

CCI-Paradox Upstream LLC

Summit Point Federal 1

SHL: 956' FNL 1319' FWL
NENW, Sec. 6 T43N R19W, New Mexico P.M.
SHL Latitude : North 38.023266° (NAD 83)
SHL Longitude : West 109.008889° (NAD 83)
SHL Colorado South (NAD 83)
Northing : 1512949.98 ft.
Easting : 1989472.53 ft.

BHL: 1904' FSL 1337' FWL
NESW, Sec. 6 T43N R19W, New Mexico P.M.
BHL Latitude: North 38.016623° (NAD 83)
BHL Longitude: West 109.008839°
BHL Colorado South Zone (NAD 83)
Northing: 1510532 ft.
Easting: 1989396 ft.

San Miguel County, Colorado

Federal Lease Number: COC69518

Onshore Oil & Gas Order No. 1 & No. 2

Drilling Plan

All lease and/or unit operations will be conducted in such a manner that full compliance is made with applicable laws, regulations (43 CFR 3100), Onshore Oil and Gas Order No. 1 and 2, and the approved plan of operations. The operator is fully responsible for the actions of the subcontractors. A copy of these conditions will be furnished with the field representative to ensure compliance.

This Application for Permit to Drill (APD) is filed under the Notice of Staking (NOS) process as stated per Onshore Order No. 1 (OSO #1) and supporting Bureau of Land Management (BLM) documents. This NOS process included an onsite meeting held on November 11, 2011, prior to the submittal of this application at which time the specific concerns of CCI Paradox Upstream LLC and the BLM were discussed. All specific concerns of the BLM representatives are addressed herein, as are specific stipulations from the BLM.

Company Contact: Mr. John Warren, CCI Paradox Upstream LLC 303-563-5369- Vice President of Operations. For specific questions or concerns regarding this Drilling Program contact company contact.

1 Formation Tops

Finished GL = 7413', GL to KBm= 21 ft., KBm Elevation = 7434' Formation Tops are at referenced at KBm.

Formation Tops	Measured Depth MD –ft.(KBm. Ref.)	True Vertical Depth (TVD ft.- (Kbm. Ref.)	O/G/FW Bearing
Morrison	21	21	
Salt Wash	732	732	
Summerville	1041	1041	
Entrada	1127	1127	
Navajo	1218	1218	
Wingate	1413	1413	FW
Chinle	2162	2162	
Cutler	2333	2333	
Hermosa	4146	4146	
Ismay	5888	5792	O
Paradox Salt	6299	6125	
Pinkerton Trail	10041	9376	
Leadville (Primary Objective)	10150	9484	G
McCracken	10594	9928	G
TD	10637	9971	

The Summit Point Federal # 1 well surface location is less than 50 feet northeast of a prior well Big Mac 6-12 well pad. The formation tops down to the kick-off point should be nearly the same the stratigraphic column in the reference well Big Mac 6-12 well. The surface bedrock formation was determined from the Colorado Geological Map published by the USGS. Wells located in a 3 section area surrounding the Summit Point Federal location were used to estimate the shallow formation listed above. The Top of the Chinle should be encountered at a depth of 2162' MD (subsea 5272') based on the Big Mac # 6-12 well logs.

All fresh water and prospectively valuable minerals encountered during drilling will be recorded by depth and adequately protected. All indications of usable water (10,000 ppm or less TDS) shall be reported to the BLM-Tres Rios Field Office-Durango prior to running the next string of casing or before plugging orders are requested, whichever occurs first. If noticeable water flows are detected, samples will be submitted to the BLM along with any water analyses conducted.

Note: The operator proposes to protect potable groundwater/aquifers as follows: The Wingate formation is forecasted to be a fresh water aquifers, Pamela Leschak sent a memo dated 6/19/13 requesting CCI consider setting surface casing pipe at least 150' below the top of Chinle formation(2162' MD + 150' = 2312' MD), CCI is in agreement with the BLM , 9-5/8" 40 #/ft, J-55, LT&C surface casing shoe will be set at 2312' MD and cemented back to surface to make sure a good barrier distance is away from any fresh water sources.

DIRECTIONAL DRILLING PROGRAM

See attached directional plan labeled as Design # 2 dated November 18, 2013 shown below.

