From: Sent: To: Cc:

Subject:

Macquesten, Gail, EMNRD Wednesday, June 30, 2010 2:51 PM Pinskeep@btaoil.com Jones, William V., EMNRD; Swazo, Sonny, EMNRD; Sanchez, Daniel J., EMNRD; Phillips, Dorothy, EMNRD; William Carr; Inge, Richard, EMNRD Application for injection Owl 20504 JV-P #005 2010 2-25 Formal Notice of Loss of Injection Authority.pdf

Ms. Inskeep-

Attachments:

Sonny Swazo is out of the office for a few days, so I am responding to your questions regarding what BTA Oil Producers LLC (BTA) needs to do to come into compliance with 19.15.5.9 NMAC, so that it can pursue its request for an injection permit for the Owl 20504 JV-P #005, 30-015-35435.

As I'm sure Sonny explained, the OCD cannot issue an injection permit to an operator who is out of compliance with 19.15.5.9 NMAC (Part 5.9). See 19.15.26.8 NMAC.

BTA entered into a stipulated order and settlement agreement in Case 14413, agreeing that it would be treated as out of compliance with Part 5.9 until it completed certain corrective actions with regard to a pit located at the site of the Pardue C 8808 JVP #001 well. See R-13218. Although BTA is working on the corrective actions required under R-13218, it has not completed those actions and is therefore still considered out of compliance with Part 5.9. I understand that you and Sonny were discussing the possibility of entering into a stipulated amendment to R-13218 that would allow BTA to move forward with its request for an injection permit for the Owl 20504 JV-P #005, while keeping BTA under Part 5.9 for all other purposes.

Before the Oil Conservation Division (OCD) will agree to such an amendment, BTA needs to resolve some outstanding issues with regard to the Owl well. The well was permitted as a disposal well in August 2007, but the permit expired after one year because BTA did not report any injection. It wasn't even clear from OCD records that the well had even been drilled and completed. In 2010, an OCD inspector found that the well was injecting. By letter dated February 25, 2010, Daniel Sanchez notified BTA that it had lost its injection authority. The letter also instructed BTA to file amended C-115s reporting the injection into the well, and file missing reports regarding the completion of the well. I've attached a copy of the letter.

It appears that BTA has filed amended C-115s, showing injection into the well since August 2007. There is no reported injection for February 2010, however. The inspector observed injection on February 18, 2010. Please explain why no C-115 amendment was filed showing the injection in February.

I reviewed the well file, and found no additional filings regarding the completion of the well. Please work with the district office to ensure that the regulatory filings for the well are complete.

Once the C-115s are correctly amended and the regulatory filings are complete, the OCD will be willing to discuss an amendment to R-13218. Since Mr. Bill Carr represents BTA in that case, please have him contact me if BTA wants to discuss an amendment.

Please note that if BTA receives an amendment to R-13218 and is able to pursue its application for injection permit, OCD Legal may request that the application be set for hearing.

Sincerely,

From: Sent: To: Subject: Phillips, Dorothy, EMNRD Friday, June 25, 2010 9:56 AM Jones, William V., EMNRD FW: BTA 20504 JV-P Owl #5 App to Inject

Will, just thought you might want to know that the well Hughes 689 C #4 (30-025-24914) on BTA Financial Assurance Report is plugged and they are now okay on Financial Assurance. There is still an issue with 5.9 problem listed below with Sonny.

From: Phillips, Dorothy, EMNRD Sent: Friday, June 25, 2010 9:51 AM To: Swazo, Sonny, EMNRD Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Sonny, I found your e-mail below. Just wanted to let you know that BTA plugged Hughes 689 C #4 (30-025-24914) Site released.

# 30-025-24914 HUGH 689-C #004 [305303]

General Well Information Status: Plugged, Site Released

From: Swazo, Sonny, EMNRD
Sent: Thursday, June 17, 2010 11:32 AM
To: Phillips, Dorothy, EMNRD
Cc: Jones, William V., EMNRD; Sanchez, Daniel J., EMNRD; Macquesten, Gail, EMNRD; Altomare, Mikal, EMNRD; Mull, Donna, EMNRD; Hill, Larry, EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

BTA Oil Producers LLC is in violation of 5.9 in at least two ways—financial assurance and a corrective order. The "LLC" is in violation of 5.9 because it needs to post financial assurance on the Hughes 689 C #4 (30-025-24914). The "LLC" is also in violation of 5.9 by virtue of Order No. 13218. Provision 11.d of the Order states: "BTA shall be in violation of 19.15.5.9 NMAC until it has submitted an acceptable delineation plan, received OCD approval of a remediation plan, completed soil remediation and begun remediation of water contamination. If the OCD remediates the site, BTA shall be in violation of 19.15.5.9 NMAC until it demonstrates that it has reimbursed the OCD for its expenses in excess of any amount recovered from the applicable financial assurance." The "LLC" needs to demonstrate to us—at a minimum—that it has complied with Order No. 13218.

Sonny

From: Phillips, Dorothy, EMNRD
Sent: Thursday, June 17, 2010 9:32 AM
To: Jones, William V., EMNRD
Cc: Sanchez, Daniel J., EMNRD; Altomare, Mikal, EMNRD; Swazo, Sonny, EMNRD; Mull, Donna, EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Will, I think these are Hobbs wells and I have already contacted Donna Mull about it. BTA is on my hold list from the Attorneys and the 5.9 Corrective Action List. I was told not approve anything for them until they spoke with them. I have e-mailed Gail, Mikal and Sonny as to how they want me to proceed.

Inactive Well Additional Financial Assurance Report

#### 3019 BTA OIL PRODUCERS Total Well Count: 5 Printed On: Thursday, June 17 2010

Property	Well Name	Lease Type	ULSTR	OCD Unit Letter	API	Well Type	Last Prod/Inj	Inactive Additional Bond Due	Measured Depth	Required Bond Amount	Bond Required Now	Bond In Place	In Violation
2357	LEA 7406 JV-S #002	S	N-28-26S-36E	N	30-025-25702	0	02/2007	03/01/2009	3349	8349	Y	0	Y
	LEA 7406 JV-S #004	S	K-28-26S-36E	к	30-025-25829	0	09/2007	10/01/2009	3268	8268	Y	0	Y
	LEA 7406 JV-S #006	S	F-28-26S-36E	F	30-025-25909	0	03/2007	04/01/2009	3250	8250	Y	0	Y
	LEA 7406 JV-S #008	s	C-28-26S-36E	С	30-025-25930	0	03/2007	04/01/2009	3270	8270	Y	0	Y
	LEA 7406 JV-S #009Y	s	D-28-26S-36E	D	30-025-26068	0	02/2007	03/01/2009	3270	8270	Y	0	Y

From: Jones, William V., EMNRD
Sent: Thursday, June 17, 2010 9:20 AM
To: Pam Inskeep
Cc: Dustin\_Winkler@blm.gov; Sanchez, Daniel J., EMNRD; Phillips, Dorothy, EMNRD; Ezeanyim, Richard, EMNRD; Dade, Randy, EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Hello Pam:

Thanks for the updated diagrams and information. This clears up a lot, but some loose ends remain.

