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OCT 13 1998

SECRETARY, BOARD OF
OIL, GAS & MINING

**BEFORE THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
STATE OF UTAH**

IN THE MATTER OF THE REQUEST FOR)	
AGENCY ACTION OF RIVER GAS)	
CORPORATION FOR AN ORDER)	FINDINGS OF FACT,
ESTABLISHING 160 ACRE (OR SUBSTANTIAL)	CONCLUSIONS OF LAW
EQUIVALENT THEREOF) DRILLING AND)	AND ORDER
SPACING UNITS FOR THE PRODUCTION OF)	Docket No. 98-016
GAS (INCLUDING COALBED METHANE))	Cause No. 243-1
FROM THE FERRON FORMATION IN)	
PORTIONS OF TOWNSHIPS 14, 15 AND 16)	
SOUTH, RANGES 8 AND 9 EAST, SLM,)	
CARBON AND EMERY COUNTIES, Utah)	
)	

This cause came on for hearing before the Utah Board of Oil, Gas and Mining (the "Board") on Wednesday, September 23, 1998, at the hour of 10:00 a.m., in Vernal, Utah.

The following Board members were present and participated at the hearing:

- Thomas B. Faddies
- Jay L. Christensen
- Raymond Murray
- Elise L. Erler
- Allan Mashburn; and
- Stephanie Cartwright

Chairman Dave D. Lauriski was unable to attend and Mr. Faddies served as Acting Chairman in his stead. Attending and participating on behalf of the Division of Oil, Gas and Mining (the "Division") were Lowell Braxton, Acting Director, Robert J. Krueger, Petroleum Engineer, and Brad Hill, Geologist. The Board and the Division were represented by Daniel G. Moquin, Esq., and Patrick J. O'Hara, Esq., Assistant Attorneys

General, respectively. Attending and participating on behalf of the Bureau of Land Management ("BLM") were Robert Hendricks, Chief-Branch of Fluid Minerals, Utah State Office, and Eric Jones, Petroleum Engineer, Moab District Office.

Testifying on behalf of Petitioner River Gas Corporation ("RGC") were Joseph L. Stephenson, Vice President-Land, Terry D. Burns, Geologist, and John M. Hollingshead, Reservoir Engineer. Frederick M. MacDonald, Esq., Pruitt, Gushee & Bachtell, appeared as attorney on behalf of RGC.

The Board received two letters from third parties concerning this matter. The Board was copied on a letter dated August 26, 1998 from Petroco to RGC which it deems a letter of protest. However, no representative from Petroco made an appearance at the hearing. Cyprus Plateau Mining Corporation also sent a letter dated August 31, 1998 requesting the Board give consideration to its mining activities (which are occurring within the area which is the subject of this cause), particularly its reclamation requirements, in its review of the Request for Agency Action.

The Division and the BLM expressed their support of the Request for Agency Action. No statements were made at the hearing in opposition of the Request for Agency Action and no other parties appeared or participated at the hearing.

The Board, having considered the testimony presented and the exhibits received into evidence at the hearing, being fully advised, and for good cause appearing, hereby makes the following findings of fact, conclusions of law, and order.

FINDINGS OF FACT

1. The following Carbon and Emery County lands (hereinafter referred to as the "Subject Lands") were, as of the date of the hearing, not subject to any spacing order:

Township 14 South, Range 8 East, SLM

- Section 13: All
- Section 14: Lots 1 (40.66), 2 (40.59),
3 (40.51), and 4 (40.44), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 23: Lots 1 (40.38), 2 (40.35),
3 (40.31), and 4 (40.27), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 24: All
- Section 25: All
- Section 26: Lots 1 (40.43), 2 (40.79),
3 (42.04), and 4 (44.19), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 35: Lots 1 (45.04), 2, (44.19),
3 (43.69), and 4 (43.71), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]

(containing 4,507.59 acres)

Township 14 South, Range 9 East, SLM

- Section 2: Lots 1 (41.38), 2 (41.41),
3 (41.44), and 4 (41.47),
S $\frac{1}{2}$ N $\frac{1}{2}$, S $\frac{1}{2}$ [All]

