

Sante Fe's proposed formula using Mitchell's net productive acreage is as follows:

Allowable Factor = $\left(\frac{660}{660} + \frac{600}{1980} + \frac{221}{320}\right)/3 = 0.66$ Penalty = 34%

Suppose Sante Fe had proposed their location to be 10 Ft FNL, the allowable factor would be: Allowable Factor = $\left(\frac{660}{660} + \frac{10}{1980} + \frac{221}{320}\right)/3 = 0.57$

Penalty = 43% The example demonstrates how unreasonable Sante Fe's proposed formula is. The formula allows companies to drill lease line producers with little penalty.