

**RAILROAD COMMISSION OF TEXAS
HEARINGS DIVISION**

OIL & GAS DOCKET NO. 20-0286518

IN RE: P-5 ORGANIZATION REPORT OF BENGAL PETROLEUM USA, LLC

FINAL ORDER

The Commission finds that after notice and an opportunity for hearing regarding the captioned matter, the Operator failed to request a hearing and pay the hearing fee as required by 16 TEX. ADMIN. CODE §3.15(g)(4) and TEX. NAT. RES. CODE §89.022(f). This matter having been duly submitted to the Railroad Commission of Texas at conference held in its offices in Austin, Texas, the Commission makes the following findings of fact and conclusions of law.

FINDINGS OF FACT

1. Bengal Petroleum USA, LLC [Operator #064275] (the "Operator"), is the record operator or one or more inactive wells in the State of Texas and is required to file Organization Report (Form P-5) with the Commission. Operator's most recent P-5 was due on or before August 1, 2013.
2. After filing its most recent Organization Report (Form P-5) with the Commission, the Operator was notified they were deficient and had failed to comply with the requirements of 16 TEX. ADMIN. CODE § 3.15 (Surface Equipment Removal Requirements and Inactive Wells) and provided with a written statement of the reasons for the determination and allowed ninety (90) days from the date its P-5 was due to comply with the requirements of 16 TEX. ADMIN. CODE § 3.15 and TEX. NAT. RES. CODE §§89.021 - 89.030.
3. After the expiration of ninety (90) days and pursuant to 16 TEX. ADMIN CODE §3.15(g)(4), an authorized Commission employee determined that the Operator's Organization Report still could not be renewed because the Operator continued to fail to comply with the requirements of 16 TEX. ADMIN. CODE §3.15 (Surface Equipment Removal Requirements and Inactive Wells).
4. The Commission sent the Operator a letter by certified mail giving notice to the Operator of the determination of continued non-compliance regarding specified inactive wells, attached as Exhibit A to this order, and advising the Operator of the right to request a hearing to show compliance. The letter notified the Operator that the hearing request must be received in docket services no later than 30 days after the date of the letter. The letter also notified the Operator that a final order denying renewal of the Operator's Organization Report (Form P-5) would result in the cancellation of all P-4 Certificates of Compliance and the severance of all pipeline or other carrier connections.

5. All notices and letters from the Commission to the Operator on this matter were addressed and mailed to the Operator's most recently reported address on the Form P-5 Organization Report.

6. The Operator did not timely request a hearing and pay the hearing fee on these issues as required under 16 TEX. ADMIN. CODE §3.15(g)(4) (Surface Equipment Removal Requirements and Inactive Wells).

7. Statewide Rule 15 (16 TEX. ADMIN. CODE §3.15) is a Commission rule that relates to safety or the prevention or control of pollution.

CONCLUSIONS OF LAW

1. The Operator received proper notice and an opportunity for hearing regarding compliance with 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §§89.021 - 89.030.

2. All things necessary to the Commission attaining jurisdiction over the subject matter and the parties in this matter have been performed or have occurred.

3. The Operator is in violation of Commission Statewide Rule 15 and did not timely request a hearing to contest the determination that it was in violation.

4. The Operator's P-5 Organization Report should not be renewed and all of the Operator's P-4 Certificates of Compliance should be cancelled, with all related pipeline or other carrier connections severed. 16 Tex. Admin. Code §3.15 (g)(4) and Tex. Nat. Res. Code §§89.022(f), 91.704 - 91.706.

5. The Operator's P-5 Organization Report cannot be renewed until the operator brings the inactive wells shown on the attached Exhibit A into compliance with the requirements of 16 Tex. Admin. Code §3.15 and Tex. Nat. Res. Code §§89.021 - 89.030.

IT IS ORDERED that renewal of Bengal Petroleum USA, LLC's P-5 Organization Report is hereby **DENIED**.

