

**RAILROAD COMMISSION OF TEXAS  
HEARINGS DIVISION**

**OIL & GAS DOCKET NO. 20-0284612**

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**IN RE: P-5 ORGANIZATION REPORT OF PENERGY**

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**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. Penergy [Operator #651174] (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 May 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 Penergy's P-5 Organization Report is hereby **DENIED**.

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

**It is further ORDERED** that Penergy 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 Penergy 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 October 1, 2013.)

API Number	District	ID Number	Lease Name	Well Number
105 00109	7C	07088	SHANNON -A- Electricity must be disconnected (certify on Form W-3C) Production fluids must be purged (certify on Form W-3C)	17
105 00345	7C	02065	EL TEX Must resolve Field Operations H-15 delinquency preventing 14B2 approval	5
105 00372	7C	02056	VAUGHAN, ISABEL -A- Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 delinquency preventing 14B2 approval	18
105 00373	7C	02056	VAUGHAN, ISABEL -A- Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 delinquency preventing 14B2 approval	19
105 00376	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	42
105 00496	7C	02069	SHANNON, J. M. EST. -C- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2
105 00498	7C	07087	SHANNON, J. M. -B- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	7
105 00499	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	8
105 00500	7C	07087	SHANNON, J. M. -B- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	9
105 00502	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	11
105 00504	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	12
105 00505	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	14
105 00506	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C)	1
105 00509	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	2 A

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 00510	7C	02057	CBS SHANNON ESTATE	2
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 00511	7C	02057	CBS SHANNON ESTATE	3
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
105 00512	7C	02057	CBS SHANNON ESTATE	3 A
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
105 00514	7C	02057	CBS SHANNON ESTATE	5
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
105 00516	7C	02057	CBS SHANNON ESTATE	7
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
105 00518	7C	02057	CBS SHANNON ESTATE	9 A
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 00523	7C	02065	EL TEX	4
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 00524	7C	02065	EL TEX	6
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 00910	7C	02071	SHANNON -T-	2
Electricity must be disconnected (certify on Form W-3C)				
105 00911	7C	02071	SHANNON -T-	3
Electricity must be disconnected (certify on Form W-3C)				
105 00912	7C	02071	SHANNON -T-	4
Electricity must be disconnected (certify on Form W-3C)				
105 00915	7C	02071	SHANNON -T-	8
Electricity must be disconnected (certify on Form W-3C)				
105 00917	7C	02071	SHANNON -T-	9A
Electricity must be disconnected (certify on Form W-3C)				
105 00918	7C	02071	SHANNON -T-	10
Electricity must be disconnected (certify on Form W-3C)				
105 00919	7C	02071	SHANNON -T-	10A
Electricity must be disconnected (certify on Form W-3C)				
105 00920	7C	02071	SHANNON -T-	11
Electricity must be disconnected (certify on Form W-3C)				

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 00921	7C	02071	SHANNON -T- Electricity must be disconnected (certify on Form W-3C)	12W
105 00967	7C	02053	VAUGHAN -B- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval Must resolve District Office field rule violation issue preventing 14(B)(2) approval	1
105 00968	7C	02053	VAUGHAN -B- Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval Must resolve District Office field rule violation issue preventing 14(B)(2) approval	2
105 00972	7C	02053	VAUGHAN -B- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	8
105 00976	7C	02054	VAUGHAN -C- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	5
105 00977	7C	02054	VAUGHAN -C- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	4
105 00983	7C	02071	SHANNON -T- Electricity must be disconnected (certify on Form W-3C)	3A
105 01468	7C	02066	SHANNON, M. A. EST. Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	2
105 01474	7C	02066	SHANNON, M. A. EST. Electricity must be disconnected (certify on Form W-3C) Must resolve UIC H-5 Test issue preventing 14(B)(2) approval	8
105 01488	7C	02066	SHANNON, M. A. EST. Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	22
105 01842	7C	02056	VAUGHAN, ISABEL -A- Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2
105 01846	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	58
105 01847	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	57
105 01848	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	56
105 01852	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	52