**CCI Paradox
Upstream LLC
/ New Tech
Global**

Project: San Miguel Co., CO
Site: Sec.6-T43N-R19W
Well: Summit Point Federal 1
Wellbore: Wellbore #1
Design: Design #2
Latitude: 38° 1' 23.757 N
Longitude: 109° 0' 32.000 W
Ground Level: 7413.00
WELL @ 7434.00usft

Archer

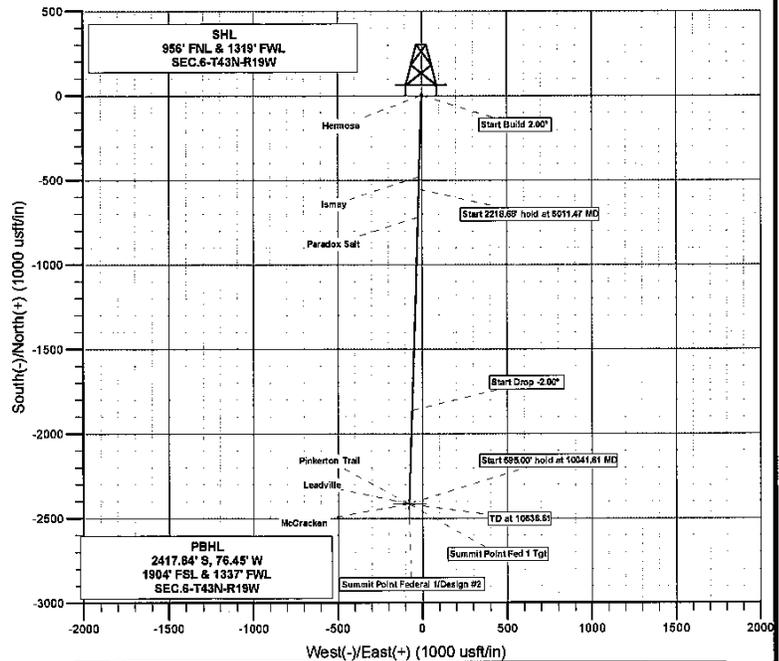
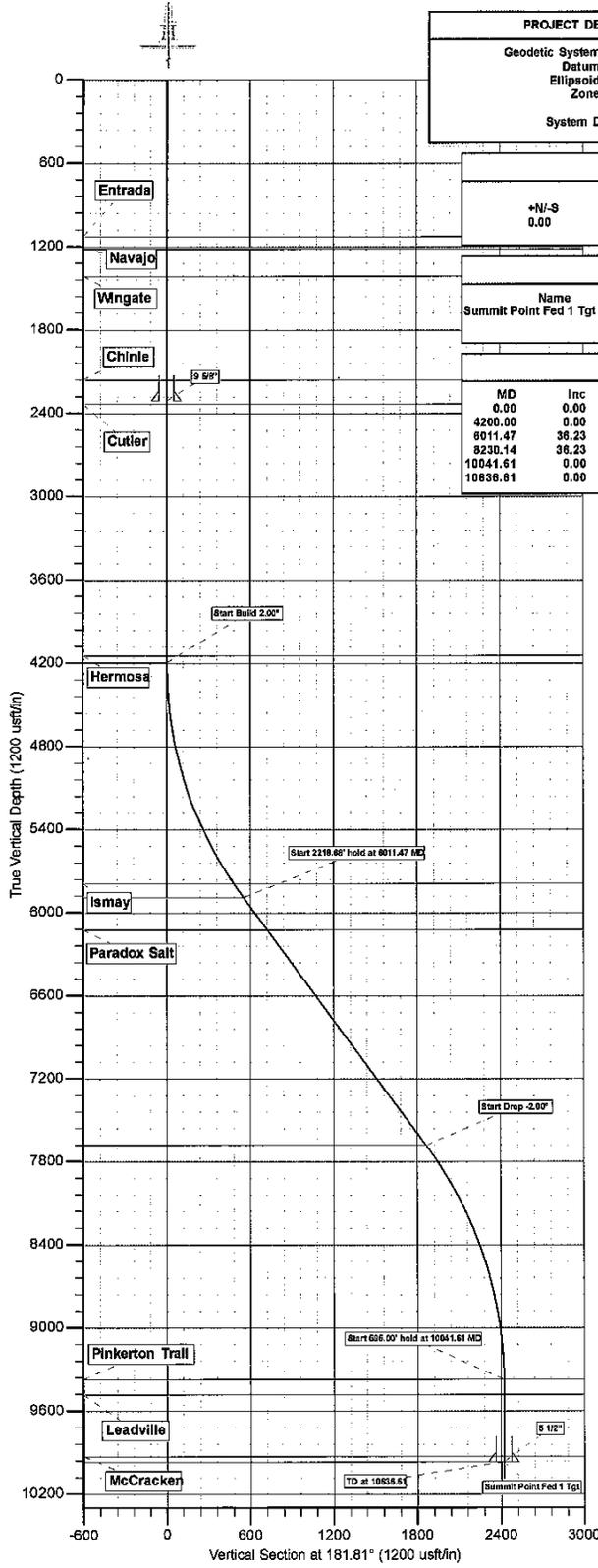
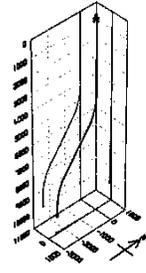
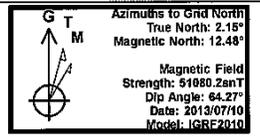
PROJECT DETAILS: San Miguel Co., CO		REFERENCE INFORMATION	
Geodetic System: US State Plane 1983 Datum: North American Datum 1983 Ellipsoid: GRS 1980 Zone: Colorado Southern Zone System Datum: Mean Sea Level		Co-ordinate (N/E) Reference: Well Summit Point Federal 1, Grid North Vertical (TVD) Reference: WELL @ 7434.00usft Section (VS) Reference: Slot - (0.00N, 0.00E) Measured Depth Reference: WELL @ 7434.00usft Calculation Method: Minimum Curvature	