- a. Sounds like the 30-015-34749 well is still a valid producer. Since the BLM has protested this application because of this 30-015-34749 well, please send an explanation and those new wellbore diagrams to Dustin Winkler in Carlsbad with BLM and ask him to retract the protest. Once a protest is received, we cannot proceed until retracted.
- b. On the 30-015-10730 well, it appears a plug should have been placed over the 9-5/8 inch cut/pull point at 1783 feet. Would you please find out from your field people the likely reason this was not done? (for my information and for the records in this application)

The plugging bond issue. As I understand it, you get the individual well bonds back as soon as the well no longer requires this bond and they can be posted very quickly with Dorothy Phillips of this office. I can't release any injection/disposal permit until bonds are posted – per OCD Rule 5.9.

- c. Clearly BTA needs an individual well bond posted for one well of the 94 wells listed for OGRID 260297.
- d. The stranded OGRID 3019 has 5 wells and from your information it appears they are being taken care of. The trouble is they show up in our records as each well needing a bond. I will ask Dorothy and Daniel if this is OK but it would be better if you would work with them and the Artesia district office on this issue.

Will Jones New Mexico Oil Conservation Division Images Contacts

From:Dustin\_Winkler@blm.govSent:Friday, June 25, 2010 1:25 PMTo:Jones, William V., EMNRDCc:Pam InskeepSubject:RE: BTA 20504 JV-P Owl #5 App to Inject

Will,

BTA has thier plug and abandonment notice of intent approved. BTA has 3 months to commence plugging operations.

With this approval, the BLM no longer objects to the Owl #5 becoming a SWD.

Thanks,

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

То
"Dustin Winkler@blm.gov"
<dustin winkler@blm.gov=""></dustin>
сс
"Jones, William V., EMNRD"
<william.v.jones@state.nm.us></william.v.jones@state.nm.us>
Subject
RE: BTA 20504 JV-P Owl #5 App to
Inject

Thanks, Mr. Winkler. Currently, reclamation of the P&A'd site is underway. The reclamation plan was approved by the BLM and OCD. We hope to have the work completed within one week, barring any unforeseen circumstances. Terry Gregston with the BLM Carlsbad office was at the site yesterday and stated to our Environmental Coordinator, Skip Baca, that she was pleased with the progress.

Will I need to notify you, specifically, once the reclamation is completed?

Will the protest remain in place until the reclamation is completed and the site is inspected?

Thanks,

Pam

-----Original Message-----From: Dustin\_Winkler@blm.gov [mailto:Dustin\_Winkler@blm.gov] Sent: Thursday, June 17, 2010 12:35 PM To: Pam Inskeep Cc: Jones, William V., EMNRD Subject: Re: BTA 20504 JV-P Owl #5 App to Inject

It appears that with the proximitiy of the two Owl #1 wells, there was a mistake on which well is the reason for the BLM protest. The producing Owl #1 (30-015-34749) is fine. The P&A Owl #1 (30-015-10730) is the one that needs corrected. I'm sorry for the confusion and any problems this has caused.

Thanks,

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

Pam Inskeep <pinskeep@btaoil.< th=""><th></th></pinskeep@btaoil.<>	
com>	То
	" <u>Dustin_Winkler@blm.gov</u> "
06/17/2010 10:45	< <u>Dustin_Winkler@blm.gov</u> >
AM	СС
	"Jones, William V., EMNRD"
	< <u>William.V.Jones@state.nm.us</u> >
	Subject
	BTA 20504 JV-P Owl #5 App to Inject

Good morning, Mr. Winkler.

Attached please find a letter of request regarding your protest to our application for Authorization to Inject at our 20504 JV-P Owl #5 location, Lea County which was submitted to the OCD. Also attached are three wellbore diagrams for all of our Owl locations, current and plugged.

Should you have any questions or require additional information, please do not hesitate to contact me. You will receive an immediate response.

Thank you for your time,

Pam

Pam Inskeep
Regulatory Administrator
BTA Oil Producers
104 S. Pecos
Midland, TX 79701
(432) 682-3753
(432) 683-0325 fax
pinskeep@btaoil.com[attachment "BTA Owl wells wellbore diagrams.pdf"
deleted by Dustin H Winkler/CFO/NM/BLM/DOI] [attachment "BTA 20504 JV-P Owl
#1 Request to BLM.pdf" deleted by Dustin H Winkler/CFO/NM/BLM/DOI]

From: Sent:	Pam Inskeep [Pinskeep@btaoil.com] Thursday, June 24, 2010 2:53 PM
То:	Swazo, Šonny, EMNRD
Cc:	Jones, William V., EMNRD
Subject:	BTA 20504 JV-P Owl #5 App to Inject

Good afternoon, Mr. Swazo.

I wanted to touch base with you regarding our conversation and correspondence last week.

- a. The delineation report is currently being prepared for submittal to the OCD.
- b. The Hughes 689-C #4 has been re-inspected and released by the OCD. No additional financial assurance is needed for this location.
- c. Mr. Winkler and Mr. Ingram, BLM, have approved BTA's proposal to re-enter the P&A Owl Draw Unit #1 to set an additional plug. It is my understanding that, once the proposed procedure is approved, their protest to the referenced Application to Inject will be withdrawn.
- d. Have you had the opportunity to speak with Mr. Sanchez? We are awaiting your additional recommendations.
- e. Re the stranded OGRID 3019 all wells were plugged last summer. Three locations have been fully reclaimed, with the final work on the remaining locations currently underway. We expect to be completed within the next week. C103 Subsequent Report Location Ready will be submitted for all five locations at that time, along with a request for inspection/release.

Thanks for your time.

