



RAILROAD COMMISSION OF TEXAS

HEARINGS DIVISION

PROPOSAL FOR DECISION

OIL AND GAS DOCKET NO. 20-0304847

THE APPLICATION OF JENEX PETROLEUM CORPORATION (OPERATOR NO. 431135) FOR UNRESTRICTED RENEWAL OF ITS P-5 AND TO CONTEST THE STAFF DETERMINATION THAT THE P-5 CANNOT BE RENEWED DUE TO NON-COMPLIANCE WITH THE INACTIVE WELL REQUIREMENTS OF STATEWIDE RULE 15

APPEARANCES

FOR APPLICANT JENEX PETROLEUM CORPORATION:

Brett Jensen, President
Lisa Barfield, Consultant

FOR THE RAILROAD COMMISSION OF TEXAS:

Melissa Glaze, Staff Attorney, Enforcement Section
Mysti Doshier, Manager, P-5 Financial Assurance Unit

FOR PROTESTANTS BAY LAXSON AND JO ANN LAXSON:

Bay Laxson

FOR PROTESTANT MICHAEL BORDOVSKY:

E. O. (Trey) Scott, III, Consultant

PROCEDURAL HISTORY:

Notice of Hearing:	June 28, 2017
Hearing on the merits:	August 11, 2017
Close of record:	August 25, 2017
Proposal for Decision:	September 13, 2017
Heard by:	Ryan M. Lammert, Administrative Law Judge Richard Eyster, P.G., Technical Examiner

SUMMARY

Jenex Petroleum Corporation (Operator No. 431135), (“Jenex”), challenges the Commission staff’s determination that renewal of its Form P-5 *Organization Report* (“P-5”) cannot be approved due to Jenex’s failure to comply with the inactive well requirements of Statewide Rule 15(d)(1) (generally, “SWR 15”).¹ Jenex is the current operator of 334 non-compliant wells—each well lacks an approved Form W-3X *Application for an Extension of Deadline for Plugging an Inactive Well*, 14 wells do not have on file a certified Form W-3C *Certification of Surface Equipment for an Inactive Well*, and five wells failed a Form H-5 mechanical integrity test.

Jenex appeared at hearing, but failed to present evidence sufficient to show that it is in compliance with the inactive well requirements of SWR 15. The record evidence demonstrates that the subject wells are not in compliance with the inactive well requirements of SWR 15, and, as a result, Jenex unsuccessfully challenged the Commission staff’s determination that renewal of its P-5 cannot be approved.

The Administrative Law Judge and Technical Examiner (collectively, “Examiners”) recommend that the Commission deny the unrestricted renewal of Jenex’s P-5.

APPLICABLE AUTHORITY

Statewide Rule 15(d)(1), titled *Plugging of inactive land wells required*:

- (1) An operator that assumes responsibility for the physical operation and control of an existing inactive land well must maintain the well and all associated facilities in compliance with all applicable Commission rules and orders and within six months after the date the Commission or its delegate approves an operator designation form must either:
 - (A) restore the well to active operation as defined by Commission rule;
 - (B) plug the well in compliance with a Commission rule or order; or

¹ 16 TEX. ADMIN. CODE § 3.15(d)(1).

(C) obtain approval of the Commission or its delegate of an extension of the plugging deadline for plugging an inactive well.

EVIDENCE PRESENTED

JENEX

Jenex did not present evidence demonstrating it had restored inactive wells to active operation, plugged inactive wells, or obtained approval of the Commission of an extension of the plugging deadline for plugging inactive wells. Rather, Jenex requested of the Commission an alternative Form P-5 renewal cycle consistent with its intent to transfer inactive wells to other operators:

. . . we would stipulate that the . . . information provided by . . . the Staff attorney is correct. However, we believe that there are mitigating circumstances with regard to our renewal laid out in our opening statement that – beginning with the fact that we are not looking for a – normal review. We’re not even looking for a renewal per se. We’re simply trying to move these wells to operators that can . . . operate them according to Commission rules . . .²

STAFF

The Enforcement Section of the Office of General Counsel (“Staff”) submitted evidence demonstrating that Jenex is the current operator of 334 wells which fail to comply with the inactive well requirements of SWR 15(d)(1).³ Staff demonstrated each well lacks an approved Form W-3X *Application for an Extension of Deadline for Plugging an Inactive Well*, 14 wells do not have on file a certified Form W-3C *Certification of Surface Equipment for an Inactive Well*, and five wells failed a Form H-5 mechanical integrity test.⁴

EXAMINERS’ OPINION

Statewide Rule 1 provides that “no organization . . . operating wholly or partially within this state . . . for the purpose of performing operations within the jurisdiction of the Commission shall perform such operations without having on file with the Commission an approved organization report.”⁵ Accordingly, an operator seeking to conduct oil and gas operations within the State must have on file with the Commission a current and active Form P-5 *Organization Report*.

² Tr., pg. 41, lns. 4 – 23.

³ See Staff Exhs. 2, 3, and 4.

⁴ *Id.*

⁵ 16 TEX. ADMIN. CODE § 3.1(a)(1).

