RULE 37/38 CASE NOS. 0250298 ET AL.[1]

APPLICATIONS OF DOMINION OKLAHOMA TEXAS E&P, INC., FOR EXCEPTIONS TO STATEWIDE RULES 37 AND/OR 38 TO DRILL THE KELLY 102 LEASE, WELL NOS. 26, 27, 28, 29, 30 and 31, FAWCETT (WOLFCAMP) AND SAWYER (CANYON) FIELDS, SUTTON COUNTY, TEXAS

APPEARANCES:

FOR APPLICANT:	**APPLICANT:**
Philip Whitworth Steve Towns Nguyen B. Ngoc	Dominion Oklahoma Texas E&P, Inc.
FOR PROTESTANT:	**PROTESTANT:**
Bonner Walsh Maggie Davis	Margaret Galbreath

PROPOSAL FOR DECISION

PROCEDURAL HISTORY

DATE APPLICATIONS FILED:	January 17, 2007[2] June 1, 2007[3]
DATE OF NOTICES OF HEARING:	September 19, 2007
DATE OF HEARING:	October 23, 2007
HEARD BY:	Marshall Enquist, Hearings Examiner Thomas H. Richter, Technical Examiner
DATE PFD CIRCULATED:	April 24, 2008

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[1] This proceeding involves also Rules 37/38 Case Nos. 0250312, 0250297, 0252244, 0252265 and 0253335.

[2] Rule 37 Case Nos. 0250298 (Well No. 26), 0250312 (Well No. 27) and 0250297 (Well No. 28).

[3] Rule 37 Case Nos. 0252244 (Well No. 29), 0252265 (Well No. 30) and 0253335 Well No. 31).

STATEMENT OF THE CASE

This was a consolidated hearing involving the applications of Dominion Oklahoma Texas E&P, Inc. ("Dominion")[4], for exceptions to Statewide Rules 37 and/or 38 to drill the Kelly 102 Lease, Well Nos. 26, 27, 28, 29, 30 and 31 ("proposed wells"), in the Fawcett (Wolfcamp) and Sawyer (Canyon) Fields, Sutton County, Texas. Rule 38 density exceptions are requested as to the Sawyer (Canyon) Field for all of the proposed wells. A Rule 37 leaseline spacing exception is requested for Well No. 28. Rule 37 between well spacing exceptions are requested as to the Sawyer (Canyon) Field for all of the proposed wells. As to the Fawcett (Wolfcamp) Field, none of the proposed wells require a Rule 38 exception. Rule 37 between well spacing exceptions are requested for Well Nos. 30 and 31 and a Rule 37 leaseline spacing exception is requested for Well No. 28. Attached to this proposal for decision as Appendix 1 is a summary showing the proposed well locations and type of exception requested, if any, in each of the subject fields, and copies of Dominion's plats submitted with its Forms W-1.

The applications are protested by Margaret Galbreath, the owner of an unleased mineral interest in a tract which is adjacent to the Dominion 640-acre Kelly 102 Lease on the southeast. A hearing was held on October 23, 2007. Dominion appeared and presented evidence. Margaret Galbreath was represented at the hearing by her grandson, Bonner Walsh, and her daughter, Maggie Davis. Mr. Walsh cross-examined Dominion's witnesses and gave a closing statement.

DISCUSSION OF THE EVIDENCE

Official Notice

The examiners have taken official notice of field rules for the subject fields. The Sawyer (Canyon) Field has special field rules providing for 500' leaseline and 1,000' between well spacing and 320 acre proration units, with optional 40 acre proration units. The Fawcett (Wolfcamp) Field is subject to statewide rules providing for 467' leaseline and 1,200' between well spacing and 40 acre proration units. The examiners have also officially noticed the gas proration schedules for the subject fields. The Sawyer (Canyon) Field was discovered in 1967 at a depth of 5,800' and has several thousand wells. The Fawcett (Wolfcamp) Field was discovered in 1983 at a depth of 4,241'. Dominion has 22 wells in the Fawcett (Wolfcamp) Field, but none of these are on the Kelly 102 Lease.

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[4] Dominion has been purchased by Highmount Exploration and Production Texas. Dominion stated that it does not matter which entity the permit, if issued, is issued to. A blanket P-4 change of all wells from Dominion to Highmount is in process.