- Section 3: Lots 1 (49.54), 2 (48.48),
3, (48.42), 4 (48.35), 5 (40.78),
6 (40.01), and 7 (38.48),
S $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NE $\frac{1}{4}$, W $\frac{1}{2}$ SE $\frac{1}{4}$,
SW $\frac{1}{4}$ [All]
- Section 4: Lots 1 (48.33), 2 (48.37),
3 (48.39), and 4 (48.43), S $\frac{1}{2}$ N $\frac{1}{2}$,
S $\frac{1}{2}$ [All]
- Section 5: Lots 1 (48.31), 2 (48.06),
3 (47.80), and 4 (47.55), S $\frac{1}{2}$ N $\frac{1}{2}$,
S $\frac{1}{2}$ [All]
- Section 6: Lots 1 (47.35), 2 (47.21),
3 (47.07), 4 (39.38), 5 (33.68),
6 (33.78), and 7 (33.89), SE $\frac{1}{4}$ NW $\frac{1}{4}$
S $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, SE $\frac{1}{4}$ [All]
- Section 7: Lots 1 (33.95), 2 (33.96),
3 (33.98), and 4 (33.99), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 8: All
- Section 18: Lots 1 (34.01), and 2 (34.03),
E $\frac{1}{2}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$ [N $\frac{1}{2}$]

(containing 4,871.28 acres)

Township 15 South, Range 8 East, SLM

- Section 1: Lots 1 (4.96), 2 (4.62), 3 (4.66),
4 (4.70), 5 (40), 6 (40), 7 (40),
8 (43.37), 9 (43.40), 10 (40),
11 (40), 12 (40), 13 (43.42), and
14 (43.45), W $\frac{1}{2}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ [All]
- Section 2: Lots 1 (4.82), 2 (5.01), 3 (5.21),
4 (5.40), 5 (40), 6 (40), 7 (40),
8 (40), 9 (40), 10 (40), 11 (40),
and 12 (40), S $\frac{1}{2}$ [All]

- Section 3: Lots 1 (5.54), 2 (5.63), 3 (5.71),
4 (5.80), 5 (40), 6 (40), 7 (40),
8 (40), 9 (40), 10 (40), 11 (40),
and 12 (40), S½ [All]
- Section 10: All
- Section 11: All
- Section 12: Lots 1 (43.36), 2 (43.16),
3 (42.96), and 4 (42.76), W½E½,
W½ [All]
- Section 13: Lots 1 (42.69), 2 (42.56),
3 (42.36), and 4 (42.04), W½E½,
W½ [All]
- Section 14: All
- Section 15: All
- Section 22: All
- Section 23: All
- Section 24: Lots 1 (41.62), 2 (41.56),
3 (41.34), and 4 (40.95), W½E½,
W½ [All]
- Section 25: Lots 1 (40.97), 2 (40.86),
3 (40.74), and 4 (40.63), W½E½,
W½ [All]
- Section 26: All
- Section 27: All
- Section 34: All
- Section 35: All
- Section 36: Lots 1 (40.38), 2 (40.28),
3 (40.16), and 4 (40.06), W½E½,
W½ [All]

(containing 11,627.14 acres)

Township 15 South, Range 9 East, SLM

- Section 6: Lots 3 (44.53), 4 (42.78),
5 (38.12), 6 (38.38), and 7 (39.02),
SE¼NW¼, E½SW¼ [W½]

- Section 7: Lots 1 (39.45), 2 (39.56),
3 (39.67), 4 (38.31), and 5 (38.36),
NE $\frac{1}{4}$ SW $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$ [W $\frac{1}{2}$]
- Section 9: Lots 1 (41.07), 2 (43.22),
N $\frac{1}{2}$ SE $\frac{1}{4}$ [SE $\frac{1}{4}$]
- Section 15: All
- Section 16: All
- Section 18: Lots 1 (39.98), 2 (40.09),
3 (40.20), and 4 (40.31), E $\frac{1}{2}$ W $\frac{1}{2}$
[W $\frac{1}{2}$]
- Section 19: Lots 1 (40.42), 2 (40.53),
3 (40.64), and 4 (40.75), E $\frac{1}{2}$ W $\frac{1}{2}$
[W $\frac{1}{2}$]
- Section 20: E $\frac{1}{2}$
- Section 21: All
- Section 22: All
- Section 23: SW $\frac{1}{4}$
- Section 26: W $\frac{1}{2}$
- Section 27: All
- Section 28: All
- Section 29: All
- Section 30: Lots 1 (40.78), 2 (40.74),
3 (40.70), and 4 (40.66), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 31: Lots 1 (40.56), 2 (40.40),
3 (40.24), and 4 (40.08), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
- Section 32: All
- Section 33: All
- Section 34: All

