

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Gill Ranch Storage, LLC, and Pacific Gas and Electric Company (U39G),

Complainants

v.

Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust; Gary Player Ventures; Southern States Realty, a California corporation; All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams; Brooke S. Antrim, Michael F. Antrim & Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992; Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership; Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond; Joseph Curtis Edmondson; Jimmy L. Graham, Trustee of the Jim Graham Trust dated October 30, 1984; Vern Jones Oil & Gas Corporation; All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry, V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual, and V. Lynn Grigsby, as Trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94; Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such Trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby; All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property; Earl Brix Fenston, Jr.; Daniel L. Herman, Executor of the Estate of Jeffrey Fenston, and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan

(EDM)

Case 10-02-001

(Filed February 2, 2010)

**CONCURRENT DIRECT  
TESTIMONY ON BEHALF OF  
GILL RANCH GAS  
STORAGE PROJECT**

Fenston, deceased, including, but not limited to, Daniel L. Herman; All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas; All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; Duane Lee Soares; Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987,

Defendants

April 9, 2010

1            Chapter 2: Answers to Complaint

- 2            •        Section A – J. Curtis Edmondson Status  
3            •        Section B – Response to Southern States Realty

4            Statement of Qualifications

5        **B.     Background on Project**

6            **1.     Project Description**

7            On October 29, 2009, the Commission issued Decision 09-10-035 (“Decision” or  
8            “D.09-10-035”), granting GRS’ and PG&E’s applications for certificates of public  
9            convenience and necessity (“CPCN”) authorizing the construction and operation of the  
10           Project, an underground natural gas storage facility in Madera and Fresno Counties.<sup>1</sup> The  
11           Commission was the lead agency for review of the Project under the California  
12           Environmental Quality Act (“CEQA”). In D.09-10-035, the Commission adopted a Final  
13           Mitigated Negative Declaration for the Project.<sup>2</sup>

14           The Project is comprised of (1) a 20 billion cubic feet (“Bcf”) underground natural gas  
15           storage field (“Storage Field”), within the Gill Ranch Gas Field, (2) a compressor station that  
16           will be used to inject and withdraw gas into and from the Storage Field, and associated  
17           dehydration and control facilities, (3) a natural gas pipeline extending approximately 27 miles  
18           from the Storage Field to an interconnection with PG&E’s Line 401, and (4) an electric  
19           substation located at the compressor station that will be connected to an approximately nine-  
20           mile 115 kV electric power line extending from PG&E’s Dairyland-Mendota 115 kV power  
21           line to the compressor site. There are approximately 5,020 acres within the boundary of the  
22           Storage Field (the “Storage Field Boundary”). A map showing the Project components is  
23           provided as Attachment A hereto.

24           With the exception of the electric power line, which will be constructed, owned, and  
25           operated by PG&E, GRS owns a 75% interest in the Project and PG&E owns a 25% interest  
26           in the Project. GRS is the initial operator of the Project. GRS will provide competitive long-  
27           and short-term firm and interruptible natural gas storage services at market-based rates using

---

<sup>1</sup> PG&E also requested and received a permit to construct an electric substation and 115 kV electric power line in connection with the Project. (The Decision is available on the Commission’s web site: <http://docs.cpuc.ca.gov/cyberdocs/Libraries/WEBPUB/Common/searchRes/jpdsp.asp?pagenumber=1&FT=false&fromQSearch=yes&desc=Detailed+Search>.)

<sup>2</sup> D.09-10-035, Ordering Paragraph 26. (The Final Mitigated Negative Declaration is available on the Commission’s web site: [http://www.cpuc.ca.gov/Environment/info/mha/gill\\_ranch/71312nd.htm](http://www.cpuc.ca.gov/Environment/info/mha/gill_ranch/71312nd.htm).)

1 its 75% interest in the Project. PG&E will provide natural gas storage services using its 25%  
2 interest in the Project. PG&E's interest in the Project will be integrated with the operation of  
3 PG&E's existing gas storage facilities, and PG&E's existing market storage rates will apply  
4 to services provided by PG&E. GRS and PG&E will each separately market its respective  
5 share of Project storage capacity and will compete in the provision of natural gas storage  
6 services with each other and with other California storage providers.

## 7 **2. Storage Project Property Rights**

8 In general, two types of property rights are required in connection with natural gas  
9 storage projects: (1) the right to store natural gas in subsurface formations, and (2) surface  
10 rights, including easements, necessary to accommodate related project facilities.<sup>3</sup>

11 In California, the surface owner has the right to store natural gas in subsurface  
12 geological formations, subject to an obligation not to unreasonably interfere with a mineral  
13 owner's or lessee's right to explore for and produce oil and gas. Typically, storage leases  
14 entered into with surface owners allow storage in subsurface formations, as well as the use of  
15 the surface for development of storage facilities, including compression equipment and  
16 related facilities, and injection and withdrawal wells.

17 Although only storage rights are required for storage projects, where mineral rights  
18 have been separated from the surface property, project owners also may seek either the  
19 mineral rights to the property or the consent and agreement of the mineral owners or lessees  
20 to conduct storage operations. Obtaining mineral rights or consents from any separate  
21 mineral rights owners or lessees will preclude such owners or lessees from drilling into or  
22 through project storage reservoirs and causing damage to reservoirs or the taking of stored  
23 gas. Obtaining such rights will also preclude others from claiming that recoverable gas  
24 reserves exist in project reservoirs (prior to the injection of gas) or that project operations  
25 have otherwise unreasonably interfered with their rights.

26 GRS and PG&E have entered into underground gas storage lease agreements with the  
27 owners of the fee simple surface interests covering approximately 92% of the approximately  
28 5,020 acres within the Storage Field Boundary, pursuant to which GRS and PG&E lease the

---

<sup>3</sup> A gas transmission pipeline used to transport gas between an interconnecting utility's system and a storage project requires easements along the pipeline route. Here, GRS and PG&E have acquired or expect to acquire, through negotiated agreements, easements along the approximately 27-mile Project pipeline route. Thus, as noted above, condemnation of pipeline easements is not addressed in this testimony.

1 subject property for the purposes of injection, storage, and withdrawal of natural gas.<sup>4</sup> GRS  
2 and PG&E expect to complete underground gas storage agreements with the remaining  
3 surface owners soon. Where the surface owners also own mineral rights, GRS and PG&E  
4 have acquired or expect to acquire their consent to Project storage operations through mutual  
5 agreement in the underground storage leases. Upon completing agreements with all of the  
6 surface owners, GRS and PG&E will have all of the rights necessary to begin storing gas in  
7 the Storage Field, subject to an obligation not to unreasonably interfere with the right to  
8 explore for and produce oil and gas as to those mineral estates that have been severed from  
9 the surface estates.

### 10 **3. Authority to Condemn**

11 By law, a gas corporation may condemn any property necessary for the construction  
12 and maintenance of its gas plant.<sup>5</sup> Additionally, an entity with the power of eminent domain  
13 may exercise that power to acquire any property “necessary to carry out and make effective  
14 the principal purpose involved including but not limited to property to be used for the  
15 protection or preservation of the attractiveness, safety, and usefulness of the project,” and  
16 including subsurface rights.<sup>6</sup>

17 Upon the grant of the CPCN in the Decision, GRS became a public utility gas  
18 corporation with the power of eminent domain. PG&E, a public utility gas corporation, had  
19 the power of eminent domain before the Decision issued.

### 20 **C. Description of Property to be Condemned**

#### 21 **1. Condemnation of Mineral Interests**

22 In order to protect the integrity of the Storage Field and the gas stored therein, GRS  
23 and PG&E seek to obtain consents to Project operations from the owners and lessees of the  
24 severed mineral rights within the Storage Field Boundary. Mineral rights generally include  
25 the right to explore for and produce oil and gas. However, GRS and PG&E are not seeking  
26 any exploration or production rights. Rather, GRS and PG&E are seeking only those rights  
27 necessary to protect the integrity of the Storage Field.

---

<sup>4</sup> In two cases, GRS and PG&E have made an outright purchase of storage rights in the Storage Formations.

<sup>5</sup> Pub. Util. Code, § 613.

<sup>6</sup> Code of Civ. Proc., §§ 1240.110(a), 1240.120(a).

1 GRS and PG&E have acquired consents to project operations from the owners and  
2 lessees of many, but not all, of the mineral rights that have been severed from the surface area  
3 within the Storage Field Boundary. These consents to Project operations include the mineral  
4 owner's or lessee's agreement not to drill into or to drill through the First and Second Starkey  
5 Formations, and the Lower Moreno Sand which lies immediately above the First Starkey  
6 Formation (the "Storage Formations") without GRS' and PG&E's prior consent. GRS and  
7 PG&E presently seek to acquire similar mineral interests in Madera and Fresno Counties from  
8 the remaining severed mineral rights owners and lessees within the Storage Field Boundary.

9 In particular, GRS and PG&E seek to condemn a portion of the mineral rights, *i.e.* the  
10 rights to drill through and into the Storage Formations (the "Mineral Interests"). Upon the  
11 acquisition of the Mineral Interests by GRS and PG&E, the mineral owner and lessee  
12 Defendants shall be precluded from drilling into to produce from, or granting others the right  
13 to drill into to produce from, the Storage Formations, and drilling through, or granting to  
14 others the right to drill through, the Storage Formations, without GRS' and PG&E's approval  
15 of drilling plans and timing designed to protect the integrity of the Storage Field and natural  
16 gas therein, which approval GRS and PG&E may grant, withhold, or condition in their sole  
17 discretion, and then only in accordance with such approved drilling plans. A map showing  
18 the Mineral Interests to be condemned is included as Attachment B.<sup>7</sup>

19 Specifically, the Storage Formations are comprised of the First and Second Starkey  
20 Zones (also known as the ST-1 Sand and the ST-2 Sand of the Starkey Formation) and the  
21 Lower Moreno Sand (also know as the Moreno D-1 Sand). As used in this testimony, the ST-  
22 1 Sand and the ST-2 Sand of the Starkey Formation are understood to be the equivalent of the  
23 First and Second Panoche, or P-1 and P-2 Zones, or the stratigraphic equivalent thereof as  
24 found at measured depths of 5,690 feet in the Texaco Gill Ranch #32-21 Well located in  
25 Section 21, T13S, R16E, MDB&M. It is necessary to acquire from Defendants their right to  
26 drill through and into the Lower Moreno Sand, which lie immediately above the First Starkey  
27 Zone, in order to protect against the possibility of communication between the First Starkey  
28 Zone and the Moreno D-1 Sand. The Moreno D-1 Sand is defined for purposes of this  
29 testimony as those sands found in the Vern Jones, Gill Ranch #1-21 Well over measured

---

<sup>7</sup> GRS and PG&E have entered into an agreement with Armstrong Petroleum Corporation ("Armstrong"), a mineral lessee, pursuant to which Armstrong has consented to Project operations in the area identified as the "Armstrong Lease" on the Mineral Ownership and Lessees map included in Attachment B.

1 depths of 5, 585 feet to 5,657 feet below the surface, or the stratigraphic equivalent thereof. A  
2 figure showing the Storage Formations is included as Attachment C.

