

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

NMOCD - ACO 254

IN THE MATTER OF MARBOB ENERGY CORPORATION,

Respondent.

AGREED COMPLIANCE ORDER

Pursuant to the New Mexico Oil and Gas Act, NMSA 1978, §§70-2-1 through 70-2-38, as amended ("Act") and 19.15.14.1227.E NMAC, the Director of the Oil Conservation Division ("OCD") and Marbob Energy Corporation ("Marbob") enter into this Agreed Compliance Order ("Order").

FINDINGS

Parties:

1. The OCD is the state division charged with administration and enforcement of the Act, and rules and orders adopted pursuant to the Act.
2. Marbob is a corporation operating wells in the state of New Mexico under OGRID 14049.

Grayburg-Jackson West Cooperative Unit Wells:

3. The Grayburg-Jackson West Cooperative Unit (GJWC Unit) includes state and fee lands in Township 17 South, Range 29 East, Eddy County, New Mexico.
4. The OCD approved the GJWC Unit in Case No. 3468, Order No. R-3127, dated October 4, 1966.
5. Marbob became operator of record for the GJWC Unit on October 1, 1984. Marbob operated the GJWC Unit until August 1, 1992 when Mack Energy Corporation ("Mack") split off from Marbob and became operator of record for the GJWC Unit. On March 1, 2006, COG Operating LLC ("COG") became operator of record for the GJWC Unit. Although Mack is no longer operator of

ACO

Marbob Energy Corporation (14049)

Page 1 of 12

record, Mack continues to operate the GJWC Unit pursuant to a contract with COG.

6. The original GJWC Unit Agreement designated the unitized formation to be that portion of the Grayburg-San Andres formation encountered between the depths of 2220 feet and 3600 feet, underlying certain specified state and fee lands.
7. The unitized formation was included within the Grayburg-Jackson (Seven Rivers-Queen-Grayburg-San Andres) Pool.
8. By Order No. R-3127-A in Case No. 3728, dated March 4, 1968, the OCD approved the expansion of the Unit to include 400 additional acres of state lands. The description of the unitized formation did not change.
9. On November 15, 2005, several months before COG became operator of record, Mack filed two applications for hearing regarding the Unit. In Case No. 13609, Mack sought an amendment to Order No. R-3127-A extending the vertical limits of the unitized formation to include all formations from the top of the Seven Rivers formation to the base of the Glorieta-Yeso (Paddock) formation, being those depths from 1,116 feet to 4,636 feet. In Case No. 13608, Mack sought an order extending the vertical limits of the Grayburg-Jackson (Seven Rivers-Queen-Grayburg-San Andres) Pool to include the Glorieta-Yeso (Paddock) formation underlying the Unit. The two cases were consolidated for hearing.
10. On June 13, 2006, the OCD granted Mack's applications. Order No. R-3127-B, issued in Case No. 13609, approved the amendment to the Unit Agreement to extend the vertical limits of the unitized formation to include all formations from the top of the Seven Rivers formation to the base of the Glorieta-Yeso (Paddock) formation. Order No. R-12567, issued in Case No. 13608, extended the vertical limits of the Grayburg-Jackson (Seven Rivers-Queen-Grayburg-San Andres) Pool to include the Glorieta-Yeso (Paddock) formation underlying the Unit area.
11. In September 2006 COG notified the OCD that it had discovered discrepancies in the regulatory filings for 72 wells in the GJWC Unit.
12. According to COG, 70 wells in the GJWC Unit were producing from the Yeso (Paddock) formation before the expansion of the unitized formation and the expansion of the pool. Nine of the 70 wells were producing from the Yeso (Blinbry) formation, which was not included in the expanded unitized formation. COG found some evidence of discrepancies in the regulatory filings for two additional wells in the Unit, but was not able to verify its findings in the well files. Those two wells are now plugged and abandoned.
13. Production reports for the 70 wells incorrectly reported commingled production from the non-unitized intervals as Unit production; an underpayment of royalties attributable to state lands occurred as a result.

ACO

Marbob Energy Corporation (14049)

Page 2 of 12

14. Well completion reports and sundry notices for the 70 wells listed the incorrect pool(s) and incomplete or incorrect perforations. In some instances, wells were re-completed to different zones without giving required notice to OCD or obtaining OCD approval.
15. According to COG's review of the well files, the wells were either drilled to or re-completed to zones outside the Unitized Area and the reported pool as early as December 1984. This practice continued through March 1997.
16. Thirty-three of the wells were drilled to or re-completed to the unauthorized zones during the time period when Marbob was GJWC Unit operator; thirty-seven were drilled to or re-completed to the unauthorized zones during the time period when Mack was GJWC Unit operator.
17. Exhibit A is a spreadsheet prepared by COG summarizing its findings. It identifies each well, the total depth, the original completion date, the location of the perforations, the date the Yeso perforations were added, the producing formation(s), the initial production date, and the current status of each well.
18. At OCD's request, COG provided well files for five sample wells. Documents in the well files corroborated COG's findings regarding those wells.
19. On November 2, 2006, Mack agreed to pay \$615,444.30 to the State Land Office as settlement for underpayment of royalties.
20. Mack/COG voluntarily filed corrected C-103, C-104, and C-105 reports with the OCD for the 70 wells identified in Exhibit A.
21. On January 19, 2007, Mack entered into Agreed Compliance Order 161 to resolve Mack's civil and criminal liabilities under NMSA 1978, §70-2-31 as to the following rules and statutes: 19.15.5.303 NMAC; 19.15.3.102.A and B NMAC; 19.15.13.1101.A NMAC; 19.15.3.117 NMAC; 19.15.13.1103 NMAC; 19.15.13.1115.A NMAC; NMSA 1978, §70-2-31(B); and NMSA 1978, §70-2-31(D). Agreed Compliance Order 161 also resolved Mack's criminal liability pursuant to NMSA 1978, §70-2-10 as to Case No. 13608 and Case No. 13609.

Dodd Federal Unit Wells:

22. The Dodd Federal Unit, created in 2004, contains 2400 acres of federal lands located in Township 17 South, Range 29, East, Eddy County, New Mexico. The Dodd Federal Unit is adjacent to and directly northeast of the GJWC Unit.
23. Marbob acquired certain oil and gas leases in the area now included within the Dodd Federal Unit area from Sun Oil Company in October 1982. Marbob acquired one additional lease in this area from Amoco Production Company between 1986 and 1993. This tract was acquired through a Farmout Agreement

with a continuous drilling provision. Certain acreage was earned after 1986, and the balance of the acreage was purchased in 1993. Wells on leases later included in the Dodd Federal Unit will be referred to as the "Dodd wells."

