



MODRALL SPERLING
LAWYERS

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April 22, 2014

Mr. Michael McMillan
Oil Conservation Division
New Mexico Department of Energy, Minerals and Natural Resources
1220 South Saint Francis Drive
Santa Fe, NM 87505

Re: Supplemental Affidavit for Case No. 15113

Dear Mr. McMillan:

Enclosed please find the supplemental affidavit prepared regarding the geology of Reliant's 23-1-G well in the above-referenced matter. You requested this supplemental affidavit during the Oil Conservation Division hearing on April 17, 2014. Per your request, the affidavit also addresses the verbal agreement between OXY and Reliant.

Please do not hesitate to contact me if we may provide any additional information or if you have questions about the information provided. Thank you for your attention to this matter.

Sincerely,

Jordan L. Kessler
ATTORNEY FOR RELIANT
EXPLORATION AND PRODUCTION
LLC

Enclosure

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

**THE APPLICATION OF RELIANT
EXPLORATION AND PRODUCTION LLC, FOR
COMPULSORY POOLING SECTION 23, T. 20N, R. 32 E
HARDING COUNTY, NEW MEXICO.**

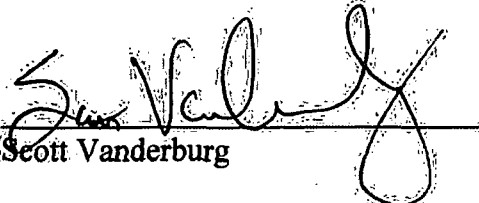
CASE NO. 15113

AFFIDAVIT OF SCOTT VANDERBURG

Scott Vanderburg, being first duly sworn, deposes and states:

1. I am President of Reliant Exploration and Production LLC ("Reliant"), and have personal knowledge of the matters stated herein.
2. I am familiar with the geology of Section 23, Township 20 North, Range 32 East, NMPM, Harding County, New Mexico.
3. Attachment A is a map of CO2 production in the Bravo Dome area near Reliant's proposed 23-1-G well. Reliant acreage is highlighted in yellow on the attached map. Reliant has drilled several wells similar to the proposed well in the target formation on its adjacent acreage that have been productive and its evaluation of the geology underlying the proposed spacing unit for the 23-1-G well indicates that it will also be productive.
4. In my opinion, granting Reliant's application for compulsory pooling is in the best interest of conservation, the prevention of waste and the protection of correlative rights.
5. I am also familiar with the verbal agreement reached with OXY. Reliant submitted the JOA and Exhibits to OXY on or about October 18, 2013. Throughout the remainder of 2013 and through April 2014, the parties have worked together to revise and complete the JOA and Exhibits. On or about April 4, 2014, the parties arrived at a verbal agreement, wherein OXY would participate along with Reliant in this well.

FURTHER AFFIANT SAYETH NOT.


Scott Vanderburg

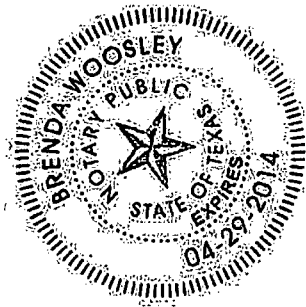
STATE OF TEXAS)
)ss.
COUNTY OF MIDLAND)