Moreover, Texas law expressly conditions renewal of a P-5 on an operator's compliance with the requirements of SWR 15.⁶ Among other things, the rule establishes a deadline for plugging an inactive well. Unless the current operator obtains an extension of the plugging deadline, it must either re-establish production or plug the well within the deadline established by Commission rules.⁷

An inactive well is defined as "an unplugged well that has been spudded or has been equipped with the cemented casing and has no reported production, disposal, injection, or other permitted activity for a period of greater than 12 months."⁸

In order to obtain an extension of deadline for plugging an inactive land well, it is necessary that:

- (1) the Commission or its delegate approves the operator's W-3X;
- (2) the operator has a current organization report (Form P-5 Organization Report);
- (3) the operator has, and on request provides evidence of, a good faith claim to a continuing right to operate the well;
- (4) the well and associated facilities are otherwise in compliance with all Commission rules and orders; and
- (5) for a well more than 25 years old, the operator successfully conducts and the Commission or its delegate approves a fluid level or hydraulic pressure test establishing that the well does not pose a potential threat of harm to natural resources, including surface and subsurface water, oil, and gas.⁹

Terms and conditions to apply for an extension of deadline for plugging an inactive land well are dictated by SWR 15(f).¹⁰

At the hearing on the merits, it was incumbent upon Jenex to submit evidence that it had obtained approval of the Commission or its delegate of an extension of the deadline for plugging its inactive well, or, to otherwise provide evidence of compliance with the inactive well requirements of SWR 15. Jenex failed to present such evidence.

⁶ 16 TEX. NAT. RES. CODE § 89.022(c).

⁷ 16 TEX. ADMIN. CODE § 3.15(d)(1).

⁸ 16 TEX. ADMIN. CODE § 3.15(a)(6).

⁹ 16 TEX. ADMIN. CODE § 3.15(e).

¹⁰ 16 TEX. ADMIN. CODE § 3.15(f).

The evidence of record in this case shows that Jenex is the current operator of 334 wells which fail to meet the requirements of Statewide Rule 15. Jenex failed to secure from the Commission approved extensions of deadline for plugging its inactive land wells. Additionally, Jenex failed to re-establish production from the wells, or otherwise plug the wells in accordance with Commission rules. As a result, Jenex's inactive wells are non-compliant with the inactive well requirements of SWR 15; and, thus, Jenex failed to overcome Commission Staff determination that renewal of its P-5 cannot be approved.

CONCLUSION

The Examiners agree with Staff that Jenex should be denied unrestricted renewal of its P-5 *Organization Report* and make the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

1. Jenex Petroleum Corporation holds Operator No. 431135.
2. Jenex Petroleum Corporation is the current operator of the wells identified on attached Appendix 1, which is hereby adopted and incorporated by reference for all purposes.
3. On or about October 7, 2016, Jenex Petroleum Corporation was sent notification from the Commission's P-5 Financial Assurance Unit that renewal of its P-5 *Organization Report* would be denied for failure to meet the inactive well requirements of 16 TEX. ADMIN. CODE § 3.15(d)(1). The notice identified each of Jenex Petroleum Corporation's non-compliant wells and included a description of their respective deficiencies.
4. On or about April 5, 2017, Jenex Petroleum Corporation was sent notification from the Commission's P-5 Financial Assurance Unit that renewal of its P-5 *Organization Report* would be denied for failure to meet the inactive well requirements of 16 TEX. ADMIN. CODE § 3.15(d)(1). The notice identified each of Jenex Petroleum Corporation's non-compliant wells and included a description of their respective deficiencies. The notice also established a 30-day deadline by which Jenex Petroleum Corporation could request a hearing to challenge Commission staff determination.
5. Jenex Petroleum Corporation timely requested a hearing on the matter.
6. At hearing, Jenex Petroleum Corporation presented evidence insufficient to demonstrate compliance with the inactive well requirements of 16 TEX. ADMIN. CODE § 3.15(d)(1).
7. The 334 wells identified on Appendix 1 fail to meet the inactive well requirements of 16 TEX. ADMIN. CODE § 3.15(d)(1).

- a. Each well lacks an approved Form W-3X *Application for an Extension of Deadline for Plugging an Inactive Well*.
 - b. 14 wells do not have on file with the Commission a certified Form W-3C *Certification of Surface Equipment for an Inactive Well*. F
 - c. Five wells failed a Form H-5 mechanical integrity test.
8. For purposes of TEX. NAT. RES. CODE § 91.114, at all times relevant hereto Brett Jensen, is an individual who held a position of ownership or control of Jenex Petroleum Corporation.

CONCLUSIONS OF LAW

1. Jenex Petroleum Corporation has been provided notice and an opportunity for hearing regarding compliance with TEX. NAT. RES. CODE §§ 89.021-89.030 and 16 TEX. ADMIN. CODE § 3.15.
2. All things necessary to the Commission attaining jurisdiction have occurred.
3. Jenex Petroleum Corporation failed to comply with the requirements of TEX. NAT. RES. CODE, Chapter 89, Subchapter B-1 and 16 TEX. ADMIN. CODE § 3.15.
4. Jenex Petroleum Corporation's P-5 *Organization Report* may not be renewed or approved. TEX. NAT. RES. CODE § 89.022(c).

RECOMMENDATIONS

The Administrative Law Judge and Technical Examiner recommend the Commission enter an order denying the unrestricted renewal of Jenex Petroleum Corporation's P-5 Organization Report.

The Administrative Law Judge and Technical Examiner also recommend that the Commission cancel all extensions of deadline to plugging issued for the subject wells.

The Administrative Law Judge and Technical Examiner also recommend that Jenex Petroleum Corporation be directed to place the subject wells into compliance with all Commission Statewide Rules.

The Administrative Law Judge and Technical Examiner also recommend that Brett Jensen be made subject to the restrictions of TEX. NAT. RES. CODE § 91.114(a)(2).