24. In 2004 Marbob applied for statutory unitization of the Dodd Federal Unit for the purpose of conducting secondary recovery operations within the Grayburg-Jackson and East Empire-Yeso Pools. The OCD approved the Dodd Federal Unit by Order No. R-12228 in Case No. 13350, dated November 1, 2004. The unitized interval within the Unit Area comprises that interval from the top of the Seven Rivers formation to the base of the Yeso-Paddock formation.
25. Marbob also applied for, and obtained, an order contracting the East Empire-Yeso Pool and extending the horizontal boundaries and the vertical limits of a portion of the Grayburg-Jackson Pool. By Order No. R-12256 in Case No. 13386, dated January 3, 2005, the OCD extended the vertical limits of the Grayburg-Jackson pool within the Dodd Federal Unit Area to include the Glorieta and Yeso/Paddock intervals. The order also provided that within the Dodd Federal Unit Area, the Grayburg-Jackson Pool shall be renamed the Grayburg-Jackson-Yeso Pool.
26. Between October 6, 2006 and March 13, 2007, Marbob filed sundry notices on forty-four Dodd Federal Unit wells reporting perforations in the Grayburg-San Andres, Glorieta, and Yeso/Paddock intervals. The sundry notices did not provide dates for the perforations.
27. In December 2006, Marbob filed an application for approval of a water-flood project in the Dodd Federal Unit. Marbob included in its application wellbore diagrams for wells in the area of review, showing the perforations. The wellbore diagrams for 23 of those wells also identified dates for the perforations. The dates provided by Marbob for those 23 wells indicated that Marbob perforated the Glorieta and Yeso/Paddock intervals prior to the 2004 creation of the Dodd Federal Unit and prior to the January 2005 extension of the vertical limits of the Grayburg-Jackson Pool to include the Glorieta and Yeso/Paddock intervals.
28. A review of the OCD well files for the 23 wells showed that Marbob's filings for those 23 wells did not report perforations in the Glorieta and Yeso/Paddock intervals, as well as a number of additional perforations in the Grayburg-San Andres interval, prior to the 2004 creation of the Dodd Federal Unit and the January 2005 extension of the vertical limits of the Grayburg-Jackson Pool to include the Glorieta and Yeso/Paddock intervals. Further review revealed that a number of the perforations reported for the Grayburg-San Andres Interval were non-existent. The sundry notices filed between October 6, 2006 and March 13, 2007 listed perforation depths for some, but not all, of the previously unreported perforations, and did not correct past filings that reported non-existent perforations.

29. In June 2007, the OCD advised Marbob that it was investigating Marbob's filing and reporting and contemplating initiation of enforcement actions against Marbob for failing to correctly report information as required by the Act and OCD Rules.
30. Marbob provided some information on its filings for wells in the Dodd Federal Unit, and the OCD used that information to prepare the spreadsheet attached as Exhibit B. That spreadsheet identifies 44 wells in the Dodd Federal Unit (by current and former name and API number). For each well, the spreadsheet identifies the following information:
 - the location of the perforations as originally reported by Marbob and the corresponding dates of those reports,
 - the location of the actual perforations made and corresponding dates for said perforations,
 - the date of submission/receipt by the BLM of the recently-submitted sundry notice for each site, and perforation depths recorded on those sundries.
31. Prior to the creation of the Dodd Federal Unit in 2004, Marbob's filings for the Dodd wells, identified in Exhibit B (including, where applicable, federal applications for permits to drill and sundry notices, and OCD requests for allowables and production reports), stated that the wells were producing from the Grayburg-Jackson (Seven Rivers Queen Grayburg San Andres) Pool ("Grayburg-Jackson Pool"), and Marbob's filings reported perforations at depths consistent with the Grayburg-Jackson Pool. Prior to 2004, the vertical limits of the Grayburg-Jackson Pool did not extend to the Glorieta and Yeso/Paddock formations, which were at that time included in the East Empire-Yeso Pool.
32. Marbob produced the wells identified in Exhibit B from the Glorieta and/or Yeso/Paddock intervals prior to the creation of the Dodd Federal Unit and prior to the extension of the vertical limits of the Grayburg-Jackson Pool to include the Glorieta and the Yeso/Paddock formations.
33. Marbob's production reports for the wells identified in Exhibit B prior to the creation of the Dodd Federal Unit and prior to the extension of the vertical limits of the Grayburg-Jackson Pool incorrectly reported commingled production from the Yeso/Paddock formation as production from the Grayburg-Jackson Pool.
34. Well completion reports and sundry notices for the wells identified in Exhibit B listed the incorrect pool(s) and incomplete or incorrect perforation dates and locations. In some instances, the initial completion data that was reported for the wells inaccurately indicated perforations at levels where no such perforations were actually made and/or omitted report of perforations that were, in fact, made, both within and outside of the Grayburg-Jackson Pool zone. In some instances, wells were later re-completed to different zones without giving the required notice to the OCD or obtaining required OCD approval.

ACO

Marbob Energy Corporation (14049)

Page 5 of 12

Foster Eddy Federal Lease Wells:

35. Marbob operates wells in the Foster Eddy Federal Lease, in Section 17, Township 31 East, Eddy County, New Mexico.
36. In a letter to the OCD dated June 2, 2008, Marbob identified seven of its Foster Eddy Federal wells as out of compliance with OCD filing requirements.
37. At OCD's request, Marbob provided its well files for the seven identified Foster Eddy Federal wells.
38. A comparison of the information provided in Marbob's well files and OCD's well files for the seven identified wells shows that between July 1989 and January 1997, Marbob filed well completion reports and sundry notices for the seven wells listing the incorrect pool(s) and incomplete or incorrect perforations. In some instances, the initial completion data that was reported for the wells inaccurately indicated perforations at levels where no such perforations were actually made and/or omitted report of perforations that were, in fact, made, both within and outside of the Grayburg-Jackson Pool. Marbob's production reports for the wells identified on Exhibit C incorrectly reported commingled production from the Yeso/Paddock formation as production from the Grayburg-Jackson Pool. Exhibit C summarizes these findings.
39. A report prepared in 1989 by Marbob's consulting geologist of the observed oil and gas indications during the drilling of one of the Foster Eddy Federal wells, the Foster Eddy No. 8, shows that Marbob was aware of the location of formation tops in the area and the depths of "significant shows of oil or gas" in the area.
40. Marbob filed sundry notices for the seven wells indicating production from perforations located in the Grayburg-Jackson Pool. However, Marbob had also perforated and was producing from lower zones.
41. Well history and completion reports in Marbob's well files for the seven wells document the accurate perforation depths and the dates of those perforations. Also present, however, are handwritten notations that cross out references to perforations that would be in zones lower than the Grayburg-Jackson Pool, and write in non-existing perforations that would be in the Grayburg-Jackson Pool. The sundry notices filed by Marbob with the BLM and the OCD report the edited, inaccurate version of the perforation locations.
42. On September 17, 1996, Marbob applied to the OCD for administrative approval of an unorthodox location for the Foster Eddy Federal No. 13, notifying the OCD and an offset operator producing from the Grayburg-San Andres formation that it proposed to drill the Foster Eddy Federal No. 13 "to the San Andres Formation at an unorthodox location based on geologic/reservoir considerations." Marbob did not identify and provide notification to any offset operators that may have been

ACO

Marbob Energy Corporation (14049)

Page 6 of 12

producing from other formations. Marbob received the requested approval. Marbob's well completion report for the Foster Eddy Federal No. 13, dated January 16, 1997, reported perforations at 3509' to 3855', which would put the perforations within the San Andres. Those perforations did not exist. Marbob actually perforated the well below the San Andres, at 4726' to 5027'.