Signed and sworn to before me this 22 day of April, 2014, by Scott Vanderburg



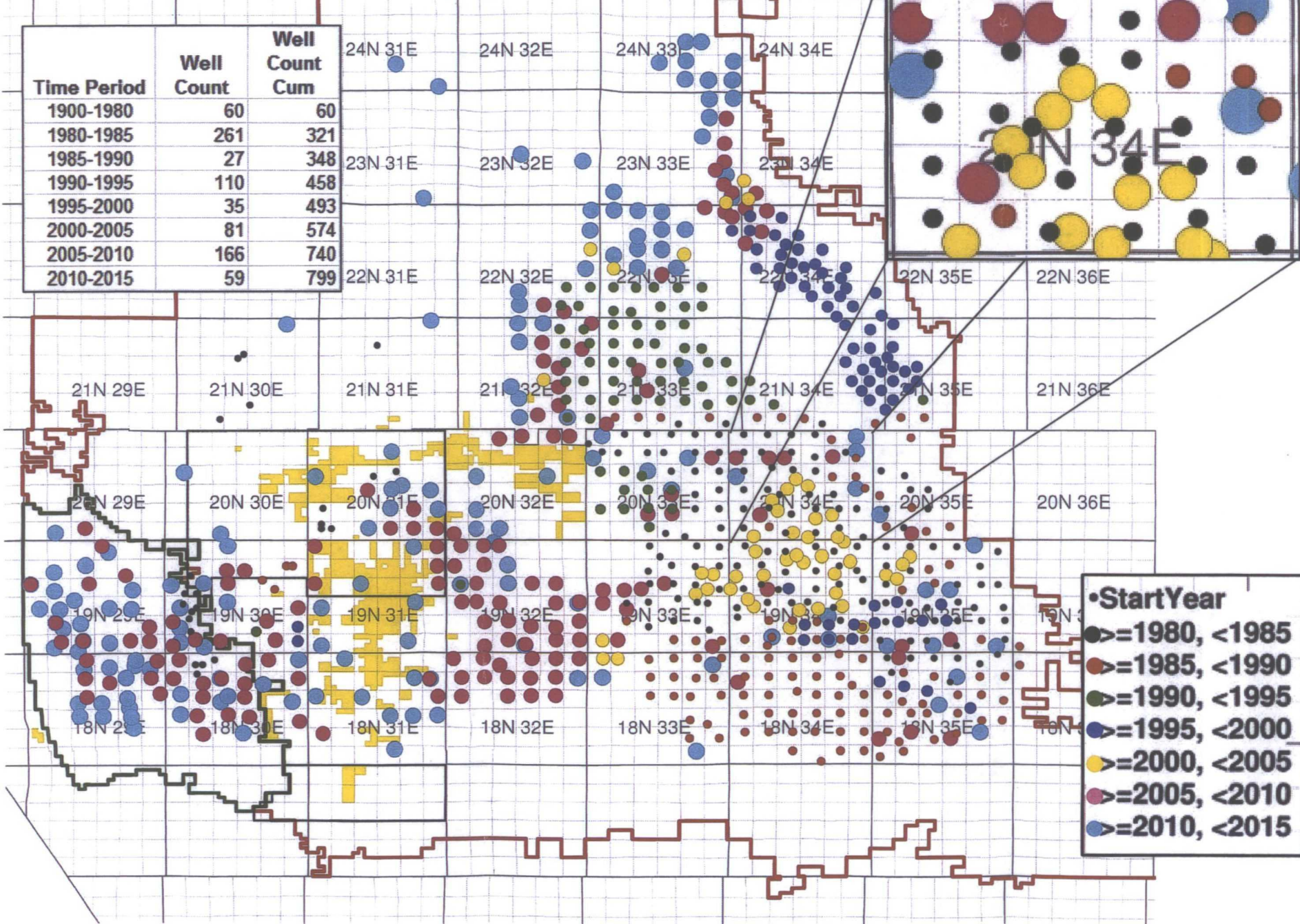
Notary Public
My Commission Expires: 4-29-2014

(Seal)



Date of First Production (5 year increments)

Time Period	Well Count	Well Count Cum
1900-1980	60	60
1980-1985	261	321
1985-1990	27	348
1990-1995	110	458
1995-2000	35	493
2000-2005	81	574
2005-2010	166	740
2010-2015	59	799



acres.

1	C	B	A
2	F	G	H
3	K	J	I
4	N	O	P

This is how the section would be configured if its west boundary had tracts greater or less than 40 acres.

4	3	2	1
5	6	7	8
12	11	10	9
13	14	15	16
L	K	J	I
m	N	O	P

If the section is significantly longer, extra lots are designated at the north end in sig-sag fashion; same with the west side if the section is significantly wider.



A rule of thumb...the portion of the section that ALMOST remains unchanged regardless of geometric fluctation is the southeast of the southeast corner, or quarter-quarter.

A last note - there are rare sections within New Mexico which defy any sort of configuration convention; consult title surveys for those.

PETROLEUM RECOVERY RESEARCH CENTER, SOCORRO, NM-87801