

FILE

13
RECEIVED-DOCKETING DIV
2011 OCT -7 PM 5:14
PUCO

1 Q. PLEASE STATE YOUR NAME AND BUSINESS AFFILIATION.

2 A. My name is Anita M. Noce. I am Senior Accountant for Brainard Gas Corporation
3 (hereinafter, "Brainard").

4 Q. WHAT IS YOUR BUSINESS ADDRESS?

5 A. My business address is 8500 Station Street, Suite 100, Mentor, Ohio 44060.

6 Q. PLEASE SUMMARIZE YOUR EDUCATIONAL AND PROFESSIONAL
7 EXPERIENCE.

8 A. I hold an Associate Degree in Accounting from Lakeland College. Prior to joining
9 Brainard and its affiliated Ohio utilities in 2007, I have held various accounting and
10 bookkeeping positions for over twenty years with Bergensons Property Services
11 (Assistant Controller, Office Manager 2006 – 2007); Tegam, Inc. (Staff Accountant
12 2004 – 2006); Cicogna Electric & Sign Co. (Accountant, Office Manager 2003 –
13 20040; Sunshine Industries (Accounting Manager 1998 – 2001); Sunleaf Nursery
14 (Bookkeeper 1994 – 1997); and Signets Inc. (Bookkeeper 1990 - 1993).

15
16 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

17 A. On August 26, 2011 the Staff of the Public Utilities Commission of Ohio ("Staff") filed
18 its report in this docket denominated "Financial Audit of the Gas Cost Recovery
19 Mechanisms for the Effective GCR Periods July 1, 2009 through June 30, 2011"
20 (hereinafter, "Staff Report"). My testimony supports our conclusion that Staff's Actual
21 Adjustment calculation is not accurate and results in an unwarranted disallowance of
22 purchased gas cost.

23
24 Q. Can you summarize the Company's Position?

25 A. Yes. In large measure, the manner in which Staff calculates imbalances identified in the
26 Staff Report, and which fundamentally affects the level of the Actual Adjustment
27 recommendation of an overcollection requiring a Reconciliation Adjustment, is
28 attributable to mere timing differences in:

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician SM Date Processed OCT 11 2011

- 1 • meter readings: Brainard's readings of its delivery meters includes fewer days than
- 2 Cobra Pipeline's readings of its delivery meter to Brainard, resulting in a mismatch
- 3 of receipts (purchases) by Brainard and sales to its GCR customers;
- 4 • "negative burn" adjustment: Staff concludes that Brainard sold more gas than it
- 5 purchased. The fact is that once again this erroneous conclusion is attributable to
- 6 timing variations between Brainard reading its delivery meters to customers and
- 7 Cobra's reading of its meter registering receipts by Brainard into its system.

8 Staff also ignores a correcting adjustment for a meter reading error for deliveries to
9 Dillen Products, a significant volume transportation service customer. This has the effect
10 of understating deliveries by Brainard from gas transported on Cobra for transportation to
11 Dillen, and overstating deliveries by Brainard from gas transported on Cobra for retail
12 sales customers. This was in part the cause of Staff's conclusion that Brainard was in a
13 negative imbalance position on Cobra. Our correcting adjustment rectifies this.

14 Finally, Brainard's purchases for delivery on the Cobra System were actually in a
15 positive imbalance with its sales to GCR customers during the Audit Period. As I will
16 discuss, on a total system basis (excluding deliveries through Orwell-Trumbull pipeline)
17 there was a negative imbalance during the audit period largely based on issues with two
18 wells owned by Excalibur that were delivering direct into Brainard's distribution system.
19 I note that Brainard no longer obtains supplies from Excalibur; these two wells are shut in
20 and the Excalibur-owned meters have been removed.