Dominion

Dominion's 640-acre Kelly 102 Lease covers Section 102, Block C, HE & WT RR Co. Survey, A-1249, in Sutton County. Dominion has drilled 25 wells on this lease in the Sawyer (Canyon) Field. Of the six additional wells that are proposed, only Well No. 28 crowds a mineral property line (within 130 feet). All of the six additional wells require Rule 37 between well spacing exceptions. From the lease map presented by Dominion, it does not appear that any locations remain on the Kelly 102 Lease for the drilling of additional wells that are regular under the applicable well spacing rule in the Sawyer (Canyon) Field.

The protest of Margaret Galbreath is based on her ownership of an unleased mineral interest in Section 90, which offsets the Kelly 102 Lease to the southeast. There appear to be no producing wells on the Galbreath tract. Only one of Dominion's proposed wells, Well No. 31, is near the Galbreath tract, and it is about 1200' away, at a location 1100' from the south line and 500' from the east line of Dominion's lease. In addition, there is a producing well, Well No. 14, that is between the location of the proposed Well No. 31 and the Galbreath tract.

All 25 wells drilled on the Kelly 102 Lease are completed in the Sawyer (Canyon) Field at depths from 4,800' to 6,125'. Well No. 1 on the lease first produced in October 1972, and the last nine wells were drilled between September 2001 and August 2003. Twenty-four of the wells currently are producing, and Well No. 1 is temporarily abandoned. During July, 2007, the 24 active wells produced 41,141 MCF of gas and 55 barrels of condensate. Cumulative production for the lease through July, 2007, was 4,616,000 MCF of gas.

A petroleum engineer retained by Dominion performed a study based on logs of the 25 wells on the Kelly 102 Lease. In these wells, average net pay in the Sawyer (Canyon) Field is 254', with an average porosity of 7.3% and initial water saturation of 47.8%.

The Kelly 102 Lease is situated on a west-dipping monocline, but structure is relatively unimportant in deciding where to drill wells in this portion of the Sawyer (Canyon) Field. Reservoir thickness appears to be much more important, and Dominion has situated its proposed infill wells at the remaining optimal locations.

In general, production from wells in the Sawyer (Canyon) Field in this area tends to decline steeply during the first two years of production and then to level out to a decline of 5% to 20% thereafter. Initial pressure in the first wells drilled on Dominion's lease in the Sawyer (Canyon) Field was about 1,934 psi.

From rate versus time production plots for the 25 wells on the Kelly 102 Lease, Dominion's petroleum engineer calculated an average estimated ultimate recovery per well of 325 MMCF of gas. Based on reservoir parameters, this volume represents a drainage area of about 9.8 acres per well.

Volumetrically calculated original recoverable reserves in the Sawyer (Canyon) Field for the Kelly 102 Lease are 31,476 MMCF. Cumulative production on the lease through July 2007 was 4,616 MMCF of gas. Projected future cumulative production by the existing wells on the lease is 3,502 MMCF. As of October, 2007, current recoverable reserves were 26,860 MMCF. Projected average EUR for the six proposed wells is 325 MMCF each for a total additional recovery from the six proposed wells of 1,950 MMCF. Recoverable reserves under the lease that will not be recovered by the existing wells on the lease or the six proposed wells are 21,408 MMCF.

Dominion believes that the requested Rule 37 and 38 exceptions are necessary to give Dominion an opportunity to recover its fair share of hydrocarbons from the reservoir and that the proposed well locations are reasonable. Because 1,905 MMCF of gas under the Kelly 102 Lease would go unrecovered unless the six proposed wells are drilled, Dominion argues that approval of the requested exceptions is necessary to prevent confiscation.

Galbreath

Margaret Galbreath did not present any evidence, but a statement of her position was presented by Mr. Walsh. Mr. Walsh cross-examined one of Dominion's expert witnesses, Mr. Ngoc, regarding differences in the calculations presented by Dominion in the present applications and the calculations presented in a prior application for nine additional wells on the Kelly 102 Lease. Through cross, Mr. Walsh also explored the possibility that Dominion might drill horizontal wells in the Sawyer (Canyon) Field, thus reducing the number of surface locations on the lease. The multiple surface locations disrupt ranching operations, primarily goat raising.