(containing 9,929.55 acres)

Township 16 South, Range 8 East, SLM

- Section 1: Lots 1 (18.06), 2 (21.06),
3 (21.04), 4 (21.01), 5 (40),
6 (40), 7 (40), 8 (35.56),

- 9 (37.05), 10 (40), 11 (40),
12 (40), 13 (37.10), and 14 (37.02),
W $\frac{1}{2}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ [All]
- Section 2: Lots 1 (21), 2 (21), 3 (21),
4 (21), 5 (40), 6 (40), 7 (40),
8 (40), 9 (40), 10 (40), 11 (40),
and 12 (40), S $\frac{1}{2}$ [All]
- Section 3: Lots 1 (20.94), 2 (20.82),
3 (20.70), 4 (20.58), 5 (40.00),
6 (40), 7 (40), 8 (40), 9 (40),
10 (40), 11 (40), and 12 (40),
S $\frac{1}{2}$ [All]
- Section 10: All
- Section 11: All
- Section 12: Lots 1 (37.47), 2 (37.58),
3 (37.53), and 4 (37.60), W $\frac{1}{2}$ E $\frac{1}{2}$,
W $\frac{1}{2}$ [All]
- Section 13: Lots 1 (39.07), 2 (41.35),
3 (40.73), and 4 (38.80), W $\frac{1}{2}$ E $\frac{1}{2}$,
W $\frac{1}{2}$ [All]
- Section 14: All
- Section 15: All
- Section 22: All
- Section 23: All
- Section 24: Lots 1 (38.62), 2 (38.92),
3 (39.09), and 4 (39.18), E $\frac{1}{2}$ W $\frac{1}{2}$,
W $\frac{1}{2}$ [All]
- Section 25: Lots 1 (39.78), 2 (40.88),
3 (40.92), and 4 (40.29), W $\frac{1}{2}$ E $\frac{1}{2}$,
W $\frac{1}{2}$ [All]
- Section 26: All
- Section 27: All
- Section 34: Lots 1 (39.74), 2 (39.78),
3 (39.82), and 4 (39.86), N $\frac{1}{2}$ S $\frac{1}{2}$,
N $\frac{1}{2}$ [All]
- Section 35: Lots 1 (39.82), 2 (39.80),
3 (39.76), and 4 (39.74), N $\frac{1}{2}$ S $\frac{1}{2}$,
N $\frac{1}{2}$ [All]

Section 36: Lots 1 (40.02), 2 (40.06),
3 (40.10), 4 (38.31), 5 (38.65),
6 (39.13), and 7 (39.60), NW $\frac{1}{4}$ SE $\frac{1}{4}$,
W $\frac{1}{2}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ [All]

(containing 11,736.94 acres)

Township 16 South, Range 9 East, SLM

- Section 1: Lots 1 (39.90), and 2 (39.70),
S $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ [E $\frac{1}{2}$]
- Section 3: Lots 1 (39.96), 2 (39.88),
3 (39.80), and 4 (39.72), S $\frac{1}{2}$ N $\frac{1}{2}$,
S $\frac{1}{2}$ [All]
- Section 4: Lots 1 (39.72), 2 (39.80),
3 (39.88), and 4 (39.96), S $\frac{1}{2}$ N $\frac{1}{2}$,
S $\frac{1}{2}$ [All]
- Section 5: Lots 1 (40), 2 (40), 3 (40), and
4 (40), S $\frac{1}{2}$ N $\frac{1}{2}$, S $\frac{1}{2}$ [All]
- Section 6: Lots 1 (40), 2 (40), 3 (40),
4 (40), 5 (40), 6 (40), and 7 (40),
SE $\frac{1}{4}$ NW $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$,
SE $\frac{1}{4}$ [All]
- Section 7: Lots 1 (40), 2 (40), 3 (40), and
4 (40), E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ [All]
- Section 8: All
- Section 9: All
- Section 10: All
- Section 11: All
- Section 12: All
- Section 14: All
- Section 15: All
- Section 16: All
- Section 17: All
- Section 18: Lots 1 (40), 2 (40), 3 (40), and
4 (40), E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ [All]
- Section 19: Lots 1 (40), 2 (40), 3 (40), and
4 (40), E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ [All]