21 **Q. Is this calculation of imbalances found in the Staff Report?**

22 **A.** No, we requested and received Staff's spreadsheets underlying the Actual Adjustment
23 calculation in the Staff Report, the most recent version of which were received on
24 September 27. In analyzing the "Imbalance" tab included there, we found how Staff
25 determined lost and unaccounted gas on the Cobra System (as opposed to the Brainard
26 system in the aggregate) for the audit period (Source: Imbalance Tab, Cells 302 – 306
27 E):

Allocated Receipts from Cobra	48,425 Dth
Sales less Great Plains Exploration and Excalibur	46,810
Difference (imbalance)	(1,615 Dth)

1

2 We believe this calculation ignores a key fact, which is that timing differences in the
3 meter read periods for Brainard and for Cobra Pipeline. A second key fact ignored in the
4 Staff calculation is the disproportionately large load transported to transportation service
5 customers as opposed to retail sales customers, which is particularly exaggerated in the
6 summer months, since our sales load is heat sensitive. We have prepared an exhibit that
7 shows the months of October and December 2008 deliveries to all customers that
8 illustrates both of these points. See Brainard Exhibit No. 1, attached hereto.

9 In October 2008, Brainard's total meter reads for all transportation and GCR customers
10 was 20,072.4 Mcf. Of this total, 3,003.4 Mcf was Great Plains Exploration gas Brainard
11 purchased that was transported on Orwell-Trumbull Pipeline rather than Cobra, so we
12 eliminate those volumes from the calculation. We also eliminated 510.2 Mcf of
13 production gas delivered by Excalibur, a local producer, directly into Brainard's
14 distribution system. After netting these figures, we identified 16,558.8 Mcf as deliveries
15 to our customers that were transported through the Cobra Pipeline system. Note that in
16 October 2008, 16,006 Mcf was delivered to our transportation customers and only 553
17 Mcf was delivered to our retail customers, which is 3.34 percent of total deliveries.

18 The line titled "Brainard Days Read" shows that there were 30 days in this meter reading
19 cycle. So the average daily deliveries to our customers that had been transported on
20 Cobra was 551.96 Mcf.

21 Cobra however had 31 days in its meter reading period. That created an artificial
22 variance in deliveries to customers of 551.96 Mcf less than Cobra delivered to Brainard.

1 Staff apparently concludes this was an imbalance, but in actuality it was caused
2 exclusively by the difference in meter read periods.

3 Turning to December 2010, the same pattern is evident. Volumes delivered to all
4 Brainard customers (transportation and GCR) transported on the Cobra system totaled
5 28,549.7 Mcf (net of deliveries direct into Brainard's distribution system or transported
6 on Orwell-Trumbull instead of Cobra). Even in a period of high heat load, Brainard's
7 GCR customers account for only 4,728 Mcf of that total, or 16.56 percent. The higher
8 transportation burn in December means that the average daily usage of gas delivered
9 through Cobra's system is 951.66 Mcf. The one day variance in meter reads creates the
10 artificial variance in that amount.

11 **Q. Have you recalculated the adjustment Staff's Imbalance spreadsheet made to**
12 **correct for these timing differences?**

13 **A. Yes. We suggest that the correct calculation is as follows looking at the audit period from**
14 **October 2008 through December 2010:**

15 [remainder of page left blank intentionally]

16

1

Cobra allocated Receipts (Staff number)	48,425 Dth
Less: Timing Difference (Brainard had 30 days; Cobra had 31days in December 2010)	(969 Dth)
Less: Adjustment for "negative burns" (due to mismatch of Brainard meter reads with Cobra's)	(3,270 Dth)
Adjustment for Dillen Cheese meter misread which Staff disregards	5,319 Dth
Revised Allocated Receipts:	49,505 Dth
Sales less Great Plains Exploration and Excalibur	46,810
Difference	(2,695 Dth)
Net of positive imbalance on Cobra at 12/31/10 (Source: Cobra 12/10 imbalance statement)	1,544 Dth
Adjusted Unaccounted For Volumes	(1,151 Dth)
Unaccounted for Gas percentage	-2.33 %

2

3 **Q. What does your analysis lead you to conclude?**

4 **A.** We conclude that Brainard did not under-purchase gas it shipped on Cobra and sold to its
5 GCR customers as Staff contends. In fact, Brainard had a positive imbalance of 1,544
6 Dth on Cobra at the conclusion of the audit period.