WELL DETAILS: Summit Point Federal 1			
+N-S	+E-W	Ground Level:	7413.00
0.00	0.00	Latitude	38° 1' 23.757 N
1512949.978	1989472.617	Longitude	109° 0' 32.000 W
		Slot	

WELLBORE TARGET DETAILS (MAP CO-ORDINATES AND LAT/LONG)								
Name	TVD	+N-S	+E-W	Northing	Easting	Latitude	Longitude	Shape
Summit Point Fed 1 Tgt	9971.00	-2417.83	-76.45	1510532.144	1989396.164	38° 0' 59.843 N	108° 0' 31.820 W	Point

SECTION DETAILS									
MD	Inc	Azi	TVD	+N-S	+E-W	Dleg	TFace	VSect	Annotation
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	Start Build 2.00°
4200.00	0.00	0.00	4200.00	0.00	0.00	0.00	0.00	0.00	Start 2218.88° hold at 6011.47 MD
8211.47	38.23	181.81	5893.14	-553.61	-17.81	2.00	181.81	553.88	Start Drop -2.00°
8230.14	38.23	181.81	7682.86	-1864.23	-48.95	0.00	0.00	1865.16	Start 595.00° hold at 10041.61 MD
10041.61	0.00	0.00	9376.00	-2417.84	-76.45	2.00	180.00	2419.05	TD at 10636.61
10636.61	0.00	0.00	9971.00	-2417.84	-76.45	0.00	0.00	2419.05	

FORMATION TOP DETAILS		
TVDPath	MDPath	Formation
1127.00	1127.00	Entrada
1218.00	1218.00	Navajo
1413.00	1413.00	Wingate
2182.00	2182.00	Chinle
2333.00	2333.00	Cutler
4146.00	4146.00	Hermosa
5792.00	5887.99	Ismay
6125.00	6298.89	Paradox Salt
9375.00	10041.61	Pinkerton Trail
9484.00	10149.61	Leadville
9928.00	10593.61	McCracken



The Directional Plan –Design # 2.

- a. Kick-Off-Point (KOP) is estimated to be at ±4200’ MD. Build rate 2.0°/100 ft to 36.23° inclination at 181.81° Azimuth will be reached at 5893’TVD(6011’MD).
- b. The degree of inclination will build to 36.23 degrees and hold until ±7682’ TVD (8230’MD) is reached. Drop rate 2.0°/100ft.to 0.0° inclination by 9376’TVD(10,042’MD).
- c. A 0.0 inclination will then be held until TD is achieved. The well bore will remain vertical to ±9,971’ TVD (10,637’ MD).

*See detailed Directional Plan of Summit Point Federal 1 well Plan Design # 2 as of 11 18 13 in **Exhibit A**.

2 Casing Program

Plan : Drill a 12-1/4”hole to 2312’MD, run 9-5/8” surface casing & cement back to surface and then drill out of surface with 8-3/4” bit down to TD (10,637’MD/9971’TVD) and run 5-1/2” casing back to surface and do a two stage cement job placing the 2nd stage lead cement slurry back to surface.

Conductor: 16”, 65 #/ft., H-40, ST&C set to +/-80’MD.