RESPECTFULLY SUBMITTED,



RYAN M. LAMMERT
Administrative Law Judge



RICHARD EYSTER, P.G.
Technical Examiner

PSIWI Listing for 431135 - JENEX PETROLEUM CORPORATION - 8/4/2017 11:03:59 AM										
API No	Dist	ID No	Lease Name	Well No	W3C	W3X	Denials	SI Date	Multi	Notes
013 30487	01	13965	PRUITT, E.J. E5	49		NO	X	05/2012		
013 32058	01	09281	FOERSTER, PAUL	1		NO	X	01/2014		
013 80220	01	13965	PRUITT, E.J. E5	29		NO		04/2015		
013 80221	01	13965	PRUITT, E.J. E5	30		NO		04/2015		
013 80223	01	13965	PRUITT, E.J. E5	32		NO		04/2015		
163 00063	01	00082	BAIN, T. W.	45		NO		06/2015		
163 00140	01	00088	BURNS, JANE	44D		NO	H	03/2013		
163 00226	01	00091	BURNS, JANE -C-	18		NO		09/2003		
163 00228	01	03380	BIG FOOT OLMOS B SAND UNIT	346		NO		03/2004		
163 00231	01	03380	BIG FOOT OLMOS B SAND UNIT	348		NO		03/2004		
163 00234	01	00111	THOMPSON, WEBB -B-	21		NO		05/2013		
163 00238	01	00111	THOMPSON, WEBB -B-	27	NO	NO		06/2015		
163 00239	01	00111	THOMPSON, WEBB -B-	28	NO	NO		06/2015		
163 00242	01	00091	BURNS, JANE -C-	1		NO		07/2004		
163 00243	01	00091	BURNS, JANE -C-	2		NO		07/2004		
163 00244	01	00091	BURNS, JANE -C-	3		NO		08/2002		
163 00248	01	00091	BURNS, JANE -C-	7		NO		07/2004		
163 00253	01	00091	BURNS, JANE -C-	12		NO		07/2004		
163 00255	01	00091	BURNS, JANE -C-	14		NO		08/2003		
163 00256	01	00091	BURNS, JANE -C-	15		NO		09/2002		
163 00261	01	00089	BURNS, JANE -A-	9		NO	H	01/2015	(2 Compls)	
163 00262	01	00089	BURNS, JANE -A-	12A		NO		01/2015		
163 00263	01	00089	BURNS, JANE -A-	13		NO		06/2013		
163 00264	01	00037	ROSENAUER, MATTIE	11		NO		03/2004		
163 00265	01	00037	ROSENAUER, MATTIE	8		NO		06/2015		
163 00267	01	00037	ROSENAUER, MATTIE	61		NO		06/2015		
163 00269	01	00037	ROSENAUER, MATTIE	41		NO		03/2004		
163 00274	01	15057	SAUNDERS, SUSIE D	3		NO		06/2013		
163 00275	01	15057	SAUNDERS, SUSIE D	4		NO		06/2009		
163 00283	01	03380	BIG FOOT OLMOS B SAND UNIT	384		NO		07/2004		
163 00284	01	03380	BIG FOOT OLMOS B SAND UNIT	323 U		NO		01/2015	(2 Compls)	
163 00288	01	03380	BIG FOOT OLMOS B SAND UNIT	330		NO		03/2004		
163 00289	01	03380	BIG FOOT OLMOS B SAND UNIT	341		NO		03/2004		
163 00290	01	03380	BIG FOOT OLMOS B SAND UNIT	328		NO		03/2004		
163 00291	01	03380	BIG FOOT OLMOS B SAND UNIT	369		NO		07/2004		
163 00292	01	03380	BIG FOOT OLMOS B SAND UNIT	356		NO		01/2015		
163 00293	01	03380	BIG FOOT OLMOS B SAND UNIT	367		NO		07/2004		
163 00294	01	03380	BIG FOOT OLMOS B SAND UNIT	354		NO	H	08/2003		
163 00296	01	03380	BIG FOOT OLMOS B SAND UNIT	326		NO	H	03/2004		
163 00297	01	03380	BIG FOOT OLMOS B SAND UNIT	337		NO		03/2004		
163 00298	01	03380	BIG FOOT OLMOS B SAND UNIT	352		NO		03/2004		
163 00300	01	03380	BIG FOOT OLMOS B SAND UNIT	335		NO		01/2015		
163 00302	01	03380	BIG FOOT OLMOS B SAND UNIT	380		NO		08/2003		
163 00303	01	03380	BIG FOOT OLMOS B SAND UNIT	403		NO		07/2004		
163 00304	01	03380	BIG FOOT OLMOS B SAND UNIT	363		NO	H	03/2004		
163 00306	01	03380	BIG FOOT OLMOS B SAND UNIT	365		NO	H	08/2003		
163 00309	01	03380	BIG FOOT OLMOS B SAND UNIT	401		NO	H	09/2003		
163 00311	01	00107	THOMPSON, C. S. -A-	6		NO		07/2004		
163 00319	01	00108	THOMPSON, DENNIS	2		NO		07/2004		