Relevant Statutes And Rules:

43. At all times relevant to this matter, Rule 19.15.5.303 NMAC has required each pool to be produced as a single source of supply, with each well within a pool completed, maintained, and operated so as to prevent communication within the wellbore with any other pool. Production from each pool and each lease must be segregated, and the commingling of production before marketing, of production from separate pools or separate leases is prohibited. Exceptions for surface commingling, downhole commingling, and off-lease storage and/or measurement may be obtained only through procedures outlined in the rule.
44. At all times relevant to this matter, OCD rules have required operators to obtain a permit prior to commencing drilling, deepening, or re-entry operations, or before plugging a well back to a different pool or completing or re-completing a well in an additional pool. The applicant must file a complete Form C-101 and Form C-102. See Rule 19.15.3.102.A and B NMAC, and Rule 19.15.13.1101.A NMAC. For federal wells, the applicant must file the appropriate Bureau of Land Management (BLM) form in lieu of a Form C-102. 19.15.13.1128 NMAC.
45. At all times relevant to this matter, OCD rules have required operators to file a well completion report on Form C-105 within 20 days after the completion of a well, or the re-completion of a well into a different common source of supply. See Rule 19.15.3.117 NMAC. See also Rule 19.15.13.1103.H NMAC. For federal wells, the operator must file the appropriate BLM form in lieu of Form C-105. Rule 19.15.13.1128 NMAC.
46. At all times relevant to this matter, OCD rules have required operators to file a Form C-103 report on remedial work within 30 days following completion of such work, including "a detailed account of the work done and the manner in which such work was performed; the daily production of oil, gas and water both prior to and after the remedial operation; the size and depth of shots; the quantity of and [sic], crude, chemical or other materials employed in the operation, and any other pertinent information." See Rule 19.15.13.1103.G NMAC. For federal wells, the operator must file the appropriate BLM form in lieu of Form C-103. 19.15.13.1128 NMAC.
47. At all times relevant to this matter, OCD rules have required operators to file a form C-104 if a well is re-completed to a different pool. See Rule 19.15.13.1103.H NMAC. Federal forms may not be substituted for the Form C-104. Rule 19.15.13.1128 NMAC.

ACO

Marbob Energy Corporation (14049)

Page 7 of 12

48. At all times relevant to this matter, OCD rules have required operators to file a Form C-104, Request for Allowable and Authorization to Transport Oil and Natural Gas, for each newly completed or recompleted well or well completed in an additional pool. Rule 19.15.13.1104 NMAC. Federal forms may not be substituted for the Form C-104. Rule 19.15.13.1128.C NMAC.
49. At all times relevant to this matter, OCD rules have required operators to file a monthly production report on Form C-115. Rule 19.15.13.1115.A NMAC. Federal forms may not be substituted for the Form C-115. Rule 19.15.13.1128 NMAC.
50. At all times relevant to this matter, OCD rules have required operators proposing to drill a well at an unorthodox location to seek approval, providing information evidencing the need for the exception to the location rules. Rule 19.15.3.104.F(3) NMAC.
51. NMSA 1978, §70-2-31(A) authorizes the assessment of civil penalties of up to one thousand dollars per day per violation against any person who knowingly and willfully violates any provision of the Oil and Gas Act or any rule or order adopted pursuant to the Act.
52. NMSA 1978, §70-2-31(B) makes it unlawful for any person to knowingly and willfully:
 - (2) do any of the following for the purpose of evading or violating the Oil and Gas Act or any rule, regulation or order of the commission or the division issued pursuant to that act:
 - (a) make any false entry or statement in a report required by the Oil and Gas Act or by any rule, regulation or order of the commission or division issued pursuant to that act;
 - (b) make or cause to be made any false entry in any record, account or memorandum required by the Oil and Gas Act or by any rule, regulation or order of the commission or division issued pursuant to that act;
 - (c) omit or cause to be omitted from any such record, account or memorandum full, true and correct entries; or
 - (d) remove from this state or destroy, mutilate, alter or falsify any such record, account or memorandum.
53. Each day of violation of NMSA 1978, §70-2-31(B) constitutes a separate offense. NMSA 1978, §70-2-31(C).
54. Any person who knowingly and willfully procures, counsels, aids, or abets the commission of the knowing and willful violation of any provision of the Oil and

Gas Act or any provision of any rule or order issued pursuant to that Act is subject to penalties. NMSA 1978, §70-2-31(D).

55. NMSA 1978, §70-2-33(A) and Rule 19.15.1.7(P)(2) NMAC define "person" in relevant part as including a "corporation."

CONCLUSIONS

1. The OCD has jurisdiction over the parties and subject matter in this proceeding.
2. Marbob is a "person" as defined by NMSA 1978, §70-2-3(A) and Rule 19.15.1.7(P)(2) NMAC.
3. Regarding the GJWC Unit wells identified in Exhibit A, Marbob is subject to civil penalties pursuant to NMSA 1978, §70-2-31(A) as to the following rules and statutes: 19.15.5.303 NMAC; 19.15.3.102.A and B NMAC; 19.15.13.1101.A NMAC; 19.15.3.117 NMAC; 19.15.13.1103 NMAC; 19.15.13.1104 NMAC; 19.15.13.1128.C NMAC; 19.15.13.1115.A NMAC; NMSA 1978, §70-2-31(B); and NMSA 1978, §70-2-31(D).
4. Regarding the Dodd Federal Unit wells identified in Exhibit B, Marbob is subject to civil penalties pursuant to NMSA 1978, §70-2-31(A) as to the following rules and statutes: 19.15.5.303 NMAC; 19.15.3.102.A and B NMAC; 19.15.13.1101.A NMAC; 19.15.3.117 NMAC; 19.15.13.1103 NMAC; 19.15.13.1104 NMAC; 19.15.13.1128.C NMAC; 19.15.13.1115.A NMAC; and NMSA 1978, §70-2-31(B).
5. Regarding the Foster Eddy Federal wells identified in Exhibit C, Marbob is subject to civil penalties pursuant to NMSA 1978, §70-2-31(A) as to the following rules and statutes: 19.15.5.303 NMAC; 19.15.3.102.A and B NMAC; 19.15.13.1101.A NMAC; 19.15.3.117 NMAC; 19.15.13.1103 NMAC; 19.15.13.1104 NMAC; 19.15.13.1128.C NMAC; 19.15.13.1115.A NMAC; 19.15.3.104.F(3) NMAC; and NMSA 1978, §70-2-31(B).
6. Regarding the Foster Eddy Federal #13, Marbob is subject to civil penalties pursuant to NMSA 1978, §70-2-31(A) as to 19.15.3.104.F(3) NMAC.

ORDER

1. Marbob agrees to pay a penalty of \$500,000.00 (five hundred thousand dollars) pursuant to NMSA 1978, §70-2-31(A) as to the following rules and statutes: 19.15.5.303 NMAC; 19.15.3.102.A and B NMAC; 19.15.13.1101.A NMAC; 19.15.3.117 NMAC; 19.15.13.1103 NMAC; 19.15.13.1104 NMAC; 19.15.13.1128.C NMAC; 19.15.13.1115.A NMAC; 19.15.3.104.F(3) NMAC; NMSA 1978, §70-2-31(B); and NMSA 1978, §70-2-31(D).

