

If Home-stake Oil argues that not being able to drill the unorthodox well will cost the state of New Mexico tax dollars you can pursue the following line of questioning;

- 1-How many years do you expect the new well to be productive?
- 2-How much oil do you expect to recover over these years from the unorthodox well? How much oil would you recover if you remained 330 feet from the section line? Do you have the engineering calculations that I can review?
- 3-How much less oil will the Sarah Johnston #1 and the HSOG #2 wells produce over this time if the unorthodox well is drilled? Do you have the engineering calculations that I can review?
- 4-Is the amount of oil recovered from the unorthodox well plus the reduced oil recovered from Sarah Johnston #1 and the HSOG #2 larger than the amount of oil that would be recovered from a well 330 feet from the section line plus the oil that would be recovered from the Sarah Johnston #1 and the HSOG #2. How much? Do you have the engineering calculations that I can review?
- 5-What other options have you investigated regarding Sarah Johnston #1 and the HSOG #2 to increase its ultimate recovery if the unorthodox well is not approved? How much additional oil would be recovered if oil was pumped at Sarah Johnston #1 and the HSOG #2? Do you have the engineering calculations that I can review?
- 6-How much additional oil would be recovered if steam or chemicals were injected at Sarah Johnston #1 and the HSOG #2? Do you have the engineering calculations that I can review?
- 7-How much additional oil would be recovered if horizontal drilling was undertaken at Sarah Johnston #1 and the HSOG #2? Do you have the engineering calculations that I can review?

Kaplan
Question