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**west virginia** department of environmental protection

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Office of Oil and Gas  
601 57th Street SE  
Charleston, WV 25304  
(304) 926-0450  
(304) 926-0452 fax

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

January 16, 2015

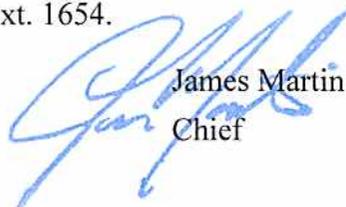
**WELL WORK PLUGGING PERMIT**

**Plugging**

This permit, API Well Number: 47-10900533, issued to HARPER, HAYDEN ENERGY KA, LLC, is evidence of permission granted to perform the specified well work at the location described on the attached pages and located on the attached plat, subject to the provisions of Chapter 22 of the West Virginia Code of 1931, as amended, and all rules and regulations promulgated thereunder, and to all conditions and provisions outlined in the pages attached hereto. Notification shall be given by the operator to the Oil and Gas Inspector at least 24 hours prior to the construction of roads, locations, and/or pits for any permitted work. In addition, the well operator shall notify the same inspector 24 hours before any actual well work is commenced and prior to running and cementing casing. Spills or emergency discharges must be promptly reported by the operator to 1-800-642-3074 and to the Oil and Gas inspector.

Upon completion of the plugging well work, the above named operator will reclaim the site according to the provisions of WV Code 22-6-30. The above named operator will also file, as required in WV Code 22-6-23, an affidavit on form WR-38 by two experienced persons in the operator's employment and the Oil and Gas inspector that the work authorized under this permit was performed and a description given. Failure to abide by all statutory and regulatory provisions governing all duties and operations here under may result in suspensions or revocation of this permit and in addition may result in civil and/or criminal penalties being imposed upon the operator.

This permit will expire in two (2) years from date of issue. If there are any questions, please free to contact me at (304) 926-0499 ext. 1654.

  
James Martin  
Chief

Operator's Well No: 10218  
Farm Name: TOLER, CHARLES E  
**API Well Number: 47-10900533**  
**Permit Type: Plugging**  
Date Issued: 01/16/2015

**Promoting a healthy environment.**

## PERMIT CONDITIONS

West Virginia Code §22-6-11 allows the Office of Oil and Gas to place specific conditions upon this permit. Permit conditions have the same effect as law. Failure to adhere to the specified permit conditions may result in enforcement action.

### CONDITIONS

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1. All pits must be lined with a minimum of 20 mil thickness synthetic liner.
2. In the event of an accident or explosion causing loss of life or serious personal injury in or about the well or while working on the well, the well operator or its contractor shall give notice, stating the particulars of the accident or explosion, to the oil and gas inspector and the Chief within twenty-four (24) hours.
3. Well work activities shall not constitute a hazard to the safety of persons.

10900533P

WW-4B  
Rev. 2/01

1) Date October 28, 2014  
2) Operator's  
Well No. Beazley #10218  
3) API Well No. 47-109 - 00533

STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF OIL AND GAS

APPLICATION FOR A PERMIT TO PLUG AND ABANDON

- 4) Well Type: Oil \_\_\_ / Gas X / Liquid injection \_\_\_ / Waste disposal \_\_\_ /  
(If "Gas, Production X or Underground storage \_\_\_) Deep \_\_\_ / Shallow \_\_\_
- 5) Location: Elevation 1670 Watershed n/a based on records  
District Pineville/Oceana 7.5 County Wyoming Quadrangle Oceana
- 6) Well Operator Hayden & Harper Energy KA, LLC 7) Designated Agent Eric Linn  
Address 1001 Moorehead Square Dr. Ste. 350 Address 1001 Moorehead Square Dr. Ste. 350  
Charlotte, NC 28203 Charlotte, NC 28203
- 8) Oil and Gas Inspector to be notified Name Gary Kennedy  
Address PO Box 268  
Nimitz, WV 25978
- 9) Plugging Contractor Name Patchwork Oil & Gas, LLC  
Address 8165 Elizabeth Pike  
Elizabeth, WV 26143

10) Work Order: The work order for the manner of plugging this well is as follows:

Detailed plugging schematic to follow

Detailed step by step plugging procedure to follow schematic

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Notification must be given to the district oil and gas inspector 24 hours before permitted work can commence.