Mr. Walsh, on Mrs. Galbreath's behalf, argued that Dominion is, in effect, seeking special field rules for its Kelly 102 Lease and that the depleted initial pressures in Dominion's most recently drilled wells show that the lease is already being effectively drained by existing wells. In the event the Commission approves Dominion's applications, Galbreath asks that the permits contain provisions to protect the freshwater sands and the surface waters.

EXAMINERS' OPINION

An owner of oil and gas is entitled to a reasonable opportunity to recover the reserves underlying his tract, and any denial of that opportunity amounts to confiscation. *Atlantic Refining Co. v. Railroad Commission*, 346 S.W.2d 801 (Tex. 1961); *Imperial American Resources Fund, Inc. v. Railroad Commission*, 557 S.W.2d 280 (Tex. 1977). An applicant seeking exceptions to Statewide Rules 37 and/or 38 based on prevention of confiscation must show that: (1) it is not feasible for the applicant to recover its fair share of minerals from regular locations; and (2) that the proposed irregular locations are reasonable.

Sawyer (Canyon) Field

The Kelly 102 Lease has been drilled to complete density under the applicable field rules which allow 40-acre optional units. If additional wells are to be drilled in the Sawyer (Canyon) Field, they must have Rule 38 density exceptions. It also appears that given the location of the 25 existing wells on the Kelly 102 Lease completed in the Sawyer (Canyon) Field, no locations remain on the lease that are regular to both leaselines and to the locations of the existing wells under applicable spacing rules. For this reason, Well No. 28 requires a leaseline spacing exception and all the proposed wells require between well Rule 37 exceptions in the Sawyer (Canyon) Field.

The evidence shows that, on the average, the 24 wells now producing from the Sawyer (Canyon) Field are draining only 9.8 acres per well. As of October, 2007, current recoverable reserves under the Kelly 102 Lease in the Sawyer (Canyon) Field were 26,860 MMCF of gas. Existing wells on the lease will recover only 3,502 MMCF of the remaining recoverable reserves, and 23,358 MMCF of gas under the lease will go unrecovered if Dominion is not permitted to drill additional wells. This 23,358 MMCF of gas cannot be recovered by additional wells drilled at regular locations on the lease because there are no such remaining regular locations. Drilling the six proposed wells appears necessary to give Dominion a reasonable opportunity to recover more of its fair share of reserves. On average, the producing wells on Dominion's lease have an EUR of 325 MMCF to per well. The six proposed wells should recover 1,950 MMCF of gas, leaving recoverable reserves in place of 21,408 MMCF.

The locations of the proposed Well Nos. 26, 27, 29, 30 and 31 are reasonable. The proposed locations do not crowd any mineral property line. The Galbreath tract offsets the Kelly 102 Lease to the southeast, and the closest of the proposed wells (Well No. 31), to the Galbreath tract is about 1180' away. In addition, there is a producing well, Well No. 14, that is between the locations of the proposed wells and the Galbreath tract. It does not appear from the evidence that any of the proposed wells in the Sawyer (Canyon) Field will drain hydrocarbons from the Galbreath tract.

Well No. 28 is 130' south of the north line of the Kelly 102 Lease, but there has been no protest by any party across the leaseline. Dominion, as the operator of the section to the north, Section 101, is its own offset. Mrs. Galbreath's unleased tract is 5,350' southeast of the location of Well No. 28 and her tract is unaffected by Well No. 28.

Accordingly, the evidence is sufficient to establish that, as to the Sawyer (Canyon) Field, approval of a Rule 37 leaseline spacing exception for Well No. 28, Rule 37 between well spacing exceptions for Well Nos. 26 through 31 and Rule 38 density exceptions for Well Nos. 26 through 31, are necessary to protect correlative rights and prevent confiscation.

Fawcett (Wolfcamp) Field

Little of Dominion's evidence relates to the Fawcett (Wolfcamp) Field. Dominion did offer a log cross-section comparing the log of Kelly 102 Well No. 18 with the log of the Shurley Well 94 located four miles away. The log of the Kelly 102 Well No. 18 does not show the presence of the Fawcett (Wolfcamp) Field. It appears to be Dominion's wish that they be allowed to produce any stray sands attributable to the Fawcett (Wolfcamp) should they be found.

Because none of the existing wells on the Kelly 102 Lease are completed in Fawcett (Wolfcamp) Field, the proposed wells do not require Rule 38 density exceptions for this field. Proposed Well Nos. 26, 27, 29, 30 and 31 do not require Rule 37 leaseline spacing exceptions, because they are regular to lease lines. They would not be regular as to between well spacing regarding the existing surrounding wells if any of those wells were completed in the Fawcett (Wolfcamp), but none are.