3 GRS' and PG&E's acquisition of the Mineral Interests necessary to protect the safety  
4 and usefulness of the Project does not preclude the owners and lessees of such Mineral  
5 Interests from using the portions of their mineral rights that GRS and PG&E are not  
6 acquiring, subject to GRS' and PG&E's prior approval of any drilling through the Storage  
7 Formations. For example, within the Storage Field Boundary, mineral rights owners and  
8 lessees may drill wells above the Storage Formations, as long as those wells do not affect the  
9 Storage Formations, and they may drill through the Storage Formations as long as they  
10 receive GRS' and PG&E's prior consent, as discussed above, but they may not drill into the  
11 Storage Formations to produce therefrom.

12 **2. Mineral Owners and Lessees Whose Minerals Interests are to be**  
13 **Condemned**  
14

15 Following is a summary of the Mineral Interests GRS and PG&E seek to acquire from  
16 mineral owners and lessees in Madera and Fresno Counties. One mineral owner, Gill OG&M  
17 Trust, owns the mineral rights for approximately 1,000 of the acres within the Storage Field  
18 Boundary for which GRS and PG&E have not been able to reach agreement.<sup>8</sup> GRS and  
19 PG&E recently learned that the Gill OG&M Trust entered into a lease with Gary Player  
20 Ventures for these mineral rights. The remaining mineral owners and lessees with whom  
21 agreement has not been reached each hold portions, or fractions, of the mineral rights  
22 associated with other properties within the Storage Field Boundary. The six parties that own  
23 Mineral Interests in both Counties are marked with an asterisk.

24 **Madera County**

25 *Mineral Owners*

- 26 • Mineral Interests owned by the Gill OG&M Trust, and leased by Gary Player  
27 Ventures from the Gill OG&M Trust.  
28 • Mineral Interests owned by Southern States Realty.\*

---

<sup>8</sup> GRS and PG&E propose to install an observation well to monitor Project operations in the 1,000 acres of land for which the Gill OG&M Trust owns and Gary Player Ventures leases the mineral rights. GRS and PG&E have all of the necessary property rights to install this observation and monitoring well. Since filing the Complaint, GRS and PG&E have learned that Gill OG&M Trust and/or Gary Player Ventures have begun conducting oil and/or gas operations on the approximately 1,000 acres.

- 1 • Mineral Interests owned by the heirs and devisees of Barbara A. Williams, aka
- 2 Barbara Jane Williams, deceased.\*
- 3 • Mineral Interests owned by the Calvin and Ines Antrim Revocable Trust
- 4 created on December 28, 1992.\*
- 5 • Mineral Interests owned by the Kingdon R Hughes Family Limited
- 6 Partnership.\*
- 7 • Mineral Interests owned by Neil F. Ormond.\*
- 8 • Mineral Interests owned by Joseph Curtis Edmondson.\*

9

10 Mineral Lessees

- 11 • Mineral Interests leased by Gary Player Ventures from the Gill OG&M Trust.
- 12 • Mineral Interests leased by The Jim Graham Trust Dated October 30, 1984.
- 13 • Mineral Interests leased by Vern Jones Oil & Gas Corporation.

14

15 Fresno County

16 Mineral Owners

- 17 • Mineral Interests owned by Southern States Realty.\*
- 18 • Mineral Interests owned by the heirs and devisees of Blanche G. Brown,
- 19 deceased.
- 20 • Mineral Interests owned by Clayton Brown, as Successor Trustee Under the
- 21 Last Will and Testament of Alfred R. Brown.
- 22 • Mineral Interests owned by the Calvin and Ines Antrim Revocable Trust
- 23 created on December 28, 1992.\*
- 24 • Mineral Interests owned by the heirs and devisees of Barbara A Williams, aka
- 25 Barbara Jane Williams, deceased.\*
- 26 • Mineral Interests owned by the heirs and devisees of Harold Williams,
- 27 deceased.
- 28 • Mineral Interests owned by Joseph Curtis Edmonson.\*
- 29 • Mineral Interests owned by Earl Brix Fenston, Jr.
- 30 • Mineral Interests owned by the heirs and devisees of Jeffrey Allen Fenston,
- 31 deceased.
- 32 • Mineral Interests owned by the heirs and devisees of J.G. Imeson, deceased.
- 33 • Mineral Interests owned by the heirs and devisees of Rose I. Kepford, aka
- 34 Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased.
- 35 • Mineral Interests owned by Duane Lee Soares.



- 1 • Mineral Interests owned by the William Sherman Thomas Revocable Trust of
- 2 1987, established on October 28, 1987.
- 3 • Mineral Interests owned by the Kingdon R. Hughes Family Limited
- 4 Partnership.\*
- 5 • Mineral Interests owned by Neil F. Ormond.\*

6

7 Mineral Lessees

- 8 • Mineral Interests leased by Vern Jones Oil & Gas Corporation

9 The legal descriptions, assessor’s parcel numbers, and owner and lessee identification  
 10 for the properties associated with the Mineral Interests to be condemned are included in  
 11 Attachment D. This information was obtained from a review of the Official Records of the  
 12 Madera and Fresno County Recorder’s offices, as well as through publicly available  
 13 information on probate filings for deceased owners and investigations as to the heirs of  
 14 deceased owners where a probate had not been filed. Additionally, GRS obtained, on behalf  
 15 of the Project, title opinions for the property necessary to carry out the Project.

16 **D. Condemnation is in the Public Interest**

17 Because GRS and PG&E will provide competitive gas storage services from their  
 18 respective Project interests, they must ask the Commission to find that the proposed  
 19 condemnation of Mineral Interests is in the public interest, pursuant to Public Utilities Code  
 20 section 625(a)(1)(A). The Commission already determined in D.09-10-035 that the Project is  
 21 in the public interest.<sup>9</sup> As part of its review, the Commission also analyzed and approved the  
 22 Project configuration in the Final Mitigated Negative Declaration (“MND”) adopted for the  
 23 Project.<sup>10</sup>

24 As explained in detail below, GRS’ and PG&E’s acquisition of the Mineral Interests is  
 25 in the public interest because it satisfies the criteria set forth in Public Utilities Code section  
 26 625(b)(2):<sup>11</sup>

- 27 (1) The public interest and necessity require the Project;

---

<sup>9</sup> D.09-10-035, *mimeo*, Conclusion of Law 2; Ordering Paragraphs 1, 3, 5.

<sup>10</sup> D.09-10-035, *mimeo*, Conclusions of Law 6, 7, 9; Ordering Paragraphs 26, 27, 29.

<sup>11</sup> The proposed condemnation is not necessary to provide service as a provider to an unserved area, so this testimony does not address Public Utilities Code section 625(b)(1).

- 1 (2) The property to be condemned is necessary for the Project;
- 2 (3) The public benefit of acquiring the property by eminent domain
- 3 outweighs the hardship to the owners of the property; and
- 4 (4) The Project is located in a manner most compatible with the greatest
- 5 public good and least private injury.

6 **1. The Public Interest and Necessity Require the Project**

7 In the Decision at Conclusion of Law 2, the Commission concluded that the public

8 convenience and necessity require the construction and operation of the Project. The

9 Commission affirmed that its “let the market decide” policy for competitive gas storage

10 facilities, adopted in the Gas Storage Decision, presumes a need for new gas storage facilities

11 dedicated to non-core customers.<sup>12</sup> Additionally, the Commission found that the evidence of

12 need for the Project provided by GRS and PG&E satisfied the requirements of Public Utilities

13 Code sections 1001 and 1002.<sup>13</sup>

14 In concluding that GRS and PG&E demonstrated actual need for the Project,

15 consistent with Public Utilities Code section 1001, the Commission relied on the following

16 uncontroverted evidence of market support for the proposed storage services:

- 17 (a) The Commission’s and the California Energy Commission’s (“CEC”) 2005
- 18 Energy Action Plan II and the CEC’s 2007 Integrated Energy Policy Report
- 19 recognize the need for increased storage to ensure California’s natural gas
- 20 infrastructure is sufficient to meet California’s peak demand requirements,
- 21 enhance supply reliability, and provide price stability;<sup>14</sup>
- 22 (b) Anticipated natural gas demand in the electric power sector implicates a need
- 23 for additional storage;
- 24 (c) The Project’s central California location will make it possible to more
- 25 efficiently and cost-effectively use existing utility gas infrastructure, and will
- 26 provide increased reliability and price stability during periods of high demand
- 27 and during supply interruptions; and

---

<sup>12</sup> D.09-10-035, *mimeo*, p. 17 (referring to the Gas Storage Decision (D.93-02-013 (48 CPUC2d 107, 127 and Finding 37)).

<sup>13</sup> D.09-10-035, *mimeo*, p. 17.

<sup>14</sup> Energy Action Plan II (2005) is available on the CEC’s web site: [http://www.energy.ca.gov/energy\\_action\\_plan/2005-09-21\\_EAP2\\_FINAL.PDF](http://www.energy.ca.gov/energy_action_plan/2005-09-21_EAP2_FINAL.PDF) . The 2007 Integrated Energy Policy Report is also available on the CEC’s web site: <http://www.energy.ca.gov/2007publications/CEC-100-2007-008/CEC-100-2007-008-CMF.PDF> .

1 (d) The fact that other independent storage providers are fully subscribed and have  
2 received Commission authority to expand their operations, and response to  
3 GRS' open season for its share of Project capacity, demonstrate market  
4 demand.<sup>15</sup>

5 The Commission also concluded that pursuant to Public Utilities Code section 1002,  
6 the Project is consistent with community values, will have no effect on recreational and park  
7 areas and historic and aesthetic values, and will have no significant effect on the  
8 environment.<sup>16</sup> GRS and PG&E conducted extensive outreach efforts that included local  
9 community members and state and local agencies and elected officials.<sup>17</sup> The Commission  
10 received letters of support for the Project from numerous elected officials and local  
11 jurisdictions. Specifically, letters of support were sent by Senator Dave Cogdill, Assembly  
12 Members Michael N. Villines and Juan Arambula, Fresno County Board of Supervisors,  
13 Madera County Board of Supervisors, Fresno County Farm Bureau, Madera County Farm  
14 Bureau, and the City Managers of the Cities of Fresno and Mendota.<sup>18</sup> No letters of  
15 opposition were received.<sup>19</sup>

16 The Commission found that the Project will create socioeconomic benefits for Madera  
17 and Fresno Counties in the form of employment opportunities and revenue generation.<sup>20</sup>  
18 Construction of the Project will require approximately 350 workers over a 10- to 12- month  
19 period.<sup>21</sup> Approximately 40% of these workers will come from the local labor force.  
20 Approximately 10 full-time local employees will operate the Project after construction.<sup>22</sup> The  
21 Project will contribute approximately \$1.2 million per year to fund local services in Madera  
22 County and approximately \$600,000 per year to fund local services in Fresno County.<sup>23</sup> The  
23 Project will not result in significant impacts to public facilities and services.<sup>24</sup>

---

15 D.09-10-035, *mimeo*, pp. 17-19 and Conclusion of Law 2. Wild Goose Storage, Inc., an independent storage provider, recently filed an application to further increase its storage capacity (A.09-04-021).