Work order approved by inspector *Gary Kennedy* Date 11/13/14

**Beazley #10218**  
47-109-00533

**PROPOSED PLUGGING PROCEDURE**

1. Prepare plugging permit application.
2. Certify to surface and coal owners.
3. Certify to State inspector for signature.
4. Once all signatures are obtained, copy for our records and certify to Jeff at the State Office for approval.
5. Receive plugging permit good for 2 years.
6. Notify the designated State inspector 24 hours prior to commencing operations.
7. Take equipment to location and begin prepping for plug.
8. Rig up
9. Verify total depth of 2697'; open hole
10. Run in to TD, run 8.5 sacks of 6% Bentonite gel from TD up to 2203'
10. Pull tubing back to 2203' set first plug with 28.5 sacks of Class A cement with no more than 3% CaCl<sub>2</sub> and no other additives from 2203' up to 1922'. This will cover bottom plug. Pull tubing back.
11. Wait 8 hours, run in and tag plug. *ADD MORE CEMENT IF PLUG IS NOT AT 1922'.*
12. Run 2 sacks of 6% Bentonite gel from 1922' up to 1792'.
13. Based on records, 8 1/4 is cemented to approximately to 1800'.
14. Attempt to rip casing starting at 1700'.
15. Pull tubing back to 1792', set second plug with 66 sacks of Class A cement with no more than 3% CaCl<sub>2</sub> and no other additives from 1792' up to 1620'. This will cover gas show, rip, and elevation. ✓
16. Pull tubing back, wait 8 hours
17. Run back in and tag plug.

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*[Handwritten signature]*

18. Run 17 sacks of 6% Bentonite gel from 1620' up to 597'.
19. Pull tubing back to 597' and run 52 sacks of Class A cement with no more than 3% CaCl<sub>2</sub> and no other additives from 597' to 452', "attempt" to pull 10".
20. Pull tubing back, wait 8 hours
21. Run back in and tag plug. *ADD CEMENT IF TOP IS NOT 452'.*
22. Run 6 sacks of 6% Bentonite gel from 452' up to 100'.
23. Pull tubing back to 100' and run 42 sacks of Class A cement with no more than 3% CaCl<sub>2</sub> and no other additives from 100' to Surface.
22. Solidify pit with more cement and lime, then bury.
23. Set 6" x 4' steel pipe with concrete with 1/2" API identification.
24. Rig down, and move equipment out.
25. Prepare WR-34 & WR-38 for permit release.

★ REMOVE 18" IF POSSIBLE.  
JMM

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*[Handwritten signature]*

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10900533P



STATE OF WEST VIRGINIA  
DEPARTMENT OF MINES  
OIL AND GAS DIVISION 25

Quadrangle PINEVILLE

Permit No. WYO-533

WELL RECORD

Oil or Gas Well Gas  
(KIND)

Company Hope Natural Gas Company  
Address Clarksburg, W. Va.  
Farm Lash Litz Beasley Acres 1090  
Location (waters) \_\_\_\_\_  
Well No. 10218 Elev. 1670' ✓  
District Wyoming County Oceana  
The surface of tract is owned in fee by \_\_\_\_\_  
Address \_\_\_\_\_  
Mineral rights are owned by \_\_\_\_\_  
Address \_\_\_\_\_  
Drilling commenced 3-31-59  
Drilling completed 6-8-59  
Date Shot 6-10-59 From 2660 To 2677  
With 80 Qts.

Casing and Tubing	Used in Drilling	Left in Well	Packers
Size			Kind of Packer
16			
13	18	18	
10	505	505	Size of
8 1/4	2022	2022	
6 3/4			Depth set
5 3/16			
3			Perf. top
2			Perf. bottom
Liners Used			Perf. top
			Perf. bottom

Open Flow /10ths Water in \_\_\_\_\_ Inch  
/10ths Merc. in \_\_\_\_\_ Inch  
Volume 783 M Cu. Ft.  
Rock Pressure 740# lbs. hrs.  
Oil None bbls., 1st 24 hrs.  
WELL ACIDIZED No  
WELL FRACTURED No

CASING CEMENTED \_\_\_\_\_ SIZE \_\_\_\_\_ No. Ft. \_\_\_\_\_ Date \_\_\_\_\_  
8" casing cemented with 20 bags ✓ LESS THAN 200'  
COAL WAS ENCOUNTERED AT 547 FEET 24" INCHES ✓  
FEET INCHES FEET INCHES  
FEET INCHES FEET INCHES

RESULT AFTER TREATMENT \_\_\_\_\_  
ROCK PRESSURE AFTER TREATMENT \_\_\_\_\_  
Fresh Water None Feet \_\_\_\_\_ Salt Water None Feet \_\_\_\_\_