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**Exhibit A**

API Number	District	ID Number	Lease Name	Well Number
105 01855	7C	02055	VAUGHAN, ISABEL	49
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01856	7C	02055	VAUGHAN, ISABEL	40
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01857	7C	02055	VAUGHAN, ISABEL	38
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01859	7C	02055	VAUGHAN, ISABEL	36
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01860	7C	02055	VAUGHAN, ISABEL	35
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01862	7C	02055	VAUGHAN, ISABEL	21
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01864	7C	02056	VAUGHAN, ISABEL -A-	17
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 01865	7C	02055	VAUGHAN, ISABEL	17
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01866	7C	02056	VAUGHAN, ISABEL -A-	16
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 01868	7C	02055	VAUGHAN, ISABEL	15
Electricity must be disconnected (certify on Form W-3C)				
105 01870	7C	02055	VAUGHAN, ISABEL	14
Electricity must be disconnected (certify on Form W-3C)				
105 01871	7C	02055	VAUGHAN, ISABEL	11
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01873	7C	02055	VAUGHAN, ISABEL	9
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01874	7C	02055	VAUGHAN, ISABEL	8
Electricity must be disconnected (certify on Form W-3C)				
105 01875	7C	02055	VAUGHAN, ISABEL	7
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 01876	7C	02055	VAUGHAN, ISABEL	6
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01878	7C	02055	VAUGHAN, ISABEL	5
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01880	7C	02055	VAUGHAN, ISABEL	4
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01881	7C	02056	VAUGHAN, ISABEL -A-	3
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 01882	7C	02055	VAUGHAN, ISABEL	3
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01883	7C	02055	VAUGHAN, ISABEL	2
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01886	7C	02055	VAUGHAN, ISABEL	1
Production fluids must be purged (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01887	7C	02055	VAUGHAN, ISABEL	62
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 01888	7C	02055	VAUGHAN, ISABEL	63
Electricity must be disconnected (certify on Form W-3C)				
105 01889	7C	02055	VAUGHAN, ISABEL	64
Electricity must be disconnected (certify on Form W-3C)				
105 02059	7C	02051	SHANNON, J. M. ESTATE -A-	3
Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 02061	7C	07088	SHANNON -A-	4
Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 02063	7C	07088	SHANNON -A-	5
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 02066	7C	07088	SHANNON -A-	9
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
105 02069	7C	07087	SHANNON, J. M. -B-	1
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				

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Exhibit A



API Number	District	ID Number	Lease Name	Well Number
105 02435	7C	02069	SHANNON, J. M. EST. -C- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	1
105 03076	7C	02074	VAUGHAN -D- T. Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1
105 03078	7C	02074	VAUGHAN -D- T. Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2
105 03082	7C	02074	VAUGHAN -D- T. Must resolve Field Operations H-15 delinquency preventing 14B2 approval	7
105 03377	7C	02075	VAUGHN -E- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1A
105 03379	7C	02075	VAUGHN -E- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2
105 03380	7C	02075	VAUGHN -E- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2A
105 03381	7C	02075	VAUGHN -E- Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 delinquency preventing 14B2 approval	3W
105 03383	7C	02075	VAUGHN -E- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	4
105 03384	7C	02075	VAUGHN -E- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	5
105 03550	7C	02053	VAUGHAN -B- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	4
105 10013	7C	07086	SHANNON -D- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	2
105 11100	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C) Production fluids must be purged (certify on Form W-3C)	9
105 30249	7C	05950	SHANNON "4" Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1
105 30279	7C	05990	SHANNON -18- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1
105 30693	7C	06807	SHANNON - 18A Must resolve Field Operations H-15 delinquency preventing 14B2 approval	1
105 30772	7C	07087	SHANNON, J. M. -B- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	15
105 31154	7C	05990	SHANNON -18- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	2

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 31567	7C	05990	SHANNON -18-	3
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 31969	7C	07087	SHANNON, J. M. -B-	3
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32017	7C	07087	SHANNON, J. M. -B-	25
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32072	7C	07087	SHANNON, J. M. -B-	22
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32073	7C	02055	VAUGHAN, ISABEL	23
Electricity must be disconnected (certify on Form W-3C)				
105 32096	7C	07087	SHANNON, J. M. -B-	21
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32131	7C	07087	SHANNON, J. M. -B-	18
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32763	7C	05950	SHANNON "4"	2
Must resolve Field Operations H-15 delinquency preventing 14B2 approval				
105 32848	7C	02055	VAUGHAN, ISABEL	74
Electricity must be disconnected (certify on Form W-3C)				
105 32849	7C	02055	VAUGHAN, ISABEL	75
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32850	7C	02055	VAUGHAN, ISABEL	76
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32851	7C	02055	VAUGHAN, ISABEL	77
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 32864	7C	02055	VAUGHAN, ISABEL	90
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 33010	7C	07087	SHANNON, J. M. -B-	16
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 33011	7C	12937	SHANNON "D"	3
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				
105 34923	7C	02052	SHANNON, J. M. EST. -B-	8
Electricity must be disconnected (certify on Form W-3C)				
Must resolve Field Operations H-15 failure preventing 14(B)(2) approval				

