

CHK Reservoir Engineering Evidence Backup Rebuttal

REASONABLE RESERVOIR PRESSURE DATA POINTS

These pressures may be the same considering the resolution of DST measurement.

Well	Date	BHP(psi)	Source / Comment
CC State #1	9/19/2004	7090	Kick in zone of interest @ 11482' SIDPP 1000 w/ 11.8 ppg mud
State WEL Com #1	11/10/1969	7080	DST - FSIP
	12/10/1980	4875	Dwights - Calc // SITP 3750
	9/10/1986	3175	Dwights - Calc // SITP 2373 (After shut in)
	7/16/1987	6328	Dwights - Calc // SITP 5013 (After shut in) Questionable
	11/18/1998	2561	Dwights - Calc // SITP 1914
	8/5/1998	2298	Dwights - Calc // SITP 1720
State WEK #1	4/15/1967	7491	DST - ISIP
	9/13/1987	8543	Dwights - Calc // SITP 5138
	10/10/1980	5019	Dwights - Calc // SITP 3810
	10/12/1998	330	Dwights - Calc // SITP 254 (After shut in) Questionable
	8/3/1998	1008	Dwights - Calc // SITP 760 (After shut in)
State H 15 #1	4/18/1976	7743	Dwights - Calc // SITP 6270
P Q Osudo State #2	12/17/2003	8667	PBU test - Typo curve
P Q Osudo State #1	2/2/1990	6379	PBU test - Horner analysis - no type curve
Hunger Buster State #3	7/20/2005	5783	Calc from SITP 4300 psi May not be stabilized pressure
Osudo 9 State Com #1	3/15/2005	5951	Calc from SITP 4425 Not stabilized Still building 75 psi per day. BHP is higher than 5951
K F 4 State #1	1/18/2008	6595 6616	Hearing notes Calc from SITP 5150
North Wilson Deep Unit #1	11/20/1964	6715	Dwights - Calc // SITP 5500
North Wilson Deep Unit #2	1/30/1966 12/17/1986	6170 6593	DST - ISIP and FSIP Dwights - Calc // SITP 5413
New Mexico DQ State #1	9/26/1974	6633	Dwights - Calc // SITP 5263