Pam

From: Pam Inskeep Sent: Thursday, June 17, 2010 5:05 PM To: 'Jones, William V., EMNRD' Cc: 'Sonny.Swazo@state.nm.us' Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Mr. Jones,

An update to our ongoing correspondence:

- a. We are aware of and are working on Order No. 13218. Order No. R-13218-A First Amendment to the Stipulated Order & Settlement Agreement was signed by Mr. Daniel Sanchez on 3/10/2010 stating approval of the delineation plan. Work is underway, with updates to Mr. von Gonten as work progresses. I believe that the delineation report is currently being prepared for submittal to the OCD (item 2(b) of Order No. R-13218-A).
- b. The Hughes 689-C #4 (P&A 6/24/08) location was inspected today by Maxey Brown, OCD. The site will require some additional work. This additional work has been scheduled for tomorrow. Mr. Brown will be contacted for re-inspection, as soon as the work is completed. Hopefully, the location will be released after this work is performed.
- c. Our production engineer for the area, Tom Williams, has spoken with Wesley Ingram and Dustin Winkler with the BLM about the plugged well (Owl Draw Unit #1). Tom is reviewing all of the records and working on a proposal(s) regarding the situation.

d. I have spoken with Mr. Swazo about our financial assurance and compliance matters. He is going to talk with Mr. Sanchez and get back to us. We will move forward with his recommendations, as soon as we hear back from him.

Thanks again for all of your time,

Pam

Pam Inskeep BTA Oil Producers

From: Swazo, Sonny, EMNRD
Sent: Thursday, June 17, 2010 11:32 AM
To: Phillips, Dorothy, EMNRD
Cc: Jones, William V., EMNRD; Sanchez, Daniel J., EMNRD; Macquesten, Gail, EMNRD; Altomare, Mikal, EMNRD; Mull, Donna, EMNRD; Hill, Larry, EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

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Sonny

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From:Pam Inskeep [Pinskeep@btaoil.com]Sent:Thursday, June 17, 2010 11:24 AMTo:Jones, William V., EMNRDSubject:RE: BTA 20504 JV-P Owl #5 App to InjectAttachments:Owl Draw Unit #1 data.pdf

Mr. Jones,

We very much appreciate your time in handling this application. In response to your additional questions:

- a. We have submitted well information, wellbore diagrams, and a request to Mr. Winkler with the BLM to retract their protest to the application. You were copied on same.
- b. The original plugging operations for this well, in February 1966, placed plugs at the top of 13-3/8" csg, 588-688', 5690-5800', 6990-7100', 8290-8400', 9990-10100', 11790-11900', and 13400-13510' as shown on the approved BLM sundry notices dated Feb 7, 1966 and Feb 21, 1966. When reentering the wellbore in December 2006, BTA was able to clean out to 1781' but was unable to go inside the 9-5/8" csg stub. In May 2007, we spotted plugs at 588—688' and surface to 66'. These operations were reported on accepted for record BLM sundry notice dated May 28, 2007. All plugs are also shown on the previously submitted wellbore diagram.
- c. Property 305303, 30-025-24914, Hugh 689-C #004, was plugged 6/24/08. Sundry with plugging operations was submitted to the OCD July 2008 and approved (for plugging of the wellbore only) July 2008. Sundry Location Ready for Inspection was submitted to the OCD on 6/15/2010. Maxey Brown, Hobbs OCD, has scheduled to inspect the location this date. Once Mr. Brown approves the location, we will request the well be removed from our bond.
- d. I will contact Dorothy Phillips and Daniel Sanchez to work with them on the bonding issues for the 5 remaining wells.

Thanks,

Pam

From: Jones, William V., EMNRD [mailto:William.V.Jones@state.nm.us]
Sent: Thursday, June 17, 2010 10:20 AM
To: Pam Inskeep
Cc: Dustin\_Winkler@blm.gov; Sanchez, Daniel J., EMNRD; Phillips, Dorothy, EMNRD; Ezeanyim, Richard, EMNRD; Dade, Randy, EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

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Will Jones New Mexico Oil Conservation Division Images Contacts

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From: Sent: To: Cc: Subject: Dustin\_Winkler@blm.gov Thursday, June 17, 2010 1:06 PM Pam Inskeep Jones, William V., EMNRD RE: BTA 20504 JV-P Owl #5 App to Inject

Pam,

The protest was not for the reclamation, it was for the way the well was plugged. I believe Will mentioned this well in one of his e-mails.

Thanks,

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

Pam Inskeep	
<pinskeep@btaoil.< td=""><td></td></pinskeep@btaoil.<>	
com>	То
	" <u>Dustin Winkler@blm.gov</u> "
06/17/2010 12:14	< <u>Dustin_Winkler@blm.gov</u> >
РМ	СС
	"Jones, William V., EMNRD"
	< <u>William.V.Jones@state.nm.us</u> >
	Subject
	RE: BTA 20504 JV-P Owl #5 App to
	Inject

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Will the protest remain in place until the reclamation is completed and the site is inspected?

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Thanks,

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

Pam Inskeep <pinskeep@btaoil. com&gt;</pinskeep@btaoil. 	То
com	"Dustin Winkler@blm.gov"
06/17/2010 10:45	<pre><dustin_winkler@blm.gov></dustin_winkler@blm.gov></pre>
AM	СС
	"Jones, William V., EMNRD"
	< <u>William.V.Jones@state.nm.us</u> >
	Subject
	BTA 20504 JV-P Owl #5 App to Inject

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Should you have any questions or require additional information, please do not hesitate to contact me. You will receive an immediate response.

Thank you for your time,

Pam

Pam Inskeep Regulatory Administrator BTA Oil Producers 104 S. Pecos Midland, TX 79701 (432) 682-3753 (432) 683-0325 fax pinskeep@btaoil.com[attachment "BTA Owl wells wellbore diagrams.pdf" deleted by Dustin H Winkler/CFO/NM/BLM/DOI] [attachment "BTA 20504 JV-P Owl #1 Request to BLM.pdf" deleted by Dustin H Winkler/CFO/NM/BLM/DOI]