Formation	Color	Hard or Soft	Top	Bottom	Oil, Gas or Water	Depth	Remarks
Caly			0	3			
Sand			3	118			
Sand, Broken			118	153			
Lime			153	207			
Sand			207	258			
Lime, Sandy			258	292			
Slate			292	466			
Sand			466	488			
Slate			488	547			
Coal			547	549			
Sand			549	618			
Slate			618	661			
Sand			661	926			
Sand, Broken			926	936			
Lime, Sandy			936	946			
Sand, Broken			946	976			
Slate & Shells			976	1,040			
Sand, Broken			1,040	1,120			
Sand			1,120	1,429			
Slate			1,429	1,433			
Sand			1,433	1,507			
Sand, Broken			1,507	1,651			
Slate			1,651	1,693			
Sand, Broken			1,693	1,818	Gas	1742'	Show ✓
Red Rock			1,818	1,838			
Slate & Shells			1,838	1,884			
Sand			1,884	1,909			
Sand, Broken			1,909	1,921			
Slate & Shells			1,921	1,948			
Sand			1,948	1,970			



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*[Handwritten signature]*

B-2

10900533P

Formation	Color	Hard or Soft	Top 2 1/2'	Bottom	Oil, Gas or Water	Depth Found	Remarks
Red Rock			1,970	1,981			
Slate & Shells			1,981	2,018			
Sand, Ravenclyff			2,018	2,060			
Sand, Broken			2,060	2,087			
Lime			2,087	2,096			
Sand, Broken			2,096	2,143			
Red Rock			2,143	2,210			
Sand			2,210	2,241			
Red Rock			2,241	2,255			
Sand, Upper Maxton			2,255	2,311			
Lime			2,311	2,446			
Sand, Maxton Broken			2,446	2,465			
Red Rock			2,465	2,503			
Lime			2,503	2,569			
Red Rock			2,569	2,579			
Lime			2,579	2,631			
Sand, Lower Maxton			2,631	2,675	Gas	2667'-75'	✓
Red Rock			2,675	2,681			
Slate			2,681	2,697			
Total Depth				2,697			

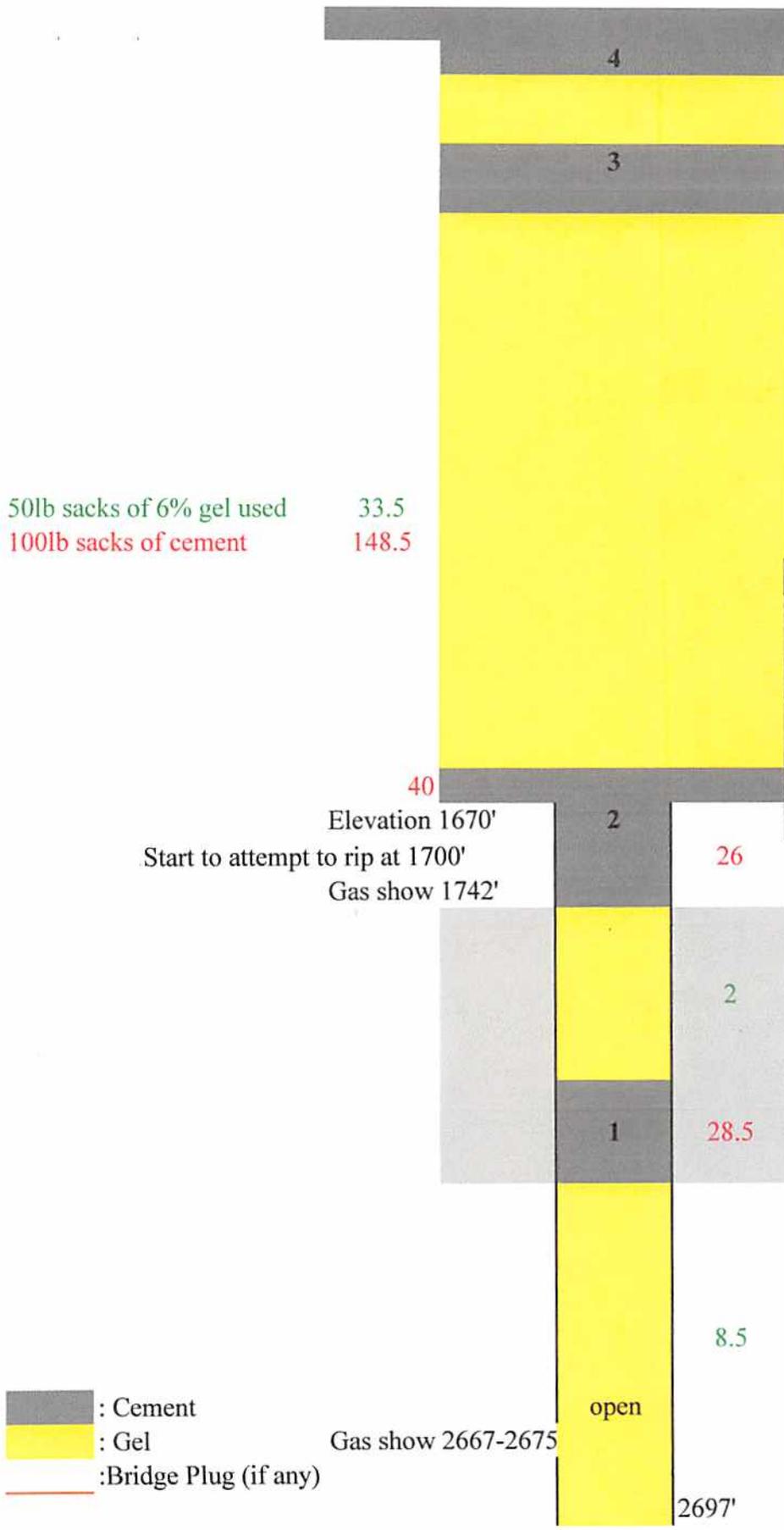
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NOV 20 1959