7 **Q. Will the synchronization of the reading of Brainard's Bridge Road Meter at the**
8 **interconnection with Cobra with the reading of its delivery meters for its large**
9 **transportation customers as discussed in Mr. Smith's testimony remedy the timing**
10 **issues you have discussed?**

1 **A.** Not completely, but it will result in a significantly smaller mismatch between Cobra
2 deliveries at Bridge Road and Brainard's delivery meter reads. There will always be
3 slight timing differences. Although Bridge Road and the two largest transportation
4 accounts are telemetered and we use those readings, the GCR meters all must be
5 manually read. Because the transportation customer usage is disproportionately larger
6 than the sales customer usage, reading the delivery meters even a day or two prior to the
7 Bridge Road meter at the Cobra interconnect can cause minor divergences that make it
8 difficult to match up exactly with sales customer consumption. The new procedure we
9 have initiated is to employ the telemeter readings on the delivery meters to Brainard's
10 largest transportation customers for billing purposes. We will check the mechanical
11 meter readings periodically as close to the time the Bridge Road meter is read in order to
12 verify accuracy of the telemeter readings. We believe that this will essentially eliminate
13 the variances exclusively due to timing differences of the respective meter readings.

14
15 **Q.** **Please explain your conclusion that the adjustments you have made to Staff's**
16 **calculation with respect to volumes of gas shipped on Cobra are appropriate.**

17 **A.** I have already described in Brainard Exhibit 1 how the difference in meter reading
18 schedule, particularly because of the proportionately larger transportation load can skew
19 the receipts versus deliveries to end users. And we have just explained how we believe
20 we will minimize that discrepancy going forward.

21 Regarding the "negative burn" adjustment that Staff omitted, this is also necessary to
22 avoid the same timing problem. It relates to that difference of one day in meter reading
23 cycles that was typical during the audit period. Again, this should not be a significant
24 issue prospectively because of the telemeter readings we will use for the largest two
25 accounts.

26 **Q.** **Please explain why you made the adjustment for your transportation service**
27 **customer, Dillen Products?**

1 **A.** We think it is appropriate to reflect this adjustment because it corrected a meter reading
2 error that we adjusted in May 2009 for erroneous readings from March 2008 through
3 March 2009. Because of the inaccurate meter, this account was underbilled. The
4 adjustment reflects the actual deliveries to Dillen, and thus creates a positive imbalance
5 which reduced the gas cost included in the EGC component of the GCR to the benefit of
6 our GCR customers.

7 There are other possible inaccuracies. We are unable to verify Staff's calculations in
8 some instances because the computations in the spread sheets are "hard coded" such that
9 we cannot test the formulas employed, and thus question the validity of the output.

10 Our belief is that the calculated negative imbalance is vastly overstated.

11 **Q.** Do you disagree with Staff's conclusion that for the audit period Brainard on a total
12 system basis experienced a negative imbalance?

13 **A.** We agree that if you look (as we believe you should) at Brainard's entire system receipts
14 for delivery to its sales and transportation customers during the audit period, there was a
15 negative imbalance. We calculate that negative imbalance at 8,886 Dth.

16 **Q.** Have you prepared an exhibit supporting this calculation?

17 **A.** Yes. See Brainard Exhibit 2. This exhibit reflects the imbalances from the various
18 sources of delivery into Brainard's system. So you will see a column identifying
19 purchases from Great Plains (Column J) that identifies Mcf burned by GCR customers
20 sold by Great Plains and delivered to Brainard's system through Orwell-Trumbull
21 Pipeline. Column K shows the invoiced deliveries (using daily invoice register records as
22 reflected in Column I), net of the Great Plains/Orwell-Trumbull deliveries in Column J.
23 In Column L we show the summed supplier invoices for volumes received by Brainard
24 into its system. Then we have identified the positive and negative imbalances in Column
25 O by month on a total system basis net of the Orwell-Trumbull receipts. I converted
26 these Mcf values to Dth in Column P to facilitate comparison with Staff's imbalance
27 calculation.