2. Marbob agrees that for a period of one (1) year following the execution of this Agreement, upon reasonable notice by the OCD, it will provide full and complete access to all of its well files for examination and review by the OCD or its designee(s). Well files will be made available in the form in which they are normally maintained by Marbob, and without redaction or alteration.
3. Marbob agrees to file within 90 days of execution of this Order for each of the 44 wells identified in Exhibit B and each of the seven wells identified in Exhibit C, the following corrected forms with the OCD or the BLM, as applicable, and provide copies of BLM forms to the OCD:
 - i. Well Completion or Recompletion Reports (BLM Form 3160-4) for each well completion incorrectly reported and for each re-completion that was incorrectly reported or unreported, including accurate producing interval information and a complete perforation record;
 - ii. Sundry Notices (BLM Form 3160-5) for each completion and recompletion including the perforations and the dates of those perforations, and a sundry notice identifying all perforations and the dates of those perforations, and identifying as false any previously reported perforations that do not exist;
 - iii. Request for Allowable and Authorization to Transport (OCD Form C-104) for each completion and recompletion, including accurate perforation data.
4. As to the seven wells identified in Exhibit C Marbob agrees that it will **either** accomplish the following by January 30, 2009, **or** will shut in each well for which the following has not been accomplished by January 30, 2009, with such wells to remain shut-in until the below-listed tasks have been completed:
 - i. file amended production reports for the Foster Eddy property for the months from July 1989 to present, allocating production to the appropriate pools under an allocation formula acceptable to the OCD; **and**
 - ii. submits a complete application to obtain approval to commingle production from the producing zones of each well or plugs the well back so that it produces only from an approved zone or zones; **and**
 - iii. submits a complete application to obtain approval for non-standard location for Foster Eddy Federal No. 13 based on true and accurate information regarding the geology and the reservoir.
5. The OCD reserves the right to pursue additional enforcement actions as to violations discovered by the review of Marbob's files by the OCD or its designee(s) or that become apparent through any other means and are not addressed in this agreed compliance order.
6. OCD may issue the press release approved by both the parties at the time of signing this Order. This Order and all documents in the well files and case files held by OCD related to the wells addressed in this Order are public documents.

7. By signing this Order, Marbob expressly:
- (a) acknowledges the correctness of the Findings and Conclusions set forth in this Order;
 - (b) agrees to pay the \$500,000.00 (five hundred thousand dollar) penalty at the time this Order is executed;
 - (c) agrees to make its well files available to the OCD or its designee(s), as described in Ordering Paragraph 2, above;
 - (d) agrees to file corrected forms, as described in Ordering Paragraph 3, above, for each of the 44 wells identified in Exhibit B and each of the seven wells identified in Exhibit C within 90 days of execution of this Order;
 - (e) agrees to file amended production reports for the seven wells identified in Ordering Paragraph 3, above, within three months of execution of this Order, and to meet the requirements of Ordering Paragraph 4, above, or shut in the wells as described in Ordering Paragraph 4, above;
 - (f) agrees to file within 90 days of the execution of the Order, corrected forms as described in Ordering Paragraph 3, above, to correct filing errors and discrepancies identified by the OCD in any review of Marbob's files it may do that were not addressed in the corrected filings made pursuant to Ordering Paragraphs 3 and 4;
 - (g) acknowledges that the OCD reserves the right to pursue additional enforcement actions as to violations discovered in the course of the review of Marbob's files by the OCD or its designee(s) or that become apparent via other means and that are not the subject of this agreed compliance order;
 - (h) waives any right, pursuant to the Oil and Gas Act or otherwise, to a hearing challenging the entry of this Order (either prior to or subsequent to the entry of this Order) or to an appeal from the entry of this Order; and
 - i) agrees that the Order may be enforced by OCD or Oil Conservation Commission Order, by suit or otherwise to the same extent and with the same effect as a final Order of the OCD, Oil Conservation Commission, or District Court entered after notice and hearing or trial in accordance with all relevant statutes and rules.
8. Entry of this Order resolves all civil liability of Marbob under 19.15.5.303 NMAC, 19.15.3.102.A and B NMAC, 19.15.13.1101.A NMAC, 19.15.3.117 NMAC, 19.15.13.1103 NMAC, 19.15.13.1104 NMAC, 19.15.13.1128.C NMAC, 19.15.13.1115.A NMAC, NMSA 1978, §70-2-31(B), and NMSA 1978, §70-2-31(D) as to the wells identified in Exhibits A, B and C, and resolves all civil liability of Marbob under 19.15.3.104.F(3) NMAC as to the Foster Eddy Federal No. 13.

Oil Conservation Division

By: [Signature]
Title: Director, Oil Conservation Division
Date: 12/17/08

By: [Signature]
Title: Cabinet Secretary
Date: 12.17.08

Marbob Energy Corporation

By: [Signature]
Title: [Signature]
Date: [Signature]

GJ WEST COOP UNIT WELLS
 EDDY COUNTY, NM

SOR
 TED
 BY: DATE YESO PERFS ADDED

ORIGINAL

Date Yeso

COUNT

INITIAL
 FIRST PROD

CURRENT
 STATUS

UWI (APINum)	Field Name	Operator	New Name	Sec	Twn	Rng	TD	COMP DATE	Perfs	Perfs Added	Producing Formation	DATE	STATUS
130015250890000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #63	22	17S	29E	4,550	12/17/1984	2235-4167	12/4/1984	Q-GB-SA-YESO	Dec-84	active
230015251310000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #65	28	17S	29E	4,400	6/15/1946	2662-4471	12/29/1984	SA-YESO	Jan-85	active
330015201240000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #48	21	17S	29E	4,225	5/20/1968	2245-4165	3/18/1985	GB-SA-YESO	May-68	active
430015254290000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #67	27	17S	29E	5,074	12/23/1985	2429-3847	10/29/1985	SA-YESO	Jan-86	active
530015255000000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #75	21	17S	29E	4,465	7/10/1986	2624-4190	6/11/1986	SA-YESO	Jul-86	active
630015254890000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #78	21	17S	29E	4,450	1/3/1986	2610-4189	7/17/1986	SA-YESO	Jan-86	active
730015254300000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #71	22	17S	29E	4,565	12/28/1985	2276-4174	7/28/1986	Q-GB-SA-YESO	Jan-86	active
830015254310000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #72	22	17S	29E	5,060	12/28/1985	2659-4188	8/14/1986	SA-YESO	Jan-86	active
930015253840000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #70	22	17S	29E	4,430	10/5/1985	2623-4189	8/22/1986	SA-YESO	Oct-85	active
1030015254660000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #73	21	17S	29E	4,460	12/21/1985	2243-4194	9/2/1986	Q-GB-SA-YESO	Jan-86	active
1130015253830000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #69	21	17S	29E	4,335	9/29/1985	2585-4171	11/11/1986	SA-YESO	Oct-85	active
1230015254580000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #77	28	17S	29E	4,590	12/31/1985	2447-4422	11/20/1986	Q-GB-SA-YESO	Jan-86	P&A'd 2004
1330015253820000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #68	28	17S	29E	4,435	10/21/1985	2589-4244	12/4/1986	SA-YESO	Oct-85	active
1430015254920000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #74	28	17S	29E	4,480	12/30/1985	2320-4336	12/8/1986	Q-GB-SA-YESO	Jan-86	active
1530015256570000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #84	22	17S	29E	4,510	1/5/1987	2656-4473	12/16/1986	SA-YESO	Jan-87	active
1630015256910000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #81	21	17S	29E	4,660	1/9/1987	2594-4256	12/26/1986	SA-YESO	Jan-87	active
1730015256590000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #85	22	17S	29E	4,580	9/17/1987	2662-4208	9/8/1987	SA-YESO	Sep-87	active-GB/SA only now
1830015261030000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #89	22	17S	29E	4,428	5/15/1989	2648-4212	5/10/1989	SA-YESO	Jun-89	active
1930015264930000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #83	28	17S	29E	4,480	12/6/1990	2670-4376	11/19/1990	SA-YESO	Jan-91	active
2030015265810000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #90	28	17S	29E	4,585	1/26/1991	2701-4436	1/9/1991	SA-YESO	Jan-91	active
2130015256330000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #80	21	17S	29E	4,490	2/3/1991	2774-4290	1/22/1991	SA-YESO	Feb-91	active
2230015266140000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #91	28	17S	29E	4,639	3/2/1991	2710-4413	2/12/1991	SA-YESO	Mar-91	active
2330015266400000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #93	28	17S	29E	4,500	3/20/1991	2818-4346	3/6/1991	SA-YESO	Apr-91	active
2430015266860000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #95	22	17S	29E	4,518	5/17/1991	3939-4223	5/12/1991	YESO	Jun-91	active
2530015256100000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #82	21	17S	29E	4,465	5/31/1991	2763-4255	5/23/1991	SA-YESO	Jun-91	active
2630015267430000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #79	21	17S	29E	4,490	6/13/1991	2637-4228	6/4/1991	SA-YESO	Jul-91	active
2730015267530000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #96	22	17S	29E	4,496	6/22/1991	2663-4245	6/13/1991	SA-YESO	Jul-91	active
2830015267540000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #97	22	17S	29E	4,520	6/30/1991	2673-4282	6/25/1991	SA-YESO	Jul-91	active
2930015267690000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #99	21	17S	29E	4,525	8/6/1991	2608-4280	7/30/1991	SA-YESO	Aug-91	active
3030015268380000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop	21	17S	29E	4,450	11/25/1991	2603-4227	10/14/1991	SA-YESO	Dec-91	active