Date July 21, 1959, 19

APPROVED Hope Natural Gas Company, Owner

By Jack Bailey  
(Title)

*Handwritten initials*



13

50lb sacks of 6% gel used 33.5  
100lb sacks of cement 148.5

Plugs		
Plug #4	Surface-100'	Surface
Plug #3	452-597	Coal/10" rip if poss.
Plug #2	1620-1792	Gas, rip, elevation
Plug #1	1922-2022	Bottom Plug

Cement plugs are at a minimum of 100' Class A Cement with no more than 3% CaCl2 and no other additives.

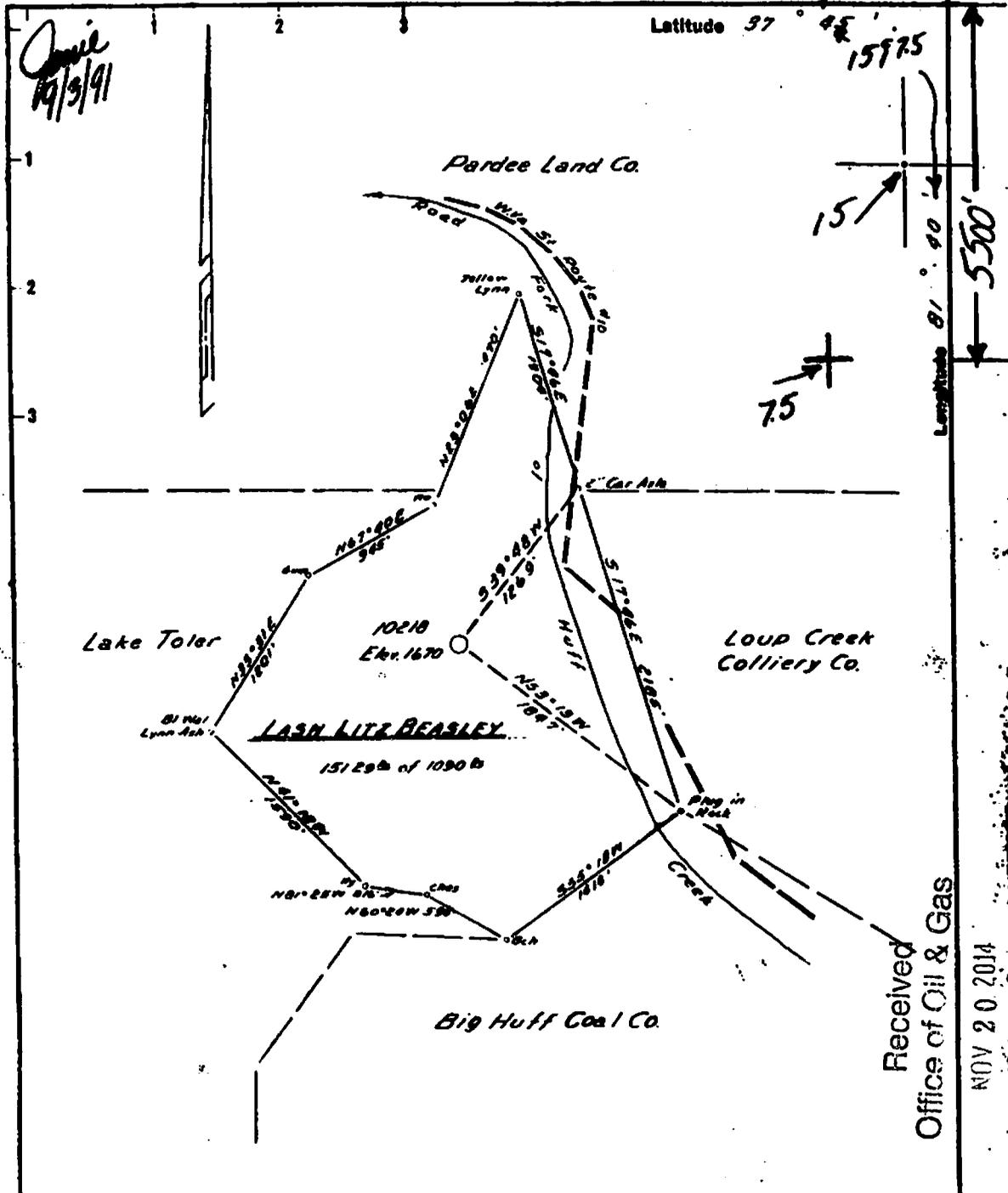
Gel spacers between all cement plugs must be fresh water with at least 6% Bentonite by weight