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SUNDRY NC (Do not use this form for pro- Use "APPLI  WELL GAS WELL OTHER 2. NAME OF OPERATOR Jake L. Hanon 3. ADDRESS OF OPERATOR Box 663, Dallas, Te Box 663, Dallas, Te 1980' FE & S1, Unit Bddy County, New Me 14. PERMIT NO.	Dry Hole MAS o clearly and in accordance w K, Section 18,	VEY PRTS ON WE or plug back to a di or such proposals.) with any State regul	Interent reservoir.	I.C. 06 G. IF INDIAN, AL 7. UNIT AGREEMI Owl Draw 8. FARM OR LEA Owl Draw 9. WELL NO. 1 10. FIELD AND F	LOTTBE OR THE ENT NAME Unit SE NAME Unit	UBE NAME
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Box 663, Dallas, Te LOCATION OF WELL (Report location See also space 17 below.) At surface 1980' FE & S1, Unit Eddy County, New Me 4. FERMIT NO. 6. Check A	K, Section 18,			10. FIELD AND P	201 OF WILL	
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Jake L. Har	aon					Ow1	Draw Uni	t	
3. ADDRESS OF OPER.	ATOR					9. WEL		· · · · · · · · · · · · · · · · · · ·	
Box 663, D	allas, To:	Kas					1		
4. LOCATION OF WELL See also space 17		n clearly and in accordance w	vith any State	requirements.*	·	10. FIE	LD AND POOL, OI	WILDO	CAT >
At surfaceS	S1, Unit	K, Section 18,	T-26-S,	R-27-E,			., T., R., M., OR E	O'LE. ANI	our)
	S1, Unit		T-26-S,	R-27-Е,		11. SEC.	L. T., R., M., OR E URVEY OR AREA 18, T-20	5-5,	
At surfaceS 4 1980' FB &	Sl, Unit y, New Me	XICO				11. SEC. Sec. Bddy	L. T., R., M., OR E URVEY OR AREA 18. T-20	New	R-27-8 Mexico
At surfaces of 1980' FB & Eddy County	S1, Unit	XICO				11. SEC. Sec. Bddy	LAT. R. M. OR E URVEY OR AREA LS. T-20 County,	<b>New</b>	R-27-8 Mexico
At surfaces of 1980' FB & Eddy County	Si, Unit y, New Mer	XICO	hether DF, RT, G	R, stc.)		11. SEC Sec. Bddy 12. cot Bd	IS, T., R., M., OR E URVEY OR AREA IS, T-2( COUNTY, UNTY OR PARISH BY	<b>New</b>	R-27-8 Mexico
At surfaceS <b>4</b> 1980' . <b>PB &amp;</b> Eddy Count; 14. PERMIT NO. 30-0 15-	Si, Unit y, New Mer	xico 15. Elevations (Show w Appropriate Box To Ind	hether DF, RT, G	R, stc.)		11. SEC Sec. Bddy 12. cot Bd Other Do	I. T., R., M., OR E URVEY OR AREA <b>18.</b> T-20 County, INTY OR PARISH <b>Ay</b>	<b>New</b>	R-27-8 Mexico
At surfaceS <b>4</b> 1980' . <b>PB &amp;</b> Eddy Count; 14. PERMIT NO. 30-0 15-	S1, Unit y, New Mar 0730 Check NOTICE OF IN	xico 15. Elevations (Show w Appropriate Box To Ind	hether DF, RT, G	R, stc.)	ort, or O	11. SEC Sec. Bddy 12. cot Bd Other Do	I. T., R., M., OR E URVEY OR AREA <b>18.</b> T-20 County, INTY OR PARISH <b>Ay</b>	-S, New 13. s	R-27-8 Mexico
At surfaceS <b>1980' . PB &amp;</b> <b>Eddy Count</b> : 14. PERMIT NO. 30-0 15-	S1, Unit y, New Mar 0730 Check NOTICE OF IN	XICO	hether DF, RT, G	R, BLC.) e of Notice, Repo	ort, or O SUBSEQU	11. SEC Sec. Bddy 12. cot Bd Other Do	I. T. R., M., OR E URVEY OR AREA IS. T-24 County, INTY OF PARISH Sy Data Data	New 13. s'	R-27-8 Mexico
At surfaceS <b>1980</b> , <b>PB 2</b> <b>Eddy Count</b> ; 14. PERMIT NO. 30-01S- 16. TEST WATER SHO	SL, Unit y, New Mer 0730 Check NOTICE OF IN DT-OFF	Appropriate Box To Ind TENTION TO : PULL OR ALTER CASING	hether DF, RT, G	r, etc.) e of Notice, Repo water shut-off	Dift, or O SUBSEQU	11. SEC Sec. Bddy 12. cot Bd Other Do	I, T., R., M., OR E URFVY OR AREA 18, T-20 County, INTY OR PARISH By Data Data Data of: REPAIRING V	New 13. s' New	R-27-8 Mexico
At surfaceS <b>1980</b> , <b>PB</b> <b>Eddy Count</b> 14. PERMIT NO. 30-01S- 16. TEST WATER SHI FRACTURE TREAT	SL, Unit y, New Mer 0730 Check NOTICE OF IN DT-OFF	Appropriate Box To Ind TENTION TO : PULL OR ALTER CASING MULTIPLE COMPLETE	hether DF, RT, G	r, etc.) e of Notice, Repu water shut-off fracture tebatme	Dift, or O SUBSEQU	11. SEC Sec. Bddy 12. cot Bd Other Do	I. T. R., M., OR E URVEY OR AREA IS, T-2C COUNTY, INTY OR PARISH By DIA DIA OF: REPAIRING T ALTERING C/	New 13. s' New	R-27-8 Mexico

proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)\*

Shot and pulled  $1782.96^{\circ}$  of  $9.5/8^{\circ}$  casing. Set 80 sack cement plug in and out of 13.3/8" casing from 588' to 688' and a 20 sack cement plug in top of 13.3/8" casing. Hole was loaded with mud laden fluid and bring water. Marker was erected. Job completed February 12, 1966.

Final report will be filed when location is cleaned up in four to six months.

RECEIVED

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REFERENCE WED

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18. I hereby certify that the foregoing is true SIGNED A MA	yberry TITLE District Cle	rk DATE February 21, 1966
(This space for Fourth of Saite office use		DATE
H. L. BISTRICT ENCINEER	*See Instructions on Reverse Side	

