the division when it has seeded or planted and when it successfully achieves re-vegetation.
  - J. Closure notice.
- (1) The operator shall notify the surface owner by certified mail, return receipt requested, that the operator plans to close a temporary pit, a permanent pit, a below-grade tank or where the operator has approval for on-site closure. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is sufficient to demonstrate compliance with this requirement.
- (2) The operator of a temporary pit or below-grade tank or an operator who is approved for on-site closure shall notify the appropriate division district office verbally or by



other means at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the operator's name and the location to be closed by unit letter, section, township and range. If the closure is associated with a particular well, then the notice shall also include the well's name, number and API number.

K. Closure report. Within 60 days of closure completion, the operator shall submit a closure report on form C-144, with necessary attachments to document all closure activities including sampling results; information required by 19.15.17 NMAC; a plot plan; and details on back-filling, capping and covering, where applicable. In the closure report, the operator shall certify that all information in the report and attachments is correct and that the operator has complied with all applicable closure requirements and conditions specified in the approved closure plan. If the operator used a temporary pit, the operator shall provide a plat of the pit location on form C-105 within 60 days of closing the temporary pit.

The operator shall file a deed notice identifying the exact location of the on-site burial with the county clerk in the county where the on-site burial occurs.



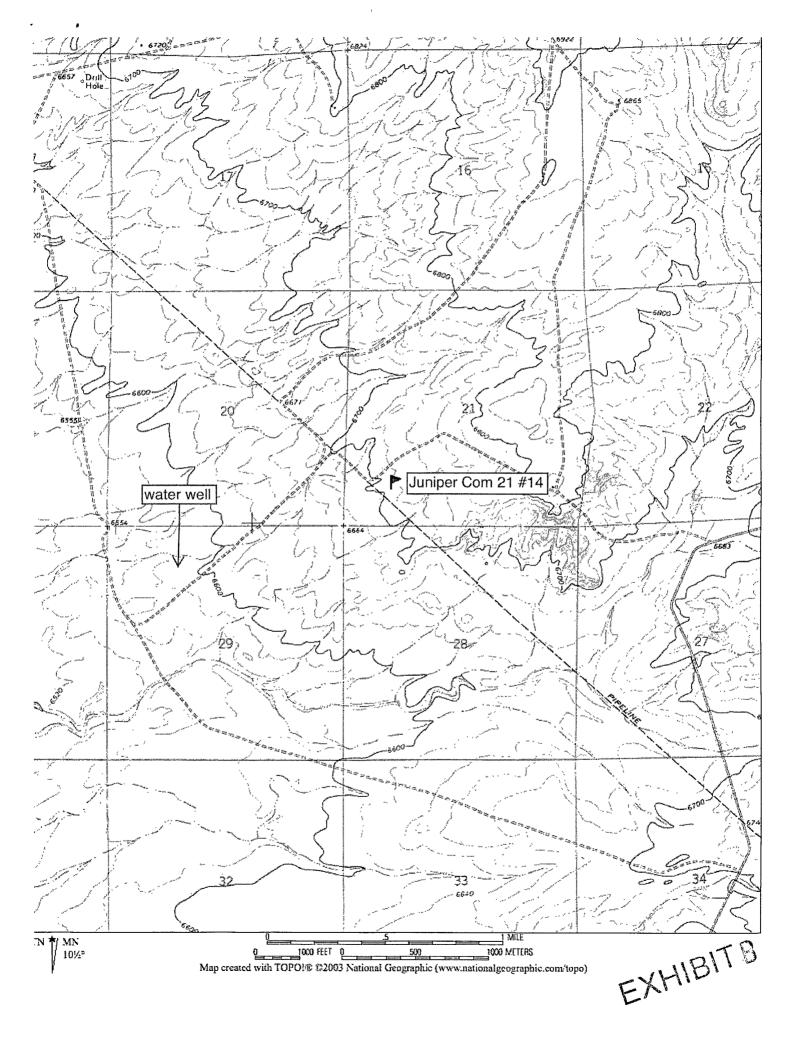
# New Mexico Office of the State Engineer POD Reports and Downloads