31	30015267810000	GRAYBURG JACKSON	COG Operating LLC	#101	GJ West Coop #98	22	17S	29E	4,459	11/25/1991	2612-4247	10/15/1991	SA-YESO	Dec-91	active
32	30015268400000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #100	21	17S	29E	4,470	11/9/1991	2599-4250	10/25/1991	SA-YESO	Dec-91	active	
33	30015268390000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #102	21	17S	29E	4,450	11/13/1991	2627-4318	10/31/1991	SA-YESO	Dec-91	active	
34	30015201920001	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #108	28	17S	29E	6,380	1/24/1993	3983-4990	12/23/1992	YESO	Jun-93	active	
35	30015272560000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #103	28	17S	29E	5,050	4/8/1993	2600-4275	2/9/1993	SA-YESO	Jun-93	active	
36	30015272570000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #104	21	17S	29E	5,050	4/3/1993	2631-4282	2/13/1993	SA-YESO	Jun-93	active	
37	30015272580000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #105	28	17S	29E	5,052	4/5/1993	2629-4303	3/1/1993	SA-YESO	Jun-93	active	
38	30015272590000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #106	21	17S	29E	5,050	5/20/1993	2587-4204	3/19/1993	SA-YESO	Jun-93	active	
39	30015272600000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #109	28	17S	29E	5,048	5/1/1993	3334-4271	3/26/1993	SA-YESO	Jun-93	active	
40	30015273450000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #112	16	17S	29E	4,355	5/26/1993	2623-4238	3/27/1993	SA-YESO	Jun-93	P&A'd 2001	
41	30015273640000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #119	21	17S	29E	4,408	5/20/1993	2622-4280	4/8/1993	SA-YESO	Sep-93	active	
42	30015273630000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #118	21	17S	29E	4,421	6/10/1993	2611-4219	4/26/1993	SA-YESO	Jun-93	active	
43	30015273580000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #113	21	17S	29E	4,456	6/24/1993	2599-4200	4/29/1993	SA-YESO	Jun-93	active	
44	30015273590000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #114	21	17S	29E	4,378	6/28/1993	2593-4240	5/10/1993	SA-YESO	Jun-93	active	
45	30015274470000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #120	21	17S	29E	4,417	6/24/1993	2634-4170	5/18/1993	SA-YESO	Jun-93	active	
46	30015273620000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #117	21	17S	29E	4,920	7/8/1993	2561-4595	6/4/1993	SA-YESO	Jul-93	active	
47	30015273600000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #115	21	17S	29E	4,758	7/18/1993	2616-4584	6/11/1993	SA-YESO	Jul-93	active	
48	30015273770000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #107	21	17S	29E	5,068	1/6/1994	3935-4987	11/8/1993	YESO	Jul-94	active	
49	30015208440000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #124	28	17S	29E	10,890	8/16/1973	4098-5008	3/31/1994	YESO	Jul-94	active	
50	30015203510001	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #123	23	17S	29E	10,835	5/27/1994	3939-5202	4/26/1994	YESO	Jul-94	active	
51	30015031710000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #8	28	17S	29E	4,650	12/5/1945	4109-4432	6/13/1994	SA-YESO	Dec-45	active	
52	30015030360000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #26	22	17S	29E	5,296	7/5/1937	2839-5103	7/19/1994	GB-SA-YESO	Aug-37	active	
53	30015031690000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #16	28	17S	29E	5,215	2/24/1947	2673-4894	11/1/1994	GB-SA-YESO	Feb-47	active	
54	30015282650000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #122	28	17S	29E	5,521	2/11/1995	2712-4371	1/25/1995	SA-YESO	Feb-95	active	
55	30015031700000	GRAYBURG JACKSON	COG Operating LLC	GJ West Coop #7	28	17S	29E	5,702	4/27/1946	3302-4869	2/6/1995	SA-YESO	Apr-46	active	

56	30015031660000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #6	27	17S	29E	5,205	1/23/1945	3106-4229	3/20/1995	SA-YESO	Feb-45	active
57	30015282100000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #121	28	17S	29E	5,570	2/9/1995	2685-4421	3/28/1995	SA-YESO	Feb-95	active
58	30015284940000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #139	28	17S	29E	4,955	6/3/1995	3179-4423	5/23/1995	SA-YESO	Jun-95	active
59	30015285140000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #133	28	17S	29E	4,600	6/1/1/1995	4018-4449	5/31/1995	YESO	Jun-95	active
60	30015285180000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #138	28	17S	29E	4,590	6/28/1995	4046-4425	6/14/1995	YESO	Jun-95	active
61	30015285160000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #136	28	17S	29E	4,594	7/6/1995	4089-4446	6/27/1995	YESO	Jul-95	active
62	30015285170000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #137	28	17S	29E	4,625	8/3/1995	4088-4423	7/5/1995	YESO	Aug-95	active
63	30015285150000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #134	28	17S	29E	4,609	8/5/1995	4028-4420	7/14/1995	YESO	Aug-95	active
64	30015285130000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #131	21	17S	29E	5,294	8/11/1995	3901-4218	8/8/1995	YESO	Aug-95	active
65	30015285910000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #135	22	17S	29E	4,405	9/4/1995	3965-4313	8/15/1995	YESO	Sep-95	active
66	30015030280000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #24	21	17S	29E	7,407	7/24/1961	4000-4388	9/15/1995	YESO	Jul-61	active
67	30015291800000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #140	21	17S	29E	7,500	12/26/1996	3929-4228	11/23/1996	YESO	Dec-96	active
68	30015293000000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #143	28	17S	29E	4,602	4/1/1997	4042-4411	2/19/1997	YESO	Mar-97	active
69	30015292990000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #142	28	17S	29E	4,628	5/5/1997	4119-4415	3/4/1997	YESO	May-97	active
70	30015292980000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #141	21	17S	29E	4,502	3/27/1997	3978-4296	3/11/1997	YESO	Mar-97	active
EVIDENCE OF YE														
71	30015207420000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #87	28	17S	29E	10,870	10/28/1972	2617-4253		SA-YESO		P&AD 2003
72	30015266240000	GRAYBURG JACKSON	COG Operating LLC	GU West Coop #92	28	17S	29E	4,800	3/11/1991	2741-4445	2/20/1991	SA		P&AD 2002