. 07/	27/09 13:07 FAX 432 683 0325	BTA UIL PRODUCER	រដ្ឋា ហប ស	. [
		AUG	- 4 2009	A
		OCD-	ARIESIA	•
	Form 3160-5 UNITED STAT (February 2005) DEPARTMENT OF TH	res He interior	FORNI AIPROVED ONIBNG 1004-0137 Expires Maich 31, 2007	·
	BUREAU OF LAND M		5 Lease Senal No NMNM 114969	
	SUNDRY NOTICES AND R Do not use this form for proposal abandoned well. Use Form 3160 - 3	s to drill or to re-enter an	6 If Indian Allottee of Tribe Name	
ï	SUBMIT IN TRIPLICATE- Other in	structions on reverse side.	7 IFUnit of CA/Agreement, Name and/or No.	
•	I Type of Well Gas Well Othe	r /	8 Well Name and No.	
	2 Name of Operator BTA Oil Producers		Owl Draw Unit, 20504 JV-P #1 SWD 9 API Well No	•
. ·	Ja Address	3b Phone No (include area codè)	30-015-10730	
•	104 S. Pecos, Midland, TX 79701	432-682-3753	10 Field and Pool or Exploratory Area - Wildcat	
	<ul> <li>4 Location of Well (Footage, Sec. 7, R., M. or Survey Descriptue UL-K-, Sec. 18, T26S-R27E</li> </ul>	ou)	11 County or Parish, State	
	1980' FSL & 1980' FWL		Eddy Co., NM	
	12. CHECK APPROPRIATE BOX(ES)	TO INDICATE NATURE OF NOTICE,	REPORT, OR OTHER DATA	
	TYPE OF SUBMISSION	TYPE OF ACTION		
•	Notice of Intent	Deepen Production (S	Start/Resume) Water Shut-Off Well Integrity	
· · ·	Subsequent Report	New Construction Recomplete	Abunden	
	Final Abandonment Notice	Plug Back Water Dispos		
•••	BTA respectfully submits the following: 12/13-29/06 Dug'out 13-3/8" surface esg stub, wel unable to go inside 9-5/8" esg stub. P	d on extension & collar. Filled cellar w/cmt. rep to P&A.	Test BOP to 5000 psi. Clean out to 1781'.	
·	5/10/2007 Spot 77 sv cint plug 588 - 688'. POH v	w/20 jts tbg. Spot 56 sx cmt plug surface to 6	6'. Cut of wellhead. Install P&A marker.	
	(Note: This was a re-entry of Jake L. Hamon Owl I	Draw Unit #1, P&A 2/12/1966)	ACCEPTED FOR RECO	RD .
12/07	Accepted as to plugging of the well bo Lightility under bond is retained until Surface restoration is completed.	re.	JUL 3 0 2009	
6	14 Thereby certify that the foregoing is noe and correct Name (Printed Typed)		BUREAU OF LAND MANAGEMENT	T
	Pan Inskeep	Title Regulatory Admin	istentor CARLSBAD FIELD OFFICE	·
$\mathcal{F}$	Signature AM: M. Maria	Date	05/28/2007	
R		OR FEDERAL OR STATE OFFIC	CE USE	
· · ·				
	Approved by Conditions of approval. If any, are attached. Approval of this n certify that the applicant holds legal or equitable title to those ri which would entitle the applicant to conduct operations thereon	ghts in the subject lease Office .	Date	•
•	Title 18 USC Section 1001 and Title 43 USC. Section 1212, mail States any false, fictitious or fraudulent statements or representa	ke it a crime for any person knowingly and willfu	ully to make to any department or agency of the United	· · ·
	(Instructions on page 2)	more to any maner within its jui (section		
			· · · · · ·	
· ,				
• .				

From:Pam Inskeep [Pinskeep@btaoil.com]Sent:Thursday, June 17, 2010 10:45 AMTo:Dustin\_Winkler@blm.govCc:Jones, William V., EMNRDSubject:BTA 20504 JV-P Owl #5 App to InjectAttachments:BTA Owl wells wellbore diagrams.pdf; BTA 20504 JV-P Owl #1 Request to BLM.pdf

Good morning, Mr. Winkler.

Attached please find a letter of request regarding your protest to our application for Authorization to Inject at our 20504 JV-P Owl #5 location, Lea County which was submitted to the OCD. Also attached are three wellbore diagrams for all of our Owl locations, current and plugged.

Should you have any questions or require additional information, please do not hesitate to contact me. You will receive an immediate response.

Thank you for your time,

Pam

Pam Inskeep Regulatory Administrator BTA Oil Producers 104 S. Pecos Midland, TX 79701 (432) 682-3753 (432) 683-0325 fax pinskeep@btaoil.com

CHeekw/Sown/ SwAZO about Rulas.9 FOR BTA WDJ 6/21/10

From:	Jones, William V., EMNRD
Sent:	Thursday, June 17, 2010 9:20 AM
To:	'Pam Inskeep'
Cc:	'Dustin_Winkler@blm.gov'; Sanchez, Daniel J., EMNRD; Phillips, Dorothy, EMNRD; Ezeanyim, Richard, EMNRD; Dade, Randy, EMNRD
Subject:	RE: BTA 20504 JV-P Owl #5 App to Inject

Hello Pam:

Thanks for the updated diagrams and information. This clears up a lot, but some loose ends remain.

- Sounds like the 30-015-34749 well is still a valid producer. Since the BLM has protested this application because of this 30-015-34749 well, please send an explanation and those new wellbore diagrams to Dustin Winkler in Carlsbad with BLM and ask him to retract the protest. Once a protest is received, we cannot proceed until retracted.
- b. On the 30-015-10730 well, it appears a plug should have been placed over the 9-5/8 inch cut/pull point at 1783 feet. Would you please find out from your field people the likely reason this was not done? (for my information and for the records in this application)

The plugging bond issue. As I understand it, you get the individual well bonds back as soon as the well no longer requires this bond and they can be posted very quickly with Dorothy Phillips of this office. I can't release any injection/disposal permit until bonds are posted – per OCD Rule 5.9.

- c. Clearly BTA needs an individual well bond posted for one well of the 94 wells listed for OGRID 260297.
- d. The stranded OGRID 3019 has 5 wells and from your information it appears they are being taken care of. The trouble is they show up in our records as each well needing a bond. I will ask Dorothy and Daniel if this is OK but it would be better if you would work with them and the Artesia district office on this issue.

Will Jones New Mexico Oil Conservation Division Images Contacts

From:	Jones, William V., EMNRD
Sent:	Tuesday, June 15, 2010 4:43 PM
То:	'Pam Inskeep'
Cc:	'Dustin_Winkler@blm.gov'; Ezeanyim, Richard, EMNRD; Phillips, Dorothy, EMNRD
Subject:	RE: BTA 20504 JV-P Owl #5 App to Inject

Pam:

- Please look through this application and pick out all the Wellbore Diagrams and place the API numbers on these a. diagrams and email them back to me -1 will replace the ones in the application. 1 am having trouble matching up diagrams and wells because the well names are so similar.
- b. One well was drilled to 13510 feet and plugged back to 5743 feet but no further -- why was that well not plugged to surface? Is it producing? Maybe you could mark the status and productive interval on the wellbore diagram.
- c. The well you plan to inject into it seems to be plugged back with a retrievable packer is this true? Why was not a permanent bridge plug used?
- d. The 30-015-34749 well has not been plugged and the BLM is now protesting this application unless this well is
- e. Did you get the bond posted?