Proposed Well Nos. 30 and 31 require Rule 37 between well spacing exceptions as they are, respectively, within 1158' of proposed Well No. 27 and 810' of proposed Well No. 30. Dominion did not present any calculation of its fair share of the recoverable reserves in place in the Fawcett (Wolfcamp) Field on the Kelly 102 Lease. Dominion did not show that it is not feasible to recover its fair share of the recoverable reserves in the Fawcett (Wolfcamp) Field from wells at regular locations, did not show that the irregular locations are necessary to recover Dominion's fair share of the recoverable reserves in the Fawcett (Wolfcamp) Field on the Kelly 102 Lease and did not show that the proposed irregular locations are reasonable. The examiners recommend that the Rule 37 between well spacing exceptions for proposed Well Nos. 30 and 31 be denied. The examiners also recommend that Dominion be granted regular drilling permits for Wells 26, 27and 29 in the Fawcett (Wolfcamp).

Well No. 28 requires a leaseline spacing exception, as it is only 130' from the north line of the Kelly 102 Lease. Dominion did not show it is not feasible to recover its fair share of the recoverable reserves in the Fawcett (Wolfcamp) Field from wells at regular locations, did not show that the irregular location is necessary to recover Dominion's fair share of the recoverable reserves in the Fawcett (Wolfcamp) Field on the Kelly 102 Lease and did not show that the proposed irregular location is reasonable. The examiners recommend that the Rule 37 leaseline spacing exception for Well No. 28 be denied.

Dominion did not prove current recoverable reserves under its lease in the Fawcett (Wolfcamp) Field, and because none of the existing wells on Dominion's lease are completed in this field, there are regular locations on the lease where additional wells can be drilled. The examiners cannot presume that it is not feasible for Dominion to recover its fair share of reserves from this field from wells drilled at regular locations. Accordingly, the examiners recommend that Dominion's request for Rule 37 exceptions for Well Nos. 28, 30 and 31 in the Fawcett (Wolfcamp) Field be denied.

Based on the record in this case, the examiners recommend adoption of the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. At least ten (10) days notice was provided to all persons affected by this application.

2. Dominion Oklahoma Texas E&P, Inc. ("Dominion") requests exceptions to Statewide Rules 37 and/or 38 to drill the 640-acre Kelly 102 Lease, Well Nos. 26, 27, 28, 29, 30, and 31, Fawcett (Wolfcamp) and Sawyer (Canyon) Fields, Section 102, Block C, HE & WT RR Co. Survey, A-1249, Sutton County, Texas, as more particularly described in Appendix 1 to this proposal for decision, which is incorporated into this finding by reference.

    a. Rule 38 density exceptions are requested as to the Sawyer (Canyon) Field for all of the proposed wells.

    b. Rule 37 between well spacing exceptions are requested as to the Sawyer (Canyon) Field for all of the proposed wells.

    c. A Rule 37 leaseline spacing exception in the Sawyer (Canyon) Field is requested for proposed Well No. 28.

    d. As to the Fawcett (Wolfcamp) Field, none of the proposed wells require Rule 38 exceptions, but a Rule 37 leaseline spacing exception is requested for Well No. 28 and Rule 37 between well spacing exceptions are requested for Well Nos. 30 and 31. Rule 37 exceptions are not required for the remainder of the proposed wells in the Fawcett (Wolfcamp) Field.

3. The Dominion applications are opposed by Margaret Galbreath, owner of the minerals in an unleased tract in Section 90 adjacent to the Dominion Kelly 102 Lease on the southeast.

4. The Fawcett (Wolfcamp) Field was discovered in 1983 and is subject to statewide rules providing for 467' lease line and 1,200' between well spacing and 40-acre proration units.

5. The Sawyer (Canyon) Field was discovered in 1967 and is subject to special field rules providing for 500' lease line and 1,000' between well spacing, and 320-acre proration units, with optional 40-acre proration units.

6. A total of 25 wells have been drilled on the 640-acre Kelly 102 Lease, all of which are completed in the Sawyer (Canyon) Field, and none of which are completed in the Fawcett (Wolfcamp) Field. The Kelly 102 Lease has been drilled to complete density in the Sawyer (Canyon) Field. Twenty-four of the existing wells currently are producing, and one well, Well No. 1, is temporarily abandoned.