APPENDIX 1

163 00320	01	00108	THOMPSON, DENNIS	3		NO		08/2003		
163 00321	01	00108	THOMPSON, DENNIS	4		NO		07/2004		
163 00324	01	00108	THOMPSON, DENNIS	7		NO		07/2004		
163 00326	01	03380	BIG FOOT OLMOS B SAND UNIT	302		NO		01/2015		
163 00329	01	03380	BIG FOOT OLMOS B SAND UNIT	253 U		NO		01/2015	(2 Compls)	
163 00330	01	03380	BIG FOOT OLMOS B SAND UNIT	219 U		NO		01/2015	(2 Compls)	
163 00333	01	03380	BIG FOOT OLMOS B SAND UNIT	310		NO		03/2004		
163 00335	01	03380	BIG FOOT OLMOS B SAND UNIT	309		NO		03/2004		
163 00336	01	03380	BIG FOOT OLMOS B SAND UNIT	292		NO		03/2004		
163 00338	01	03380	BIG FOOT OLMOS B SAND UNIT	230		NO		02/2004		
163 00340	01	03380	BIG FOOT OLMOS B SAND UNIT	209		NO		01/2015		
163 00342	01	03380	BIG FOOT OLMOS B SAND UNIT	211		NO		07/2004		
163 00343	01	03380	BIG FOOT OLMOS B SAND UNIT	212		NO		02/2004		
163 00344	01	03380	BIG FOOT OLMOS B SAND UNIT	210		NO		01/2015		
163 00345	01	03380	BIG FOOT OLMOS B SAND UNIT	238		NO		01/2015		
163 00347	01	03380	BIG FOOT OLMOS B SAND UNIT	257		NO	H	07/2004		
163 00348	01	14885	BURNS, JANE A	256		NO		01/2015		
163 00349	01	14885	BURNS, JANE A	255		NO		01/2015		
163 00350	01	14885	BURNS, JANE A	235		NO		01/2015		
163 00351	01	14885	BURNS, JANE A	254		NO		01/2015		
163 00352	01	14885	BURNS, JANE A	207		NO		03/2008		
163 00353	01	14885	BURNS, JANE A	234		NO		01/2015		
163 00357	01	03380	BIG FOOT OLMOS B SAND UNIT	236		NO	H	07/2004		
163 00359	01	03380	BIG FOOT OLMOS B SAND UNIT	277		NO		07/2004		
163 00363	01	03380	BIG FOOT OLMOS B SAND UNIT	296		NO		08/2003		
163 00364	01	03380	BIG FOOT OLMOS B SAND UNIT	297		NO	H	03/2004		
163 00365	01	03380	BIG FOOT OLMOS B SAND UNIT	298		NO		09/2003		
163 00366	01	03380	BIG FOOT OLMOS B SAND UNIT	218		NO		09/2003		
163 00367	01	03380	BIG FOOT OLMOS B SAND UNIT	312		NO		03/2004		
163 00373	01	03380	BIG FOOT OLMOS B SAND UNIT	311		NO		03/2004		
163 00374	01	03380	BIG FOOT OLMOS B SAND UNIT	314		NO		10/2003		
163 00378	01	03380	BIG FOOT OLMOS B SAND UNIT	371		NO		07/2004		
163 00381	01	03380	BIG FOOT OLMOS B SAND UNIT	386		NO		01/2015		
163 00382	01	03380	BIG FOOT OLMOS B SAND UNIT	373		NO		07/2004		
163 00383	01	03380	BIG FOOT OLMOS B SAND UNIT	387		NO	H	07/2004		
163 00384	01	03380	BIG FOOT OLMOS B SAND UNIT	374		NO		01/2015		
163 00390	01	03380	BIG FOOT OLMOS B SAND UNIT	332		NO		03/2004		
163 00392	01	03380	BIG FOOT OLMOS B SAND UNIT	406		NO		07/2004		
163 00393	01	03380	BIG FOOT OLMOS B SAND UNIT	411I		NO		01/2015		
163 00394	01	03380	BIG FOOT OLMOS B SAND UNIT	410I		NO		07/2004		
163 00395	01	03380	BIG FOOT OLMOS B SAND UNIT	398		NO	H	08/2003		
163 00397	01	03380	BIG FOOT OLMOS B SAND UNIT	358		NO		07/2004		
163 00399	01	03380	BIG FOOT OLMOS B SAND UNIT	400		NO	H	07/2004		
163 00428	01	03380	BIG FOOT OLMOS B SAND UNIT	316		NO		01/2015		
163 00430	01	03380	BIG FOOT OLMOS B SAND UNIT	319		NO		01/2015		
163 00431	01	03380	BIG FOOT OLMOS B SAND UNIT	189		NO		01/2015		
163 00434	01	03380	BIG FOOT OLMOS B SAND UNIT	173		NO		07/2004		
163 00435	01	03380	BIG FOOT OLMOS B SAND UNIT	161I		NO	H	03/2006		
163 00436	01	03380	BIG FOOT OLMOS B SAND UNIT	160		NO		01/2004		
163 00441	01	03380	BIG FOOT OLMOS B SAND UNIT	174		NO		01/2015		
163 00443	01	14988	BIG FOOT OLMOS D SAND UNIT	200		NO		06/2009		