G. BURLERSON ; 9-08-06

<u>DODD FEDERAL UNIT</u>	<u>COLOR KEY</u> →	<u>Perforations Omitted from Reports</u>	<u>Falsely Reported Perforations</u>	<u>Accurately Reported Perforations (as to Both Depth and Date)</u>	<u>Non-Existent Perforations Reported</u>
<u>Well</u> <i>(API, Name, AKA)</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>(reporting previously reported actual . previously - omitted actual & previously-reported fictitious perforations)</i>	
30-015-26282 Dodd Fed Unit 62, MDodd A-43	June 1990: SA 2754-3334	April 1990: Yeso 4102-4359	Rec'd Nov 2006: 4102-4359	April 1990 - SA 2754-3334 Yeso 4102-4359	SA 2754-3334
30-015-26227 Dodd Fed Unit #49, M.Dodd B- 65	Dec 1989: SA 2805-3410	Nov 1989: Yeso 4112-4384	Rec'd Nov 2006: 4112-4384	November 1989: SA 2805-3410 Yeso 4112-4384	SA 2805-3410
30-015-26365 Dodd Fed Unit #48, MDodd B- 67	Dec 1990: SA 2822-3473	Nov 1990: Yeso 4123-4370	Rec'd Dec 2006: 4123-4370	Nov/Dec 1990: SA 2822-3473 Yeso 4123-4370	SA 2822-3473

<u>Well</u> <i>(API Name, AKA)</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>(reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent Perforations Reported</u>
30-015-26220 Dodd Fed Unit #46, MDodd B-66	Dec 1989: SA 2765-3392	Nov 89: Yeso 4095-4402	Rec'd Dec 2006: 4095-4402	Nov/Dec 1989: SA 2765-3392 Yeso 4095-4402	SA 2765-3392
30-015-25397 Dodd Fed Unit #41, MDodd A-37	Nov 1985: SA 2706-3281	Oct 1985: SA 2385-3281 Yeso 4071-4326	Rec'd Dec 2006: 2385-2605 4071-4326	October 1985: GB/SA 2385-2605, SA 2706-3281, Yeso 4071-4326	
30-015-25231 Dodd Fed Unit #35, MDodd B-48	Dec 1985: SA 2788-3347	Oct 1985: SA 2788-3347 Oct 1985: Yeso 4149-4201 Nov 1985: SA 2485-2701 Dec 1986: Yeso 4269-4342	Rec'd Dec 2006: 2485-2701 4149-4342	October 1985: SA 2788-3347, October 1985: Yeso 4149-4201 November 1985: SA 2485-2701 December 1986: Yeso 4269-4342	

<u>Well</u> <i>(API, Name, AKA)</i>	<u>Previously Reported Performations</u>	<u>Actual Performations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>(reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent Performations Reported</u>
30-015-02976 Dodd Fed Unit #31, MDodd B-2	Sept 1985 : SA 3146-3345	August 1985: SA3708-3790 Yeso 4085-4350 Nov 1987: SA 2796-3347	Rec'd Dec 2006: 2796-4350	Sept./Aug 85: SA 3146-3345. Sept./Aug 85: 3708-3790, Yeso 4085-4350 Nov. 1987: SA 2796-3347	SA 3146-3345 [as reported in Sept 1985]
30-015-02974 Dodd Fed Unit #28, MDodd B-4	Aug 1985: SA 2791-3343	Aug 1985: SA 2791 - -3794 Yeso 4094 - 4344	Rec'd Dec 2006: 3693-4344	Aug/Sept. 85: SA 2791-3343, Aug/Sept. 85: SA 3693-3794, Yeso 4094-4344	
30-015-25230 Dodd Fed Unit #30, MDodd B-47	Dec1985: SA 3434-3510	Dec 1985: Yeso 4138-4291 Nov1987: SA 2833-3349	Rec'd Dec 2006: 2833-3349 4138-4291	Dec 1985 : SA 3434-3510 Dec 1985: SA 2833-3349 Yeso 4138-4291	SA 3434-3510
30-015-25340 Dodd Fed Unit #26, MDodd B-51	Nov 85: GB/SA 2445-3320	Nov1985: SA 2445- -3966 Yeso 5244-5699 May 1987: Yeso 4101-4367	Rec'd Dec 2006: 3657-3966 4101-4367	Nov/Dec 85: GB/SA 2445-2658, SA 2765-3320 Nov 1985: Yeso 5244-5363, 5403-5699. May 1987: Yeso 4101-4367	

<u>Well</u> <i>(API Name, AKA)</i>	<u>Previously Reported</u> <u>Perforations</u>	<u>Actual Perforations</u> <i>[per operator well bore diagram]</i>	<u>Perfs Reported via</u> <u>2006-07 Sundries</u> <i>[no corresponding dates]</i>	<u>Amended Federal & State Reports</u> <u>submitted 2008</u> <i>(reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent</u> <u>Perforations</u> <u>Reported</u>
30-015-25464 Dodd Fed Unit #9, MDodd B-56	Feb 1987 : SA 2763-3296	Jan 1987 : SA 2763-3296	<i>Rec'd Dec 2006:</i> 2459-2666 4081-4341	Jan/Feb 1987 : SA 2763-3296, <i>fictitious perforations!</i>	
30-015-25461 Dodd Fed Unit #13, Boyd Dodd 7	Dec85: CB/SA 2492-3189	Jan 1987 : Yeso 4081-4341	<i>Rec'd Dec 2006:</i> 3189-3442 4137-4348	Jan/Feb 1987: Yeso 4081-4341	
		Sept 1990 : SA 2459-2666		Sept 1990: SA 2459-2666	
		Dec 1985: SA 2493-2531 SA 2804-		Dec 1985: CB 2493-2531, SA 2804-3189,	
30-015-25438 Dodd Fed Unit #16, MDodd B-53	Feb 86: CB/SA 2465-3310	June 1988: Yeso 4137-4348	<i>Rec'd Dec 2006:</i> 4107-4322	June 1988: Yeso 4137-4348	
		Nov1985: SA 2770-3310 SA 2465-2673		Nov/Dec 1985: CB/SA 2465-2673, SA 2770-3310,	
		Dec 1986: Yeso 4107-4322		Yeso 4107-4322	
30-015-25705 Dodd Fed Unit #1, Mdodd B-60	Feb 1987: SA 2552-2719	Jan 1987: Yeso 4516 - 4595 Yeso 4005 - 4180	<i>Rec'd Dec 2006</i> 3848-62 4005-4595	Jan/Feb 1987: SA 3848-3862 Yeso 4005-4180, 4516-4595	
		Mar 1987: Lov/SA 2552-2718		March 1987: SA 2552-2718	