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█ : Cement  
█ : Gel  
— : Bridge Plug (if any)

2000'

10900533A



June 19/3/91

Latitude 37° 45' 15.75"

Longitude 81° 00' 00"

15'

5500'

7.5

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New Location X  
 Drill Deeper  
 Abandonment

Map Sheet 202 W, 9-17 N 62, F.B. 1204, R.M. 16

Company CNG Transmission  
 Address 445 N Main Street, Casper, WY 82401  
 Farm LASH LITZ BEASLEY  
 Tract \_\_\_\_\_ Acres 1090 Lease No. 37678  
 Well (Farm) No. \_\_\_\_\_ Serial No. 10218  
 Elevation (Spirit Level) 1670'  
 Quadrangle PINEVILLE 15/Oceana  
 County WYOMING District OCEANA  
 Engineer Ray H Bradley  
 Engineer's Registration No. 2425  
 File No. \_\_\_\_\_ Drawing No. \_\_\_\_\_  
 Date 1/23/59 Scale 1" = 50 Poles

STATE OF WEST VIRGINIA  
 DEPARTMENT OF MINES  
 OIL AND GAS DIVISION  
 CHARLESTON

WELL LOCATION MAP  
 AP# WV-47-109-0533P

7.5 Plugging Cancelled  
 + Denotes location of well on United States Topographic Maps, scale 1 to 62,500, latitude and longitude lines being represented by border lines as shown.

- Denotes one inch spaces on border line of original tracing.

Handwritten initials

WW-4A  
Revised 6-07

1) Date: October 28, 2014  
2) Operator's Well Number Beazley #10218  
3) API Well No.: 47 - 109 - 00533

**STATE OF WEST VIRGINIA**  
**DEPARTMENT OF ENVIRONMENTAL PROTECTION, OFFICE OF OIL AND GAS**  
**NOTICE OF APPLICATION TO PLUG AND ABANDON A WELL**

4) Surface Owner(s) to be served:	5) (a) Coal Operator
(a) Name <u>Charles Toler</u>	Name <u>A.Z Litz Heirs c/o J. William St. Clair</u>
Address <u>519 Huff Road</u>	Address <u>1102 Third Ave. Suite 107</u>
<u>Cyclone, WV 24827</u>	<u>Huntington, WV 25701</u>
(b) Name _____	(b) Coal Owner(s) with Declaration
Address _____	Name _____
	Address _____
(c) Name _____	Name _____
Address _____	Address _____
6) Inspector _____	(c) Coal Lessee with Declaration
Address _____	Name _____
	Address _____
Telephone _____	

**TO THE PERSONS NAMED ABOVE: You should have received this Form and the following documents:**

- (1) The application to Plug and Abandon a Well on Form WW-4B, which sets out the parties involved in the work and describes the well its and the plugging work order; and
- (2) The plat (surveyor's map) showing the well location on Form WW-6.

The reason you received these documents is that you have rights regarding the application which are summarized in the instructions on the reverses side. However, you are not required to take any action at all.

Take notice that under Chapter 22-6 of the West Virginia Code, the undersigned well operator proposes to file or has filed this Notice and Application and accompanying documents for a permit to plug and abandon a well with the Chief of the Office of Oil and Gas, West Virginia Department of Environmental Protection, with respect to the well at the location described on the attached Application and depicted on the attached Form WW-6. Copies of this Notice, the Application, and the plat have been mailed by registered or certified mail or delivered by hand to the person(s) named above (or by publication in certain circumstances) on or before the day of mailing or delivery to the Chief.

