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Sent: Friday, October 21, 2005 11:44 AM

To: 'Jeremy_Casterson@co.blm.gov'

Cc: 'Marianna Raftopoulos'; 'claire@publiclandsadvocacy.org'; 'Stephen Flaherty'; 'Jane Seiler'; 'Jennifer Bates'; 'Georgeann Mitchell'; 'gblack@samson.com'; 'Rich Frommer'

Subject: Comments on Significance Criteria regarding lease stips and COA's

Jeremy: Per our phone call today, I wanted to submit some comments to you regarding the difficulties producers are experiencing in dealing with leases and C.O.A.'s placed on leases as they relate to our ability to get drilling rigs, schedule completions and hook up wells to flow natural gas. You said the resource team was considering 2 to 3 months of available time on a lease on an annual basis as a significant impact to the producer's ability to access their lease rights. Based on the current time frames we are experiencing to obtain a drilling rig to drill an exploratory well (almost impossible in the summer months), drill the well (20-30 days minimum on an exploratory well assuming no equipment failures or fishing expeditions), schedule the completion procedures (in some cases we may perform 2-3 hydraulic fractures that have to be done at separate time intervals for each producing zone we believe has potential), test the well and perform laboratory analysis to determine test results, and build a gathering line to the well, I believe this amount of time is inadequate. I spoke with Stephen Flaherty and he and I agreed that a minimum of 5-6 months is necessary to adequately access our lease rights to drill a well. There continues to be a tremendous shortage of drilling rigs and field personnel to perform drilling and completion procedures. This shortage is not anticipated to dissipate any time soon. Anything short of this time frame would constitute a significant impact in our view. I haven't spoken to all of the producers in our group and they may have differing opinions than ours. If you have any questions, please give me or Stephen a call. Thank you for your consideration of our comments on this important issue.

Vanessa Cameron