163 00444	01	14988	BIG FOOT OLMOS D SAND UNIT	201		NO		06/2009		
163 00445	01	14988	BIG FOOT OLMOS D SAND UNIT	202		NO		06/2009		
163 00446	01	03380	BIG FOOT OLMOS B SAND UNIT	203		NO	H	10/2000		
163 00447	01	03380	BIG FOOT OLMOS B SAND UNIT	191		NO		03/2006		
163 00452	01	03380	BIG FOOT OLMOS B SAND UNIT	176		NO		03/2006		
163 00453	01	14988	BIG FOOT OLMOS D SAND UNIT	190		NO		06/2009		
163 00454	01	03380	BIG FOOT OLMOS B SAND UNIT	172		NO	H	02/2004		
163 00455	01	03380	BIG FOOT OLMOS B SAND UNIT	175		NO		01/2015		
163 00456	01	03380	BIG FOOT OLMOS B SAND UNIT	1381		NO		01/1998		
163 00492	01	03380	BIG FOOT OLMOS B SAND UNIT	63		NO		01/2015		
163 00493	01	03380	BIG FOOT OLMOS B SAND UNIT	70		NO	H	07/2004		
163 00495	01	03380	BIG FOOT OLMOS B SAND UNIT	47		NO	H	03/2011		
163 00496	01	03380	BIG FOOT OLMOS B SAND UNIT	49		NO	H	07/2004		
163 00498	01	03380	BIG FOOT OLMOS B SAND UNIT	82		NO		08/2002		
163 00499	01	03380	BIG FOOT OLMOS B SAND UNIT	48		NO		01/2015		
163 00500	01	03380	BIG FOOT OLMOS B SAND UNIT	58		NO		01/2015		
163 00501	01	03380	BIG FOOT OLMOS B SAND UNIT	69		NO		07/2004		
163 00504	01	03380	BIG FOOT OLMOS B SAND UNIT	78		NO		01/2015		
163 00507	01	03380	BIG FOOT OLMOS B SAND UNIT	85		NO		01/2015		
163 00509	01	03380	BIG FOOT OLMOS B SAND UNIT	361		NO		07/2004		
163 00514	01	03380	BIG FOOT OLMOS B SAND UNIT	86		NO		07/2004		
163 00516	01	03380	BIG FOOT OLMOS B SAND UNIT	95		NO	H	02/2004		
163 00518	01	03380	BIG FOOT OLMOS B SAND UNIT	79		NO	H	02/2004		
163 00520	01	03380	BIG FOOT OLMOS B SAND UNIT	97		NO		07/2004		
163 00522	01	03380	BIG FOOT OLMOS B SAND UNIT	93		NO		03/2003		
163 00523	01	03380	BIG FOOT OLMOS B SAND UNIT	59		NO	H	07/2004		
163 00524	01	03380	BIG FOOT OLMOS B SAND UNIT	75		NO		07/2004		
163 00525	01	03380	BIG FOOT OLMOS B SAND UNIT	55		NO	H	03/2011		
163 00526	01	03380	BIG FOOT OLMOS B SAND UNIT	45		NO		03/2011		
163 00528	01	03380	BIG FOOT OLMOS B SAND UNIT	64		NO		03/2011		
163 00542	01	03380	BIG FOOT OLMOS B SAND UNIT	32		NO		07/2004		
163 00544	01	03380	BIG FOOT OLMOS B SAND UNIT	273		NO		03/2004		
163 00562	01	03380	BIG FOOT OLMOS B SAND UNIT	6		NO		07/2004		
163 00563	01	00083	BAKER, CHARLES	5		NO		08/2014		
163 00598	01	00102	SHELLER, H. A.	4		NO		06/2015		
163 00599	01	00102	SHELLER, H. A.	5	NO	NO		06/2015		
163 00600	01	00102	SHELLER, H. A.	6	NO	NO		06/2015		
163 00601	01	00102	SHELLER, H. A.	7		NO		06/2015		
163 00602	01	00102	SHELLER, H. A.	8	NO	NO		06/2015		
163 00917	01	03380	BIG FOOT OLMOS B SAND UNIT	4		NO		01/2015		
163 00919	01	03380	BIG FOOT OLMOS B SAND UNIT	13		NO		01/2015		
163 00920	01	03380	BIG FOOT OLMOS B SAND UNIT	11		NO		01/2015		
163 00924	01	03380	BIG FOOT OLMOS B SAND UNIT	2		NO		01/2015		
163 00925	01	03380	BIG FOOT OLMOS B SAND UNIT	15		NO		01/2015		
163 00926	01	03380	BIG FOOT OLMOS B SAND UNIT	14		NO		01/2015		
163 00928	01	03380	BIG FOOT OLMOS B SAND UNIT	24		NO		01/2015		
163 00929	01	03380	BIG FOOT OLMOS B SAND UNIT	33		NO		01/2015		
163 00932	01	03380	BIG FOOT OLMOS B SAND UNIT	83		NO		01/2015		
163 00934	01	03380	BIG FOOT OLMOS B SAND UNIT	54		NO		01/2015		
163 00935	01	03380	BIG FOOT OLMOS B SAND UNIT	46		NO		01/2015		
163 00936	01	03380	BIG FOOT OLMOS B SAND UNIT	42		NO		01/2015		