Section 20: All
Section 21: All
Section 22: All
Section 28: All
Section 29: All
Section 30: Lots 1 (40), 2 (40), 3 (40), and
4 (40), E $\frac{1}{2}$ W $\frac{1}{2}$, E $\frac{1}{2}$ [All]
Section 31: Lots 1 (39.77), 2 (39.31),
3 (38.85), and 4 (38.39), E $\frac{1}{2}$ W $\frac{1}{2}$,
E $\frac{1}{2}$ [All]
Section 32: All
Section 33: All

(containing 16,314.64 acres),

being 58,987.14 aggregate acres.

2. RGC is an Alabama corporation in good standing in the State of Utah. RGC owns working interests in approximately 80% of the Subject Lands and intends to drill, complete and operate wells thereon for the production of gas (primarily coalbed methane) from the Ferron formation underlying said lands.

3. Approximately 80% of the Subject Lands are subject to Federal oil and gas leases. Pursuant to the Record of Decision for the Price Coalbed Methane Project dated May, 1997, the BLM will allow development of those leases only on a 160 acre spacing pattern.

4. The Ferron formation is uniform throughout the Subject Lands and constitutes one gas pool. It is defined for purposes of this cause as follows:

the stratigraphic equivalent of the interval from 3,070 feet to 3,320 feet as shown in the Bulk Density/Gamma Log of the Utah 32.82 well located in the NW $\frac{1}{4}$ NE $\frac{1}{4}$ of Section 32, Township 15 South, Range 9 East, SLM.

One well will effectively and economically drain approximately 160 acres in that pool.

5. The establishment of approximate 160 acre drilling and spacing units for the Ferron formation underlying the Subject Lands will allow for orderly development, prevent waste by drilling unnecessary wells, adequately protect the correlative rights of all affected parties, result in the greatest recovery of hydrocarbon substances, and is just and reasonable under the circumstances.

6. Each such unit should be comprised of a governmental quarter section, *e.g.* NE $\frac{1}{4}$, or lots and quarter-quarter sections substantially comprising the same. Given the unique surveyed status of the lands and to avoid orphaned lands and unorderly development thereof, special units, comprised of Lots 1, 2, 7, 8, 9 and 10 in the first grouping and Lots 3, 4, 5, 6, 11 and 12 in the second grouping, are justified for Sections 1, 2, and 3 of Townships 15 and 16 South, Range 8 East, SLM.

7. The permitted well for each such unit should be located no closer than 660 feet from the outer boundary of said unit and no closer than 1,320 feet from other wells completed and producing from the Ferron formation, except as may otherwise be permitted by administrative action for topographical or geologic reasons or other good cause shown.

8. A copy of the Request for Agency Action was mailed to the royalty, overriding royalty, working interest and other production interest owners, and operators within the Subject Lands disclosed by the appropriate Federal, State and County realty records.

9. Notice was duly published as required by Utah Admin. Code Rule R641-106-100.

10. The vote of the Board members present in the hearing and in this cause was unanimous in favor of granting the Request for Agency Action.

CONCLUSIONS OF LAW

1. Due and regular notice of the time, place, and purpose of the hearing was properly given to all interest parties in the form and manner as required by law and the rules and regulations of the Board and Division.

2. The Board has jurisdiction over all matters covered by the Request for Agency Action and all interest parties therein, and has the power and authority to render the order herein set forth pursuant to Utah Code Anno. §§ 40-6-5(3)(b) and 40-6-6.

3. The Request for Agency Action satisfies all statutory and regulatory requirements for the relief sought therein and should be granted.

