

discovered that Tandem Energy Corp. had been merged with Platinum Energy Resources in Houston, Texas.

7. I then initiated contact, both telephonically and email, with Stephen Fuerst and T. Nguwen concerning the purpose of the hearing. Through email I sent them a copy of the application and the pre-hearing statement prepared by Mr. Hall. I also forwarded to them, through email, their request for information on the location of Platinum Energy Resources' closest well. Copies of pertinent email communications with Mr. Fuerst and Mr. Nguwen and myself are attached hereto.

8. At some point in the dialogue between Mr. Fuerst and Mr. Nguwen and me I recommended to COG Operating LLC that Mr. Ramon Reyes, the geologist employed by COG Operating, LLC, to directly communicate with Mr. Nguwen with regard to any further specific concerns that Platinum Energy Resources may have had. To my knowledge there was direct communication between Mr. Reyes and Mr. Nguwen.

9. To my knowledge and information, Platinum Energy Resources, Inc. did not file an objection to the application, nor did Mr. Fuerst and Mr. Nguwen express an objection to me. It is my further opinion that Mr. Fuerst and Mr. Nguwen fully understood the purpose and intent of the application.

FURTHER AFFIANT SAYETH NAUGHT.


ERNEST L. PADILLA

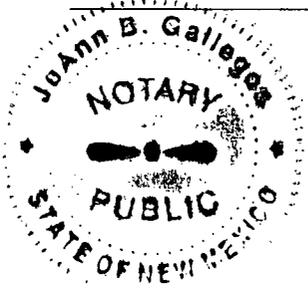
SWORN TO AND SUBSCRIBED to before me this 21st day of June, 2011, by

Ernest L. Padilla.


Notary Public

My Commission Expires:

5-11-2013



Ernest Padilla

From: Ernest Padilla [epadillaplf@qwestoffice.net]
Sent: Tuesday, January 25, 2011 1:18 PM
To: 'sfuerst@platenergy.com'; 'tnguwen@platenergy.com'
Cc: 'David Evans'; 'J. Scott Hall'
Subject: NM Oil Conservation Division Case No. 14577
Attachments: 001 Application of COG for vertical extension filed 111610 (00234364).pdf; Pre-Hearing Statement by COG filed 120810 (00238232).pdf

Gentlemen:

Attached are the application and pre-hearing statement that I mentioned during our earlier telephone conversation. Briefly, the application calls for the vertical extension of the Grayburg-Jackson (Seven Rivers-Queen-Grayburg-San Andres) Pool to correspond with the horizontal and vertical extent of the Burch-Keeley Unit in Eddy County, NM, operated by COG Operating. The application and the pre-hearing statement are self-explanatory as to the purpose of the application. The 5000-feet of vertical depth is based on ownership (rather than geologic features) which was severed by Conoco, quite some time ago, thus creating an allocation of production problem should the pool be extended beyond 5000 feet. Conoco owns the rights below 5000 feet.

As I explained during our conversation, an attempt to notify Tandem Energy, an offset operator or owner, of a January 6, 2011 hearing was ineffective due to the fact that Tandem has merged with Platinum and is no longer in Midland. At the hearing we disclosed that the certified mailing to Tandem had been ineffective, therefore, my purpose in contacting you is to seek a waiver of the application and hearing. This would eliminate the necessity of having to continue the hearing and send notice by certified mail of the hearing of at least 20 days.

In the meantime I have asked COG Operating for information concerning your nearest well or interests. As soon as I get that I will forward it to you.

Please let me know if you have any questions.

Ernest L. Padilla
PADILLA LAW FIRM, P.A.
P.O. Box 2523
Santa Fe, New Mexico 87504-2523
T: 505-988-7577
F: 505-988-7592
E: epadillaplf@qwestoffice.net; (office) padillalaw@qwestoffice.net

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6/14/2011

Ernest Padilla

From: Ernest Padilla [epadillaplf@qwestoffice.net]
Sent: Tuesday, January 25, 2011 4:01 PM
To: 'sfuerst@platenergy.com'; 'tnguyen@platenergy.com'
Cc: 'David Evans'; 'J. Scott Hall'
Subject: FW: NM Oil Conservation Division Case No. 14577
Attachments: 001 Application of COG for vertical extension filed 111610 (00234364).pdf; ATT00001..htm
 Gentlemen:

I am forwarding an email to me from COG Operating indicating that the closest Tandem Energy well is the Square Lake 12 Fed Unit in Section 12, T17S, R29E in answer to your question. Let me know if you have any questions. Thanks.

Ernest L. Padilla
 PADILLA LAW FIRM, P.A.
 P.O. Box 2523
 Santa Fe, New Mexico 87504-2523
 T: 505-988-7577
 F: 505-988-7592
 E: epadillaplf@qwestoffice.net

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From: Stuart Dirks [mailto:SDirks@conchoresources.com]
Sent: Tuesday, January 25, 2011 3:18 PM
To: epadillaplf@qwestoffice.net
Cc: SHall@montand.com; David Evans
Subject: FW: NM Oil Conservation Division Case No. 14577

Mr. Padilla-

The closest operations of Tandem Energy is the Square Lake 12 Fed Unit, it is contiguous to the Burch Keely Unit in Section 12. The serial register page shows this unit as 100% Tandem Energy.

Thanks,
 Stuart

COG OPERATING LLC
 Stuart A. Dirks, CPL, CDOA
 Senior Landman
 550 W. Texas Avenue, Suite 100

6/14/2011

EXHIBIT A

Anadarko Petroleum Corp.
1201 Lake Robbins Drive
The Woodlands, TX 77380

Burnett Oil Co., Inc.
801 Cherry St. Unit 9
Fort Worth, EX 76102

CBS Operating Corporation
P.O. Box 2236
Midland, TX 79702

Cimarex Energy Company
600 N. Marienfeld, Suite 600
Midland, TX 79701

Conoco Philips Co.
3300 N. A Street, Bldg 5
Midland, TX 79705

EnerVest Operating LLC
1001 Fannin St., Suite 800
Houston, TX 77002

EOG Resources, Inc.
P.O. Box 2267
Midland, TX 79702

Lobos Energy Partners
3817 NW Expressway Suite 950
Oklahoma City, OK 73112

Pioneer Natural Resources USA Inx.
P.O. Box 3178
Midland, TX 79702

Mr. Don Peterson
Assistant Field Manager
Bureau of Land Management
620 E. Greene
Carlsbad NM 88220-6292

EXHIBIT A (Cont.)

Southern Bay Energy LLC
110 Cypress Station Dr., #220
Houston, TX 77090

Southwest Royalties, Inc.
C/o Clayton Williams Energy, Inc.
6 Desta Drive, Suite 3000
Midland, TX 79705

Tandem Energy Corp.
200 N. Lorraine Street, Ste 400
Midland, TX 79701

Hunt Oil Company
1445 Ross Avenue, Suite 1400
Dallas, TX 75202-2703