1 **Q. What is the total system imbalance net of Orwell-Trumbull receipts that compares**
2 **with Staff's computation of a negative imbalance that Staff assigns exclusively to**
3 **Cobra throughput?**

4 **A. That value is (8,885.6 Dth). However, as I have shown in the table depicting imbalances**
5 **on the Cobra system, we experienced a positive imbalance on Cobra during the audit**
6 **period of 1,544 Dth. So on a total system basis net of Orwell-Trumbull throughput, we**
7 **experienced a negative imbalance during the audit period of (7,341.6 Dth).**

8 **Q. What was the cause of this negative imbalance during the audit period?**

9 **A. We believe it is largely attributable to measurement and billing inaccuracies for deliveries**
10 **directly into Brainard from the two Excalibur wells. Due to pressure adjustments on the**
11 **Excalibur meters, volumes should have been calculated with a multiplier, and the**
12 **volumes therefore understated Brainard's gas invoice. Because Excalibur owned the**
13 **meters, Brainard was not responsible to verify the volumes of gas transported through**
14 **Excalibur's meters on these wells. Many times before and during the audit period, the**
15 **volumes delivered and accuracy of measurement of the wells were questioned, and at**
16 **times the well was shut in. Excalibur has never issued adjusting invoices to correct any**
17 **measurement inaccuracies or failure to apply multipliers. See Exhibit 4 for the Excalibur**
18 **volumes billed to Brainard.**

19 **Q. Does the Company accept that an Actual Adjustment is appropriate in this**
20 **proceeding?**

21 **A. Yes. We acknowledge that imbalances were improperly accounted for in the monthly**
22 **GCR filings Brainard made during the audit period. We also acknowledge that purchase**
23 **volumes were slightly overstated by including "free gas" to royalty customers.**
24 **Correcting for these inaccuracies, we believe that an AA reconciliation in favor of the**
25 **GCR customers should be made in the amount of \$47,603. See Brainard Exhibit 3 for the**
26 **calculation of this adjustment. We propose that the adjustment be made by a refund over**
27 **two years.**

- 1 Q. Does this conclude your direct testimony?
- 2 A. Yes, it does.

EXHIBIT 1

Roger's calculation from his imbalance tab:

Allocated Receipts	48,425
Sales les GP and Ex (Dth)	<u>46,810</u>
Difference	1,615

Our calculation:

Cobra Allocated Receipts	48,425	
Less timing difference	(969)	Brainard's had 30 days of reads, Cobra had 31 days
Adjustment for Neg burns	(3,270)	This is due to nothing more than a timing issues of when Brainard reads compared to Cobra
Adjustment for Dillen	<u>5,319</u>	Roger backs this out - we do agree at all - this was an adjustment that should be in the calc
	49,505	

Sales les GP and Ex (Dth) 46,810

Difference	(2,695)
Cobra Imbalance @ 12/31/10	<u>1,544</u>
	(1,151)

Unaccounted For Gas -2.33%

9/30/08 - 10/30/08	20,072.40
Less GPE Custs	(3,003.40)
Excalibur	<u>(510.20)</u>
GCR & Tran Cobra Volumes Tran	16,558.80
Brainard Days Read	30.00
MCFs/Day	551.96
Times Days Variance	<u>1.00</u>
Timing Difference - MCFs	551.96
Conversion to Dths	<u>1.0323</u>
Timing Difference - Dths	569.79

11/30/10 - 12/30/10	37,179.30
Less GPE Custs	(8,539.50)
Excalibur	<u>(90.10)</u>
Cobra Volumes Transported	28,549.70
Brainard Days Read	30.00
MCFs/Day	951.66
Times Days Variance	<u>1.00</u>
Timing Difference - MCFs	951.66
Conversion to Dths	<u>1.0185</u>
Timing Difference - Dths	969.26

