



January 14, 1997

Mr. John Pride  
Pride Energy Company  
7666 East 61st Street, Suite 605  
Tulsa, Oklahoma 74170

RE: AQUIFER EXEMPTION FOR THE MENELEE FORMATION

Dear Mr. Pride:

Based on our exhaustive review of geological and hydrological factors and pertinent federal regulations, the proposed injection zone and other water-bearing units above the injection zone have never served, do not now, and will likely never serve as a source of underground drinking water source (USDW) for human consumption.

Our conclusion is based on the fact that no wells have been drilled into these rock formations for drinking water purposes and because the injection zone occurs within a formation that produces oil and gas in the area. Also, the high cost of drilling and well construction make it economically impractical.

Only oil and gas wells have been drilled through the injection zone within the zone of endangering influence. These wells are not perforated above the base of the Menefee Formation and are cemented in place and cannot act as conduits for the upward migration of injected fluid.

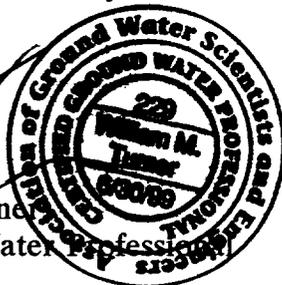
Confining zones as defined in 40 CFR § 144.3 above the injection zone, will limit fluid movement above the injection zone.

We hope this meets your needs. We are pleased to have been of service to your company.

Sincerely,

A handwritten signature in black ink, appearing to read "William M. Turner", is written over the typed name and partially over the circular seal.

Dr. William M. Turner  
Certified Ground Water Professional



**TURNER ENVIRONMENTAL CONSULTANTS**

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