7. There are no remaining locations on the Kelly 102 Lease for wells in the Sawyer (Canyon) Field which are regular to lease lines and the locations of other existing or proposed wells in the same field.

8. During July, 2007, the 24 active wells on the Kelly 102 Lease produced 41,141 MCF of gas and 55 barrels of condensate. Cumulative production for the lease through July, 2007, was 4,616,000 MCF of gas.

9. The existing wells on the Kelly 102 Lease drain relatively small areas.

    a. Based on decline curve analysis, these wells have an average estimated ultimate recovery ("EUR") of 325 MMCF per well.

    b. An EUR of 325 MMCF equates to a drainage area of 9.8 acres per well.

    c. Assuming radial drainage, the drainage radius of a well draining 9.8 acres is 368.7'.

10. Drilling of the proposed wells at the proposed locations is necessary to give Dominion an opportunity to recover more of its fair share of reserves from the Sawyer (Canyon) Field.

    a. Volumetrically calculated original recoverable reserves in this field for the Kelly 102 Lease are 31,476 MMCF of gas.

    b. Cumulative production for the Kelly 102 Lease through July, 2007 was 4,616 MMCF.

    c. As of July, 2007, current recoverable reserves in the Sawyer (Canyon) Field under the Kelly 102 Lease were 26,860 MMCF.

    d. Projected future production from the Sawyer (Canyon) Field by the 24 existing producing wells on the Kelly 102 Lease is 3,502 MMCF.

    e. Recoverable reserves in the Sawyer (Canyon) Field under the Kelly 102 Lease that will not be recovered by the existing wells on the lease are 21,408 MMCF, or 79.7% of recoverable reserves under the lease.

    f. There are no remaining locations on the Kelly 102 Lease where additional wells might be drilled that are regular to lease lines and the locations of other existing or proposed wells in the same field under applicable well spacing rules for the Sawyer (Canyon) Field.

    g. Drilling all of the proposed wells at the proposed locations is necessary to enable Dominion to recover its fair share of reserves from the Sawyer (Canyon) Field,

because, on the average, wells drilled to this field on the Kelly 102 Lease have an EUR of 325 MMCF per well.

11. As to the Sawyer (Canyon) Field, the locations of proposed Well Nos. 26-31 are reasonable.

    a. The locations for the proposed infill wells are the remaining optimal locations from the standpoint of reservoir thickness.

    b. There is no producing well on the protestant's offset tract to the southeast of the Kelly 102 Lease.

    c. The proposed well closest to protestant's offset tract is Well No. 31, which is 1100' from the south line and 500' from the east line of the Kelly 102 Lease, and about 1,200' from protestant's tract.

    d. There is an existing well, Well No. 14, producing from the Sawyer (Canyon) Field that is between the proposed well locations and protestant's offset tract.

    e. On the average, wells on the Kelly 102 Lease producing from the Sawyer (Canyon) Field drain 9.8 acres, and a well draining 9.8 acres has a drainage radius of only 368.7'.

    f. The proposed wells will not drain reserves in the Sawyer (Canyon) Field from protestant's offset tract.

12. Proposed Well Nos. 26, 27 and 29 do not require either Rule 37 spacing exceptions or Rule 38 density exceptions in the Fawcett (Wolfcamp) Field, and these wells may be permitted as regular in this field.

13. Dominion did not establish that approval of the requested Rule 37 between well spacing exceptions for proposed Well Nos. 30 and 31 in the Fawcett (Wolfcamp) Field is necessary to give Dominion an opportunity to recover its fair share of reserves from this field or to prevent the ultimate loss of hydrocarbons.

    a. Regular locations exist on the Kelly 102 Lease in the Fawcett (Wolfcamp) Field where additional wells can be drilled to this field.

    b. Dominion did not establish the amount of current recoverable reserves under the Kelly 102 Lease in the Fawcett (Wolfcamp) Field.

    c. Dominion did not establish that it is not feasible for Dominion to recover its fair share of reserves from the Fawcett (Wolfcamp) Field from wells drilled at regular locations.

d. Dominion did not establish that unusual conditions exist on or beneath the Kelly 102 Lease in the Fawcett (Wolfcamp) Field.