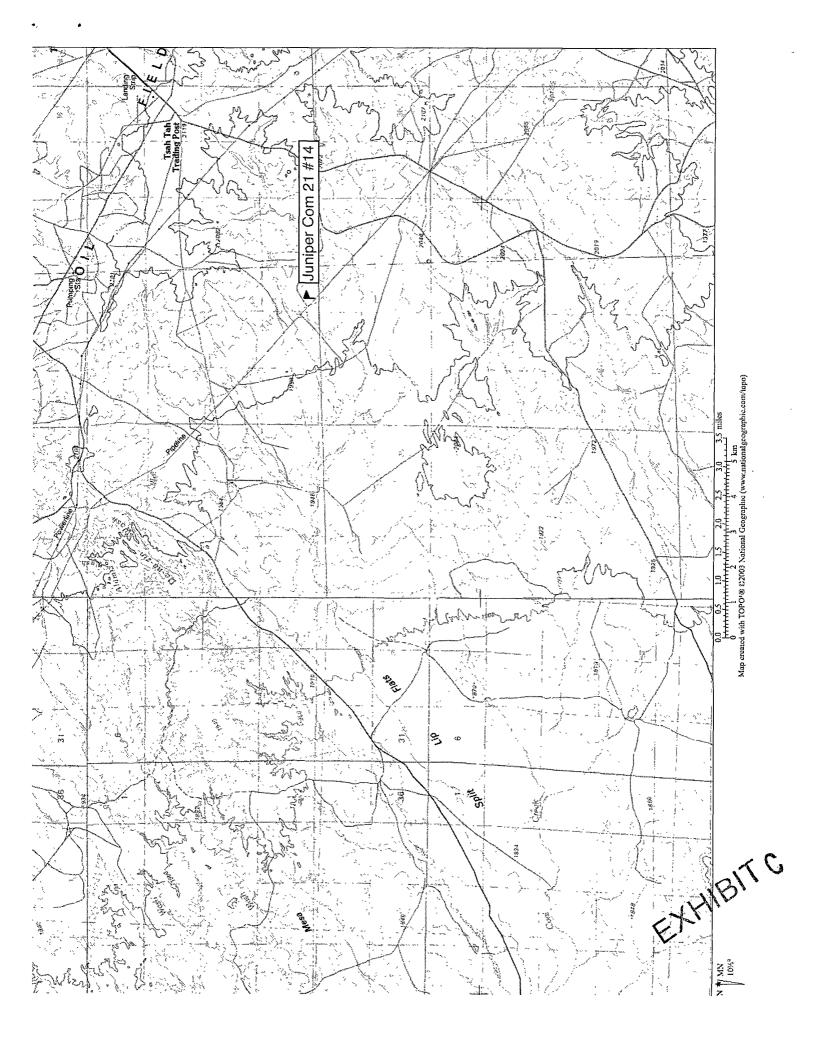
Township: 24N Range: 10W Sections:
NAD27 X: Y: Zone: Search Radius:
County: Basin: Suffix: Number: Suffix:
Owner Name: (First) (Last) ONon-Domestic ODomestic OAll
POD / Surface Data Report Avg Depth to Water Report Water Column Report
Clear Form (iWATERS Menu) (Help)
WATER COLUMN REPORT 09/30/2008  (quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are biggest to smallest) Depth Depth Water (in feet) POD Number Tws Rng Sec q q q Zone Well Water Column 10W 29 1 2 3 SJ 03141 24N 640 595 45 10W 33 4 4 SJ 01713 \_ 24N 373 24N 10W 36 4 3 158 SJ 01714 442 284