163 00945	01	03380	BIG FOOT OLMOS B SAND UNIT	99		NO		01/2015		
163 00948	01	03380	BIG FOOT OLMOS B SAND UNIT	87		NO		01/2015		
163 00949	01	03380	BIG FOOT OLMOS B SAND UNIT	92		NO		01/2015		
163 00950	01	03380	BIG FOOT OLMOS B SAND UNIT	96		NO		01/2015		
163 00952	01	03380	BIG FOOT OLMOS B SAND UNIT	94		NO		01/2015		
163 00953	01	03380	BIG FOOT OLMOS B SAND UNIT	109		NO		01/2015		
163 00955	01	03380	BIG FOOT OLMOS B SAND UNIT	134		NO		01/2015		
163 00957	01	03380	BIG FOOT OLMOS B SAND UNIT	121		NO		01/2015		
163 00958	01	03380	BIG FOOT OLMOS B SAND UNIT	119		NO		01/2015		
163 00959	01	03380	BIG FOOT OLMOS B SAND UNIT	148		NO		01/2015		
163 00962	01	03380	BIG FOOT OLMOS B SAND UNIT	157		NO		01/2015		
163 00964	01	03380	BIG FOOT OLMOS B SAND UNIT	169		NO		01/2015		
163 00965	01	03380	BIG FOOT OLMOS B SAND UNIT	171		NO		01/2015		
163 00966	01	03380	BIG FOOT OLMOS B SAND UNIT	180		NO		01/2015		
163 00967	01	04373	BORDOVSKY, J. S. "A"	194		NO		01/2015		
163 00968	01	04373	BORDOVSKY, J. S. "A"	196		NO		01/2015		
163 00969	01	03380	BIG FOOT OLMOS B SAND UNIT	150		NO		01/2015		
163 00970	01	03380	BIG FOOT OLMOS B SAND UNIT	152		NO		01/2015		
163 00972	01	03380	BIG FOOT OLMOS B SAND UNIT	111		NO		01/2015		
163 00973	01	03380	BIG FOOT OLMOS B SAND UNIT	113		NO		01/2015		
163 00974	01	03380	BIG FOOT OLMOS B SAND UNIT	115		NO		01/1998		
163 00976	01	03380	BIG FOOT OLMOS B SAND UNIT	125		NO		01/1998		
163 00977	01	03380	BIG FOOT OLMOS B SAND UNIT	127		NO		01/2015		
163 00979	01	03380	BIG FOOT OLMOS B SAND UNIT	136		NO		01/2015		
163 00986	01	03380	BIG FOOT OLMOS B SAND UNIT	182		NO		01/2015		
163 00987	01	14988	BIG FOOT OLMOS D SAND UNIT	183		NO		02/2008		
163 00995	01	14885	BURNS, JANE A	221		NO		01/2015		
163 00996	01	14885	BURNS, JANE A	222		NO	H	01/2015		
163 00997	01	14885	BURNS, JANE A	242		NO		01/2015		
163 00998	01	14885	BURNS, JANE A	243		NO	H	01/2015		
163 00999	01	03380	BIG FOOT OLMOS B SAND UNIT	244		NO		01/2015	(2 Compls)	
163 01000	01	14885	BURNS, JANE A	220		NO		01/2015		
163 01001	01	14885	BURNS, JANE A	233		NO	H	01/2015		
163 01002	01	14885	BURNS, JANE A	263		NO		01/2015		
163 01011	01	03380	BIG FOOT OLMOS B SAND UNIT	286		NO		01/2015		
163 01014	01	14885	BURNS, JANE A	264		NO		01/2015		
163 01015	01	03380	BIG FOOT OLMOS B SAND UNIT	268		NO		01/2015		
163 01023	01	03380	BIG FOOT OLMOS B SAND UNIT	376		NO		01/2015		
163 01025	01	03380	BIG FOOT OLMOS B SAND UNIT	359		NO		01/2015		
163 01028	01	03380	BIG FOOT OLMOS B SAND UNIT	347		NO		01/2015		
163 01036	01	03380	BIG FOOT OLMOS B SAND UNIT	342		NO		01/2015		
163 01037	01	03380	BIG FOOT OLMOS B SAND UNIT	353		NO		01/2015		
163 01045	01	03380	BIG FOOT OLMOS B SAND UNIT	383		NO		01/2015		
163 01046	01	03380	BIG FOOT OLMOS B SAND UNIT	368		NO		01/2015		
163 01047	01	03380	BIG FOOT OLMOS B SAND UNIT	364		NO		03/2004		
163 01058	01	03380	BIG FOOT OLMOS B SAND UNIT	318		NO		01/2015		
163 01062	01	03380	BIG FOOT OLMOS B SAND UNIT	270		NO		01/2015		
163 01063	01	03380	BIG FOOT OLMOS B SAND UNIT	290		NO		01/2015		
163 01084	01	03380	BIG FOOT OLMOS B SAND UNIT	293		NO		03/2004		
163 01605	01	06251	ROCHE, LUCY	6		NO		06/2013		
163 01618	01	00118	BURNS, JANE	35		NO		03/2011		