16 D.09-10-035, *mimeo*, pp. 12-21 and Conclusion of Law 4.

17 D.09-10-035, *mimeo*, p. 19.

18 *Id.* at 20.

19 *Id.*

20 D.09-10-035, *mimeo*, p. 20.

21 *Id.*

22 *Id.*

23 *Id.*

24 *Id.*

1 The Commission also found that construction and operation of the Project will not  
2 affect recreational or park areas because all Project components will be located on private  
3 lands, there are no park and recreation areas in the vicinity of the Project, and construction  
4 and operation of the Project will not result in a change in the use of existing parks or  
5 recreation areas.<sup>25</sup> Historic use of the Gill Ranch Gas Field area has included natural gas  
6 production and agricultural development and, therefore, the Project is consistent with  
7 historical values.<sup>26</sup> After incorporating design features and mitigation measures adopted in  
8 the Final MND, the Commission concluded that the Project will not result in significant  
9 effects on the environment, including aesthetic values.<sup>27</sup>

10 **2. The Property to be Condemned is Necessary for the Project**

11 GRS and PG&E seek to condemn the Mineral Interests because they are “necessary to  
12 carry out and make effective the principal purpose involved including but not limited to  
13 property used for the protection or preservation of the attractiveness, safety, and usefulness of  
14 the project.”<sup>28</sup> Any entity authorized to acquire property for a particular use through eminent  
15 domain may exercise that power to “acquire any interest in property necessary for that use  
16 including, but not limited to, submerged lands, rights of any nature in water, subsurface rights,  
17 airspace rights, flowage or flooding easements, aircraft noise or operation easements, right of  
18 temporary occupancy, public utility facilities and franchises, and franchises to collect tolls on  
19 a bridge or highway.”<sup>29</sup> Condemnation is also authorized:

20 Where it is necessary to protect a public work or improvement from  
21 detrimental uses on adjoining property, the condemnor has the option either  
22 (1) to acquire an easement-like interest in the adjoining property that will  
23 preclude the detrimental use or (2) acquire the fee or some other interest and  
24 then – if the condemnor desires – lease, sell, exchange, or otherwise dispose  
25 of the property to some other entity or a private person subject to carefully  
26 specified permitted uses.<sup>30</sup>

27  

---

<sup>25</sup> D.09-10-035, *mimeo*, p. 21.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.* at 21-22.

<sup>28</sup> Code of Civ. Proc., § 1240.120(a); *see also* Cal. Law Rev. Comm. Com., foll. Code Civ. Proc., § 1240.120.

<sup>29</sup> Code of Civ. Proc., § 1240.110(a).

<sup>30</sup> Cal. Law Rev. Comm. Com., foll. Code Civ. Proc., § 1240.120

1 In California, the surface owner has the right to store natural gas in subsurface  
2 geological formations, unless that right has been severed in a deed or other conveyance,  
3 subject to an obligation not to unreasonably interfere with a mineral owner's or lessee's right  
4 to explore for and produce oil and gas.<sup>31</sup> GRS and PG&E have acquired storage rights from  
5 the owners of approximately 92% of the land within the Storage Field Boundary and expect to  
6 finalize agreements with the remaining surface owners soon. Where mineral rights have not  
7 been severed from the surface estate, consent to Project operations has been included in the  
8 underground storage leases with the surface owners. Where mineral rights have been severed  
9 from surface rights, GRS and PG&E negotiated or are negotiating separately with the severed  
10 mineral rights owners and lessees to either acquire their mineral rights or their consent to the  
11 operation of the Project, including their agreement not to drill into the Storage Formations to  
12 produce therefrom or to drill through the Storage Formations without GRS' and PG&E's prior  
13 approval. Obtaining the mineral rights or consents from any separate mineral owners and  
14 lessees will preclude such owners or lessees from drilling into or through the Storage  
15 Formations and causing damage to the Storage Formations or the taking of stored gas.  
16 Obtaining such rights will also preclude others from claiming that recoverable gas reserves  
17 exist in the Storage Formations (prior to the injection of gas) or that Project operations have  
18 otherwise unreasonably interfered with their rights.

19 As public utilities with the power of eminent domain, GRS and PG&E seek to  
20 condemn the Mineral Interests for the "principal purpose" of natural gas storage. The Mineral  
21 Interests are necessary to preclude detrimental use or interference by others with natural gas  
22 storage operations at the Project and to preclude claims by mineral owners and lessees that the  
23 Project unreasonably interferes with their right to explore for and produce oil and gas.  
24 Therefore, the Mineral Interests are necessary to preserve the safety and usefulness of the  
25 Project.

26 GRS and PG&E do not seek to condemn all of the mineral rights owned or leased by  
27 the Defendants because they do not want to condemn more property or interests in property  
28 than necessary to conduct the operations authorized by the Commission. GRS and PG&E

---

<sup>31</sup> See Complaint, p. 16; also see GRS Application 08-07-032, p. 11 (the GRS Application is available on the CPUC's web site: [http://www.cpuc.ca.gov/Environment/info/mha/gillranch/pea/Application\\_GR.pdf](http://www.cpuc.ca.gov/Environment/info/mha/gillranch/pea/Application_GR.pdf)).

1 seek only that property and only those interests in property that are necessary to allow each to  
2 provide the storage services authorized in the Decision.

3 The Commission already effectively determined that the Mineral Interests are  
4 necessary for the Project when it approved GRS' and PG&E's applications, authorizing GRS  
5 and PG&E to construct and operate the Project, and provide natural gas storage services using  
6 their respective interests in Project capacity. GRS' and PG&E's applications for CPCNs  
7 described the surface and subsurface rights necessary for the Project and to protect its safety  
8 and usefulness.<sup>32</sup> The Project, including the First and Second Starkey Formations to be used  
9 by GRS and PG&E for natural gas storage services, is described in the Final MND that was  
10 adopted by the Commission.<sup>33</sup> Accordingly, in granting GRS' and PG&E's CPCN  
11 applications and approving the Project and the proposed storage services, the Commission  
12 recognized that the Mineral Interests to be condemned are necessary to preclude interference  
13 by others and to protect the safety and usefulness of the Project.

14 **3. The Public Benefit of Acquiring the Property by Eminent Domain**  
15 **Outweighs the Hardship to the Property Owners**

16 As described in detail above, the Commission has already considered and determined  
17 that (1) the public convenience and necessity require the Project, (2) the Project will result in  
18 substantial public benefits, and (3) any potential adverse effects may be mitigated to less than  
19 significant levels.<sup>34</sup> Specifically, the Commission found that GRS and PG&E demonstrated  
20 that the Project will benefit California's natural gas consumers (*i.e.*, the public) by helping to  
21 ensure the State's natural gas infrastructure is sufficient to meet peak demand requirements,  
22 enhance supply reliability, and provide price stability.<sup>35</sup> Market support for additional storage  
23 services is further evidence of the public benefits of the Project.<sup>36</sup> The Commission also  
24 found that the Project would have significant community employment and economic  
25 benefits.<sup>37</sup> The Commission found that the Project would not result in public harm with  
26 respect to recreational and park areas, historic and aesthetic values, or the environment.<sup>38</sup>

---

32 GRS Application 08-07-032, pp. 11-12; PG&E Application 08-07-033, pp. 11-12.

33 *See, e.g.*, Final MND, pp. MND-1 – MND-2 and Initial Study sections 2.3.1 and 2.3.2.

34 D.09-10-035, *mimeo*, pp. 17-22; Findings of Fact 12 and 13; and Conclusions of Law 2, 4, and 8.

35 D.09-10-035, *mimeo*, pp. 17-19; and Conclusion of Law 2.

36 *Id.*

37 *Id.* at pp. 19-21.

38 *Id.* at pp. 21-22, 58-61; Findings of Fact 12 and 13; and Conclusions of Law 4 and 8.

1 Thus, the Commission has already weighed the benefits of the Project against potential public  
2 harm, and concluded that the benefits outweigh potential harm.

3 Similarly, the Project will not result in hardship to the Defendant Mineral Interest  
4 owners and lessees. GRS and PG&E seek to obtain only the Mineral Interests necessary to  
5 protect the safety and usefulness of the Project. GRS and PG&E do not seek to condemn all  
6 of the mineral rights held by the Defendants. GRS' and PG&E's acquisition of the Mineral  
7 Interests that are necessary to protect the safety and usefulness of the Project does not  
8 preclude the Mineral Interest owners and lessees from using and enjoying the portions of their  
9 mineral rights that GRS and PG&E are not acquiring, subject to GRS' and PG&E's approval  
10 of any such use that may affect the Storage Formations. For example, mineral owners and  
11 lessees may drill wells above the Storage Formations so long as these wells do not affect the  
12 Storage Formations, and they may drill through and into the Storage Formations so long as  
13 they obtain GRS' and PG&E's consent. The Mineral Interest owners and lessees will be  
14 compensated for the Mineral Interests, based on fair market value to be established after this  
15 proceeding, in Superior Court. No one will be required to relocate a home or business as a  
16 result of GRS' and PG&E's acquisition of the Mineral Interests.

17 **4. The Project is Located in a Manner Most Compatible with the Greatest**  
18 **Public Good and the Least Private Injury**

19 GRS and PG&E carefully weighed the public good and the potential for private injury  
20 in selecting the location of the Project. GRS and PG&E provided the Commission with  
21 information regarding alternative storage sites that were considered and rejected. With  
22 respect to the Storage Field, GRS and PG&E evaluated several gas fields before selecting the  
23 Gill Ranch Gas Field for the Project.<sup>39</sup> Applying various criteria, including geologic  
24 characteristics, drive mechanism, number of production wells, location, land use, number of  
25 surface owners, and other storage suitability factors, GRS and PG&E ultimately concluded  
26 the Storage Field best achieved the Project objectives, listed below:<sup>40</sup>

- 27
  - Provide highly-flexible economic natural gas storage services to a variety of
- 28 customers;

---

<sup>39</sup> Proponent's Environmental Assessment for the Project, p. 5-2 (available on the Commission's web site:  
[http://www.cpuc.ca.gov/Environment/info/mha/gillranch/pea\\_toc.htm](http://www.cpuc.ca.gov/Environment/info/mha/gillranch/pea_toc.htm)).

<sup>40</sup> *Id.* at 5-1 – 5-2.

- 1 • Provide storage services using reservoirs with geologic characteristics suitable  
2 to conversion to multiple turn, high deliverability storage;
- 3 • Diversify the location of storage facilities in California by providing centrally-  
4 located storage capacity in the southern San Joaquin Valley;
- 5 • Provide storage services in a geographic area with less intensive present land  
6 use and with land use projected to be less intensive over the long-term;
- 7 • Provide storage services at a location with reasonable access to PG&E's gas  
8 and electric facilities and make use of existing transportation and utility  
9 corridors;
- 10 • Create additional natural gas storage capacity in California to enhance natural  
11 gas supply reliability; and
- 12 • Aid in mitigating natural gas price volatility.