October 2008

Transport	Difference	% GCR Customers
16,006	553	3.34%

December 2010

Transport	Difference	% GCR Customers
23,822	4,728	16.56%

EXHIBIT 2

	B	I	J	K	L	O	P	S	T	X
	BTU Factor	Total Commodity Daily Inv Reg MCFs	Less GPE/OTP Customers MCFs	Total Brainard Burns MCFs	Less Gas Purchases MCFs	MCF Brainard Imbalance MCFs	Converted To DTH Dths	Imbalance Running Total Dths	DTH Cobra Imbalance Dths	Less Excalibur Purchases MCFs)
Oct-08	1.0323	925.6	(128.7)	796.9	(963.6)	166.7	172.1	172.1	970.0	(510.2)
Nov-08	1.0323	3,152.0	(347.3)	2,804.7	(1,165.2)	(1,639.5)	(1,692.5)	(1,520.4)	789.0	(214.2)
Dec-08	1.0323	2,968.5	(903.8)	2,064.7	(1,565.7)	(499.0)	(515.1)	(2,035.5)	(1,085.0)	(851.7)
Jan-09	1.0323	4,354.6	(750.6)	3,604.0	(1,925.6)	(1,678.4)	(1,732.6)	(3,768.1)	(624.0)	(333.1)
Feb-09	1.0323	3,536.6	(473.0)	3,063.6	(4,633.6)	1,570.0	1,620.7	(2,147.4)	907.0	(448.6)
Mar-09	1.0200	2,695.5	(372.9)	2,322.6	(2,744.0)	421.4	429.8	(1,717.6)	1,056.0	(540.0)
Apr-09	1.0230	2,057.0	(400.8)	1,656.2	(455.8)	(1,200.4)	(1,228.0)	(2,945.6)	(938.0)	(455.8)
May-09	1.0263	952.5	(23.3)	929.2	(1,405.0)	475.8	488.3	(2,457.3)	(495.0)	(404.0)
Jun-09	1.0158	1,182.2	(340.5)	841.7	(333.5)	(508.2)	(516.2)	(2,973.5)	842.0	(333.5)
Jul-09	1.0158	913.2	(9.8)	903.4	(472.8)	(430.6)	(437.4)	(3,410.9)	179.0	(472.8)
Aug-09	1.0158	683.9	(10.5)	673.4	(501.8)	(171.6)	(174.3)	(3,585.2)	94.0	(501.8)
Sep-09	1.0158	1,030.7	(27.6)	1,003.1	(101.0)	(902.1)	(916.4)	(4,501.6)	(1,404.0)	(101.0)
Oct-09	1.0121	1,607.1	(178.1)	1,429.0	(103.8)	(1,325.2)	(1,341.2)	(5,842.8)	(1,930.0)	(103.8)
Nov-09	1.0121	1,907.2	(218.9)	1,688.3	(424.8)	(1,263.5)	(1,278.8)	(7,121.6)	(856.0)	(424.8)
Dec-09	1.0121	4,892.5	(872.0)	4,020.5	(360.9)	(3,659.6)	(3,703.9)	(10,825.5)	(3,681.0)	(360.9)
Jan-10	1.0121	5,129.7	(777.9)	4,351.8	(2,633.3)	(1,718.5)	(1,739.3)	(12,564.8)	(3,697.0)	(182.9)
Feb-10	1.0221	5,218.3	(855.2)	4,363.1	(2,352.8)	(2,010.3)	(2,054.7)	(14,619.5)	(1,463.0)	(139.6)
Mar-10	1.0221	4,052.6	(637.9)	3,414.7	(1,081.5)	(2,333.2)	(2,384.8)	(17,004.2)	313.0	(383.9)
Apr-10	1.0160	1,704.0	(163.2)	1,540.8	(1,761.0)	220.2	223.7	(16,780.5)	222.0	(284.6)
May-10	1.0160	1,191.0	(65.7)	1,125.3	(1,085.5)	(39.8)	(40.4)	(16,821.0)	(1,535.0)	(229.2)
Jun-10	1.0160	843.6	(67.3)	776.3	(2,597.1)	1,820.8	1,849.9	(14,971.0)	3,527.0	(234.9)
Jul-10	1.0160	803.4	(70.1)	733.3	(3,230.5)	2,497.2	2,537.2	(12,433.9)	2,016.0	(179.3)
Aug-10	1.0160	906.0	(71.1)	834.9	(586.2)	(248.7)	(252.7)	(12,686.6)	861.0	(128.5)
Sep-10	1.0160	1,049.9	(73.0)	976.9	(1,868.2)	891.3	905.6	(11,781.0)	59.0	(96.5)
Oct-10	1.0185	1,254.0	(142.1)	1,111.9	(1,158.7)	46.8	47.7	(11,733.3)	(795.0)	(176.9)
Nov-10	1.0185	2,599.2	(322.9)	2,276.3	(4,739.2)	2,462.9	2,508.5	(9,224.9)	3,490.0	(173.7)
Dec-10	1.0185	5,844.0	(1,128.7)	4,715.3	(5,048.4)	333.1	339.3	(8,885.6)	(465.0)	(90.1)
		63,454.8	(9,432.9)	54,021.9	(45,299.5)	(8,722.4)	(8,885.6)		1,544.0	(8,356.3)