163 01619	01	00118	BURNS, JANE	36		NO		01/2000		
163 01631	01	00082	BAIN, T. W.	25		NO		06/2015		
163 01636	01	00082	BAIN, T. W.	22		NO		06/2015		
163 01673	01	00083	BAKER, CHARLES	1	NO	NO		08/2014		
163 01675	01	00083	BAKER, CHARLES	3		NO		05/2002		
163 01677	01	03380	BIG FOOT OLMOS B SAND UNIT	5		NO		07/2004		
163 01679	01	03380	BIG FOOT OLMOS B SAND UNIT	17		NO		07/2004		
163 01680	01	03380	BIG FOOT OLMOS B SAND UNIT	31		NO		07/2004		
163 01682	01	03380	BIG FOOT OLMOS B SAND UNIT	12		NO		01/2015		
163 01687	01	03380	BIG FOOT OLMOS B SAND UNIT	91		NO		02/2004		
163 01688	01	03380	BIG FOOT OLMOS B SAND UNIT	98		NO		07/2002		
163 01689	01	03380	BIG FOOT OLMOS B SAND UNIT	73		NO	H	03/2003		
163 01690	01	03380	BIG FOOT OLMOS B SAND UNIT	34		NO		08/2013		
163 01691	01	03380	BIG FOOT OLMOS B SAND UNIT	53		NO		03/2011		
163 01692	01	03380	BIG FOOT OLMOS B SAND UNIT	51		NO		07/2004		
163 01693	01	03380	BIG FOOT OLMOS B SAND UNIT	43		NO		07/2004		
163 01694	01	03380	BIG FOOT OLMOS B SAND UNIT	62		NO		07/2004		
163 01697	01	03380	BIG FOOT OLMOS B SAND UNIT	89		NO		08/2002		
163 01701	01	03380	BIG FOOT OLMOS B SAND UNIT	41		NO		07/2004		
163 01705	01	03380	BIG FOOT OLMOS B SAND UNIT	71		NO		01/2015		
163 01707	01	03380	BIG FOOT OLMOS B SAND UNIT	280		NO		09/2002		
163 01708	01	03380	BIG FOOT OLMOS B SAND UNIT	281		NO		02/2004		
163 01710	01	03380	BIG FOOT OLMOS B SAND UNIT	301		NO		03/2004		
163 01712	01	03380	BIG FOOT OLMOS B SAND UNIT	214		NO	H	02/2004		
163 01714	01	03380	BIG FOOT OLMOS B SAND UNIT	261		NO		02/2004		
163 01717	01	03380	BIG FOOT OLMOS B SAND UNIT	141		NO		01/1998		
163 01721	01	03380	BIG FOOT OLMOS B SAND UNIT	116		NO		01/1998		
163 01729	01	04373	BORDOVSKY, J. S. "A"	195		NO		01/2015		
163 01730	01	03380	BIG FOOT OLMOS B SAND UNIT	156		NO		02/2004		
163 01736	01	03380	BIG FOOT OLMOS B SAND UNIT	81		NO		07/2004		
163 01741	01	03380	BIG FOOT OLMOS B SAND UNIT	216		NO		09/2003		
163 01746	01	00122	ROCHE, LUCY	5		NO		01/1998		
163 01748	01	00122	ROCHE, LUCY	3		NO		10/2014		
163 01800	01	03380	BIG FOOT OLMOS B SAND UNIT	108		NO		02/2004		
163 30193	01	04744	DAVIES, S. B.	1		NO		03/2014		
163 30785	01	04744	DAVIES, S. B.	2		NO		12/2010		
163 31944	01	07022	DAVIES, S.B. ET AL	5		NO		03/2015		
163 32196	01	03380	BIG FOOT OLMOS B SAND UNIT	96A		NO		01/2015		
163 32200	01	03380	BIG FOOT OLMOS B SAND UNIT	95A1		NO		01/2015		
163 32294	01	03380	BIG FOOT OLMOS B SAND UNIT	183A		NO		01/2015		
163 32360	01	03380	BIG FOOT OLMOS B SAND UNIT	248A		NO		01/2015		
163 32361	01	14885	BURNS, JANE A	245A		NO		01/2015		
163 32362	01	14885	BURNS, JANE A	246A		NO		01/2015		
163 32460	01	00037	ROSENAUER, MATTIE	10	NO	NO		06/2015		
163 32461	01	00037	ROSENAUER, MATTIE	9	NO	NO		06/2015		
163 32464	01	00037	ROSENAUER, MATTIE	13	NO	NO		06/2015		
163 32465	01	00037	ROSENAUER, MATTIE	16		NO		03/2004		
163 32468	01	00037	ROSENAUER, MATTIE	151		NO		03/2004		
163 32469	01	00037	ROSENAUER, MATTIE	12	NO	NO		06/2015		
163 32471	01	00037	ROSENAUER, MATTIE	11	NO	NO		06/2015		
163 32475	01	03380	BIG FOOT OLMOS B SAND UNIT	311A		NO		01/2015		