Thank You, Will Jones New Mexico Oil Conservation Division Images Contacts

The 30-015-34749 well has not been plugged and the BLM is now protesting this application unless this well-no longer productive? Please let me know the story. Did you get the bond posted?

From: Pam Inskeep [mailto:Pinskeep@btaoil.com] Sent: Tuesday, June 15, 2010 9:33 AM To: Jones, William V., EMNRD Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

We are, actually, in a bind for this. The well was previously permitted, drilled, and disposed into. All of the paperwork was not received in the OCD offices, and we lost our permit. We immediately ceased disposal and production of the well disposing into it. Thus, the re-application. All missing paperwork has been submitted.

The OGRID with the 94 wells is BTA Oil Producer LLC's current OGRID. The OGRID with 5 wells still under it is an old business deal. Those wells have been plugged, bur are waiting final filing of the P&A C103.

I will contact Dorothy today.

Thanks,

Pam

From: Jones, William V., EMNRD [mailto:William.V.Jones@state.nm.us] Sent: Tuesday, June 15, 2010 10:03 AM To: Pam Inskeep Cc: Phillips, Dorothy, EMNRD Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Pam:

Let me know if you folks are in a bind for this?

One thing that can really slow things down is Rule 5.9. Please make sure the Rule 5.9 issues are OK for BTA Oil (bonding and number of inactive wells)

It looks like there are 5 wells still under one OGRID and 94 wells under the 260297 OGRID. This is unusual - why is this?

You can pull up the status on the OCD web site, here are some links for the 260297 ogrid:

<u>http://www.emnrd.state.nm.us/OCD/OCDPermitting/Report/Stats/InactiveWellList.aspx?Production=15&Operator=260</u> <u>297&ACO=Exclude&TA=Exclude</u> <u>http://www.emnrd.state.nm.us/OCD/OCDPermitting/Report/Stats/InactiveWellFinancialAssuranceReport.aspx?Operato</u>

<u>r=260297</u>

Looks like the number of inactive wells is 2 which is OK but can't get any higher. There is a bond that needs to be posted – please call Dorothy Phillips and get that done.

Thank You,

Will Jones New Mexico Oil Conservation Division Images Contacts

From: Pam Inskeep [mailto:Pinskeep@btaoil.com]
Sent: Tuesday, June 15, 2010 8:43 AM
To: Jones, William V., EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Thanks for your update, Mr. Jones. Should you have any questions regarding the application, please just give a shout. You will receive an immediate response.

Thanks,

Pam

From: Jones, William V., EMNRD [mailto:William.V.Jones@state.nm.us]
Sent: Tuesday, June 15, 2010 9:32 AM
To: Warnell, Terry G, EMNRD; Pam Inskeep
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Pam:

Our mail did not run til late yesterday, but I don't remember any protest.

My desk is high with SWD applications, so it may be a while before I get to this one, and the 15 day suspense period is a minimum wait. The attorneys tell me that anyone can protest up until the date the Division director signs the permit.

Let us know if you folks receive any protest.

Will Jones New Mexico Oil Conservation Division Images Contacts

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Sent: Tuesday, June 15, 2010 10:03 AM
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Thanks for your update, Mr. Jones. Should you have any questions regarding the application, please just give a shout. You will receive an immediate response.

Thanks,

Pam

From: Jones, William V., EMNRD [mailto:William.V.Jones@state.nm.us]
Sent: Tuesday, June 15, 2010 9:32 AM
To: Warnell, Terry G, EMNRD; Pam Inskeep
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

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Let us know if you folks receive any protest.

Will Jones New Mexico Oil Conservation Division Images Contacts

From: Warnell, Terry G, EMNRD
Sent: Monday, June 14, 2010 2:00 PM
To: Pam Inskeep
Cc: Jones, William V., EMNRD
Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Hi Pam,

As far as I know, No objection has been filed against Application No. pTGW1014450225 Let's ask Will Jones the Engineer working on your application Will is out today but will be in tomorrow

From: Pam Inskeep [mailto:Pinskeep@btaoil.com] Sent: Monday, June 14, 2010 1:52 PM To: Warnell, Terry G, EMNRD Subject: RE: BTA 20504 JV-P Owl #5 App to Inject

Mr. Warnell,

With the 15-day inquiry/protest period after publication notice past, did the OCD receive any correspondence re same?

Thanks for your time.

# BTA Oil Producers 20504 JV-P Owl Draw Unit No.1 Re-Enter P&A Well to Place Cement Plug on 9-5/8" casing stub Wildcat Field Eddy County, New Mexico

Well Data:	TD 13,510' BP Surf		<u>Elevations:</u>	3333' KB 3316' GL 17' Diff	
	Casing:	13 3/8" 48# CSA 659' w/ 49 9 5/8" 40 & 43.5# CSA 5,743 below GL)		below GL) in 2 stgs, DV tool @ 2272'(Cut 6'	
	Cement Plug	s: 66' (56 sx) plug in 13 3/8" ca 100' (77 sx) plug in 13 3/8" c 110' (30 sx) plug in 9 5/8" ca 110' (30 sx) plug in 8 3/4" OI 110' (30 sx) plug in 8 3/4" OI	asing at 588 – sing at 5690 - H at 6990 - 71 H at 8290 - 84 H at 6990 - 71 H at 9990 - 10 H at 11790 - 1	688' (half in & out csg shoe) 5800' (half in & out csg) 00' .00' 00' 100' 1900'	
Procedure: 1)	Locate plugg	Locate plugged well at 2176278X, 348774 Y Section 28 T17S-R17E.			
2)	Prepare locat	Prepare location.			
3)	Dig out to surface plate. Tap surface plate to determine if there is any trapped pressure inside surface casing.				
4)	Weld on extension to 13 3/8" casing to get surface pipe above GL. Weld on Cameron 5000 psi casing head.				
5)	MI and RU workover rig and reverse unit and tanks.				
6)	NU 5000 psi BOP. Test BOP to 5000 psi. NU bell nipple so circulation goes to an open top reverse unit steel tank.				
7)	Pick up 12-1/4" Piranha mill, 1 - 8" drill collar and drill pipe.				
8)	Drill out surface cement plug at 6' to 66'.				
9)	POH and laydown 8" drill collar. PU 6 – 6-1/4" drill collars.				
10)	Run in hole with mill, DC and drill pipe to cement plug at 588'.				
11)	Drill out cement plug at 588 - 688'.				
12)	Pull out of hole with drill pipe, drill collars and mill.				
13) 14)	Run in hole with drill pipe open ended. Attempt to enter the 9-5/8" casing sub at 1785'. Work drill pipe to 1838' or deeper if possible. Rig up cement truck. Circulate hole with 9.3# salt gel mud. Mix and pump 124 Sx Class C cement with 2% CaCl. (100' plug in 12-1/4" open-hole times 100% excess)				
		20504 JV-P Owl D P&A Well Place Cemer Wildcat J Eddy County, N	Praw Unit 1 nt Plug on Field	No.1 9-5/8" casing stub	