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**COMMONWEALTH OF PENNSYLVANIA**  
Notarial Seal  
Lynne M. Coogle, Notary Public  
City of Pittsburgh, Allegheny County  
My Commission Expires March 18, 2016  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Well Operator Hayden & Harper Energy KA, LLC  
By: [Signature]  
Its: Vice President  
Address 1001 Moorehead Square Dr. Ste. 350  
Charlotte, NC 28203  
Telephone 412-812-2501

Subscribed and sworn before me this 3rd day of November, 2014  
[Signature] Notary Public  
My Commission Expires March 18, 2016

**Oil and Gas Privacy Notice**

The Office of Oil and Gas processes your personal information, such as name, address and phone number, as a part of our regulatory duties. Your personal information may be disclosed to other State agencies or third parties in the normal course of business or as needed to comply with statutory or regulatory requirements, including Freedom of Information Act requests. Our office will appropriately secure your personal information. If you have any questions about our use of your personal information, please contact DEP's Chief Privacy Officer at [depprivacyofficer@wv.gov](mailto:depprivacyofficer@wv.gov).

see letter attached to permit

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:  
 Alpha Natural Res.  
 PO Box 69  
 Pax, WV 25986

2. Article Number  
 (Transfer from service label) 7014 0510 0001 8220 7826

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  Addressee  
 X Jules Gautier III

B. Received by (Printed Name) Jules Gautier III

C. Date of Delivery 11-13-14

D. Is delivery address different from item 1?  Yes  No  
 If YES, enter delivery address below:

3. Service Type  
 Certified Mail®  Priority Mail Express™  
 Registered  Return Receipt for Merchandise  
 Insured Mail  Collect on Delivery

4. Restricted Delivery? (Extra Fee)  Yes

PS Form 3811, July 2013 Domestic Return Receipt

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 10.70	0763
Certified Fee	\$3.30	05
Return Receipt Fee (Endorsement Required)	\$2.70	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
<b>Total Postage &amp; Fees</b>	<b>\$ 16.70</b>	11/07/2014

Sent To Charles Toler  
 Street, Apt. No., or PO Box No. 519 Huff Rd  
 City, State, ZIP+4 Cyclone, WV 24827

PS Form 3800, August 2006 See Reverse for Instructions

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Office of Oil & Gas  
NOV 20 2014

109 00533P

**Subject:** RE: Plug Well API 47-109-00533; Wyoming County, WV  
**From:** Jim Higgins (JHiggins@alphanr.com)  
**To:** patchworkoilgas@yahoo.com; elinn@haydenharper.com;  
**Cc:** jpinson@haydenharper.com; ringhram@haydenharper.com; lcoogle@haydenharper.com; jwilliamstclair@gmail.com;  
**Date:** Monday, November 3, 2014 11:32 AM

That will be fine, I spoke with Bill St Clair this morning and am aware of the plugging permit.

My address is PO Box 69, Pax, WV 25986

Jim Higgins

Chief Engineer

Republic/Pax

[jhiggins@alphanr.com](mailto:jhiggins@alphanr.com)

(304) 595-1870 e303 Republic office

(304) 877-6050 e1057 Pax office

(304) 552-0679 mobil



Received  
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 NOV 20 2014

**From:** Jessica Lott & Roger Whited [mailto:patchworkoilgas@yahoo.com]  
**Sent:** Monday, November 03, 2014 10:50 AM  
**To:** Eric Linn  
**Cc:** John Pinson; Robert Inghram; Lynne Coogle; Jim Higgins; jwilliamstclair@gmail.com  
**Subject:** Re: Plug Well API 47-109-00533; Wyoming County, WV

Okay, I will certify it today.

Dear Mr. Linn:

Thank you for taking my call earlier this day when I advised you of my receipt of the attached Notice to Plug and Abandon well no 47-109-0053 (Beazley 10218). I am the manager of the mineral owner, A.Z. Litz, LLC. The coal has been leased to a subsidiary of Alpha Natural Resources I suggest that your notice be directed to the coal lessee.

My contact person at Alpha is Jim Higgins. He is copied on this email. His telephone number is 304.552.0679. If any documents need to be signed by the mineral owner, then please send them to Mr. Higgins, who will forward them on to me.

If you have any questions or concerns, please contact me.

J. William St Clair, Manager  
A.Z. Litz, LLC  
P.O. Box 522  
Huntington, West Virginia 25710  
304.300.4475

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NOV 20 2014

STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
OFFICE OF OIL AND GAS

CONSTRUCTION AND RECLAMATION PLAN AND SITE REGISTRATION APPLICATION FORM  
GENERAL PERMIT FOR OIL AND GAS PIT WASTE DISCHARGE

Operator Name Hayden & Harper Energy KA, LLC OP Code 494495359

Watershed N/A based on records Quadrangle Pineville/Oceana 7.5

Elevation 1670 County Wyoming District Oceana

Description of anticipated Pit Waste: Fluids associated with plugging

Will a synthetic liner be used in the pit? Yes 20mil. *ELK*

Proposed Disposal Method For Treated Pit Wastes:

- Land Application
- Underground Injection ( UIC Permit Number \_\_\_\_\_ )
- Reuse (at API Number \_\_\_\_\_ )
- Off Site Disposal (Supply form WW-9 for disposal location)
- Other (Explain \_\_\_\_\_)

Proposed Work For Which Pit Will Be Used:

- Drilling
- Workover
- Other (Explain \_\_\_\_\_)
- Swabbing
- Plugging

I certify that I understand and agree to the terms and conditions of the GENERAL WATER POLLUTION PERMIT issued on August 1, 2005, by the Office of Oil and Gas of the West Virginia Department of Environmental Protection. I understand that the provisions of the permit are enforceable by law. Violations of any term or condition of the general permit and/or other applicable law or regulation can lead to enforcement action.