ORDER

Based upon the Request for Agency Action, testimony and evidence submitted, and the findings of fact and conclusions of law state above, the Board hereby orders:

1. The Request for Agency Action in this cause is granted.
2. 160 acre drilling and spacing units are hereby established for the Subject Lands (as defined herein) for the production of gas, including but not limited to coalbed methane, from the Ferron formation (as defined herein) including all coals and surrounding sands.
3. Each such unit shall be comprised of a governmental quarter section, *e.g.* NE $\frac{1}{4}$, or lots and quarter-quarter section substantially comprising the same. Special units, comprised of Lots 1, 2, 7, 8, 9 and 10 in the first grouping and Lots 3, 4, 5, 6, 11 and 12 in the second grouping, are established in lieu of the NE $\frac{1}{4}$ and NW $\frac{1}{4}$ respectively for Sections 1, 2, and 3 of Townships 15 and 16 South, Range 8 East, SLM.
4. The permitted well for each such unit shall be located no closer than 660 feet from the outer boundary of said unit and no closer than 1,320 feet from other wells completed and producing from the Ferron formation (as defined herein) unless otherwise permitted by administrative action approved by the Division in compliance with Utah Admin. Code Rule R649-3-3 (rule governing "Exception to Location and Siting of Wells").

5. Pursuant to Utah Admin. Code Rule R641 and Utah Code Ann. § 63-46b-6 to -10, the Board has considered and decided this matter as a formal adjudication.

6. This Findings of Fact, Conclusion of Law and Order ("Order") is based exclusively on evidence of record in the adjudicative proceeding or on facts officially noted, and constitutes the signed written order stating the Board's decision and the reasons for the decision, all as required by the Administrative Procedures Act, Utah Code Ann. § 63-46b-10 and Utah Administrative Code Rule R641-109.

7. Notice re: Right to Seek Judicial Review by the Utah Supreme Court or to Request Board Reconsideration: As required by Utah Code Ann. § 63-46b-10(e) to -10(g), the Board hereby notifies all parties in interest that they have the right to seek judicial review of this final Board Order in this formal adjudication by filing a timely appeal with the Utah Supreme Court within 30 days after the date that this Order issued. Utah Code Ann. § 63-46b-14(3)(a) and -16. As an alternative to seeking immediate judicial review, and not as a prerequisite to seeking judicial review, the Board also hereby notifies parties that they may elect to request that the Board reconsider this Order, which constitutes a final agency action of the Board. Utah Code Ann. § 63-46b-13, entitled, "Agency review - Reconsideration," states:

(1)(a) Within 20 days after the date that an order is issued for which review by the agency or by a superior agency under Section 63-46b-12 is unavailable, and if the order would otherwise constitute final agency action, any party may file a

written request for reconsideration with the agency, stating the specific grounds upon which relief is requested.

(b) Unless otherwise provided by statute, the filing of the request is not a prerequisite for seeking judicial review of the order.

(2) The request for reconsideration shall be filed with the agency and one copy shall be sent by mail to each party by the person making the request.

(3)(a) The agency head, or a person designated for that purpose, shall issue a written order granting the request or denying the request.

(b) If the agency head or the person designated for that purpose does not issue an order within 20 days after the filing of the request, the request for reconsideration shall be considered to be denied.

Id. The Board also hereby notifies the parties that Utah Admin. Code Rule R641-110-100, which is part of a group of Board rules entitled, "Rehearing and Modification of Existing Orders," states:

Any person affected by a final order or decision of the Board may file a petition for rehearing. Unless otherwise provided, a petition for rehearing must be filed no later than the 10th day of the month following the date of signing of the final order or decision for which the rehearing is sought. A copy of such petition will be served on each other party to the proceeding no later than the 15th day of the month.

Id. See Utah Admin. Code Rule R641-110-200 for the required contents of a petition for Rehearing. If there is any conflict between the deadline in Utah Code Ann. § 63-46b-13 and the deadline in Utah Admin. Code Rule R641-110-100 for moving to rehear this matter, the Board hereby rules that the later of the two deadlines shall be available to any

party moving to rehear this matter. If the Board later denies a timely petition for rehearing, the party may still seek judicial review of the Order by perfecting a timely appeal with the Utah Supreme Court within 30 days thereafter.

8. The Board retains continuing jurisdiction over all the parties and over the subject matter of this cause, except to the extent said jurisdiction may be divested by the filing of a timely appeal to seek judicial review of this order by the Utah Supreme Court.

9. For all purposes, the Acting Chairman's signature on a faxed copy of this Order shall be deemed the equivalent of a signed original.

ISSUED this 13 day of October, 1998.