It is further ORDERED that all P-4 Certificates of Compliance issued to Bengal Petroleum USA, LLC as operator of record are hereby **CANCELLED** and all related pipeline or other carrier connections are hereby **SEVERED**.

It is further ORDERED that Bengal Petroleum USA, LLC shall bring the wells on Exhibit A into compliance with Statewide Rule 15 (16 TEX. ADMIN. CODE §3.15) and that the Operator's P-5 Organization Report shall not be renewed until the wells on Exhibit A have been brought into compliance as required by this order.

It is further ORDERED that Bengal Petroleum USA, LLC and each person who held a position of ownership or control in the Operator at the time the Operator's most-recent P-5 Organization Report was filed shall be subject to the terms of TEX. NAT. RES. CODE §91.114.

It is further ORDERED by the Commission that this order shall not be final and effective until 20 days after a party is notified of the Commission's order. A party is presumed to have been notified of the Commission's order three days after the date on which the notice is actually mailed. If a timely motion for rehearing is filed by any party at interest, this order shall not become final and effective until such motion is overruled, or if such motion is granted, this order shall be subject to further action by the Commission. Pursuant to TEX. GOV'T. CODE §2001.146(e), the time allotted for Commission action on a motion for rehearing in this case prior to its being overruled by operation of law, is hereby extended until 90 days from the date the parties are notified of the order.

All requested Findings of Fact and Conclusions of Law which are not expressly adopted herein are **DENIED**. All pending motions and request for relief not previously granted or granted herein are **DENIED**.

RAILROAD COMMISSION OF TEXAS

(Signatures affixed by Rule 15 Inactive Well
Master Order dated January 21, 2014.)

API Number	District	ID Number	Lease Name	Well Number
417 30913	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	68
417 31243	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) Production fluids must be purged (certify on Form W-3C) No approved W-3X on file Must resolve UIC H-5 Test issue preventing 14(B)(2) approval	69
417 31392	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	82
417 31398	7B	03544	MORRIS, J. P. No approved W-3X on file	71
417 31399	7B	03544	MORRIS, J. P. No approved W-3X on file	72
417 31400	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	73
417 31401	7B	03544	MORRIS, J. P. No approved W-3X on file	74
417 31537	7B	03544	MORRIS, J. P. No approved W-3X on file	78
417 31538	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	76
417 31539	7B	03544	MORRIS, J. P. No approved W-3X on file	75
417 31621	7B	03544	MORRIS, J. P. No approved W-3X on file	92
417 31622	7B	03544	MORRIS, J. P. No approved W-3X on file	91
417 31881	7B	03544	MORRIS, J. P. No approved W-3X on file	93
417 31882	7B	03544	MORRIS, J. P. No approved W-3X on file	94
417 31895	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	79
417 32448	7B	03544	MORRIS, J. P. Electricity must be disconnected (certify on Form W-3C) No approved W-3X on file	97

Docket No. 20-0286518

Exhibit A

API Number	District	ID Number	Lease Name	Well Number
417 32449	7B	03544	MORRIS, J. P.	84
No approved W-3X on file				
417 32450	7B	03544	MORRIS, J. P.	85
No approved W-3X on file				
417 32929	7B	03544	MORRIS, J. P.	86
No approved W-3X on file				
417 33545	7B	03544	MORRIS, J. P.	100
No approved W-3X on file				
417 34122	7B	03544	MORRIS, J. P.	101
No approved W-3X on file				
417 35030	7B	03544	MORRIS, J. P.	102
No approved W-3X on file				
417 35031	7B	03544	MORRIS, J. P.	103
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 35143	7B	03544	MORRIS, J. P.	88
No approved W-3X on file				
417 35146	7B	03544	MORRIS, J. P.	104
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 35292	7B	03544	MORRIS, J. P.	109
No approved W-3X on file				
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
417 35293	7B	03544	MORRIS, J. P.	108
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 35719	7B	03544	MORRIS, J. P.	112
No approved W-3X on file				
417 35720	7B	03544	MORRIS, J. P.	111
Production fluids must be purged (certify on Form W-3C)				
No approved W-3X on file				
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
417 35723	7B	03544	MORRIS, J. P.	114
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 35724	7B	03544	MORRIS, J. P.	113
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 36642	7B	03544	MORRIS, J. P.	116
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				