- 15) Pull drill pipe up into surface casing at 659'.
- 16) Wait on cement overnight.
- 17) Run in hole with drill pipe and tag cement plug.
- Rig up cement truck. Mix and pump 62 Sx Class C cement with 2% CaCl. (100' plug in 12-1/4" open-hole)
- 19) Raise drill pipe to 688'. Spot a 100' (77 Sx ) Class C cement with 2% Cacl plug half in and half out of the 13-3/8" casing shoe.
- 20) Raise drill pipe to 66'. Spot a 66' (56 Sx ) Class C cement with 2% Cacl plug at top 13-3/8" casing.
- 21) Cut off 13-3/8" casing below ground level. Install P&A marker.
- 22) Restore surface location.

Date: 6/18/10

<u>\_\_\_\_\_/\_\_\_/\_\_\_</u>/\_\_\_\_\_/

20504 JV-P Owl Draw Unit No.1 Re-Enter P&A Well Place Cement Plug on 9-5/8" casing stub Wildcat Field Eddy County, New Mexico

orm 3160-5 ebruary 2005)	UNITED STATE				FORM APPROVED OM B No. 1004-0137
- · ·	DEPARTMENT OF THE BUREAU OF LAND MAN				Expires: March 31, 2007
				5. Lease Seria	
	NOTICES AND RE			1	, Allottee or Tribe Name
	ell. Use Form 3160 - 3 (				-
	IPLICATE- Other inst	ructions on reve	rse side.	7. If Unit o	CA/Agreement, Name and/or No.
. Type of Well Oil Well	Gas Well □□	P&A		8. Well Na	me and No.
Name of Operator BTA Oil Pro	ducers			Owl Di 9. API We	raw Unit, 20504 JV-P #1 SWD 
Address 104 S. Pecos, Midland, TX 79	701	3b. Phone No. (include 432-682-3753	e area code)	30-015	-10730 d Pool, or Exploratory Area
Location of Well (Footage, Sec.,	T., R., M., or Survey Description)			Wildca	
UL -K-, Sec. 18, T26S-R27E 1980' FSL & 1980' FWL					or Parish, State
					·
····	PPROPRIATE BOX(ES) TO			CEPUKI, OF	R OTHER DATA
TYPE OF SUBMISSION	 	TY	PE OF ACTION		
Notice of Intent	Acidize	Deepen	Production (St	ant/Resume)	Water Shut-Off
<b>—</b> —	Alter Casing	Fracture Treat	Reclamation		Well Integrity
Subsequent Report	Casing Repair	New Construction	Recomplete	handon	to place cmt plug on
Final Abandonment Notice	Convert to Injection	Plug and Abandon Plug Back	Water Disposa		9-5/8" csg stub
If the proposal is to deepen dire Attach the Bond under which the following completion of the inn testing has been completed. Fit determined that the site is ready	ectionally or recomplete horizontal he work will be performed or prov volved operations. If the operation nal Abandonment Notices must be y for final inspection.)	Ily, give subsurface location vide the Bond No. on file on results in a multiple comp e filed only after all require	ns and measured and to with BLM/BIA. Requi pletion or recompletion ements, including reclar	ue vertical dept red subsequent in a new interva- nation, have be	ork and approximate duration thereof. hs of all pertinent markers and zones. reports must be filed within 30 days al, a Form 3160-4 must be filed once en completed, and the operator has
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<ul> <li>If the proposal is to deepen dire Attach the Bond under which the following completion of the importance testing has been completed. Find determined that the site is ready BTA respectfully submits</li> <li>[Attachment]</li> <li>4. Thereby certify that the fore Name (Printed/Typed)</li> <li>Pagn Inskeep</li> </ul>	ectionally or recomplete horizontal he work will be performed or prov volved operations. If the operation nal Abandonment Notices must be y for final inspection.) the attached procedure for re egoing is true and correct THIS SPACE FOR attached. Approval of this notice of equitable title to those rights	Ily, give subsurface locatio vide the Bond No. on file v n results in a multiple comp e filed only after all require e-entry into the plugged e-entry into the plugged Title I Date FEDERAL OR S e does not warrant or	ns and measured and to with BLM/BIA. Requi pletion or recompletion ments, including reclar d wellbore to place a Regulatory Adminis	ue vertical dept red subsequent in a new interv nation, have be a cement plug trator 06/18/2010	hs of all pertinent markers and zones. reports must be filed within 30 days al, a Form 3160-4 must be filed once en completed, and the operator has
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From: Sent: To: Cc: Subject: Dustin\_Winkler@blm.gov Wednesday, June 09, 2010 12:26 PM Jones, William V., EMNRD Wesley\_Ingram@blm.gov 20504 JV-P Owl #5 SWD Application

Will,

After review, the BLM has noted that the 20504 JV-P Owl #1 (API: 30-015-34749) was not plugged adequately. The BLM would like to see this well addressed and fixed before disposal takes place with the 20504 JV-P Owl #5.

Thanks,

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

BID OIL Producers ILC

From:Dustin\_Winkler@blm.govSent:Wednesday, June 09, 2010 2:00 PMTo:Jones, William V., EMNRDCc:Ezeanyim, Richard, EMNRD; Wesley\_Ingram@blm.govSubject:RE: 20504 JV-P Owl #5 SWD Application

Spot a plug from 5690-5530' (minimum 25sx) (Bone Spring) CIBP @ 4010' with 25sx (Perfs -Brushy Canyon) Spot plug (minimum 25sx) from 2900'-2770' (Cherry Canyon) Spot plug (minimum 25sx) from 2050'-1850' WOC and tag (Delaware - Base of salt - Casing shoe) Spot plug (minimum 25sx) from 410'-300' WOC and tag (Top of salt) Spot plug 60' to surface

Dusty Winkler Petroleum Engineer Bureau of Land Management Carlsbad Field Office 575-234-5914

"Jones, William V., EMNRD"	
<william.v.jones@< td=""><td>То</td></william.v.jones@<>	То
state.nm.us>	< <u>Dustin_Winkler@blm.gov</u> >
	СС
06/09/2010 01:20 PM	< <u>Wesley_Ingram@blm.gov</u> >, "Ezeanyim, Richard, EMNRD"
	< <u>richard.ezeanyim@state.nm.us</u> >
	Subject
	RE: 20504 JV-P Owl #5 SWD Application

Dustin: Protest noted...