13 After considering the evidence supplied by GRS and PG&E regarding alternative  
14 storage sites, the Commission approved use of the Storage Field, located within the Gill  
15 Ranch Gas Field. As part of its approval of the Project, the Commission approved the Project  
16 location, concluding that the Project is consistent with community values and that it will result  
17 in substantial public benefits, without significant adverse effects on the environment. Any  
18 potential impacts to private agricultural operations in the Project area will be mitigated as  
19 provided in the Final MND. Further, GRS and PG&E seek to obtain only the Mineral  
20 Interests necessary to carry out and protect the safety and usefulness of the Project, and  
21 nothing more.

22 **E. Conclusion**

23 As demonstrated herein, GRS' and PG&E's condemnation of the Mineral Interests  
24 (*i.e.*, the exclusive right to drill through and into the Storage Formations beneath the property  
25 within the Storage Field boundary for the purposes of the injection, storage, and withdrawal  
26 of natural gas, as specified in Section C.1 above), is in the public interest, consistent with  
27 Public Utilities Code section 625(a)(1)(A). As a result, GRS and PG&E request a  
28 Commission Order that finds that: (1) the public interest and necessity require the Project, as  
29 previously determined in D.09-10-035; (2) the Mineral Interests to be condemned are



1 necessary for the Project; (3) the public benefit of acquiring the Mineral Interests by eminent  
2 domain outweighs the hardship to the property owners (or results in no hardship to the  
3 property owners); and (4) the Project is located in a manner most compatible with the greatest  
4 public good and least private injury. GRS and PG&E also require a Commission order  
5 authorizing GRS and PG&E to exercise their condemnation authority under Public Utilities  
6 Code section 613 to acquire each of the Mineral Interests described herein, and for such other  
7 relief as the Commission deems just and proper.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CHAPTER 2**  
**ANSWERS TO COMPLAINT**

Answers to the Complaint were filed by two Defendants, Joseph (“J.”) Curtis Edmondson (“Edmondson Answer”) and Southern States Realty, a California corporation (“SSR Answer”).<sup>41</sup> GRS and PG&E address those answers below.

**A. J. Curtis Edmondson Status**

Since the Edmondson Answer was filed, GRS, PG&E, and Defendant J. Curtis Edmondson have reached agreement with respect to the Project and the mineral rights owned by Defendant Edmondson within the Storage Field Boundary. In light of the recent agreement, GRS and PG&E plan to file a motion soon to dismiss Defendant Edmondson from this proceeding and revise the Exhibits to the Complaint accordingly, and to revise Attachment D to this testimony and, therefore, do not further address the Edmondson Answer in this testimony.

**B. Response to Southern States Realty**

The SSR Answer appears to be a “form” response to an eminent domain complaint, and raises a number of issues about the current use of the Mineral Interests owned by SSR, and the relationship between SSR and Southern California Edison (“SCE”).

The SSR Answer states that “[t]he Complaint fails to state facts sufficient to constitute a cause of action against Edison.”<sup>42</sup> Attorneys of SCE, a CPUC regulated public utility, filed the Answer. According to SCE’s web site, SSR is a subsidiary of SCE.<sup>43</sup> SSR admits that it owns “certain mineral interests in the proposed take area.”<sup>44</sup> SSR also alleges that the Mineral Interests GRS and PG&E seek to condemn from SSR “may already be devoted to a public use” and that “[t]he proposed use is not a more necessary use.”<sup>45</sup> These statements raise issues regarding the nature of the public use to which the Mineral Interests may have been devoted, whether the ownership by SSR of property that may be devoted to public use is

---

<sup>41</sup> The Edmondson Answer was filed with the Commission, but not served on GRS or PG&E. GRS obtained the Edmondson Answer from the Commission’s web site.

<sup>42</sup> SSR Answer, sec. III, par. 13.

<sup>43</sup> See SCE web site: [http://www.edison.com/files/ErX\\_corporateStructure.pdf](http://www.edison.com/files/ErX_corporateStructure.pdf) .

<sup>44</sup> SSR Answer, Section II, par. 3, 6, 9.

<sup>45</sup> SSR Answer, sec. III, par. 14 (*also see* par. 15).

1 consistent with the Commission's Affiliate Transaction Rules, and/or whether SSR should be  
2 regulated by the CPUC as a public utility.

3 SSR also states that "complaining party has failed to avail itself of all available  
4 avenues to acquire the property voluntarily rather than by resorting to condemnation, and has  
5 failed to make a required offer, has failed to offer an appraisal, has failed to enter into good  
6 faith negotiations, etc."<sup>46</sup> In fact, the Complainants have diligently and in good faith  
7 attempted to negotiate an agreement with SSR. GRS' property consultants began contacting  
8 SSR in June 2008. Multiple telephonic and electronic communications followed, as well at  
9 least one in-person meeting. On April 1, 2009, a written offer, including a mineral owner  
10 consent agreement form, was sent by U.S. Mail to SSR.

11 It also appears from Defendant SSR's statement that it is entitled to just compensation  
12 for the taking of its property, as well as other compensation, and the statement quoted in the  
13 immediately preceding paragraph, that Defendant SSR misconstrues the nature of this  
14 proceeding and the Commission's role.<sup>47</sup> When a public utility seeks to condemn property for  
15 the purpose of offering competitive services, it must first file a complaint with the  
16 Commission asking the Commission to find, after a hearing, that the proposed condemnation  
17 would be in the public interest.<sup>48</sup> If the Commission finds that the proposed condemnation  
18 would serve the public interest, the public utility may then file an eminent domain action in  
19 superior court to condemn the property. A Commission decision on such a complaint will  
20 address only whether the proposed condemnation is in the public interest and will not address  
21 the value of the property. The value of the property will be determined in the subsequent  
22 superior court action. Thus, condemnors are not required to make an offer or obtain an  
23 appraisal until the superior court valuation proceeding.

24 Here, because GRS and PG&E seek to condemn property for the purpose of offering  
25 competitive services, they filed the instant Complaint seeking a finding from the Commission  
26 that the proposed condemnation is in the public interest, pursuant to Public Utilities Code  
27 section 625. Jurisdiction to make the requested finding rests with the Commission.<sup>49</sup> As

---

<sup>46</sup> SSR Answer, sec. III, par. 21.

<sup>47</sup> SSR Answer, sec. III, par. 16.

<sup>48</sup> Pub. Util. Code, § 625(a)(1)(A).

<sup>49</sup> Pub. Util. Code, § 625(a)(1)(A).

1 noted above, the Commission previously determined in D.09-10-035 that the Project is in the  
2 public interest, and the Complaint and this testimony demonstrates that the proposed  
3 condemnation satisfies the public interest criteria of Public Utilities Code section 625.

4 In sum, Defendant SSR has offered no basis for any conclusion other than that the  
5 proposed condemnation of Defendant's Mineral Interests is in the public interest.

1 **STATEMENT OF QUALIFICATIONS**  
2 **CHARLES E. STINSON, P.E.**

3  
4 My name is Charles E. Stinson, P.E. I am Vice President, Engineering and  
5 Operations, of Gill Ranch Storage, LLC, where I have been employed since GRS was formed  
6 in September 2007. My business address is 220 NW Second Avenue, Portland, Oregon  
7 97209.

8 I received a bachelor's degree in Applied Mathematics from the University of  
9 Colorado and am a registered Petroleum Engineer in Oregon. I have been employed by NW  
10 Natural for 31 years in a variety of development and operating positions, and currently serve  
11 as Managing Director, Project Development. During my career at NW Natural and its  
12 subsidiary companies, I have been directly responsible for the development of numerous  
13 pipeline and underground storage projects, as well as the exploration and production of  
14 natural gas in various locations in the western United States. I am a current member and past  
15 chairman of the American Gas Association's Underground Storage Committee.

16 I supervised the preparation of and am sponsoring Exhibit GRS-1, the direct testimony  
17 in support of the Complaint for Authorization to Condemn Property in the Public Interest  
18 Pursuant to Public Utilities Code Section 625 (Case C.10-02-011).

19 This concludes my statement of qualifications.

**ATTACHMENTS**

1

2

3 Attachment A

Project Map

4 Attachment B

Map of Mineral Interests to be Condemned

5 Attachment C

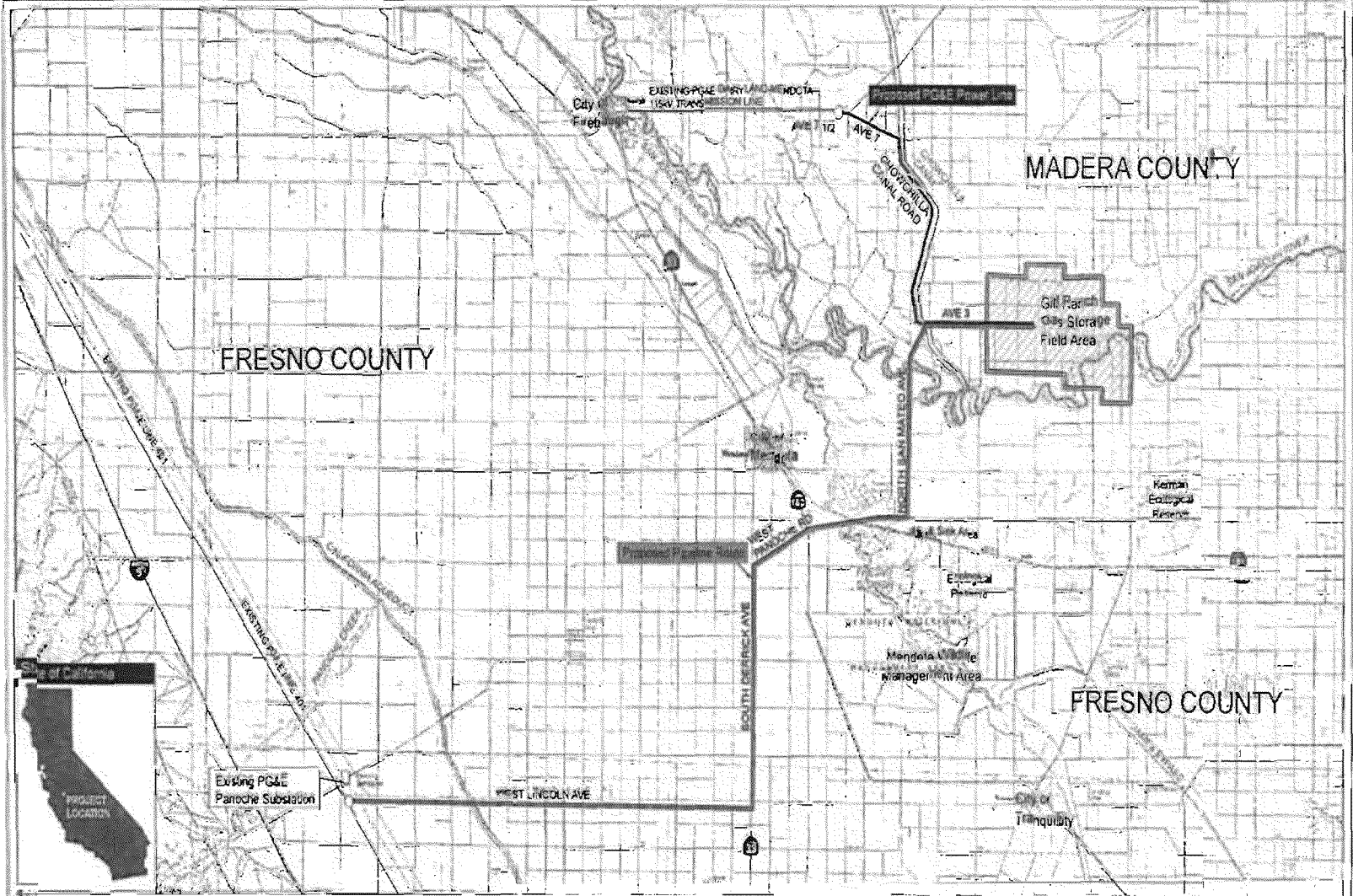
Storage Formations

6 Attachment D

Legal Descriptions of Mineral Interests to be Condemned


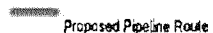




ATTACHMENT A

Figure 2.1-1: Project Elements



SOURCE: U.S. Geological Survey, EROS Data Center, Sioux Falls, SD 2009 and RMT Inc. 2009