EXHIBIT 3

AA VARIANCE

	Staff	Co Filed	Variance	Company	Co Filed	Variance	Variance
Oct-08	(\$3,433)	(\$2,827)	(\$606)	(\$1,328)	(\$2,827)	\$1,499	(\$2,105)
Nov-08	(\$6,551)	(\$4,160)	(\$2,391)	\$107	(\$4,160)	\$4,267	(\$6,658)
Dec-08	\$12,534	\$4,836	\$7,698	(\$80)	\$4,836	(\$4,916)	\$12,614
Jan-09	(\$2,617)	(\$15,969)	\$13,352	(\$4,333)	(\$15,969)	\$11,636	\$1,716
Feb-09	\$1,897	\$3,440	(\$1,543)	(\$8,277)	\$3,440	(\$11,717)	\$10,174
Mar-09	(\$3,935)	(\$1,179)	(\$2,756)	(\$5,732)	(\$1,179)	(\$4,553)	\$1,797
Apr-09	(\$13,142)	(\$12,523)	(\$619)	(\$9,140)	(\$12,523)	\$3,383	(\$4,002)
May-09	(\$606)	(\$378)	(\$228)	(\$2,431)	(\$378)	(\$2,053)	\$1,825
Jun-09	(\$4,946)	(\$3,102)	(\$1,844)	(\$3,366)	(\$3,102)	(\$264)	(\$1,580)
Jul-09	(\$4,541)	(\$4,712)	\$171	(\$2,757)	(\$4,712)	\$1,955	(\$1,784)
Aug-09	(\$1,300)	(\$1,245)	(\$55)	(\$682)	(\$1,245)	\$563	(\$618)
Sep-09	(\$3,748)	(\$3,589)	(\$159)	(\$732)	(\$3,589)	\$2,857	(\$3,016)
Oct-09	(\$8,091)	\$4,284	(\$12,375)	(\$2,486)	\$4,284	(\$6,770)	(\$5,605)
Nov-09	(\$9,142)	(\$3,474)	(\$5,668)	(\$2,775)	(\$3,474)	\$699	(\$6,367)
Dec-09	(\$25,557)	(\$4,511)	(\$21,046)	(\$6,396)	(\$4,511)	(\$1,885)	(\$19,161)
Jan-10	(\$14,998)	\$3,155	(\$18,153)	(\$1,837)	\$3,155	(\$4,992)	(\$13,161)
Feb-10	(\$10,691)	\$375	(\$11,066)	\$2,185	\$375	\$1,810	(\$12,876)
Mar-10	(\$21,721)	(\$21,934)	\$213	(\$7,314)	(\$21,934)	\$14,620	(\$14,407)
Apr-10	(\$3,431)	(\$3,837)	\$406	(\$4,435)	(\$3,837)	(\$598)	\$1,004
May-10	(\$1,340)	\$6,315	(\$7,655)	(\$1,143)	\$6,315	(\$7,458)	(\$197)
Jun-10	\$6,435	(\$9,223)	\$15,658	(\$2,186)	(\$9,223)	\$7,037	\$8,621
Jul-10	\$12,294	\$18,828	(\$6,534)	(\$704)	\$18,828	(\$19,532)	\$12,998
Aug-10	(\$2,502)	\$3,902	(\$6,404)	(\$1,143)	\$3,902	(\$5,045)	(\$1,359)
Sep-10	\$1,968	\$6,017	(\$4,049)	(\$1,621)	\$6,017	(\$7,638)	\$3,589
Oct-10	(\$1,779)	\$1,899	(\$3,678)	(\$1,961)	\$1,899	(\$3,860)	\$182
Nov-10	\$10,629	(\$8,922)	\$19,551	(\$1,911)	(\$8,922)	\$7,011	\$12,540
Dec-10	\$541	\$22,496	(\$21,955)	(\$1,163)	\$22,496	(\$23,659)	\$1,704
	(\$97,773)	(\$26,038)	(\$71,735)	(\$73,641)	(\$26,038)	(\$47,603)	(\$24,133)