I certify under penalty of law that I have personally examined and am familiar with the information submitted on this application form and all attachments thereto and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

Company Official Signature *ELK*

Company Official (Typed Name) Eric Linn

Company Official Title Vice President

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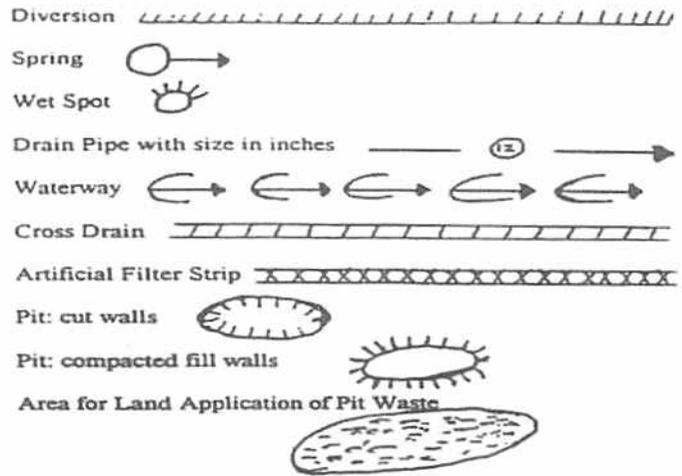
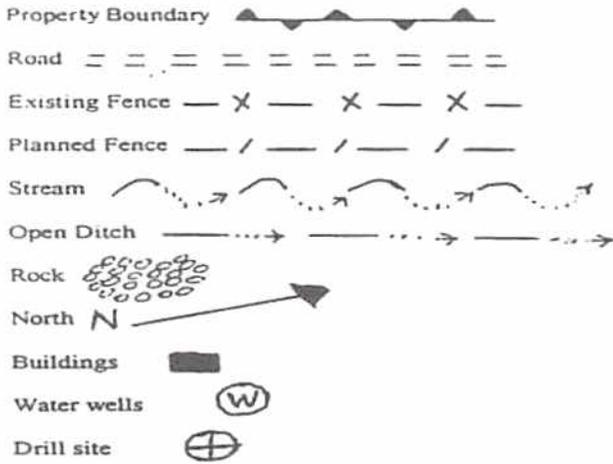
Subscribed and sworn before me this 3rd day of November, 2014

*Lynne M Coogle* Notary Public

My commission expires March 18, 2016

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Lynne M. Coogle, Notary Public  
City of Pittsburgh, Allegheny County  
My Commission Expires March 18, 2016  
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

LEGEND



Proposed Revegetation Treatment: Acres Disturbed 3.2 Prevegetation pH 4.9

Lime 2 Tons/acre or to correct to pH 6.5

Fertilizer (10-20-20 or equivalent) 500 lbs/acre (500 lbs minimum)

Mulch Straw Tons/acre

Seed Mixtures

Seed Type	Area I	lbs/acre
Tall Fescue		40
Ladino Clover		5

Seed Type	Area II	lbs/acre
Tall Fescue		40
Ladino Clover		5

Attach: Drawing(s) of road, location, pit and proposed area for land application.

Photocopied section of involved 7.5' topographic sheet.