LEGEND

0 1 2 3 4 5 10 Miles

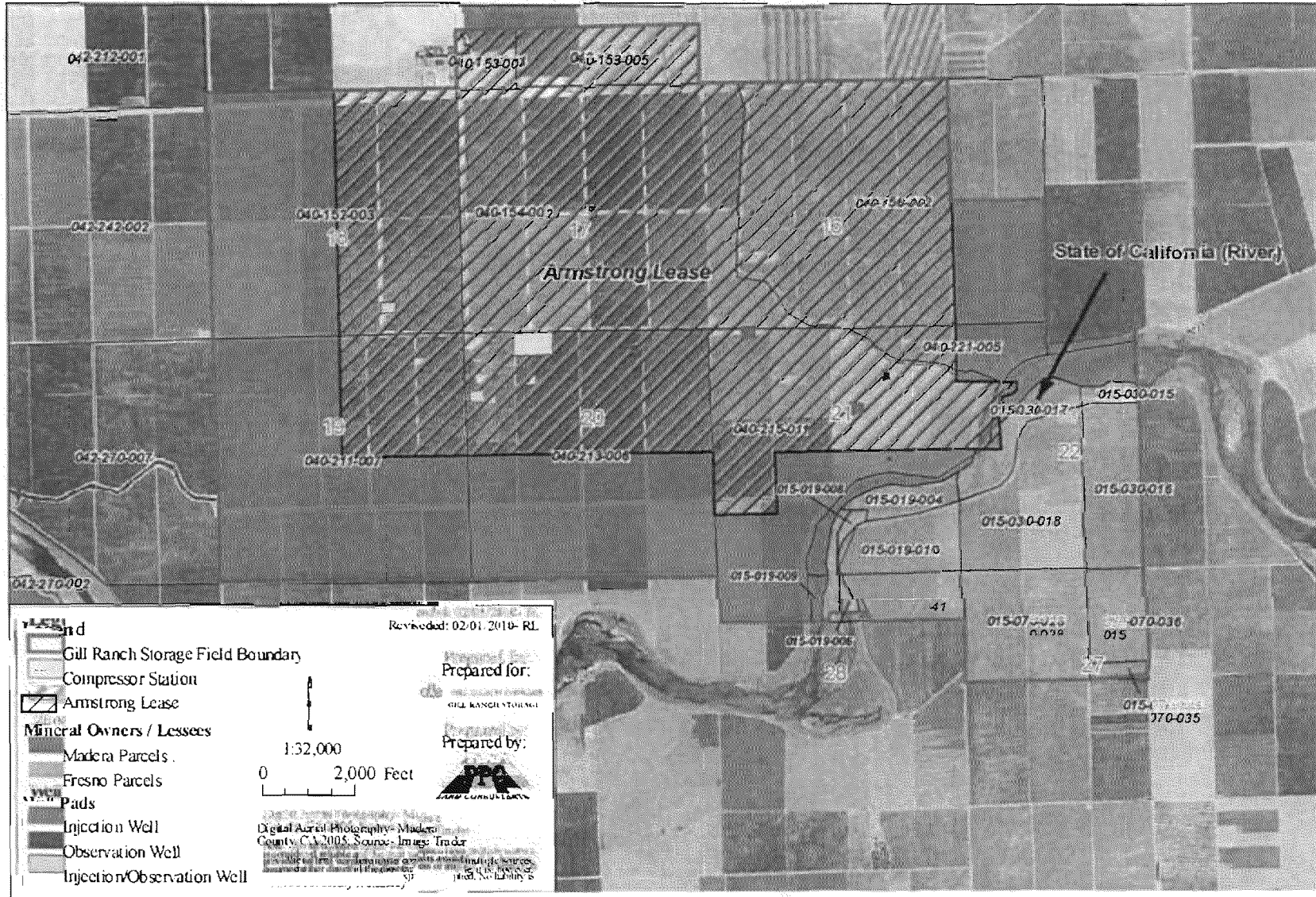


ATTACHMENT B

# Gill Ranch Gas Storage Project - Mineral Ownership and Lessees

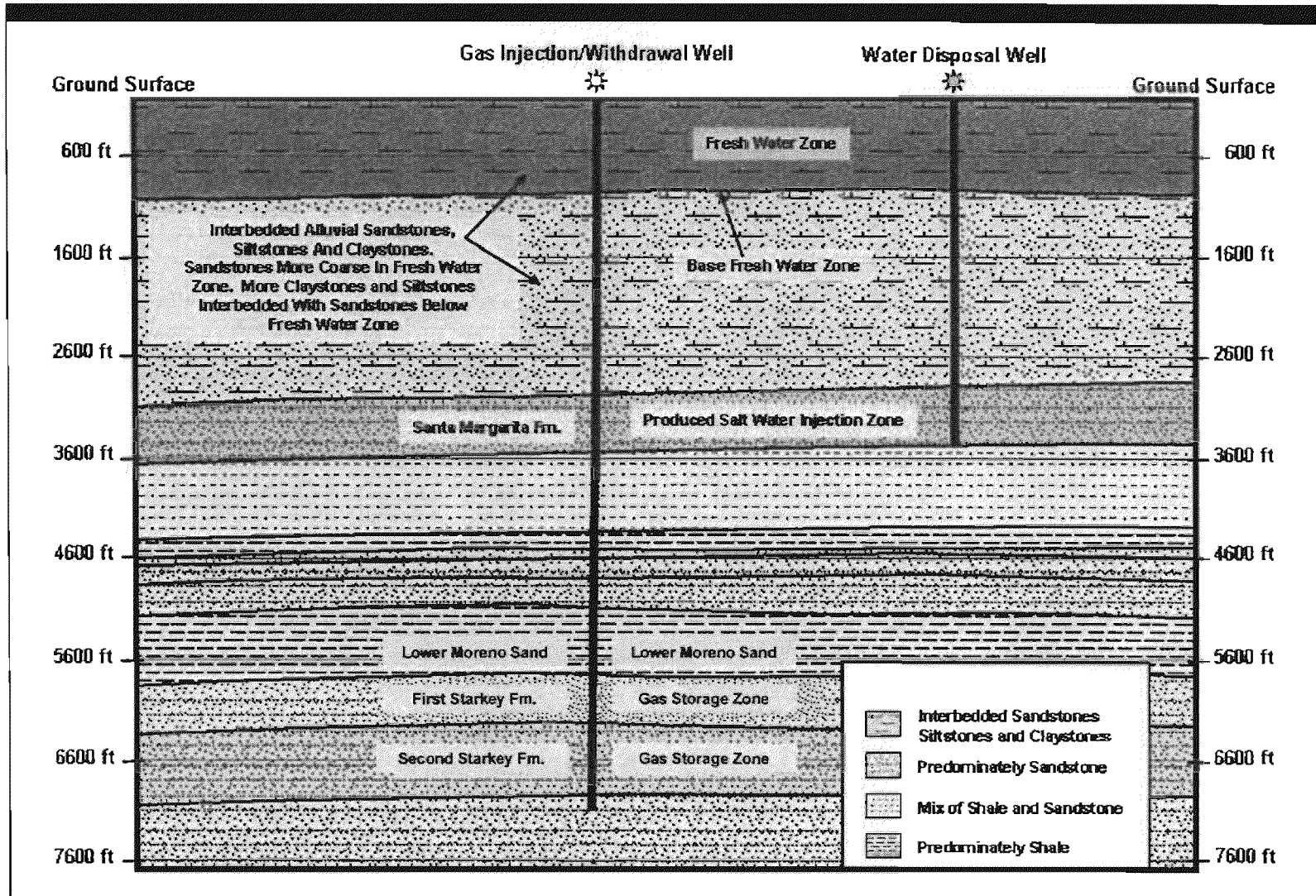
Fresno and Madera Counties, California - T13S R16E, MDB&M

Sections 16-20 and Portions of Sections 7, 15, 21, 22, and 28 (Madera Co.) - Portions of Sections 21, 22, 27, and 28 (Fresno Co.)



ATTACHMENT C

# Storage Formations



ATTACHMENT D

**LEGAL DESCRIPTION FOR MINERAL INTERESTS**

**MADERA COUNTY**

<b>Parcel No.</b>	<b><u>Legal Description</u></b>	<b>Owner Name</b>	<b>APN</b>
1	<p>That portion of the Southwest one-quarter of Section 15, Township 13 South, Range 16 East, M. D. B. &amp; M., lying West of the following described line:</p> <p>Commencing at a point on the North line of said Section 15 which bears North 89° 13' 00" East a distance of 2032.23 feet from the Northwest corner thereof; thence South 00° 27' 42" East a distance of 5297.14 feet, more or less to the South line of said Section 15. (124.112 acres +/-)</p>	Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust	040-156-002 (PTN) <sup>1</sup>
2	The fractional West one-half Section 18, Township 13 South, Range 16 East, M. D. B. & M. (326.02 acres +/-)	Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust	040-152-003 (PTN)
3	The fractional Northwest one-quarter and the Southeast one-quarter of the Southwest one-quarter of Section 19, Township 13 South, Range 16 East, M. D. B. & M. (204.33 acres +/-)	Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust	040-211-007(PTN)

<sup>1</sup> "(PTN)" as used herein means a portion of the designated Assessor's Parcel Number.