<u>Well</u> <i>(Apl. Name, AKA)</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>[per operator well bore diagram]</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>[no corresponding dates]</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>[reporting previously reported actual, previously-omitted actual & previously-reported fugitive perforations]</i>	<u>Non-Existent Perforations Reported</u>
30-015-25663 Dodd Fed Unit #2, Raper Fed. 2	Jan 1987: SA 2788-3520	Dec 1986: Yeso 4119-4131 Yeso 4225-4320 LwrSA 3727-3975 Jan 1987: SA 2803-3421	Rec'd Jan 2007 2788-3520 3727-3975 4119-4320	Dec 1986: SA 2788-3520 <i>[range erroneous as reported]</i> Dec 1986: SA 2803-3421, <i>[contained within reported range but not accurate reporting of actual perfs]</i> 3727-3975 Yeso 4119-4320	3510-3520, 2788 <i>[as reported]</i> 2788-3520 <i>[as reported]</i>
30-015-25667 Dodd Fed Unit #3, Raper Fed 3	Sept 1987: SA 2816-3228	Sept 1987: LwrSA 3712-3721 LwrSA 4018-4038 Yeso 4166-4317 Dec 1987: SA- 2816-3462	Rec'd Feb 2007 2816-3462 3712-4038 4166-4317	Sept 1987: SA 2816-3228, 4018-4038, Yeso 4166-4317 Dec 1987: SA 2816-3462 Aug 1990: SA 2487-2629	SA 2816-3228 <i>[as reported in Sept 87]</i>
30-015-25611 Dodd Fed Unit #4, Raper Fed 1	Sept 1990: SA/CB 2487-2629 Aug 1986: SA-2805-3347	Aug 1990: SA/CB 2487-2629 June 86: Yeso-4201-4238 Yeso 4493-4498 Yeso 4126-4136 July 86: LwrSA-3615-3730 LwrSA 3782-3899 LwrSA 3960-3994 SA 2792- - 3347	Rec'd Dec 2006 3615-3994 4126-4498	June/July 86: SA 2805-3347, SA 3615-3994, 2792-2804 Yeso 4126-4498	

<u>Well</u> <i>[Appl. Name, AKA]</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>[per operator well bore diagram]</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>[no corresponding dates]</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>[reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations]</i>	<u>Non-Existent Perforations Reported</u>
30-015-24488 Dodd Fed Unit #15, Boyd Dodd B-6	Dec 1984: SA-2771-3325	Dec 1984: SA-2771-3325 June 1986: GB-2572-2587 GB-2656-2689 GB-2471-2481	Rec'd Feb 2007 2471-2689	[recompletion] June 1986: GB 2471-2689.	
30-015-25341 Dodd Fed Unit #22, MDodd B-52	Dec 85: SA/GB-2448-3408	Dec 1985: SA-2773-3408 GB-2448-2684 Sept 1986: Yeso-4092-4315	Rec'd Oct 2006 4092-4315	Dec 1985: GB/SA 2448-2684, SA 2773-3408, Yeso 4092-4315	
30-015-25790 Dodd Fed unit #23	Dec 1987: SA-2789-3405	Oct 1987: Yeso-4166-4301 Dec 1987: SA-2789-3405	Rec'd Dec 2006 4166-4301	Oct-Dec 87: SA 2789-3405, Oct-Dec 87: Yeso 4166-4301	
30-015-25456 Dodd Fed Unit #25, MDodd B-54	Dec 1986: SA 3663-3713	Nov 1986: Yeso-4084-4301 May 1987: SA-2755-3402	Rec'd Dec 2006 4084-4301 2755-3402	Nov/Dec 1986: SA 3663-3713 Nov/Dec 1986: Yeso 4084-4301 May 1987: SA 2755-3402	SA 3663-3713

<u>Well</u> <i>(API, Name, AKI)</i>	<u>Previously Reported</u> <u>Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>(reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent Perforations Reported</u>
30-015-02978 Dodd Fed Unit #27, MDodd B-6	Sept 1985: SA-2795-3308	Aug 1985: SA-2795-3308 Aug 1985: Yeso-4074-4307	Rec'd Nov 2006 4074-4307	Aug/Sept 1985: SA 2795-3308, fictitious perforations!	
30-015-20078 Dodd Fed Unit #34, MDodd B-24	Nothing reported by Marbob until recent 2007 Sundry	Aug 1984: CB 2678-2692	Rec'd March 2007 2678-92	[recompletion] Aug/Sept 1984: CB 2678-2692.	
30-015-25294 Dodd Fed Unit #36, MDodd B-50	Nov 1985: SA-2777-3322	Oct 1985: SA-2777-3322 Nov 1985: CB-2473-2682 Aug 1986: Yeso-4235-4263 Yeso 4141-4154	Rec'd Dec 2006 4141-4263 2473-2682	[recompletion] Nov 1985: CB 2473-2682 August 1986: Yeso 4141-4263	
30-015-26198 Dodd Fed Unit #43, MDodd A-39	Sept 1996: CB/SA-2883-3223	Sept 1996: Yeso-4162-4360 May 1997: SA-2809-3426	Rec'd Dec 2006 2809-3426 4162-4360	Sept 1996: SA 2883-3223 Sept 1996: Yeso 4162-4360 May 1997: SA 2809-3426	SA 2883-3223
30-015-24849 Dodd Fed Unit #50, M.Dodd B-38	May 1984: SA-2608-3355	April 84: Lov/SA-2608-3355	Rec'd Feb 2007 2439-79	April 1984: SA 2608-3355;	
		April 84: CB-2439-2479 <i>*specific dates of perfs not identified on wellbore diagram</i>		April 1984: CB 2439-2479	

<u>Well</u> <i>[API Name, AKI]</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>[per operator well bore diagram]</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>[no corresponding dates]</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>[reporting previously reported actual, previously omitted actual & previously-reported fictitious perforations]</i>	<u>Non-Existent Perforations Reported</u>
30-015-25828 Dodd Fed Unit #51, MDodd B-63	Dec 1987: SA-2800-3465	Nov 1987: Yeso-4084-4384	Rec'd Jan 2007 4084-4384	Nov/Dec 1987: SA 2800-3465. Nov/Dec 1987: Yeso 4084-4384	SA 2800-3465
30-015-24842 Dodd Fed Unit #53, MDodd B-37	May 1984: SA-2620-3334	April 84: GB/SA 2441-2477 April 84: GB 2620-2701 GB 2796-3334	Rec'd Feb 2007 2441-77	April 1984: GB 2441-2477 April 1984: SA 2620-3334:	
30-015-20079 Dodd Fed Unit #38, M.Dodd B-25	Nothing reported by Marbob until recent 2007 Sundry	Sept 1984: Lov-2627-2640	Rec'd March 2007 2627-2640	[recompletion] September 1984: Lov 2627-2640	
30-015-25175 Dodd Fed Unit #37, M.Dodd B-46	March 1985 SA 3174-3289	Feb 1985: Yeso-4062-4310 April 1985: SA-2732-3725 May 1985: GB 2424-2635	Rec'd Oct 2006 2424-3725 4062-4310	Feb/March 1985: SA 3174-3289 Feb/March 1985: Yeso 4062-4310 April/May 1985: GB/SA 2424-3725	SA 3174-3289
30-015-25700 Dodd Fed Unit #55, M.Dodd B-59	Oct 1987: SA 2810-3353	Oct 1987: Yeso-4096-4392	Rec'd Dec 2006 4096-4392	October 1987: SA 2810-3353. October 1987: Yeso 4096-4392	SA 2810-3353