Record Count: 3

EXHIBITA



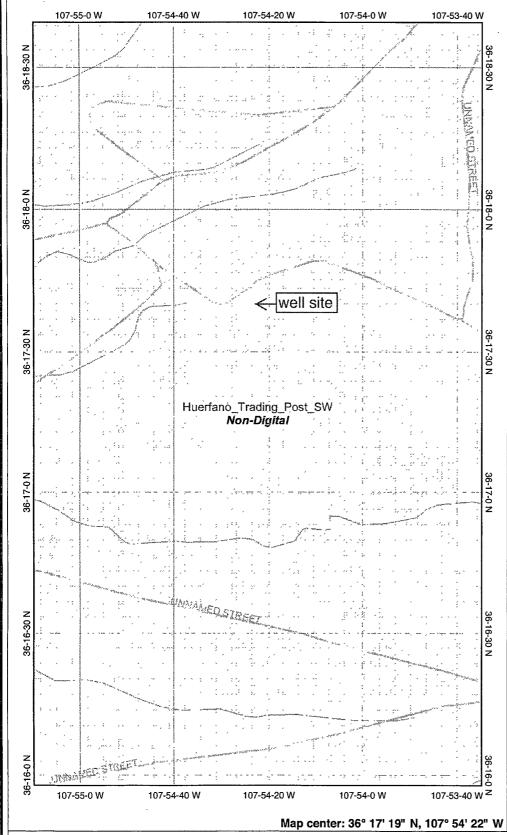


Send To Printer Back To TerraServer Change to 11x17 Print Size Show Grid Lines Change to Landscape **■USGS 460 km SW of Denver, Colorado, United States** 09 Oct 1997 metal storage building Juniper Com 21 #14

Image courtesy of the U.S. Geological Survey
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EXHIBITO

# **JUNIPER COM 21 #14**





#### Legend

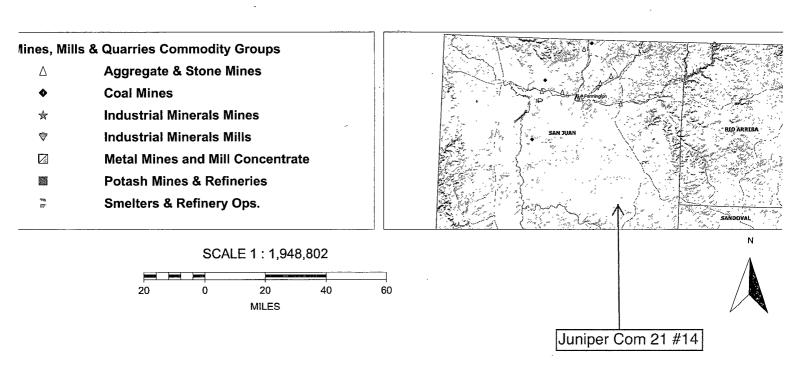
- ". Roads
- USGS Quad Index 24K Lower 48 Wetland Polygons
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland Freshwater Pond
- Lake Other
- Riverine
  - Lower 48 Available Wetland Data
  - Non-Digital Digital
- 🔀 No Data
- NHD Streams