EXHIBIT 4

Excalibur Gas Purchased by Brinard			Hostetler Adjustment with Pressure Factor/Multiplier						SR 528 Adjustment with Pressure Factor/Multiplier					
	Hostetler	Lez Line SR 528	Hostetler					Lez Line SR 528						
	MCFs	MCFs	MCFs	Pressure	Factor	MCFs	Variance	MCFs	Pressure	Factor	MCFs	Variance		
Oct-08	95.2	415.0	7.32	95	7.427	54.4	(40.8)	33.86	335	23.72	803.2	388.2		
Nov-08	78.2	136.0	10.25	44	3.965	40.6	(37.6)	67.01	293	21	1,407.2	1,271.2		
Dec-08	56.7	795.0	3.47	45	4.032	14.0	(42.7)	28.69	270	19.31	554.0	(241.0)		
Jan-09	43.9	289.2	5.91	50	4.372	25.8	(18.1)	41.15	260	18.63	766.6	477.4		
Feb-09	58.9	389.7	5.01	42	3.829	19.2	(39.7)	30.91	274	19.65	607.4	217.7		
Mar-09	62.9	477.1	3.48	53	4.576	15.9	(47.0)	29.62	319	22.7	672.4	195.3		
Apr-09	60.4	395.4	6.45	44	3.965	25.6	(34.8)	36.93	325	23.04	850.9	455.5		
May-09	33.3	370.7	5.19	45	4.032	20.9	(12.4)	48.97	323	23.04	1,128.3	757.6		
Jun-09	61.9	271.6	5.58	62	5.187	28.9	(33.0)	29.37	187	13.54	397.7	126.1		
Jul-09	54.2	418.6	5.51	56	4.779	26.3	(27.9)	41.54	188	13.88	576.6	158.0		
Aug-09	60.6	441.2	5.46	48	4.236	23.1	(37.5)	40.09	191	13.88	556.4	115.2		
Sep-09	59.6	41.4	4.91	46	4.1	20.1	(39.5)	2.78	191	13.88	38.6	(2.8) Shut In		
Oct-09	57.6	46.2	57.6			-	-	46.2			46.2	-		
Nov-09	67.1	357.7	67.1			-	-	357.7			357.7	-		
Dec-09	58.4	302.5	58.4			-	-	302.5			302.5	-		
Jan-10	53.5	129.4	53.5			-	-	129.4			129.4	-		
Feb-10	44.5	95.1	44.5			-	-	95.1			95.1	-		
Mar-10	109.5	274.4	109.5			-	-	274.4			274.4	-		
Apr-10	61.5	223.1	61.5			-	-	223.1			223.1	-		
May-10	56.2	173.0	56.2			-	-	173.0			173.0	-		
Jun-10	58.8	176.1	58.8			-	-	176.1			176.1	-		
Jul-10	42.7	136.6	42.7			-	-	136.6			136.6	-		
Aug-10	41.2	87.3	41.2			-	-	87.3			87.3	-		
Sep-10	30.9	65.6	30.9			-	-	65.6			65.6	-		
Oct-10	42.7	134.2	42.7			-	-	134.2			134.2	-		
Nov-10	42.0	131.7	42.0			-	-	131.7			131.7	-		
Dec-10	12.6	77.5	12.6			-	-	77.5			77.5	-		
							(410.8)					3,918.3		
												3,507.4		
												Pressure Factor/Multiplier Variance		
												3,507.4		