Docket No. 20-0286518

Exhibit A

API Number	District	ID Number	Lease Name	Well Number
417 36958	7B	03544	MORRIS, J. P.	117
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 36959	7B	03544	MORRIS, J. P.	118
Electricity must be disconnected (certify on Form W-3C)				
No approved W-3X on file				
417 37673	7B	03544	MORRIS, J. P.	124
No approved W-3X on file				
417 37674	7B	03544	MORRIS, J. P.	120
No approved W-3X on file				
417 38373	7B	29357	FORT GRIFFIN 3-D	1
No approved W-3X on file				
417 81628	7B	03544	MORRIS, J. P.	2
No approved W-3X on file				
417 81629	7B	03544	MORRIS, J. P.	15
No approved W-3X on file				
417 81631	7B	03544	MORRIS, J. P.	55
No approved W-3X on file				
417 81638	7B	03544	MORRIS, J. P.	65
No approved W-3X on file				
447 30248	7B	10814	PUTNAM, J. C.	4
No approved W-3X on file				
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
447 30249	7B	10814	PUTNAM, J. C.	5
No approved W-3X on file				
447 30554	7B	08575	PUTNAM, T.R.	6
No approved W-3X on file				
447 31538	7B	08575	PUTNAM, T.R.	13
No approved W-3X on file				
447 31738	7B	10814	PUTNAM, J. C.	8
No approved W-3X on file				
447 31739	7B	10814	PUTNAM, J. C.	9
No approved W-3X on file				
447 32967	7B	08575	PUTNAM, T.R.	18
No approved W-3X on file				
447 33177	7B	10814	PUTNAM, J. C.	10
No approved W-3X on file				
447 33330	7B	10814	PUTNAM, J. C.	11
No approved W-3X on file				

Docket No. 20-0286518

Exhibit A

API Number	District	ID Number	Lease Name	Well Number
447 33987	7B	08575	PUTNAM, T.R.	103
No approved W-3X on file				
447 33988	7B	08575	PUTNAM, T.R.	101
No approved W-3X on file				
447 34111	7B	08575	PUTNAM, T.R.	105
No approved W-3X on file				
447 34112	7B	08575	PUTNAM, T.R.	104
No approved W-3X on file				
447 34113	7B	08575	PUTNAM, T.R.	106
No approved W-3X on file				
447 34182	7B	08575	PUTNAM, T.R.	108
No approved W-3X on file				
447 34184	7B	08575	PUTNAM, T.R.	111
No approved W-3X on file				
447 34605	7B	24255	PUTNAM JH	11 A
Production fluids must be purged (certify on Form W-3C)				
No approved W-3X on file				
447 34829	7B	25781	PUTNAM, J.H.	11B
Production fluids must be purged (certify on Form W-3C)				
No approved W-3X on file				
447 35528	7B	08575	PUTNAM, T.R.	1N
No approved W-3X on file				
447 35670	7B	29480	PUTNAM "J"	1
No approved W-3X on file				
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
447 36072	7B	29194	PUTNAM, J. H.	1
No approved W-3X on file				
447 36115	7B	10814	PUTNAM, J. C.	40
No approved W-3X on file				
447 36116	7B	10814	PUTNAM, J. C.	41
No approved W-3X on file				
447 80906	7B	08575	PUTNAM, T.R.	2
No approved W-3X on file				
447 80907	7B	08575	PUTNAM, T.R.	3
No approved W-3X on file				
447 81530	7B	10814	PUTNAM, J. C.	7
No approved W-3X on file				
447 81867	7B	17374	PUTNAM "A"	8
Production fluids must be purged (certify on Form W-3C)				
No approved W-3X on file				

Docket No. 20-0286518

Exhibit A