EXHIBITE

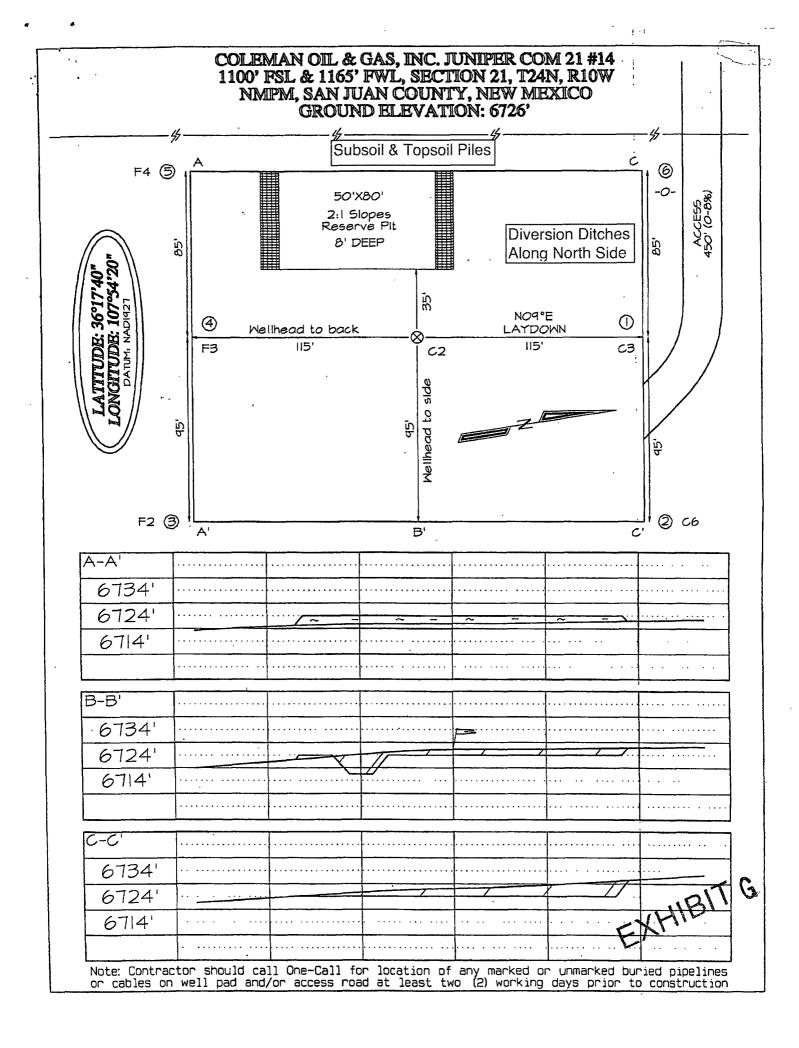
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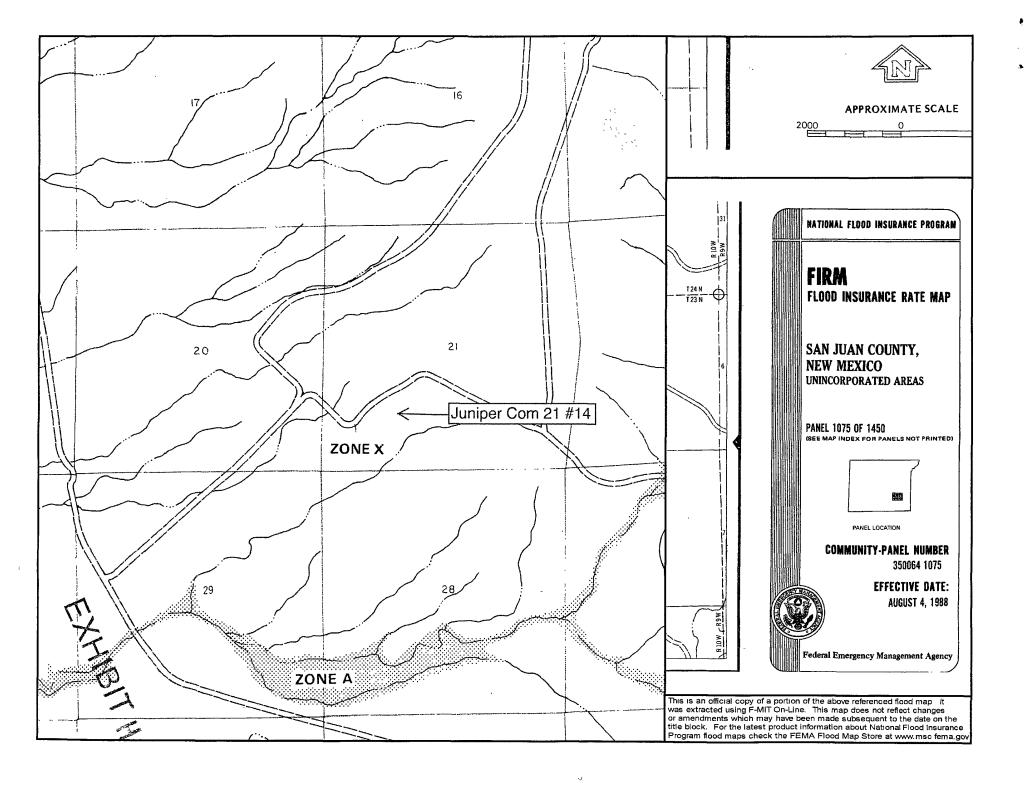
This map is a user generated static output from an Internet mapping site and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. THIS MAP IS NOT TO BE USED FOR NAVIGATION.