14. Dominion did not establish that approval of the requested Rule 37 leaseline spacing exception for proposed Well No. 28 in the Fawcett (Wolfcamp) Field is necessary to give Dominion an opportunity to recover its fair share of reserves from this field or to prevent the ultimate loss of hydrocarbons.

a. Regular locations exist on the Kelly 102 Lease in the Fawcett (Wolfcamp) Field where additional wells can be drilled to this field.

b. Dominion did not establish the amount of current recoverable reserves under the Kelly 102 Lease in the Fawcett (Wolfcamp) Field.

c. Dominion did not establish that it is not feasible for Dominion to recover its fair share of reserves from the Fawcett (Wolfcamp) Field from wells drilled at regular locations.

d. Dominion did not establish that unusual conditions exist on or beneath the Kelly 102 Lease in the Fawcett (Wolfcamp) Field.

CONCLUSIONS OF LAW

1. Proper notice of hearing was timely issued by the Railroad Commission to appropriate persons legally entitled to notice.

2. All things necessary to the Commission attaining jurisdiction over the subject matter and the parties in this hearing have been performed.

3. The granting of exceptions to Statewide Rule 37 to Dominion Oklahoma Texas E&P, Inc., to drill its Kelly 102 Lease, Well Nos. 26, 27, 28, 29, 30 and 31, in the Sawyer (Canyon) Field, Sutton County, Texas, is necessary to prevent confiscation and protect correlative rights.

4. The granting of exceptions to Statewide Rule 38 to Dominion Oklahoma Texas E&P, Inc., to drill its Kelly 102 Lease, Well Nos. 26, 27, 28, 29, 30 and 31, in the Sawyer (Canyon) Field, Sutton County, Texas, is necessary to prevent confiscation and protect correlative rights.

5. Regular drilling permits should be granted to Dominion Oklahoma Texas E&P, Inc., to drill its Kelly 102 Lease, Well Nos. 26, 27 and 29 in the Fawcett (Wolfcamp) Field, Sutton County, Texas.

6. Dominion Oklahoma Texas E&P, Inc., did not prove that the granting of between well spacing exceptions to Statewide Rule 37 to drill its Kelly 102 Lease, Well Nos. 30 and 31 in the Fawcett (Wolfcamp) Field, Sutton County, Texas, is necessary to prevent waste or confiscation or to protect correlative rights.

7. Dominion Oklahoma Texas E&P, Inc., did not prove that the granting of a leaseline spacing exception to Statewide Rule 37 to drill its Kelly 102 Lease, Well No. 28 in the Fawcett (Wolfcamp) Field, Sutton County, Texas, is necessary to prevent waste or confiscation or to protect correlative rights.

RECOMMENDATION

The examiner recommends that the applications of Dominion Oklahoma Texas E&P, Inc. for exceptions to Statewide Rules 37 and 38 to drill its Kelly 102 Lease, Well Nos. 26-31 in the Sawyer (Canyon) Field, Sutton County, Texas, be granted. The examiner recommends that regular permits be granted to Dominion Oklahoma Texas E&P, Inc., to drill its Kelly 102 Lease, Well Nos. 26, 27 and 29 in the Fawcett (Wolfcamp) Field, Sutton County, Texas. The examiner further recommends that the applications of Dominion Oklahoma Texas E&P, Inc., for exceptions to Statewide Rule 37 to drill its Kelly 102 Lease, Well Nos. 28, 30 and 31 in the Fawcett (Wolfcamp) Field be denied.

Respectfully submitted,

Marshall Enquist
Hearings Examiner

Dominion's Proposed Wells
Kelly 102 Lease,
Sutton County, Texas

Docket No.	Well No.	Location	Distance-Nearest Well		Exception(s) Requested	
			Fawcett	Sawyer	Fawcett	Sawyer
0250298	26	2566' FSL/665' FWL	N/A	714'	None	R37/38
0250312	27	1245' FEL/2450' FNL	N/A	603'	None	R37/38
0250297	28	2285' FEL/130' FNL	N/A	707'	R37	R37/38
0252244	29	1810' FWL/1945' FNL	N/A	504'	None	R37/38
0252265	30	500' FEL/1990' FSL	810'	747'	R37	R37/38
0253335	31	500' FEL/1180' FSL	810'	680'	R37	R37/38

Appendix 1

PFD\Rule37_38\Dominion Appendix 1.wpd