Samson accepts MW calculation on this well

22 BHP points in public DB, CHK used ALL 22 pressures

24 BHP points in public DB, CHK used ALL 24 pressures

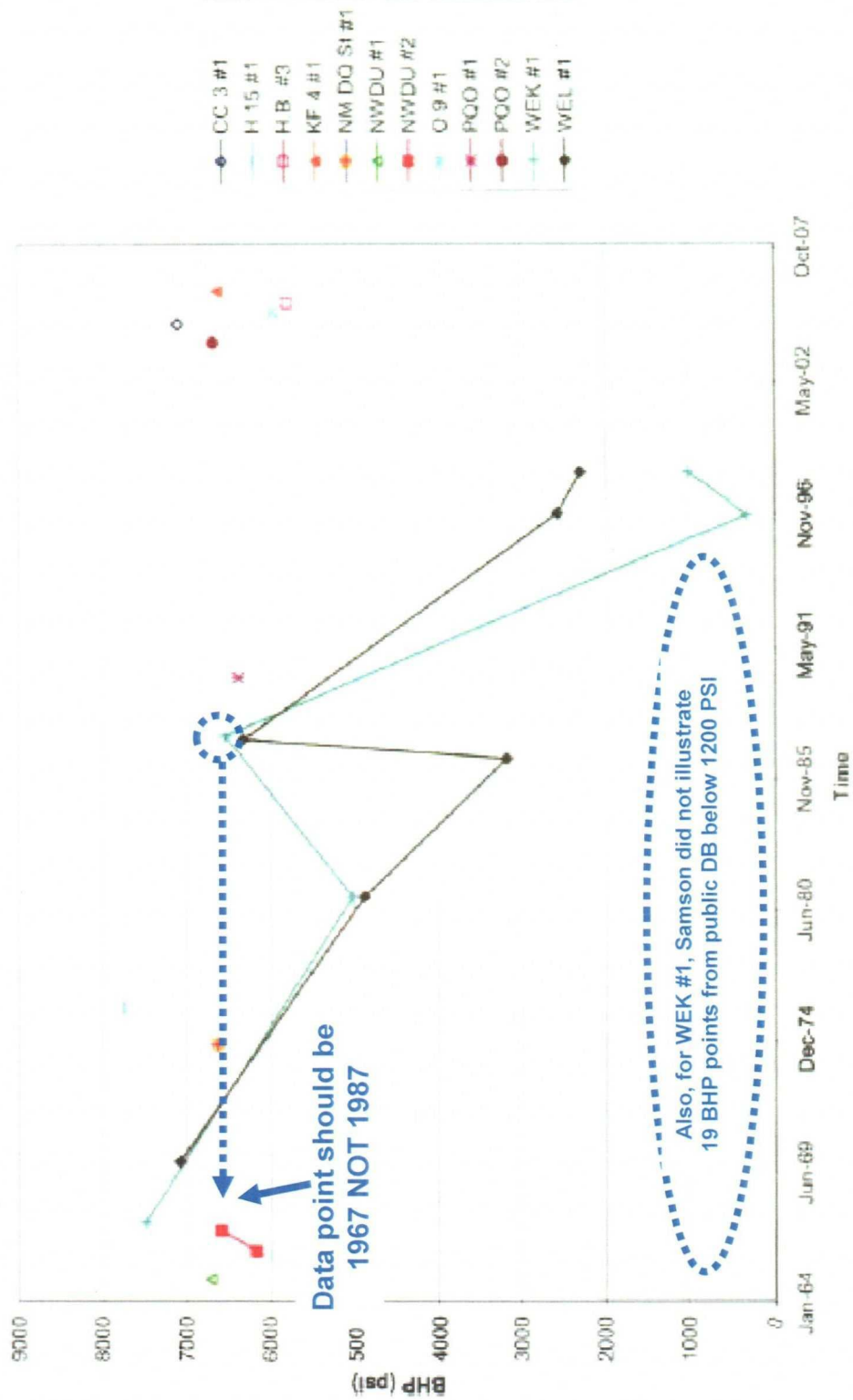
Should read 9/13/1967 NOT 1987

Samson Exhibit 45

NMOCD Case Nos. 13492/13493

CHK comments in BLUE

Reservoir Pressure Data Points



Samson Exhibit 46
NMOCD Case Nos. 13492/13493

CHK comments in BLUE

Duplication of Exhibit 38

... Samson communications

Label	Section	Well	PSD	Cum Gas (BBL)	DST 73548 BHP	DST 749115IP
1	Sec 15	WEL K 1	May-87	8.4		Pressure depletion from WEL K 1 in the south which was drilled 2 yrs prior
2	Sec 10	WEL Com 1	Jan-70	2.9	DST 70818 BHP	
3	Sec 15	State 15 1	Apr-75	0.41	Edge Well 1, 1980 Communication 70358 BHP Droughts	No communication with any of the effects
4	Sec 16	P Q Osardo	Jan-81	0.65	Came in Lower Pressure. Drapped to the WEL K 1 Profile. 53358 BHP Droughts	BHP from PSD test is 6300 psi and there is 10 000 psi. No relationship to WEL K 1 profile
5	Sec 3	CC State 3 1	Jan-84	0.002	Mud Weight 13548, 20 days later 12548 (150) Mr Bombi (1st Reservoir). Dryhole. Cannot be depleted by WEL Com 1	Mud weight value is high in zone of interest which occurred on the well. BHP 2000 psi. Same initial pressure as WEL
6	Sec 9	Osardo State 9 1	Mar-85	2	Mud Weight Cate 13018 BHP	Mud weight alone not valid indication of reservoir pressure. Calculated BHP 5951 psi
7	Sec 9	Hunger Hunter 3 State	Jan-85	0	Mud Weight Cate 16378 BHP	Mud weight alone not valid indication of reservoir pressure. Calculated BHP 5728 psi
8	Sec 10	State WEL Com 12	Jul-85	0	Apache Dryhole	No LW communication to Apache well
9	Sec 4	KF 4 State 1	Aug-85	0	Mud Weight Cate 16818 BHP, Qp 16358 BHP	Considered with pressure but is communication with other wells.