	Surface Casing.	Production Casing
	0 –	
Depths Run (ft):	2,312’MD	0-10,637’MD
Hole Size:	12.25	8.75
OD (in):	9.625	5.5
Weight (lb/ft):	40	17
Grade:	J-55	N-80
Pipe ID (in):	8.835	4.892
Pipe Drift ID (in):	SD 8.750	4.767
Burst Pressure (psi):	3950	7740
Collapse (psi):	2570	6280
Body Yield (kips):	630	397
Joint Strength (kips):	520	348
Connection:	LTC	LTC
Coupling OD (in):	10.625	6.05
Min Make up torque (ft-lb):	3900	2610
Opt Make up torque (ft-lb):	5200	3480
Max Make up torque (ft-lb)	6500	4350
Safety Factors- Calculated-BLM Model-Casing Evacuated to Air gradient		
Collapse Factor (DF=1.125)	2.486	1.290
Burst Factor (DF=1.000)	1.038	2.035
Tension Factor (DF = 1.8)	5.623	1.924

Please find attached the casing design for each phase of the table shown above.

Please see attached **Exhibits B & C** for calculations of casing design safety factors.

Wellhead:

Casing Head – 11” x 9-5/8” SOW 5M

Tubing Head – 11” x 7-1/16” 5M

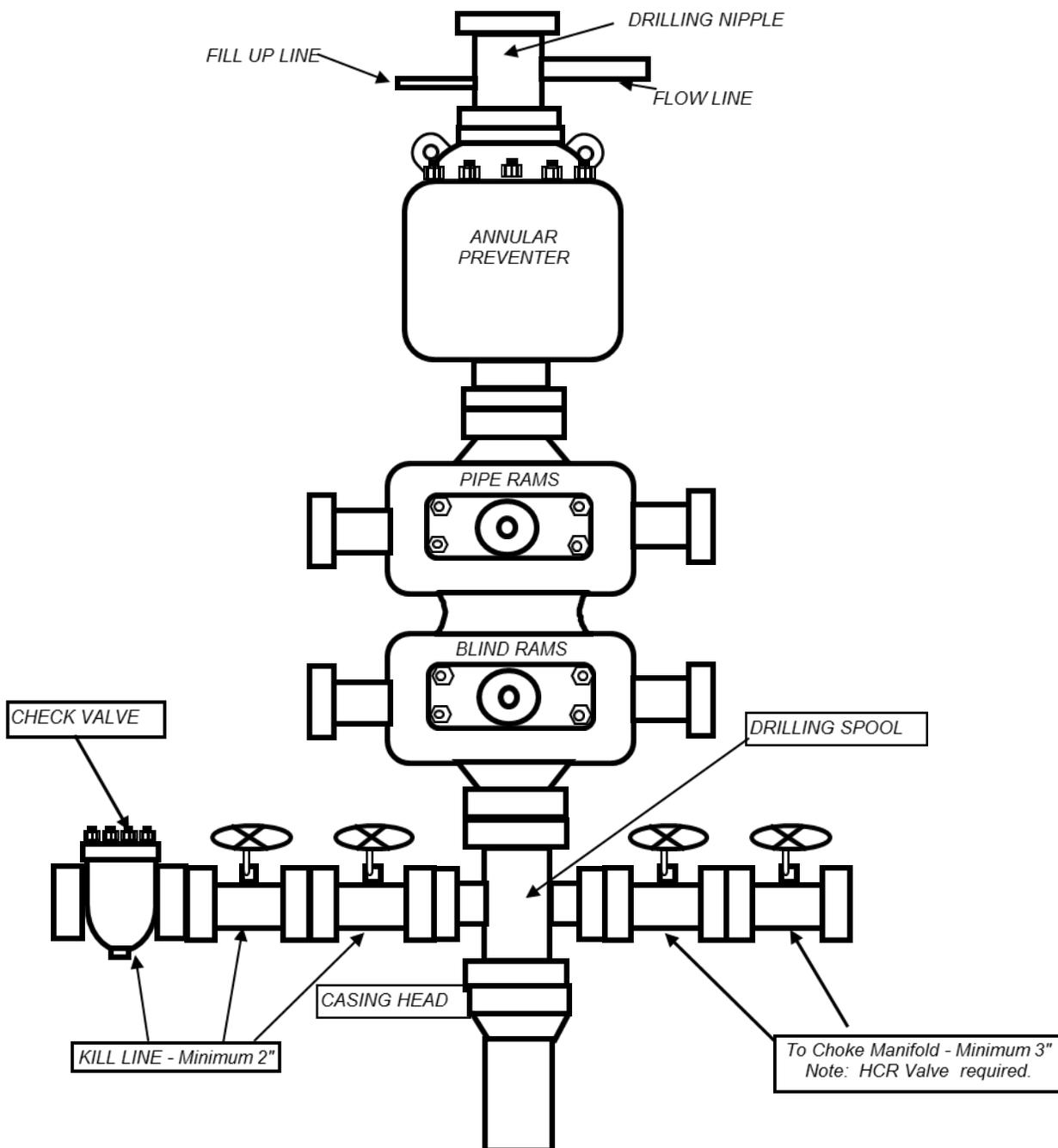
3 BOP Specification

Pressure control equipment rating will be 5,000 psi. This equipment will be nipped up on the surface casing and tested to 5000 psi high prior to drilling out. The choke manifold equipment, upper and lower kelly cock, and floor safety valves will be tested to 5000 psi high. The annular preventer will be tested to 5000 psi also. Surface casing will be tested to 1500 psi prior to drill out. BOP equipment will be tested after any repairs to equipment and at 30 day intervals. The pipe rams and blind rams shall be activated each trip. Weekly BOP drills will be held by each crew.