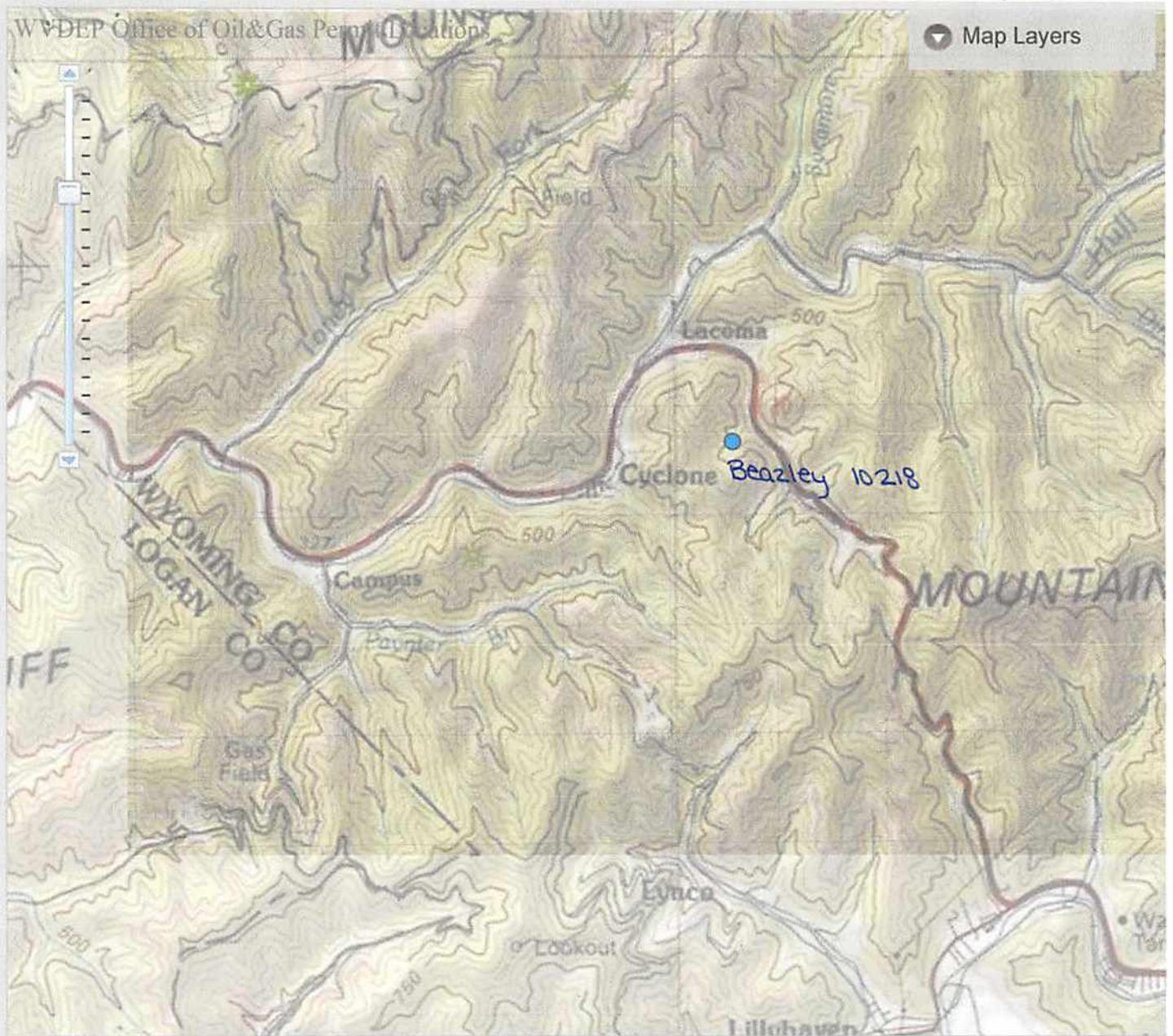
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Plan Approved by: *Henry Kennedy*

Comments: \_\_\_\_\_

Title: *Inspector* Date: *11/13/14*

Field Reviewed? ( ) Yes ( ) No



*Handwritten signature*

Beazley 10218 47-109-00533

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10900533P

WW-7  
8-30-06



West Virginia Department of Environmental Protection  
Office of Oil and Gas

**WELL LOCATION FORM: GPS**

API: 47-109-00533 WELL NO.: 10218

FARM NAME: Beazley (Toler)

RESPONSIBLE PARTY NAME: Hayden & Harper Energy KA, LLC

COUNTY: Wyoming DISTRICT: Oceana

QUADRANGLE: Pineville/Oceana 7.5

SURFACE OWNER: Charles Toler

ROYALTY OWNER: Charles Toler

UTM GPS NORTHING: 4176661.2

UTM GPS EASTING: 440597.5 GPS ELEVATION: 1670

The Responsible Party named above has chosen to submit GPS coordinates in lieu of preparing a new well location plat for a plugging permit or assigned API number on the above well. The Office of Oil and Gas will not accept GPS coordinates that do not meet the following requirements:

1. Datum: NAD 1983, Zone: 17 North, Coordinate Units: meters, Altitude: height above mean sea level (MSL) – meters.
2. Accuracy to Datum – 3.05 meters
3. Data Collection Method:

Survey grade GPS xx : Post Processed Differential \_\_\_\_\_  
Real-Time Differential \_\_\_\_\_

Mapping Grade GPS \_\_\_\_\_ : Post Processed Differential \_\_\_\_\_  
Real-Time Differential \_\_\_\_\_

4. **Letter size copy of the topography map showing the well location.**

I the undersigned, hereby certify this data is correct to the best of my knowledge and belief and shows all the information required by law and the regulations issued and prescribed by the Office of Oil and Gas.

Signature

Office Manager  
Title

October 28, 2014  
Date

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Office of Oil & Gas  
NOV 20 2014