Samson Exhibit 51
NMOCD Case Nos. 13482/13483

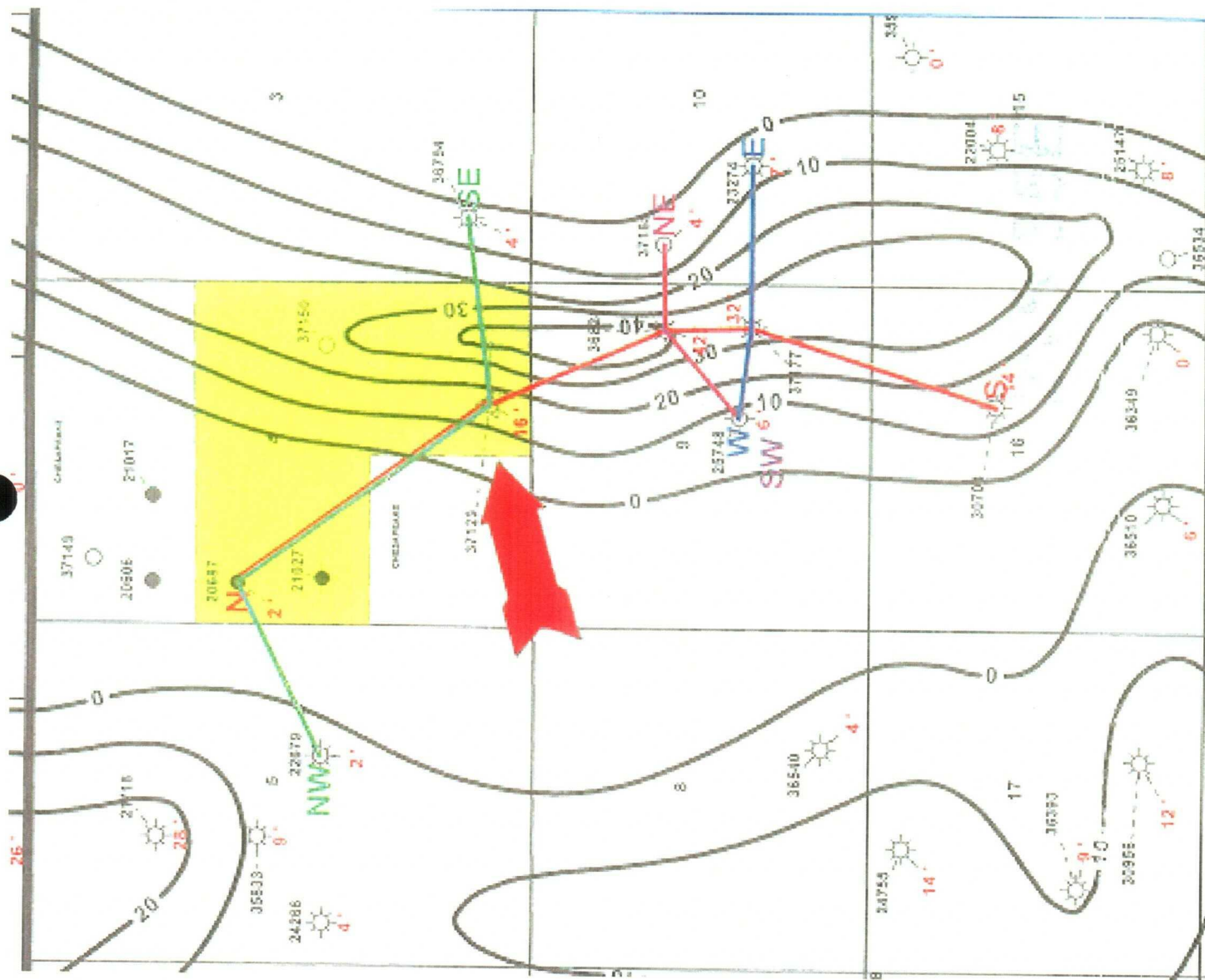
Duplication of Exhibit 40