PRESSURE CONTROL

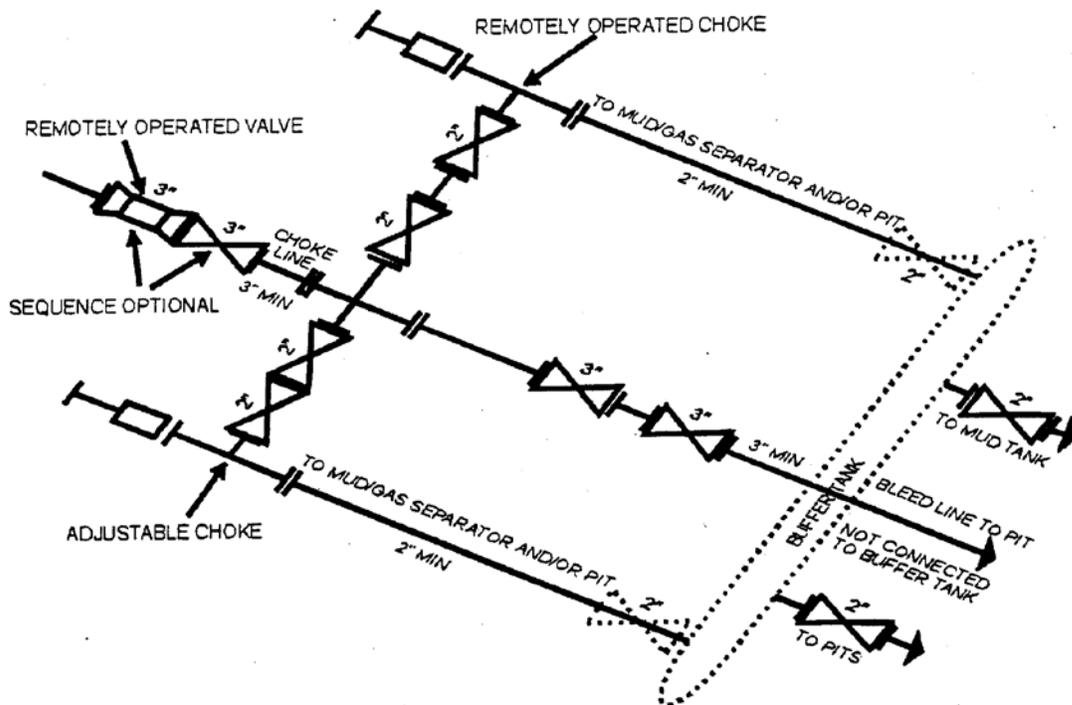
- See blowout preventer diagram.

TYPICAL 5,000 p.s.i. BLOWOUT PREVENTER



PRESSURE CONTROL

• 5 M Manifold Layout



5M CHOKE MANIFOLD EQUIPMENT - CONFIGURATION OF CHOKES MAY VARY

Although not required for any of the choke manifold systems, buffer tanks are sometimes installed downstream of the choke assemblies for the purpose of manifolding the bleed lines together. When buffer tanks are employed, valves shall be installed upstream to isolate a failure or malfunction without interrupting flow control. Though not shown on 2M, 3M, 10M, OR 15M drawings, it would also be applicable to those situations.

[54 FR 39528, Sept. 27, 1989]

BOP REQUIREMENTS

Bureau of Land Management's minimum specification for pressure control equipment are as follows:

- a. Ram Type 11" Hydraulic double ram at 5000 psi and annular section at 5,000 psi working pressure.
- b. Ram type preventers and associated equipment shall be tested to approve stack working pressure if isolated by test plug or to 70% of internal yield pressure of casing. Pressure shall be maintained for at least 10 minutes until requirements of test are met, whichever is longer. If a test plug is utilized, no bleed-off pressure is acceptable. For a test not utilizing a test plug, if a decline in pressure of more than 10% in 30 minutes occurs, the test shall be considered to have failed. Valve on casing head below test plug shall be open during test of BOP stack.
- c. As a minimum, the above test shall be performed:
 - i. when initially installed
 - ii. whenever any seal subject to test pressure is broken
 - iii. following related repairs and
 - iv. at 30 day intervals
- d. Valves shall be tested from working pressure side during BOPE tests with all downstream valves open.