They neglected to put the API numbers on the diagrams....but I got it. One well appears to be on top of the other one. I will look over the files on both API's located almost at the same location. Let me know if you have specifics on how to plug it or where to put plugs - I can write it up generically if you don't.

Apparently they did not start disposal soon enough and lost permit SWD-1091 and had to re-apply.

Will Jones New Mexico Oil Conservation Division

From:	Pam Inskeep [Pinskeep@btaoil.com]
Sent:	Wednesday, June 16, 2010 3:17 PM
To:	Jones, William V., EMNRD BTA 20504 JV-P Owl #5 App to Inject
Subject:	BTA 20004 3V-P Own #3 App to mject
Attachments:	BTA Owl wells wellbore diagrams.pdf

Mr. Jones,

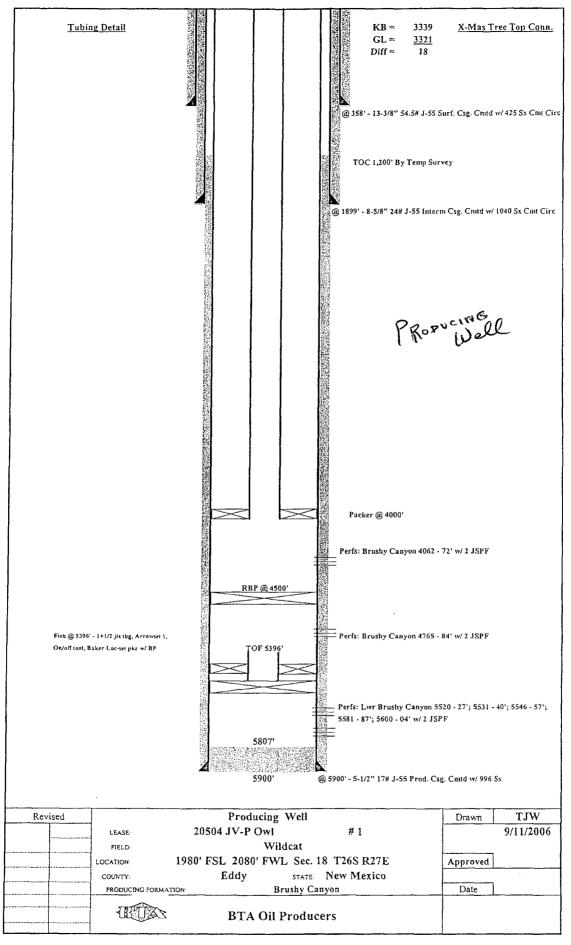
The following should answer your questions from this a.m.:

- a) Wellbore Diagrams have been labeled with API numbers. The diagram for the 20504 JV-P Owl Draw Unit #1 has been updated. All are attached.
- b) The 20504 JV-P Owl Draw Unit #1 (30-015-10730) was plugged to surface. The well was originally drilled by Jake L Hamon in Nov 1965 through Feb 1966 and plugged Feb 12, 1966. BTA filed with the BLM for reentry of the wellbore in Oct 2006, with intention to permit as a disposal if reentry was possible. The application to reenter was approved in Dec 2006. The reentry was unsuccessful and a sundry was submitted to the BLM in April 2007 proposing to P&A the well. The sundry was approved in April 2007. The well was plugged to surface 5/10/2007 and sundry notice submitted to the BLM May 2007. A copy of this sundry was resubmitted to the BLM July 2009 and accepted for record July 2009. Currently, reclamation of the P&A'd site is underway. Reclamation plan was approved by the BLM and OCD.
- c) In response to your question regarding a retrievable packer in the 20504 JV-P Owl #5, a 7" composite bridge plug was set at 3320' and capped with 20' cement for a PBTD of 3300'. The 20504 JV-P Owl #5 (30-015-35435) was drilled by BTA Oil Producers. BTA filed with the BLM for a permit to drill, as an oil well, in Feb 2007. The application was approved in Feb 2007. The well was drilled in April 2007. The well was completed as a disposal well May to June 2007.

Completion report was filed with the BLM June 2007. A copy of the report was resubmitted to the BLM May 2010 and accepted for record June 2010. Completion report was submitted to the OCD March 2010. Sundry notice of injection was submitted to the BLM Sept 2007. A copy of the sundry was resubmitted to the BLM May 2010 and was accepted for record June 2010. BTA submitted an application for authorization to inject to the OCD July 2007. The order (SWD-1091) was granted in August 2007. Injection began in Sept 2007. We lost our injection authority Feb 2010. Disposal into the well ceased immediately. All regulatory filings are caught up and current. Re-application for authorization to inject was submitted May 2010. Currently, reclamation of the site is underway to reduce the site footprint and reseed. Reclamation plan was approved by the BLM and OCD.

- d) The 20504 JV-P Owl #1 (30-015-34749) was drilled by BTA Oil Producers. BTA filed with the BLM for a permit to drill in Feb 2006. The application was approved in March 2006. The well was drilled in May 2006 and completed July 2006. Completion Report was filed with the BLM Sept 2006 and accepted for record Sept 2006. Completion report was filed with the OCD Sept 2006. A copy of the completion report was resubmitted to the OCD March 2007. Production began in August 2007. Currently, reclamation is underway to clean up overspray from a pop-off valve. Reclamation plan was approved by the BLM and OCD.
- e) We have not posted a bond for the five wells in question. All wells have been plugged, three locations have been fully reclaimed, with the remaining two currently being reclaimed with final work expected to be completed within the next week or two. C103 Subsequent Report will be submitted for all five at that time.

Please advise, should you have further questions or require additional information. I will give you a shout, after you have had an opportunity to review this email, as it is often easier to ask and respond to questions by phone rather than by written word.



BTA OIL PRODUCERS Application for Injection Owl, 20504 JV-P, #5 2310' FSL & 2130' FEL Section 18, T26S, R27E

30-015-10730