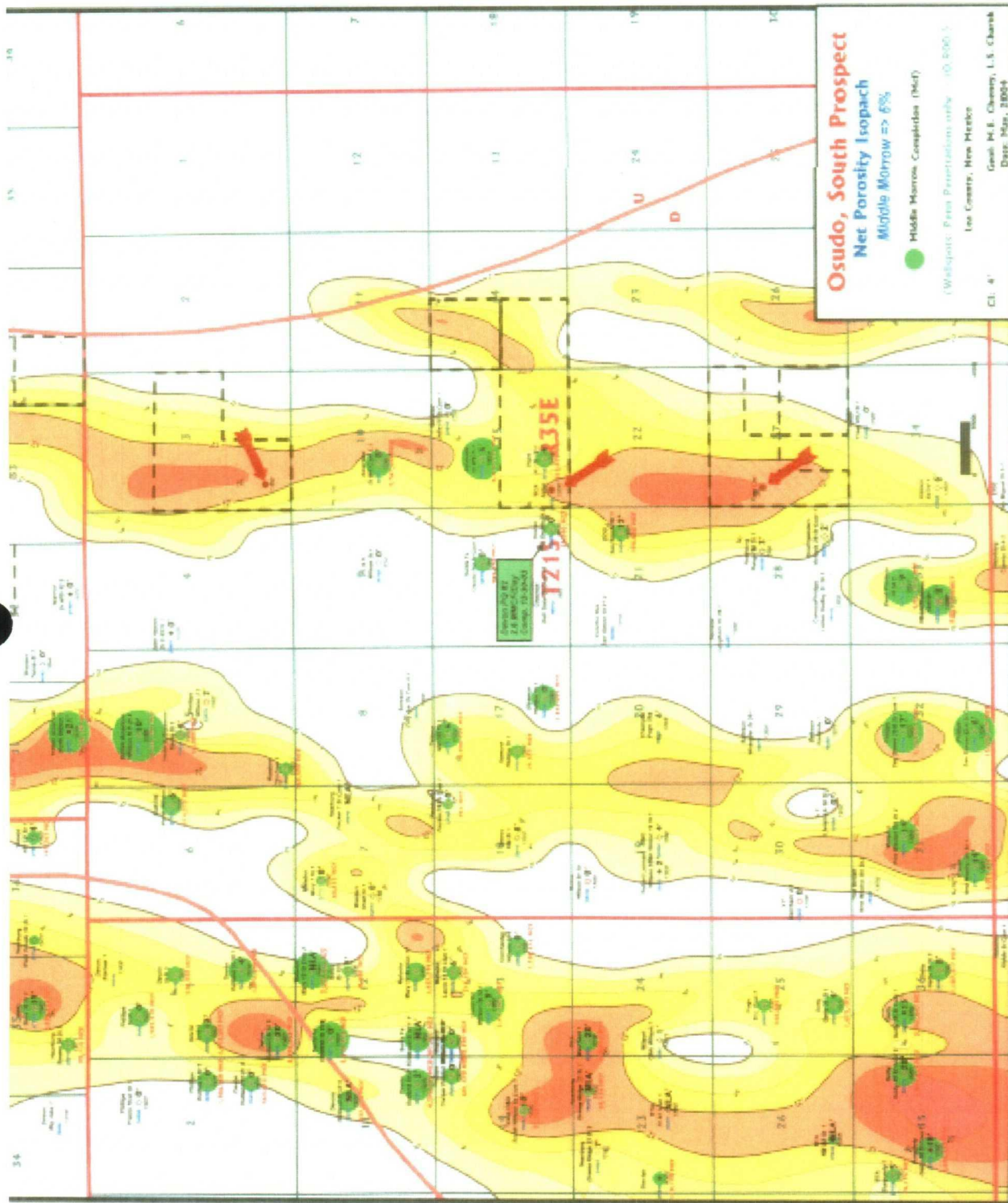
Virgin Reservoir Pressure in the Marrow Formation was Approximately 7000#