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 35164	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	4
105 35166	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	13
105 35167	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C) Must resolve UIC H-5 Test issue preventing 14(B)(2) approval	12
105 35168	7C	02066	SHANNON, M. A. EST. Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	46
105 35169	7C	02066	SHANNON, M. A. EST. Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	47
105 35174	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	33
105 35175	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	32
105 35176	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	26
105 35177	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	30
105 35178	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	27
105 35180	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	29
105 35190	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	17
105 35191	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	18 A
105 35193	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	20
105 35194	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	19
105 35203	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	31
105 35208	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	37
105 35209	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	35

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# Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 35210	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	36
105 35216	7C	02066	SHANNON, M. A. EST. Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	48
105 35227	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	10A
105 35228	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	14A
105 35232	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	28
105 35235	7C	02066	SHANNON, M. A. EST. Electricity must be disconnected (certify on Form W-3C)	49
105 35255	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	3 A
105 35256	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	11A
105 35268	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	6 A
105 35269	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	7A
105 35273	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	9 A
105 35277	7C	02052	SHANNON, J. M. EST. -B- Electricity must be disconnected (certify on Form W-3C)	41
105 35318	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	103
105 35319	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	116
105 35327	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	107
105 35362	7C	02066	SHANNON, M. A. EST. Electricity must be disconnected (certify on Form W-3C)	6A
105 35366	7C	02056	VAUGHAN, ISABEL -A- Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	25A
105 35381	7C	12243	SHANNON "4" Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	5

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# Exhibit A

API Number	District	ID Number	Lease Name	Well Number
105 80274	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	4A
105 80276	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	7
105 80282	7C	02051	SHANNON, J. M. ESTATE -A- Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	16
105 80286	7C	02053	VAUGHAN -B- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	6
105 80287	7C	02054	VAUGHAN -C- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	3
105 80289	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	34
105 80290	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	37
105 80291	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C) Must resolve Field Operations H-15 failure preventing 14(B)(2) approval	50
105 80294	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	54
105 80295	7C	02055	VAUGHAN, ISABEL Electricity must be disconnected (certify on Form W-3C)	55
105 80300	7C	02056	VAUGHAN, ISABEL -A- Must resolve Field Operations H-15 delinquency preventing 14B2 approval	4
105 80302	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C)	4
105 80303	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C)	6
105 80304	7C	02057	CBS SHANNON ESTATE Electricity must be disconnected (certify on Form W-3C)	8
105 80361	7C	02071	SHANNON -T- Electricity must be disconnected (certify on Form W-3C)	7
227 01006	08	19041	TEX-HAN DOUTHIT Electricity must be disconnected (certify on Form W-3C) Surface equipment must be removed (certify on Form W-3C)	5

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Exhibit A

API Number	District	ID Number	Lease Name	Well Number
227 03648	08	19041	TEX-HAN DOUTHIT	1
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				
227 30627	08	17401	REED-MCDONALD	4
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
227 33585	08	29531	O'DANIEL	3W
Must resolve UIC H-5 Test issue preventing 14(B)(2) approval				
227 34326	08	31888	FLEEMAN	1
Electricity must be disconnected (certify on Form W-3C)				
Surface equipment must be removed (certify on Form W-3C)				

INSUFFICIENT PROGRESS ON 10-YEAR INACTIVE WELLS: For wells shut-in at least 10 years as of September 1, 2010, operators were given five years to address the surface equipment removal requirements. For your Organization Report renewal on MAY 1, 2013, Rule 15(i) requires that you be at least 40% complete with this process. Current W-3C records indicate that you have not met this requirement (33% of your phase-in wells show that you have completed the surface cleanup). Your Organization Report renewal cannot be approved until you have met this requirement and have filed the appropriate Commission forms to update our records.

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Exhibit A