4	<p>All of that portion of State Swamp and Overflow Survey No. 174 in the Northwest one-quarter of the Southeast one-quarter in Madera County in Section 21; All of State Swamp and Overflow survey 710 in Section 21 and all that portion of Lot 3 of Section 21 lying within the South one-half of Section 21, Township 13 South, Range, 16 East, M. D. B. &amp; M. (49.10 acres +/-)</p>	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p>	<p>040-215-008(PTN) 040-215-011(PTN)</p>
5	<p>Lots 1, 2 and 3 in Section 22; All of that portion of State Swamp and Overflow Survey No's 532 and 527 in Madera County in Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M. EXCEPTING THEREFROM that portion within the East one-half of the Northeast one quarter of said Section 22.</p> <p>ALSO EXCEPTING THEREFROM all that land lying west of the West bank of the San Joaquin River located in Lots 1, 2 and 3 in Section 22, also described as State Swamp and Overflow Surveys 527 and 532; Township 13 South, Range 16 East, M. D. B. &amp; M., Madera County CA, within the following description of land:</p> <p>The SW/4 of SW/4 of NW/4; The NW/4 of SW/4 of NW/4; The N/2 of NE/4 of SW/4 of NW/4; The SW/4 of NE/4 of SW/4 of NW/4; and The E/2 of SE/4 of SW/4 of NW/4 of said Section 22</p>	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p>	<p>040-221-004 040-221-005(PTN)</p>

	<p>ALSO EXCEPTING THEREFROM that portion of Government Lots 2 and 3, and State Swamp and Overflow Surveys No. 527 and 383, all in Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M., according to the Official Plats thereof, lying North of the Northerly boundary of that parcel of land granted to the Sacramento and San Joaquin Drainage District by deed recorded November 10, 1966 in Book 974, page 440, Official Records of Madera County, Document No. 14630, and East of the following described line:</p> <p>Commencing at a point on the North line of Section 15, Township 13 South, Range 16 East, M. D. B. &amp; M., which bears North 89°13' 00" East a distance of 2032.23 feet from the Northwest corner thereof; thence South 00° 27' 42" East a distance of 5899.62 feet, more or less, to a point on said Northerly boundary of that parcel granted to the Sacramento and San Joaquin Drainage District. (97.87 acres +/-)</p>		
6	<p>All of Lot 1 of Section 28; All of that portion of State Swamp and Overflow Survey No.175 in Madera County in Sections 21 and 28; and all of State Swamp and Overflow Survey No. 3586 in the Northwest one-quarter of the Northwest one-quarter of Section 28, Township 13 South, Range 16 East, M. D. B. &amp; M. EXCEPT THEREFROM any</p>	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p>	<p>040-215-008 (PTN) 040-215-011 (PTN) 040-216-005 (PTN) 040-216-007 (PTN)</p>



	portion lying South of the South line of the North one-half of the Northwest one-quarter of said Section 28. (75.00 acres +/-)		
7	Lots 1 and 2 in Section 21, Township 13 South, Range 16 East, M. D. B. & M. (84.37 acres +/-)	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	040-215-011 (PTN)
8	That portion in Madera County of Swamp and Overflowed Lands Survey No. 350, being all of the Northeast one-quarter of the Southeast one-quarter of Section 21, Township 13 South, Range 16	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as</p>	040-215-006 (PTN) 040-215-011 (PTN)

	<p>East, M. D. B. &amp; M., EXCEPTING THEREFROM 3/10ths acre lying outside of the United States Segregation Line. (18.15 acres +/-)</p>	<p>Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	
9	<p>That part of Swamp and Overflowed Lands Survey No. 381 in Madera County, being part of the Northwest one-quarter of the Southwest one-quarter adjoining to and Southerly of the United States Meander Line, in Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M (6.33 acres +/-)</p>	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not</p>	<p>040-215-006 (PTN) 040-215-011 (PTN)</p>

		<p>limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	
10	<p>The Southeast one-quarter of Section 19, Township 13 South, Range 16 East, M. D. B. &amp; M. EXCEPTING THEREFROM the North 790 feet thereof.</p>	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	040-211-007 (PTN)

		Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership	
11	The South one-half of Section 20, Township 13 south, Range 16 East, M. D. B. & M. EXCEPTING THEREFROM the North 790 feet thereof.	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	040-213-006 (PTN)
12	The North one-half of the Southwest one-quarter and the Southwest one-quarter of the Southwest one-quarter of Section 19, Township 13 South, Range 16 East, M. D. B. & M. EXCEPTING THEREFROM the North 560 feet of the East 1270 feet of the North one-half of the	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on</p>	040-211-007 (PTN)

	Southwest one-quarter.	<p>December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Joseph Curtis Edmondson</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	
13	The North 560 feet of the East 1270 feet of the North one-half of the Southwest one-quarter, and the North 790 feet of the Southeast one-quarter of Section 19; and the North 790 feet of the South one-half of Section 20, Township 13 South, Range 16 East, M. D. B. & M.	<p>Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&amp;M Trust</p> <p>Southern States Realty, a California corporation</p> <p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Brooke S. Antrim, Michael F. Antrim &amp; Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p>	<p>040-211-007 (PTN)</p> <p>040-213-006 (PTN)</p>

		Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond [Contingent Interest]	
		Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership [Contingent Interest]	

**LEGAL DESCRIPTION FOR MINERAL INTERESTS**

**FRESNO COUNTY**

<b>Parcel No.</b>	<b><u>Legal Description</u></b>	<b>Owner Name</b>	<b>APN</b>
1	Lot 5 in Section 21, Township 13 South, Range 16 East, M. D. B. & M. (33.42acres +/-)	All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams  Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman <sup>2</sup>	015-190-10 (PTN)

<sup>2</sup> Only insofar as lying outside that portion of Sections 21 and 22 in Fresno County within the following described parcel. Being that portion Described in that certain Partial Surrender of Oil and Gas Lease Recorded August 31, 1945 in Book 2287 OR 451 Fresno County Records, described as follows:

Beginning at the quarter corner to Sections 21 and 22, Township 13 South, Range 16 East, M. D. B. & M., Thence Westerly along the Centerline of said Section 21, 3960 feet, more or less, to the Northwest corner of the Northeast quarter of the Southwest quarter of said Section 21, thence Southerly 1700 feet along the section subdivision line, thence Easterly 3960 feet, more or less, parallel with the centerline of said Section, to a point on the East boundary of said Section 21, thence continuing Easterly 160 feet, thence North 45° East 1900 feet, more or less, thence Northerly parallel with , and 1500 feet distant from the West boundary of Section 22, 2000 feet, more or less to the

		<p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited</p>	
--	--	--	--

Fresno-Madera County Line, thence following the said county line Southwesterly to the North boundary of the southwest quarter of Section 22, thence Westerly along the said North boundary to the point of beginning.

		partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond	
2	A fraction in the Southwest one-quarter of the Southeast one-quarter of Section 21 and a fraction of the Northwest one-quarter of the Northeast one-quarter of Section 28, Township 13 South, Range 16 East, M. D. B. & M., lying adjacent to and Westerly of the U. S. Meander Line embraced in Swamp and Overflowed Lands Survey No. 288. (58.48 acres +/-)	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams <b>[as to that portion of Parcel 2 lying outside of Section 28]</b></p> <p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property <b>[as to that portion of Parcel 2 lying within Section 28]</b></p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p>	015-190-10 (PTN) 015-060-41 (PTN)



		<p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
3	That portion of Swamp and Overflowed Lands Survey No. 350, in Fresno County, within Section 21, Township 13 South, Range 16 East, M. D. B. & M. (11 acres +/-)	All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams	015-190-04 (PTN) 015-190-10 (PTN)

		<p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p>	
--	--	---	--

		Earl Brix Fenston, Jr. <sup>2</sup>  Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond	
4	A fraction in the Southeast one-quarter of the Southeast one-quarter of Section 21, Township 13 South, Range 16 East, M. D. B. & M, embraced in Swamp and Overflowed Lands Survey No. 519 and more particularly described as follows: Beginning at the Northwest corner of the Southeast quarter of the Southeast quarter of said Section 21, thence East 17.39 chains to the United States Meander Line; thence following said meander line South 60° West 12.82 chains; thence South 43° West 9.23 chains; thence North 13.15 chains to the place of beginning. (9.70 acres +/-)	All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams  Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman <sup>2</sup>  Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992  Southern States Realty, a California corporation  Joseph Curtis Edmondson  Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership  All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka	015-190-04 (PTN) 015-190-10 (PTN)

		<p>Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
5	<p>Lots 4 and 5 and the Southeast one-quarter of the Southwest one-quarter of Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M. (137.14 acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p>	<p>015-030-17 (PTN) 015-030-18 (PTN)</p>

<sup>3</sup> Township 13 South, Range 16 East, MDB&M Fresno County, California: Only as to any portion lying within the geographic boundaries of those portions of Lots 1, 2, 3 and 4 in Section 21; Lots 1, 2, 3, 4, 5 and 6 of Section 22 except that portion in the projected East half of the East half thereof; and that portion of Lots 1 and 2 of the projected the North half of the North half of Section 28; and those portions of State Swamp and Overflow Survey numbers 174, 175, 288, 350, 381, 382, 519, 527, 532, 710, 3372 and 3586 within the boundaries of the aforesaid projected sectional confines, lying within the area described in the deeds recorded in Fresno County referenced herein: A) Intentionally omitted; B) January 25, 1966, in Book 5267 OR page 425 (Surface QCD Brown par 3851) Fresno County Records; C) January 25, 1966, in Book 5267 OR page 435 (Surface QCD Imeson par 3845) Fresno County Records; D) January 25, 1966, in Book 5267 OR page 441 (Surface QCD Brown par 3845) Fresno County Records; E) January 27, 1966, in Book 5268 OR page 522 (Surface QCD Brown par 3872) Fresno County Records; F) September 21, 1966 in Book 5359 OR page 269 (C. Thomas in E/2 22 this and OP par 3845) Fresno County Records; G) October 14, 1966 in Book 5367 OR page 270 (S. Thomas in Sec 21 28 and J) OP par 3851) Fresno County Records; H) August 21, 1968 in Book 5604 OR page 151 (Soares in W/2 22 par 3872) Fresno County Records.

		<p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p>	
--	--	---	--

		<p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Duane Lee Soares<sup>3</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
6	<p>That portion of Lot 6 and the Southeast one-quarter of Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M., lying in the West half of the East half of said Section 22. (98.07 acres+/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust</p> <p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce</p>	015-030-16 (PTN)

		<p>I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman</p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such</p>	
--	--	--	--

		<p>trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
7	<p>That portion of the Northeast one-quarter of the Southwest one-quarter of Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M. being Part D of Swamp and Overflowed Lands Location No. 3372, more particularly described as follows: Beginning at the Northwest corner of the Northeast quarter of the Southwest quarter of said Section 22, thence East 7.50 chains; thence South 49°45' West 9.90 chains along the segregation line, thence North 6.40 chains to the point of beginning. (2.40 acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p>	015-030-18 (PTN)



		<p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Duane Lee Soares<sup>3</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
8	<p>That part of Swamp and Overflowed Lands Survey No. 381 in Fresno County being part of the Northwest quarter of the Southwest quarter of Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M. (18.67 acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L.</p>	<p>015-030-17 (PTN) 015-030-18 (PTN)</p>

		<p>Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Duane Lee Soares<sup>3</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited</p>	
--	--	--	--

		partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond	
9	A fraction in the Southeast quarter of the Northwest quarter and a fraction in the Southwest quarter of the Northeast quarter of Section 22, Township 13 South, Range 16 East, M. D. B. & M., lying between the United States Meander Lines embraced in Swamp and Overflowed Lands Survey No. 382. (57 acres +/-)	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust <b>[Only as to that portion lying within the East Half of Section 22]</b></p> <p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas <b>[Only as to that portion lying within</b></p>	<p>015-030-15 (PTN)</p> <p>015-030-16 (PTN)</p> <p>015-030-17 (PTN)</p> <p>015-030-18 (PTN)</p>