Initial Well	State WEL #1	1901 Sec 15 Good Reservoir, Good Range 0.4 BCF 80% of Reservoir in ~7 Years	Initial Data 1401 psi from DST 15 P.
No North South Communication Indication of North South and not East West	State WEL Com #1	Sec 10 2.9 BCF Production Characteristics Made Lower 7000# Initial BHP DST Pressure Data Shows No Communication with WEL Com #1	Actually (2) indication of possible communication between oil deposits from WEL 1 and 2 results which is north south trend
East West Communication No East West Communication	Box 19-19 FOU State WEL #1 PO Onda State Com #1	Development of the East West Reservoir shows Evidence of Pressure PO Onda 1 same in lower pressure, charged as WEL #1 profile.	Minor discrepancy in WEL #1 and #2 Reservoir pressure No WEL #1 and #2 data was ever applicable to Compressure
East West Communication East West Communication	Onda State 9 Com (1) Margar Bunker WEL State #1	Comp in this lower than virgin reservoir pressure.	Reservoir north could communicate between Onda State 9 and Bunker Bunker #1 to communicate with pressure and not to communication with any other well. Onda State 9 and Bunker not straight east west
No North South Communication No Communication in these	CC State #1 WEL Com #1 WEL Com #1	Apache dry hole requires North South Communication between CC State #1 and WEL Com #1	Separate north south better than east west possible communication between WEL and WEL CC and WEL separate initial pressure