<u>Well</u> <i>(API Name, AKA)</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports submitted 2008</u> <i>(reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent Perforations Reported</u>
30-015-25834 Dodd Fed Unit #56, M.Dodd B-64	Dec 1987: SA 2775-3344	Dec 1987: Yeso-4105-4388	Rec'd Dec 2006 4105-4388	Nov 1987: SA 2775-3344 Nov 1987: Yeso 4105-4388	SA 2775-3344
30-015-25136 Dodd Fed Unit #59, M.Dodd B-45	Jan 1985: SA 2427-3331	Jan 1985: GB-2427-2691 SA-2766-3331 Jan 1985: LwSA--3677-3772 LwSA - 3916-3962 Nov 1986: Yeso-4221-4356 Yeso-4074-4139	Rec'd Dec 2006 3677-3962 4074-4356	Jan 1985: GB/SA 2427-3331, Jan 1985: Yeso 4221-4356, SA 3677-3962 Nov 86: Yeso 4074-4139	
30-015-24768 Dodd Fed Unit #61, M.Dodd A-30	March 84: SA-2762-3329	Mar 84: SA 2762-3329 Mar 84: UpSA 2598-2674 GB 2427-2465	Rec'd Feb 2007 2598-3329 2427-2465	March 1984: SA 2762-3329, March 1984: GB/SA 2427-2674	
30-015-25679 Dodd Fed Unit #80, M.Dodd A-42	Sept 1987: SA 2659-3340	Aug 1987: Yeso 3974-4260	Rec'd Dec 2006 3974-4260	Aug/Sept 1987: SA 2659-3340 Aug/Sept 1987: Yeso 3974-4260	SA 2659-3340

<u>Well</u> [API Name, AKA]	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> [per operator well bore diagram]	<u>Perfs Reported via 2006-07 Sundries</u> [no corresponding dates]	<u>Amended Federal & State Reports submitted 2008</u> [reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations]	<u>Non-Existent Perforations Reported</u>
30-015-24353 Dodd Fed Unit #84, M.Dodd A-22	Feb 1983 - SA- 2665-3323	Jan 1983: LwSA/SA-2665-3323 Jan 1983: LwSA 3908-3934 LwSA 3442-3786 June 1983: GB 2377-2498	Rec'd Feb 2007 2377-2498 3442-3934	Jan/Feb 1983: SA 2665-3323 Jan/Feb 1983: SA 3442-3934- [zones determined to be noncommercial-cast iron bridge-plug set at 3400] June 1983: GB 2377-2498	
30-015-26814 Dodd Fed Unit #91, M.Dodd A-45	Nov 1991 - SA - 2680-3398	Oct 1991 - SA - 2680-3398 Oct 1991 - Yeso- 3978-4309	Rec'd Feb 2007 3978-4309	Oct/Nov 1991: SA 2680-3398, Oct/Nov 1991: Yeso 3978-4309	
30-015-26535 Dodd Fed Unit #95, M.Dodd A-44	Jan 1991: SA 2658-3253	Dec 1990 - Yeso - 3971-4246	Rec'd Feb 2007 3971-4246	Dec 90/Jan 91: SA 2658-3253 Dec 90/Jan 91: Yeso 3971-4246	SA 2658-3253
30-015-24844 Dodd Fed Unit #52, M.Dodd B-39	June 1984 - SA - 2641-3346	May 84 -SA/GB - 2464-2506 May 84 SA/GB - 2641-2712 SA/GB - 2788-3346	Rec'd Feb 2007 2464-2506	May/June 1984: SA 2641-3346 May/June 1984 GB 2464-2506	

<u>Well</u> <i>(Apl. Name, AKA)</i>	<u>Previously Reported Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore diagram)</i>	<u>Perfs Reported via 2006-07 Sundries</u> <i>(no corresponding dates)</i>	<u>Amended Federal & State Reports</u> <i>submitted 2008 (reporting previously reported actual, previously-omitted actual & previously-reported fictitious perforations)</i>	<u>Non-Existent Perforations Reported</u>
30-015-25625 Dodd Fed Unit # 93, M.Dodd A-38	Dec 1986 - SA - 3676-3698 <i>(minor discrepancy in numbers originally reported and actuals/numbers later reported - 2677-3699/3677-3799)</i>	Nov 1986: Lwr SA - 3677-3799 Nov 1986: Yeso - 3979-4152 April 1987: SA - 2654-3392	Rec'd Jan 2007 3676-3799 2654-3392 3979-4152	Nov/Dec 1986: SA 3677-3699, Nov/Dec 1986: Yeso 3979-4152 April 1987: SA 2654-3392	
30-015-25686 Dodd Fed Unit #97, M.Dodd A-41	Feb 1987 - SA - 2630-3302	Dec 1986 - Yeso - 3940-4217 April 1989 - SA - 3070-3302	Rec'd Dec 2006 3940-4217	Dec 86/Jan 87: SA 2630-3302 Dec 86/Jan 87: Yeso 3940-4217 April 1989: SA 3070-3302	SA 2630-3302 (as to the timeframe reported in 86/87 - did not exist until 1989)
30-015-24526 Dodd Fed Unit #54, M.Dodd B-35	Aug 1983 - SA - 2840-3378	July 1983: SA - 3124-3378 SA - 2840-3058 July 1983: Lwr SA - 3420-3480 Feb 1984 - GB - 2463-2584 SA - 2641-2733 June 1986 SA - 2619-2623	Rec'd Feb 2007 2463-2584 2619-2840 3378-3480	July 1983: SA 2840-3378, July 1983: 3420-3480 Feb 1984: GB/SA 2463-2733 June 1986: SA 2619-2623	
30-015-25463 Dodd Fed Unit #18, M.Dodd B-55	Jan 1986 - SA - 2768-3415	Dec 1985 - SA - 2768-3415 Dec 1986 - Yeso - 4098-4288	Rec'd Nov 2006 4098-4288	Dec 1985: SA 2768-3415, Dec 1985: Yeso 4098-4288	

FOSTER EDDY FEDERAL	COLOR KEY →	Perforations Omitted from Reports	Falsely Reported Perforations	Accurately Reported Perforations (as to Both Depth and Date)	
<u>Well</u> <i>(API, Name)</i>	<u>Previously</u> <u>Reported</u> <u>Perforations</u>	<u>Actual Perforations</u> <i>(per operator well bore</i> <i>diagram)</i>	<u>Amended Federal & State</u> <u>Reports submitted 2008</u>	<u>Date of 2008</u> <u>Submission of</u> <u>Revised Records of</u> <u>Perforations</u>	<u>Non-Existent</u> <u>Perforations</u> <u>Reported</u>
30-015-25981 Foster Eddy #6	July 1989: 2945-3013 3090-3308 3392-3478 4001-1095 4245-4356 4758-4813	July 1989: 2945-3478 4001-4813 July 1989: 3561-3687 4845-5420	July 7, 1989: 2945-4813 July 26, 1989: 2945-4813 July 7, 1989: 3561-3687 4845-5420 July 26, 1989: 4845-5420	16-Jun-08 / 24-Jun-08	
30-015-26230 Foster Eddy #7	Jan 1991: 2997-3074 3516-3678 3753-3678	Jan 1991: 2977-3836 Jan 1991: 4804-5029	Jan 1991: 2977-3836 Jan 1991: 4804-5029	16-Jun-08	
30-015-26187 Foster Eddy #8	Dec 1989: 2888-2946 3163-3300 3396-3490 3685-3813 4690-4990	Dec 1989: 2888-3813 4960-4990 Dec 1989: 4720-4937 5150-5999	Dec 1989: 2888-3813 4960-4990 Dec 1989: 4720-4937 5150-5999	16-Jun-08	