# **MMQonline Public Version**



EXHIBITE





Oistrict I PO Bdx 1980, Hobbs, NM 88241-1980

District II PO Drawer DD, Artesia, NM 88211-0719

District III 1000 Rio Brazos Rd., Aztec, NM 87410

District IV PO Box 2088, Santa Fe. NM 87504-2088

API Number

12 Dedicated Acres

State of New Mexico Energy, Minerals & Natural Resources Department

Revised February 21. 1994 'Instructions on back Submit to Appropriate District Office State Lease – 4 Copies Fee Lease – 3 Copies

OIL CONSERVATION DIVISION PO Box 2088 Santa Fe, NM 87504-2088

AMENDED REPORT

Form C-102

RCVD FEB28'07 OIL CONS. DIV.

Pool Name

<sup>15</sup> Order No.

WELL LOCATION AND ACREAGE DEDICATION PLAT DIST. 3

<sup>14</sup> Consolidation Code

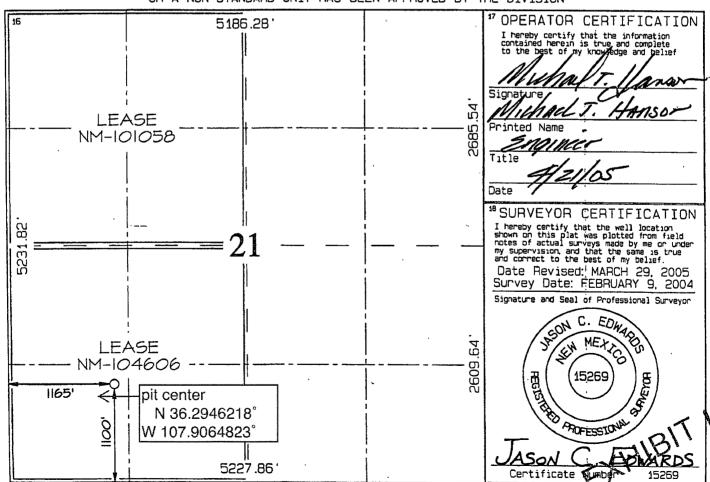
30-045	r- 32	5043		/1629		BA	21V PHOTIF	AND CUAL	
Property 34103	Code						ell Number 14		
OGRID No. 4838				*Operator Name *Elevation COLEMAN OIL & GAS, INC. 6726					
<sup>10</sup> Surface Location									
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South lune	Feet from the	East/West line	County
М	21	24N	10W		1100	SOUTH	1 <b>1</b> 65	WEST	SAN JUAN
<sup>11</sup> Bottom Hole Location If Different From Surface									
UL or lot no.	Section	Township	Range	Lot Idn	Fest from the	North/South line	Feet from the	East/Weșt line	County

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

<sup>13</sup> Joint or Infill

(W/2)

320.0 Acres -



From: brian wood <bri>drian@permitswest.com>

Subject: Coleman Juniper Com 21 #14

Date: September 30, 2008 2:26:21 PM MDT

To: howarddraper@frontiernet.net



As required by NMOCD pit rule Subsection F of 19.15.17.13 NMAC, I am notifying the Navajo Nation as surface owner that Coleman plans to close its temporary (reserve) pit (after it is built and used) using on site closure (burial) in the same pit.

The well is staked at 1100 FSL & 1165 FWL 21-24n-10w, San Juan County, NM.

The well is on lease NMNM-104606.

API # 30-045-33043

This was authorized by the Navajo Nation under SAS DNR-11341 in January, 2007.

Please call me if you have any questions.

Brian Wood Permits West, Inc. 37 Verano Loop, Santa Fe, NM 87508 Phone: 505 466-8120

Phone: 505 466-812 FAX: 505 466-9682

EXHIBIT J