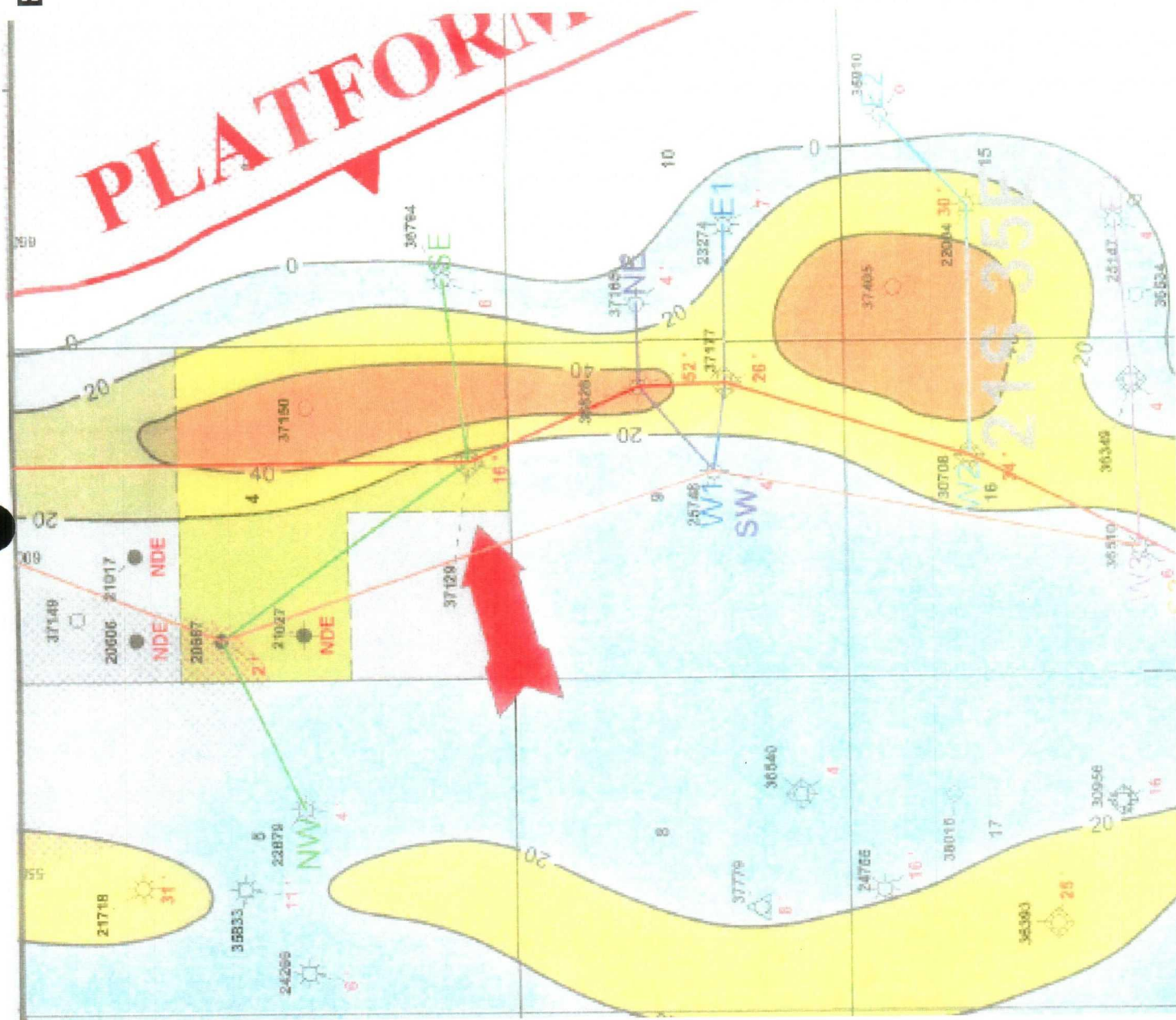
Reservoir Pressure Data Supports CHW's Geological Interpretation
and the Published Literature