- e. When testing the kill line valve(s) shall be held open or the ball removed.
- f. Annular preventers (if used) shall be functionally operated at least weekly.
- g. Pipe rams, blind rams, or annular preventer shall be activated each trip; however, this function need not be performed more than once a day.
- h. A BOPE pit level drill shall be conducted weekly for each drilling crew.

The BOP and related equipment shall meet the minimum requirements of Onshore Oil and Gas Order No. 2 for equipment and testing requirements, procedures, etc., and individual components shall be operable as designed. Chart recorders shall be used for all pressure tests. Pressure tests shall apply to all related well control equipment.

BOP systems shall be consistent with API RP53. Pressure tests will be conducted before drilling out from under casing strings which have been set and cemented in place. Blowout preventer controls will be installed prior to drilling the surface casing plug and will remain in use until the well is completed or abandoned. Preventers will be inspected and operated at least daily to ensure good mechanical working order, and this inspection will be recorded on the daily drilling report. Preventers will be pressure tested before drilling casing cement plugs.

The BLM Tres Rios Field Office in Durango, Colorado shall be notified, at least 24 hours prior to initiating the pressure test, in order to have a BLM representative on location during pressure testing.

- a. The size and rating of the BOP stack is shown on the attached diagram above.
- b. A choke line and a kill line are to be properly installed. The kill line is not to be used as a fill-up line.
- c. The accumulator system shall have a pressure capacity to provide for repeated operation of hydraulic preventers.
- d. Drill string safety valve(s) to fit all tools in the drill string, are to be maintained on the rig floor while drilling operations are in progress.

Statement of Accumulator System and Location of Hydraulic Controls

The drilling rig has not been selected for this well. Selection will take place after approval of this application is granted. Manual and/or hydraulic controls will be in compliance with OSO #2 for 5,000 psi system.

A remote accumulator will be used. Pressures, capacities, location of remote hydraulic and manual controls will be identified at the time of the BLM supervised BOP test.

During drilling operations, CCI Paradox Upstream LLC follows the API Diller's Method for kick control in the event of a gas kick.

Please see attached exhibit – **General Guidelines –BOP control – Driller's Method for Details.**

4 Cementing Program

Conductor string 16" set at 80'MD in a 26" dia. hole size.

2.29 cuft/ft x 80 ft. = 183 cuft x 1.3(30 % excess)= 238 cuft –Annular Vol. capacity
238 cuft / 1.18 cuft/sk (Yield)= **202 sacks of Type I (class A cement)** with 1 % calcium chloride, slurry weight 15.6 ppg and yield of 1.18 cuft/sack, circulates cement to surface..

Surface casing 9-5/8" set at 2312'MD in a 12-1/4" dia. hole size.

Lead Slurry: 2112 ft. x .3132 cuft/ft x 1.7 (70 % excess)= 1124 cuft / 2.09 cuft/sk(Yield) = **538 sacks of Premium Lite FM cement blend** with 1 % bwoc Calcium Chloride + 8 % bwoc Bentonite + 0.5 % bwoc Sodium Metasilicate + fresh water.

Tail Slurry: 200 ft. x .3132 cuft/ft x 1.7 (70 % excess) = 106 cuft/ 1.47 cuft/sk(Yield) = **72 sacks of Type III cement** with 1 % bwoc Calcium Chloride + fresh water.

Lead slurry: slurry weight 12.1 ppg, slurry Yield 2.09 cuft/sk, Amount of mix water 11.66 gps, 4 hr pump ability.

Tail slurry: slurry weight 14.2 ppg, slurry Yield 1.47 cuft/sk, Amount of water mix 7.36 gps

Production casing – 5-1/2" string set at 10,637'MD with a 2 stage cement job with DV tool set at 5300'MD.

1st Stage – thru shoe.

Lead Slurry: 4700 ft. x .2526 cuft/ft x 1.2 (20% excess)= 1424 cuft/ 2.63 cuft/sk(Yield)= **541 sk of Type III cement** + 0.3% bwoc R-3 (Retarder) + .25 lbs/sk Cello flake + 5 lbs/sk LCM-1 (asphaltite) + 3 % bwoc Sodium Metasilicate (accelerator) + fresh water.

Tail Slurry: 637 ft. x .2526 cuft/ft x 1.2 (20% excess) = 193 cuft / 1.47 cuft/sk(Yield) = **130 sk of Class G cement** with 0.25 lbs/sk Cello flake + 5 lbs/sack LCM-1 (Asphaltite) + 0.3 % bwoc FL-52A(fluid loss additive) + fresh water.