**STATE OF UTAH
BOARD OF OIL, GAS & MINING**

By: 
Thomas B. Faddies, Acting Chairman

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER for Docket No. 98-016, Cause No. 243-1 to be mailed by first-class mail, postage prepaid, this 14 day of October, 1998, to the following:

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Anthony James Tamburello - *Undeliverable*
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J. Mack Potter and Judith J. Potter,
Trustees of the J. Mack Potter Family
Trust Agreement dated 3/28/79
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Price, UT 84501

William and Fran Potter
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Price, UT 84501

Diane and Bruce Ware
2223 North 1200 West
Helper, UT 84526

Bonnie & Neal Frandsen
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Price, UT 84501

Carbon County
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Phyllis D. Marsing, individually and as
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c/o Duane E. Quinn, Administrator
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San Diego, CA 92114

Joyce Marsing Estate
c/o Paula Butcher,
Personal Representative
4215 East 8900 South
Price, UT 84501

Marilyn Steines
727 White Cap
Sea Brook, TX 77586

Paula Butcher
4215 East 8900 South
Price, UT 84501

Paul Pullman
2020 East 3300 South, Suite 18
Salt Lake City, UT 84109

Robert Eckels Family Trust
Christopher R. F. Eckels, Trustee
P.O. Box 30
Cedaredge, CO 81413

Mr. John P. Strang
John P. Strang & Associates
35 Sutton Place
New York, NY 10022-2464

Phillips Petroleum Corporation
P.O. Box 1967
Houston, TX 77251-1967

Henry A. Alker
P.O. Box 194001
San Francisco, CA 94119

FL Energy Corporation
2020 East 3300 South, #26
Salt Lake City, UT 84109

Brownwell Corporation
235 Madisen Road
Scarsdale, NY 10583

Zimmerman Well Service
4081 Sunnydale Drive
Moab, UT 84532

Oryx Energy Company
P.O. Box 2880
Dallas, TX 75221-2880

Headington Royalty, Inc.
7557 Rambler Road, Suite 1150
Dallas, TX 75231

Petrco Inc.
P.O. Box 1622
Roosevelt, UT 84066

Nancy Howard Espanet
2655 114th Lane SE
Kent, WA 98031

Clarence Neil Howard &
Joyce R. Howard
P.O. Box 679
Huntington, UT 84528

Rose Triolo Estate
c/o Joe Triolo, Personal Representative
P.O. Box 5
Forest Ranch, CA 95942-0005

Keith and Joyce Larsen
P.O. Box 366
Huntington, UT 84528

Intermountain Power Agency
480 East 6400 South, Suite 200
Murray, UT 84107

United States Fuel Company
340 Hardscrabble Road
Helper, UT 84526

R.K. & Vula O'Connell
P.O. Box 2003
Casper, WY 82602

Chandler & Associates, Inc.
475 Seventeenth Street, Suite 1000
Denver, CO 80202

Security Energy Company
10000 Memorial Drive #440
Houston, TX 77024

Hunter Investment Co.
2077 Sierra Ridge Court
Salt Lake City, UT 84109

Golda H. Stitt Trust
612 Country Club Road
Fairmont, West Virginia 26554

Thompson Oil Company
5945 South Fairfax Ct.
Littleton, CO 80121

Fern Roberts
4150 East Miguel Road
Phoenix, AZ 85108

Chancellor Energy, Inc.
165 South Union Blvd., Suite 356
Lakewood, CO 80228

Crestone Energy Corporation
303 East 17th Avenue, Suite 810
Denver, CO 80203

Helper Associates - *Undeliverable*
c/o Helen B. Leavitt
675 East 300 North
Helper, UT 84501

Harold L. Anderson
6656 Pike Circle
Larkspur, CO 80118

Cyprus Plateau Mining Corporation - *Re-sent 10/27/98*
P.O. Drawer PMC
Price, UT 84501

Sandra Bataglia, Trustee of the
Garofalo Family Trust dated 9/2/92
P.O. Box 144
Colusa, CA 95932

Emery County
Castle Dale, UT 84513

CO-OP Mining Company
53 West Angelo Avenue
Salt Lake City, UT 84115

Andalex Resources, Inc.
45 West 10000 South, Suite 401
Sandy, UT 84070