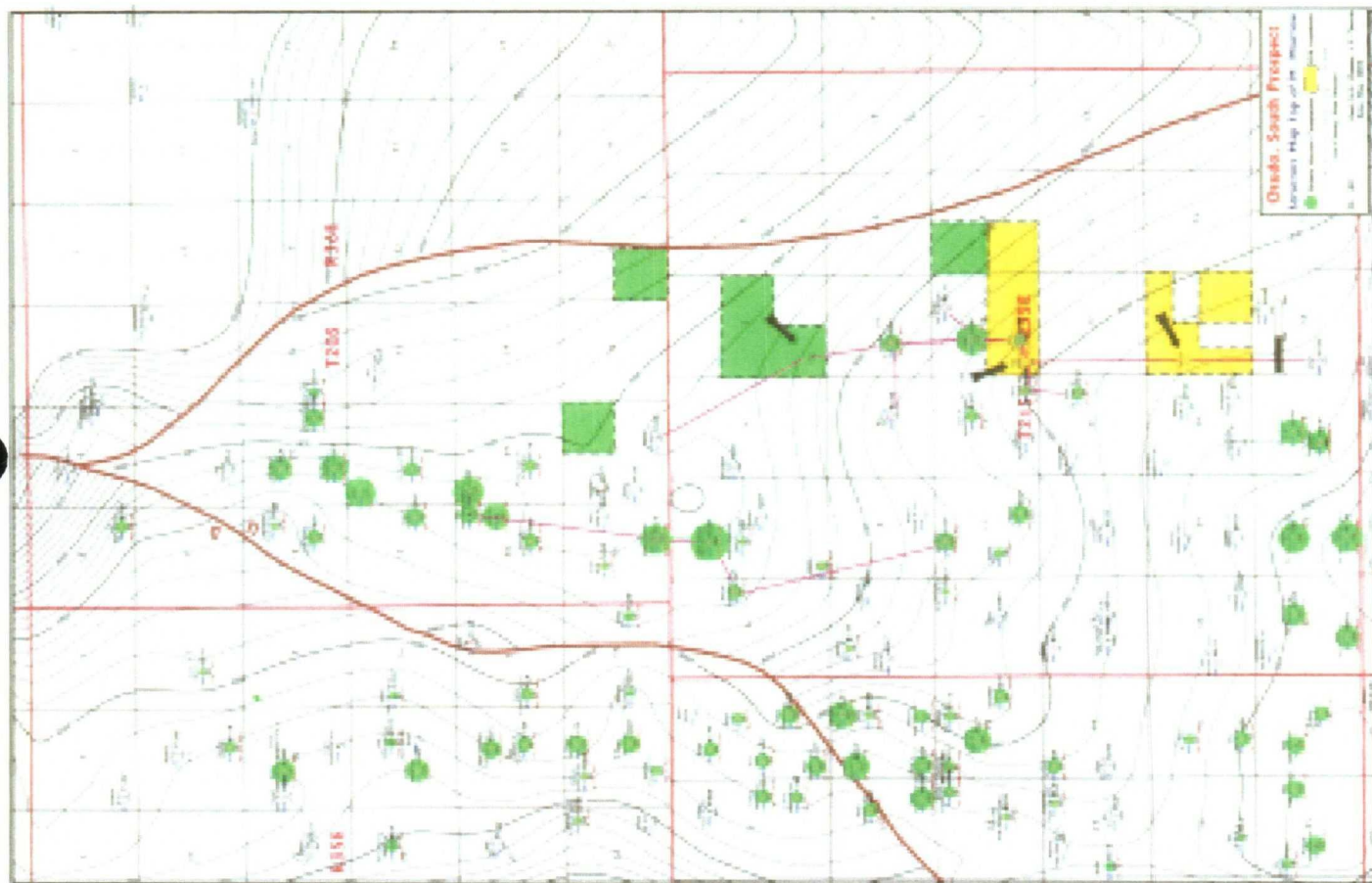
SAMSON COMMENTS Samson Exhibit 52
NMOCD Case Nos. 13492/13493





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VOLUMETRIC CALCULATION

$$G_p = 43,560 \cdot \phi \cdot h \cdot A \cdot (1 - S_w) \cdot (B_{gi} - B_{ga}) / B_{gi}$$

G_p = Gas production or reserves, SCF

ϕ = porosity, fraction

h = net pay, feet

A = Drainage area, acres

S_w = water saturation, fraction

B_{gi} = Initial gas formation volume factor, SCF/RSCF

B_{ga} = Abandonment gas formation volume factor, SCF/RSCF

$$B_g = 35.35 P / zT$$

P = Pressure, psi

z = Gas deviation factor

T = Reservoir temperature, °R

$$(B_{gi} - B_{ga}) / B_{gi} = \text{Recovery factor}$$

VOLUMETRIC UNCERTAINTY

Assume 5% Variance in terms

A	160	152	168
h	10	9.5	10.5
Ø	0.1	0.095	0.105
Sw	0.3	0.315	0.285
RF	0.75	0.7125	0.7875
Gp. MMCF	1188	921	1512
% Variance		22.5%	27.3%

Assume 10% Variance in terms

Pi	6600	6600	6600
A	160	144	176
h	10	9	11
Ø	0.1	0.09	0.11
Sw	0.3	0.33	0.27
RF	0.75	0.675	0.825
Gp. MMCF	1188	787	1731
% Variance		33.8%	45.7%