2nd stage – thru DV tool at 5300'MD

Lead Slurry: 5200 ft. x .2526 cuft/ft x 1.2 (20% excess)= 1576 cuft/ 2.63 cuft/sk(Yield)= **600 sk of Type III cement** + 0.3% bwoc R-3 (Retarder) + .25 lbs/sk Cello flake + 5 lbs/sk LCM-1 (asphaltite) + 3 % bwoc Sodium Metasilicate (accelerator) + fresh water.

Tail Slurry: 100 ft. x .2526 cuft/ft x 1.2 (20% excess) = 30 cuft / 1.47 cuft/sk(Yield) = **21 sk of Class G cement** with 0.25 lbs/sk Cello flake + 5 lbs/sack LCM-1 (Asphaltite) + 0.3 % bwoc FL-52A(fluid loss additive) + fresh water.

Lead slurry both stages: slurry weight 11.7ppg, slurry, Yield 2.63 cuft/sk, Amount of mix water 15.31 gps, .

Tail slurry of both stages : slurry weight 14.2 ppg, slurry Yield 1.47 cuft/sk, amount of water mix 6.82 gps.

**See Exhibit D for descriptions of all chemical additives in the cement slurries.*

Casing / Centralizers

After reaching each casing points on any string and after logging run has been completed TIH to TD or may already be at TD at casing point, perform flow check, circulate bottoms up, pump sweep, circulate at least 3x surface to surface volume while conditioning hole for casing, reduced mud viscosity to 36-40 sec/qt to minimize risk of cement channeling. Slug pipe, SLM out of hole. Check all casing equipment and baker lock on the float shoe and float collar and one joint above float collar. Place one centralizer (bow spring type) 10' above shoe and the next 3 collars; then spread out the centralizers every third joint back to surface on all casing strings. On the DV tool area place two cement baskets below the DV tool spread out by one joint apart. Place one centralizer above the DV tool approximately 10' above ports on a stop ring and centralize the next 3 collar above, then go back to every third joint to surface.

When pumping cement slurry try to maintain 5 to 8 BPM rate and slow down the last 10 bbls. before bumping the plug upon the float collar or closing the DV tool. Bump plug to 1000 to 1500 psi above final pump pressure. Slowly release pressure to 100 psi, ensuring floats are holding, double check if in doubted.

- a. **The BLM in Durango, Colorado will be notified, 24 hours prior , in order to have a BLM representative on location while running all casing strings and cementing.**
- b. After cementing but before commencing any test, the casing string shall stand cemented until the cement has reached a compressive strength of at least 500 psi at the shoe. WOC times shall be recorded in the driller's log.

5 Drilling Fluids

Recommended Drilling Fluids Properties									
Surface – 12.25” hole									
Depth	Mud Type	Fluid Density	Funnel Viscosity	API Filtrate	pH	Plastic Vis	Yield Point	MBT	Low Gravity Solids
(ft)		(ppg)	(sec/qt)	(ml)		(cP)	(lbs/10 0ft ²)	ppb	(% by Vol)
60'-2,312'	Spud Mud Gel & PHPA Sweeps	8.4 – 8.6	27 -29	NA	8.7 – 8.9	-	–	<7.5	1-3
Surface casing: 9 5/8” casing set around 2,312' MD									
Production – 8.75” hole									
Depth	Mud Type	Fluid Density	Funnel Viscosity	HPHT @250	ES	Plastic Vis	Yield Point	Lime	WPS (NaCl)
(ft)		(ppg)	(sec/qt)	(ml)	@ 120	(cP)	(lbs/10 0ft ²)	ppb	mg/l
2312' – 10,637'	75/25 – 80/20 OBM	8.6 – 8.8	35 - 38	4 - 6	400 - 700	16 - 24	8 - 12	2 - 5	200K – 225K
Production casing: 5 1/2" set @ 10,637'MD TD									

OBM(Oil Base Mud) will be used from out of surface casing shoe (2312'MD) to TD (10637'MD/9971'TVD).

See attached mud program for more details and properties of the fluids shown as **Exhibit E**.

OBM- Displacement Procedure:

A. Have a pre-displacement meeting with company man, tool pusher, driller and mud engineer to discuss displacement procedure and sequence of events.

B. Begin oil mud displacement (**once all oil base is on location**), remembering to keep bit on bottom when the NOV VERT reaches the bit and do not make any connections until displacement is complete.

Recommend high pump rate to ensure turbulent flow.