163 32476	01	03380	BIG FOOT OLMOS B SAND UNIT	376A		NO		01/2015		
163 32485	01	03380	BIG FOOT OLMOS B SAND UNIT	203A		NO		01/2015		
163 32496	01	03380	BIG FOOT OLMOS B SAND UNIT	227A		NO		01/2015		
163 32499	01	03380	BIG FOOT OLMOS B SAND UNIT	79A		NO		01/2015		
163 33167	01	14885	BURNS, JANE A	235A		NO		01/2015		
163 33168	01	14885	BURNS, JANE A	243A		NO		01/2015		
163 33172	01	14885	BURNS, JANE A	244A		NO		01/2015		
163 33185	01	00082	BAIN, T. W.	46		NO		01/1998		
163 33188	01	04373	BORDOVSKY, J. S. "A"	19		NO		01/2015		
163 33189	01	04373	BORDOVSKY, J. S. "A"	18		NO		01/2015		
163 33191	01	14885	BURNS, JANE A	209A		NO		01/2015		
163 33193	01	14885	BURNS, JANE A	242A		NO		01/2015		
163 33194	01	14885	BURNS, JANE A	220A		NO		01/2015		
163 33196	01	03380	BIG FOOT OLMOS B SAND UNIT	17A		NO		01/2015		
163 33205	01	03380	BIG FOOT OLMOS B SAND UNIT	212A		NO		01/2015		
163 33208	01	14885	BURNS, JANE A	208A		NO		01/2015		
163 33211	01	03380	BIG FOOT OLMOS B SAND UNIT	299A		NO		01/2015		
163 33213	01	03380	BIG FOOT OLMOS B SAND UNIT	308A		NO		01/2015		
163 33218	01	03380	BIG FOOT OLMOS B SAND UNIT	450		NO		01/2015	(2 Compls)	
163 33219	01	03380	BIG FOOT OLMOS B SAND UNIT	410A	NO	NO		01/2015		
163 33220	01	03380	BIG FOOT OLMOS B SAND UNIT	376B		NO		01/2015		
163 33221	01	03380	BIG FOOT OLMOS B SAND UNIT	342A		NO		01/2015		
163 33222	01	03380	BIG FOOT OLMOS B SAND UNIT	385A		NO		01/2015		
163 33223	01	03380	BIG FOOT OLMOS B SAND UNIT	383A		NO		01/2015		
163 80140	01	03380	BIG FOOT OLMOS B SAND UNIT	1		NO	H	07/2004		
163 80142	01	03380	BIG FOOT OLMOS B SAND UNIT	3		NO	H	07/2004		
163 80149	01	03380	BIG FOOT OLMOS B SAND UNIT	16		NO	H	07/2004		
163 80151	01	03380	BIG FOOT OLMOS B SAND UNIT	18		NO		01/2015		
163 80154	01	03380	BIG FOOT OLMOS B SAND UNIT	21		NO		07/2004		
163 80160	01	03380	BIG FOOT OLMOS B SAND UNIT	68		NO		07/2004		
163 80161	01	03380	BIG FOOT OLMOS B SAND UNIT	100		NO		10/2002		
163 80162	01	03380	BIG FOOT OLMOS B SAND UNIT	101		NO		01/2015		
163 80163	01	03380	BIG FOOT OLMOS B SAND UNIT	102		NO	H	01/1998		
163 80166	01	03380	BIG FOOT OLMOS B SAND UNIT	105		NO		01/2015		
163 80170	01	03380	BIG FOOT OLMOS B SAND UNIT	110		NO		12/2003		
163 80172	01	03380	BIG FOOT OLMOS B SAND UNIT	112		NO		01/1998		
163 80174	01	03380	BIG FOOT OLMOS B SAND UNIT	114		NO		01/2015		
163 80176	01	03380	BIG FOOT OLMOS B SAND UNIT	117		NO		01/2015		
163 80177	01	03380	BIG FOOT OLMOS B SAND UNIT	118		NO		07/2002		
163 80179	01	03380	BIG FOOT OLMOS B SAND UNIT	120		NO		02/2004		
163 80185	01	03380	BIG FOOT OLMOS B SAND UNIT	126		NO	H	01/1998		
163 80187	01	03380	BIG FOOT OLMOS B SAND UNIT	129		NO		01/2015		
163 80191	01	03380	BIG FOOT OLMOS B SAND UNIT	135		NO		12/2003		
163 80193	01	03380	BIG FOOT OLMOS B SAND UNIT	137		NO		01/1998		
163 80197	01	03380	BIG FOOT OLMOS B SAND UNIT	142		NO		01/2015		
163 80198	01	03380	BIG FOOT OLMOS B SAND UNIT	144		NO		02/2004		
163 80199	01	03380	BIG FOOT OLMOS B SAND UNIT	145		NO		02/2004		
163 80203	01	03380	BIG FOOT OLMOS B SAND UNIT	149		NO		04/2003		
163 80205	01	03380	BIG FOOT OLMOS B SAND UNIT	151		NO		01/1998		
163 80207	01	03380	BIG FOOT OLMOS B SAND UNIT	154		NO		01/2015		
163 80210	01	03380	BIG FOOT OLMOS B SAND UNIT	158		NO		02/2004		

163 80211	01	03380	BIG FOOT OLMOS B SAND UNIT	159		NO		01/2015		
163 80212	01	03380	BIG FOOT OLMOS B SAND UNIT	162		NO		07/2004		
163 80213	01	03380	BIG FOOT OLMOS B SAND UNIT	164		NO		01/2015		
163 80214	01	03380	BIG FOOT OLMOS B SAND UNIT	165		NO		01/2015		
163 80215	01	03380	BIG FOOT OLMOS B SAND UNIT	166		NO		05/2005		
163 80216	01	03380	BIG FOOT OLMOS B SAND UNIT	167		NO		01/2015		
163 80228	01	14988	BIG FOOT OLMOS D SAND UNIT	184		NO		01/2008		
163 80229	01	03380	BIG FOOT OLMOS B SAND UNIT	185		NO		01/2015		
163 80230	01	03380	BIG FOOT OLMOS B SAND UNIT	186		NO		01/2015		
163 80253	01	03380	BIG FOOT OLMOS B SAND UNIT	223		NO		01/2015		
163 80256	01	03380	BIG FOOT OLMOS B SAND UNIT	226		NO		01/2015		
163 80257	01	03380	BIG FOOT OLMOS B SAND UNIT	227		NO		01/2015		
163 80263	01	03380	BIG FOOT OLMOS B SAND UNIT	239		NO		02/2004		
163 80268	01	03380	BIG FOOT OLMOS B SAND UNIT	245	NO	NO		01/2015		
163 80271	01	03380	BIG FOOT OLMOS B SAND UNIT	248		NO		01/2015		
163 80272	01	03380	BIG FOOT OLMOS B SAND UNIT	249		NO		01/2015		
163 80278	01	03380	BIG FOOT OLMOS B SAND UNIT	317		NO		03/2004		
163 80282	01	03380	BIG FOOT OLMOS B SAND UNIT	408		NO		07/2004		
163 80586	01	00082	BAIN, T. W.	20	NO	NO		06/2015		
163 80593	01	03380	BIG FOOT OLMOS B SAND UNIT	128		NO		01/2015		
199 32161	03	26850	PICA INVESTMENT	D 1		NO		03/2011		
507 00573	01	14054	WARE, ALPHA	102		NO	X	04/2003		
507 00575	01	14047	WARE, ALPHA	104		NO		06/2003		
507 00579	01	02421	WARE, ALPHA	108		NO		04/2009		

V = H-15 failure	Field Operations, Oil & Gas Division, 512-463-6830
X = H-15 delinquency	Field Operations, Oil & Gas Division, 512-463-6830