		<p><b>the East Half of Section 22]</b></p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup> <b>[Only as to that portion lying within the West Half of Section 22]</b></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice</p>	
--	--	---	--

		<p>Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup> <b>[Only as to that portion lying within the West Half of Section 22]</b></p> <p>Duane Lee Soares<sup>3</sup> <b>[Only as to that portion lying within the West Half of Section 22]</b></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
10	The Northwest one-quarter of Section 27, Township 13 South, Range 16 East, M. D. B. & M. (160 acres +/-)	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p>	015-070-28

		<p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
11	<p>The West one-half of the Northeast one-quarter of Section 27, Township 13 South, Range 16 East, M. D. B. &amp; M. (80 acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to,</p>	<p>015-070-35 (PTN) 015-070-36 (PTN)</p>

		<p>Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust</p> <p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman</p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p>	
--	--	--	--

		<p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
12	<p>That portion of the Northeast one-quarter of the Northeast one-quarter of Section 28, Township 13 South, Range 16 East, M. D. B. &amp; M. being Part G of Swamp and Overflowed Lands Location No. 3372, more particularly described as follows: Beginning at the southwest corner of the Northeast quarter of the</p>	<p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held</p>	015-060-41 (PTN)



	<p>Northeast quarter of Said Section 28; thence East 6.40 chains; thence along the segregation line North 33°15' West 7 chains; thence North 27°West 5.50 chains; thence North 42°West 0.40 chains; thence South 11 chains to the point of beginning. (3.40 acres +/-)</p>	<p>originally as husband and wife as community property</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice</p>	
--	--	--	--

		<p>Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
13	<p>That portion of Lot 2 within the North half of the Northeast quarter of Section 28, Township 13 South, Range 16 East, M. D. B. &amp; M. (40.35 acres +/-)</p>	<p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p>	015-060-41 (PTN)

		<p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
14	<p>All that portion of State Swamp and Overflowed Lands Survey No. 174 situated in that portion of Section 21, Township 13 South, Range 16 East, M. D. B. &amp; M, lying and being in Fresno County. (8 acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees</p>	015-190-04 (PTN)

		<p>of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p>	
--	--	--	--

		Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond	
15	All that portion of State Swamp and Overflowed Lands Survey No. 527 situated in that portion of Section 22, Township 13 South, Range 16 East, M. D. B. & M, lying and being in Fresno County. (5 acres +/-)	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust [<b>Only as to that portion lying within the East Half of Section 22</b>]</p> <p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan</p>	015-030-15 (PTN) 015-030-17 (PTN)

and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas **[Only as to that portion lying within the East Half of Section 22]**

Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup> **[Only as to that portion lying within the West Half of Section 22]**

Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992

Southern States Realty, a California corporation

Joseph Curtis Edmondson

Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership

All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94

Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown

		<p>and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup> <b>[Only as to that portion lying within the West Half of Section 22]</b></p> <p>Duane Lee Soares<sup>3</sup> <b>[Only as to that portion lying within the West Half of Section 22]</b></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
16	<p>All that portion of State Swamp and Overflowed Lands Survey No. 532 situated in that portion of Section 22, Township 13 South, Range 16 East, M. D. B. &amp; M, lying and being in Fresno County. (8acres +/-)</p>	<p>All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p>	<p>015-030-17 (PTN) 015-030-18 (PTN)</p>

		<p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Duane Lee Soares<sup>3</sup></p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
17	All that portion of State Swamp and Overflowed Lands Survey No. 175 situated in the Northeast quarter of the Northwest quarter of Section 28 and that portion the	All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka	015-190-09



	<p>Southeast quarter of the Southwest quarter of Section 21, Township 13 South, Range 16 East, M. D. B. &amp; M, lying and being in Fresno County. (14 acres +/-)</p>	<p>Julie H. Williams [<b>Only as to that portion lying outside Section 28</b>]</p> <p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property [<b>Only as to that portion lying inside Section 28</b>]</p> <p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>Brooke S. Antrim, Michael F. Antrim and Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992</p> <p>Southern States Realty, a California corporation</p> <p>Joseph Curtis Edmondson</p> <p>Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership</p> <p>All of the heirs and devisees of Blanche G. Brown, deceased,</p>	
--	---	---	--

		<p>including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p> <p>Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987</p> <p>Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond</p>	
18	<p>That portion of the Southwest quarter of the Southeast quarter of Section 21 and that portion of the Northwest quarter of the Northeast one-quarter of Section 28, Township 13 South, Range 16 East, M.D.B.&amp;M. being a portion of Part F of Swamp and Overflowed Lands Location No. 3372, more particularly described as follows: Beginning at the Quarter Section corner between</p>	<p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman<sup>2</sup></p> <p>All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to</p>	<p>015-190-06 (PTN) 015-190-08 (PTN) 015-190-09 (PTN) 015-190-10 (PTN)</p>

	<p>Sections 21 and 28, thence North 25° East 22.36 chains; thence West 7.60 chains; thence South 38° West 4.60 chains; thence South 33.49 chains; thence East 8.77 chains; thence North 25° West 19.48 chains, to the place of beginning. (17acres +/-)</p>	<p>Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual; and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94</p> <p>Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby</p> <p>Earl Brix Fenston, Jr.<sup>2</sup></p>	
--	---	---	--

### MADERA COUNTY LESSEES

APN	Lessee name	Lessee contact information
040-156-002 (PTN) 040-152-003 040-211-007 040-213-006 040-215-006 040-215-008 040-216-007 040-215-011 040-221-004 (PTN) 040-221-005 040-216-005	Gary Player Ventures <sup>4</sup>	1671 W. 546 S. Cedar City, UT 84720
040-152-003 040-156-002 040-211-007 040-213-006 040-215-011	Jimmy L. Graham, Trustee of the Jim Graham Trust dated October 30, 1984	c/o Donald C. Oldaker Noriega & Bradshaw 1801 18 <sup>th</sup> Street Bakersfield, CA 93301

<sup>4</sup> Gary Player Ventures is a lessee of all of the interests listed in this Attachment D as being owned by Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust.

		c/o Armstrong Petroleum Corporation P.O. Box 1547 Newport Beach, CA 92659
040-152-003 040-156-002 040-211-007 040-215-011 040-215-008	Vern Jones Oil & Gas Corporation	555 University Avenue, Suite 180 Sacramento, CA 95825  2981 Gold Canal Dr. Rancho Cordova, CA 95670

### FRESNO COUNTY LESSEES

APN	Lessee name	Lessee contact information
015-030-18 (PTN) 015-190-40 (PTN) 015-190-10 (PTN) 015-030-17 (PTN) 015-190-08 (PTN) 015-190-09 (PTN)	Vern Jones Oil & Gas Corporation	555 University Avenue, Suite 160 Sacramento, CA 95825  2981 Gold Canal Dr. Rancho Cordova, CA 95670

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Gill Ranch Storage, LLC, and Pacific Gas and Electric Company (U39G),

Complainants

v.

Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust; Gary Player Ventures; Southern States Realty, a California corporation; All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams; Brooke S. Antrim, Michael F. Antrim & Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992; Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership; Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond; Joseph Curtis Edmondson; Jimmy L. Graham, Trustee of the Jim Graham Trust dated October 30, 1984; Vern Jones Oil & Gas Corporation; All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry, V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual, and V. Lynn Grigsby, as Trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94; Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such Trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby; All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and

(EDM)

Case 10-02-001

(Filed February 2, 2010)

**PROOF OF SERVICE**

devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property; Earl Brix Fenston, Jr.; Daniel L. Herman, Executor of the Estate of Jeffrey Fenston, and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman; All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas; All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; Duane Lee Soares; Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987,

Defendants

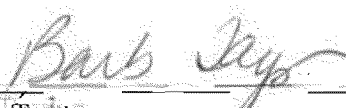
**PROOF OF SERVICE**

I hereby certify that I am a citizen of the United States of America, over 18 years of age. My address is 3620 American River Drive, Suite 205, Sacramento, CA 95864, and I am not a party to or interested in the above proceeding.

On April 9, 2010, I served a copy of **CONCURRENT DIRECT TESTIMONY ON BEHALF OF GILL RANCH GAS STORAGE PROJECT** on the addressees in the attached list as follows:

- 1. By personally delivering to, and leaving with, each addressee a copy of the Complaint and any other documents described above, at the address shown on the attached list or;
- 2. By depositing in the U.S. mail and via electronic mail to those whose addresses are available, a copy of the **CONCURRENT DIRECT TESTIMONY ON BEHALF OF GILL RANCH GAS STORAGE PROJECT** and any other documents described above, in a sealed envelope, postage prepaid, first-class mail, addressed to each addressee at the address shown on the attached list; or
- 3. Other method of service: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on April 9, 2010 at Sacramento, California.

  
\_\_\_\_\_  
Barb Taylor

Honorable Maribeth A. Bushey, ALJ 505 Van Ness Avenue, Room 5018 San Francisco CA 94102 3298 <a href="mailto:mab@cpuc.ca.gov">mab@cpuc.ca.gov</a>	Richard A. Myers Public Utilities Commission San Francisco Office 505 Van Ness Avenue San Francisco, CA 94102
--	---

Eugene Cadenasso Public Utilities Commission San Francisco Office 505 Van Ness Avenue San Francisco, CA 94102 cpe@cpuc.ca.gov	J. Jason Reiger Public Utilities Commission San Francisco Office 505 Van Ness Avenue San Francisco, CA 94102 jzr@cpuc.ca.gov
--	---

**RESPONDENT PROPERTY OWNERS/LESSEES**

**OWNERS**

Southern States Realty, a California corporation  Attn: Lisa Salinas 14799 Chestnut Street Westminster, CA 92683	Southern States Realty, a California corporation  Attn: Vicki M. Kaiser 2244 Walnut Grove Avenue Rosemead, CA 91770
All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams  Julie Williams 4125 Hillcrest Drive Boise, ID 83705	Brooke S. Antrim, Michael F. Antrim & Laurel C. Antrim, as Successor Co-Trustees of the Calvin and Ines Antrim Revocable Trust created on December 28, 1992  Brooke S. Antrim, Michael F. Antrim & Laurel C. Antrim 1357 West Shaw Avenue, #104 Fresno, CA 93711
All of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams  24424 Calle Torcido El Toro, CA 92630	Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership 16475 Dallas Parkway, Suite 610 Addison, TX 75001
Will Gill, Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees of the Gill OG&M Trust  Will Gill Jr., Robert Cadenazzi and Lee L. Gill, Co-Trustees 21501 Road 400 Madera, CA 93636-8137	Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond



	Kingdon R. Hughes Family Limited Partnership 16475 Dallas Parkway, Suite 610 Addison, TX 75001
Neil F. Ormond and/or Kingdon R. Hughes Family Limited Partnership, a Texas limited partnership, to the extent that it owns the executive rights of the interest of Neil F. Ormond  Neil F. Ormond 131 West Paul Avenue Clovis, CA 93612	All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual, and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94  V. Lynn Grigsby 149 Debrick Way Grants Pass, OR 97526
Joseph Curtis Edmondson 15490 NW Oak Hills Drive Beaverton, OR 97006	Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn Grigsby  V. Lynn Grigsby 149 Debrick Way Grants Pass, OR 97526
All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual, and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94  1075 NE Hillcrest Grants Pass, OR 97526	All of the heirs and devisees of Blanche G. Brown, deceased, including, but not limited to Janice Fry, aka Janice Darlene Fry; V. Lynn Grigsby, aka Virginia Lynn Grigsby, as an individual, and V. Lynn Grigsby, as trustee of the Blanche G. Brown Revocable Living Trust Agreement dated 9/30/94  Janice Darlene Fry 204 De Laveaga Park Road Santa Cruz, CA 95065
Earl Brix Fenston, Jr. 911 Bakersfield Street Pismo Beach, CA 93449	Clayton Brown, as Successor Trustee Under the Last Will and Testament of Alfred R. Brown and any and all beneficiaries or former beneficiaries under such trust, including, but not limited to Janice Darlene Fry, aka Janice Fry and V. Lynn Grigsby, aka Virginia Lynn

	<p>Grigsby</p> <p>Janice Darlene Fry 204 De Laveaga Park Road Santa Cruz, CA 95065</p>
<p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property</p> <p>Julie Williams 4125 Hillcrest Drive Boise, ID 83705</p>	<p>All of the heirs and devisees of Harold Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams and all of the heirs and devisees of Barbara A. Williams, aka Barbara Jane Williams, deceased, including, but not limited to, Julie Williams, aka Julie H. Williams, held originally as husband and wife as community property</p> <p>24424 Calle Torcido El Toro, CA 92630</p>
<p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to,</p> <p>772 Brussels San Francisco, CA 94134</p>	<p>Daniel L. Herman, Executor of the Estate of Jeffrey Fenston; and all of the heirs and devisees of Jeffrey Allen Fenston, aka Jeffrey Fenston and Jeffrey Alan Fenston, deceased, including, but not limited to, Daniel L. Herman</p> <p>Daniel L. Herman 377 Mandarin Drive, #303 Daly City, CA 94015</p>
<p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas</p>	<p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas</p>

<p>P.O. Box 476 Jackson, WY 83001</p>	<p>Jean Day 4106 Burke Avenue N Seattle, WA 98103</p>
<p>All of the heirs and devisees of J.G. Imeson, aka James G. Imeson, including, but not limited to: (a) all of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust; and (b) all of the heirs and devisees of Joyce Imeson Lucas, aka Joyce I. Lucas, excluding Jennifer R. Lucas, aka Jennifer L. Flanagan and Jennifer R. Flanagan, Robert I. Lucas and Lee S. Lucas</p> <p>Chauncey Kepford 201 Fourth Street, #B Encinitas, CA 92024</p>	<p>Duane Lee Soares 255 N. Grantline Road Fresno, CA 93723</p>
<p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust</p> <p>P.O. Box P Jackson, WY 83001</p>	<p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and Jean Kepford Day, Trustees of the Kepford M. Rev. Trust</p> <p>Jean Day 4106 Burke Avenue N Seattle, WA 98103</p>
<p>All of the heirs and devisees of Rose I. Kepford, aka Rose Imeson Kepford and Susannah Rose Imeson Kepford, deceased, including, but not limited to, Chauncey R. Kepford, an individual, Jean Kepford Day, an individual, and Chauncey R. Kepford and</p>	<p>Duane Lee Soares 614 N. Grantland Ave. Fresno, CA 93722</p>

<p>Jean Kepford Day, Trustees of the Kepford M. Rev. Trust</p> <p>Chauncey Kepford 201 Fourth Street, #B Encinitas, CA 92024</p>	
<p>Duane Lee Soares 365 Grantland Ave. Fresno, CA 93722</p>	<p>Duane Lee Soares 55 Grantland Ave. Fresno, CA 93722</p>
<p>Duane Lee Soares 2915 Van Ness Fresno, CA 93704</p>	<p>Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987</p> <p>Thomas A. Miller 16 Mainberry Drive Madera, CA 93637</p>
<p>Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987</p> <p>Sherman Thomas Farms Attn: Lori Pond 25810 Avenue 11 Madera, CA 93637</p>	<p>Pat Decker and Thomas A. Miller, Successor Trustees of the William Sherman Thomas Revocable Trust of 1987, established on October 28, 1987</p> <p>Pat Decker 1004 Joy Street Madera, CA 93637</p>

**LESSEES**

<p>Gary Player Ventures 1671 W. 546 S. Cedar City, UT 84720</p>	<p>Jimmy L. Graham, Trustee of the Jim Graham Trust dated October 30, 1984</p> <p>c/o Donald C. Oldaker Noriega &amp; Bradshaw 1801 18th Street Bakersfield, CA 93301</p>
<p>Jimmy L. Graham, Trustee of the Jim Graham Trust dated October 30, 1984</p> <p>c/o Armstrong Petroleum Corporation P.O. Box 1547 Newport Beach, CA 92659</p>	<p>Vern Jones Oil &amp; Gas Corporation 555 University Avenue, Suite 180 Sacramento, CA 95825</p>

Vern Jones Oil & Gas Corporation 2981 Gold Canal Dr. Rancho Cordova, CA 95670	
---	--

**RESPONDENTS' REPRESENTATIVES**

Ted Frame Law Offices of Frame & Matsumoto 201 Washington Street Coalinga, CA 93210	
--	--

**OWNERS OF ADJACENT OR BOUNDARY PROPERTIES**

Pardis Orchards and Primex Intl Trading Corp 5777 W. Century Boulevard, #1485 Los Angeles, CA 90045	California Valley Land Co., Inc. P.O. Box 219 Huron, CA 93234
Gravelly Ford LLC 101 Larkspur Landing Circle, Suite 350 Larkspur, CA 94939	Clay S. Groefsema & Janice L. Groefsema, as Trustees of the Clay and Janice Groefsema Trust dated 11/13/90; Mark A. Jones & Sue G. Jones; Tom Beermann & Leigh Beermann; Clay S. Groefsema, Trustee of the Clay S. Groefsema Trust dated October 14, 1990; Bruce K. Groefsema, Trustee of the Bruce K. Groefsema Trust dated October 14, 1990; Anne G. Hurd, Trustee of the Anne G. Hurd Trust dated October 14, 1990; Sue G. Jones, Trustee of the Sue G. Jones Trust dated October 14, 1990; Leigh G. Beermann, Trustee of the Leigh Beermann Trust dated October 14, 1990; Christopher T. Hurd and Anne G. Hurd, Trustees or their Successors in Trust, under the Hurd Family Living Trust dated June 21, 1994, and any amendments thereto; Bruce K. Goefsema and Gail Z. Groefsema, as Trustees of the Burce & Gail Groefsema Family Trust dated March 4, 1999  9499 21 ½ Avenue Lemoore, CA 93245

<p>Larry Sullivan &amp; Betty Sullivan; C.D. Rupe; Teresa D. Buchanan, Trustee of the Opal J. Rupe Testamentary Trust created under the Will of Opal J. Rupe; Teresa Buchanan; Tammy Hoffman; Tanya Weston; Susan Rusconi; Sheryl Imamura</p> <p>P.O. Box 246 Cantua Creek, CA 93608</p>	<p>Sacramento &amp; San Joaquin Drainage District 3310 El Camino Avenue Sacramento, CA 95821</p>
<p>CalMex Farms 5777 W. Century Boulevard, #1485 Los Angeles, CA 90045</p>	<p>California State Lands Commission, State of California 100 Howe Avenue, Suite 100 South Sacramento, CA 95825</p>
<p>Metropolitan Life Insurance Company 7411 N. Cedar Avenue Fresno, CA 93720</p>	<p>Steven D. Schaad &amp; Barbara L. Schaad 440 S. 4<sup>th</sup> Street Kerman, CA 93630</p>
<p>Larry Shehaday Farms LTD 144 E. Belmont Avenue Fresno, CA 93701</p>	

**PUBLIC AGENCIES**

<p>Aliso Water District 10302 Avenue 7 1/2 Firebaugh, CA 93622</p>	<p>Lower San Joaquin Levee District 11704 W. Henry Miller Avenue Dos Palos, CA 93620</p>
--	--

**COUNTIES**

<p>County of Madera Planning Department 2037 W. Cleveland Avenue, M.S. G Madera, CA 93637</p>	<p>County of Fresno Public Works and Planning 2220 Tulare Street, 6<sup>th</sup> Floor Fresno, CA 93721</p>
---	---

**OTHER UTILITIES/ENTITIES OFFERING PROPOSING  
COMPETITIVE GAS STORAGE SERVICE**

<p>Lodi Gas Storage, L.L.C. c/o James W. McTarnaghan Duane Morris, LLP Spear Tower, Suite 2200 One Market Plaza San Francisco, CA 94105-1127</p>	<p>Wild Goose Storage, Inc. c/o Jeanne B. Armstrong Goodin MacBride Squeri Day &amp; Lamprey LLP 505 Sansome Street, Suite 900 San Francisco, CA 94111</p>
<p>Central Valley Gas Storage, LLC c/o Nicor, Inc. P.O. Box 3014 Naperville, IL 60566-7014</p>	<p>Sacramento Natural Gas Storage, LLC c/o Law Office of Alfred F. Jahns 3436 American River Drive, Suite 12 Sacramento, CA 95864</p>

**MISCELLANEOUS PARTIES**

<p>Case Administration Southern California Edison Company Law Department 2244 Walnut Grove Avenue, Room 370 Rosemead, CA 91770</p>	<p>Southern States Realty, a California corporation Attn: Lisa Delorme Attorney 2244 Walnut Grove Avenue P.O. Box 800 Rosemead, CA 91770</p>
<p>Bernice E. Seidel Clerk to the board of Supervisors County of Fresno 2281 Tulare Street, Room 301 Fresno, CA 93721-2198</p>	<p>Tanna G. Boyd Chief Clerk Of The Board Of Supervisors COUNTY OF MADERA 200 WEST 4TH STREET MADERA CA 93637</p>
<p>Judi K. Mosley PACIFIC GAS AND ELECTRIC COMPANY PO BOX 7442 SAN FRANCISCO CA 94120</p>	<p>Charles E. Stinson, P.E. GILL RANCH STORAGE, LLC 220 NW 2ND AVENUE PORTLAND OR 97209</p>

Joshua S. Levenberg PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE STREET, B30A SAN FRANCISCO CA 94105	Robert T. Howard PACIFIC GAS AND ELECTRIC COMPANY PO BOX 7442 SAN FRANCISCO CA 94120
---	--

**PARTIES SERVED BY ELECTRONIC MAIL:**

Lisa.Delorme@sce.com; tboyd@madera-county.com; bseidel@co.fresno.ca.us; j3ls@pge.com;  
 JKM8@pge.com; RTHc@pge.com; atowbridge@daycartermurphy.com;  
 CStinson.GRS@nwnatural.com; Case.Admin@sce.com; jwmctarnaghan@duanemorris.com;  
 jarmstrong@goodinmacbride.com; thunckler@daycartermurphy.com; ajahns@jahnsatlaw.com;  
 cpe@cpuc.ca.gov; jzr@cpuc.ca.gov; mab@cpuc.ca.gov; ram@cpuc.ca.gov