C. SPACER FLUID

Pump spacer (\pm 20 bbls of Diesel oil and 20 bbl viscosified invert mud), then NOV VERT mud

D. Rotation and reciprocation of the pipe during displacement procedure is recommended. Monitor returns at the shaker. Signs of interface:

1. Mud weight measurements, if the weight of two fluids differs.
2. Electrical stability measurements
3. Change in viscosity
4. Change in color or surface appearance from grainy to glossy or shiny

E. Start with coarse shaker screens to prevent possible blinding.

F. Catch interface in trip tank, where it can be processed and added to the system.

Circulate as necessary until the mud has the desired properties. **Under no circumstances drill ahead with mud that is not "in shape".**

Mud Engineer must be present at displacement.

- a. Mud monitoring equipment to be used is as follows:

Periodic checks of the mud systems will be made each tour. The mud level will be checked visually.

- i. There will be sufficient mud on location to ensure well control. There will be approximately 450 bbls of mud in reserve. The mud system will be run utilizing a closed loop system.
- ii. A mud test shall be performed every 24 hours after mudding to determine, as applicable, density, viscosity, gel strength, static filtration loss and Ph.
- iii. Hazardous substances specifically listed by the EPA as hazardous waste or demonstrating a characteristic of a hazardous waste will not be used in drilling, testing or completion operations.

6 Auxiliary Equipment

PVT equipment measuring mud volume, pump strokes and percent flow will be installed after cementing surface casing and installing BOP. This system includes alarms and remote terminals located on the rig floor.

A) Mud logger with gas monitor – BSC to TD, sampling interval of 50'

B) Choke manifold with remote control choke

C) Full opening floor valve with drill pipe thread

D) Upper and lower kelly cock

E) PVT monitor on pit level, audio and visual BSC

F) Gas buster

G) Closed loop mud system will be utilized in drilling this well. Cuttings will be stored in surface containers and hauled & disposed at a legal disposal site (see Surface Use Plan – Methods for Handling Waste).

7 Logging/Coring/Formation Testing

Mud Loggers will start at base of surface casing and go thru to TD and be released after post open hole logging is finished.

Logs	Interval
Quad Combo (GR/AIT/NEUT-DEN w/ PE w/ BHC Sonic)	Base of surface casing shoe to TD 10,637'MD/9971'TVD
Surface casing CBL	0-2312'MD
Coring	None anticipated
DST/RST	None anticipated

8 Abnormal Pressure, Temperature, Potential Hazards

- a) Abnormal Pressure: The maximum anticipated bottom hole pressure is 9971'TVD x .44psi/ft. = 4387 psi and will be controlled with mud weight and BOP equipment. The fracture gradient is anticipated to be 0.85 – 0.90 psi/ft
- b) Temperature: The anticipated bottom hole temperature is 180°F.
- c) Potential Hazards: Hydrogen sulfide gas is potentially present in this field and proper monitoring equipment will be utilized (see H₂S Contingency Plan, **Exhibit G**). No lost circulation zones were encountered during drilling of offset well. If lost circulation is encountered, lost circulation materials will be used to try and mitigate losses. Wellbore geometry has been designed for a 7" intermediate casing string as a contingency plan .

9 Anticipated Agenda

Operations are expected to commence soon after a permit is issued, subject to rig availability. Drilling operations will last about 21 days. If data indicate that this is a commercial well, then production casing will be run. Surface Cased hole CBL will be run with the open hole logs in the drilling phase and the Production casing CBL will be during the completion phase of the well. The stimulation to be performed will consist of a small acid / water frac in the upper portion of the Leadville carbonate. Due to the possible close gas/water contact, a small stimulation using 15 % HCL acid flushed w/ fresh water in possibly 3 stages will be proposed. Quantities of the acid and water used will be determined on the amount of pay section shown on the open hole logs.. The operations are anticipated to last 21 days. Completion Approval for further action will be requested on a Sundry Notice. CCI Paradox Upstream LLC anticipates spudding the Summit Point Federal 1 well in fall of 2014.

- **The BLM in Durango shall be notified at least 24 hours prior to:**
 - **Spudding the well**
 - **Running the casing strings and cementing**
 - **BOP test/casing pressured tests**
- Within 30 days of completion of the well as a dry hole or producer, a copy of all logs, core descriptions, core analyses, well-test data, geologic summaries, sample description, and all other surveys or data obtained and compiled during the drilling, workover, and/or completions operations will be filed with a Completion Report (Form 3160-4) via the WIS portal, with casing/cementing reports and other required reports as attachments.
- The BLM in Durango shall be notified within 5 business days of production startup if either of the following two conditions occur:
 - The well is placed on production, or
 - The well resumes production after being off of production for more than 90 days.