

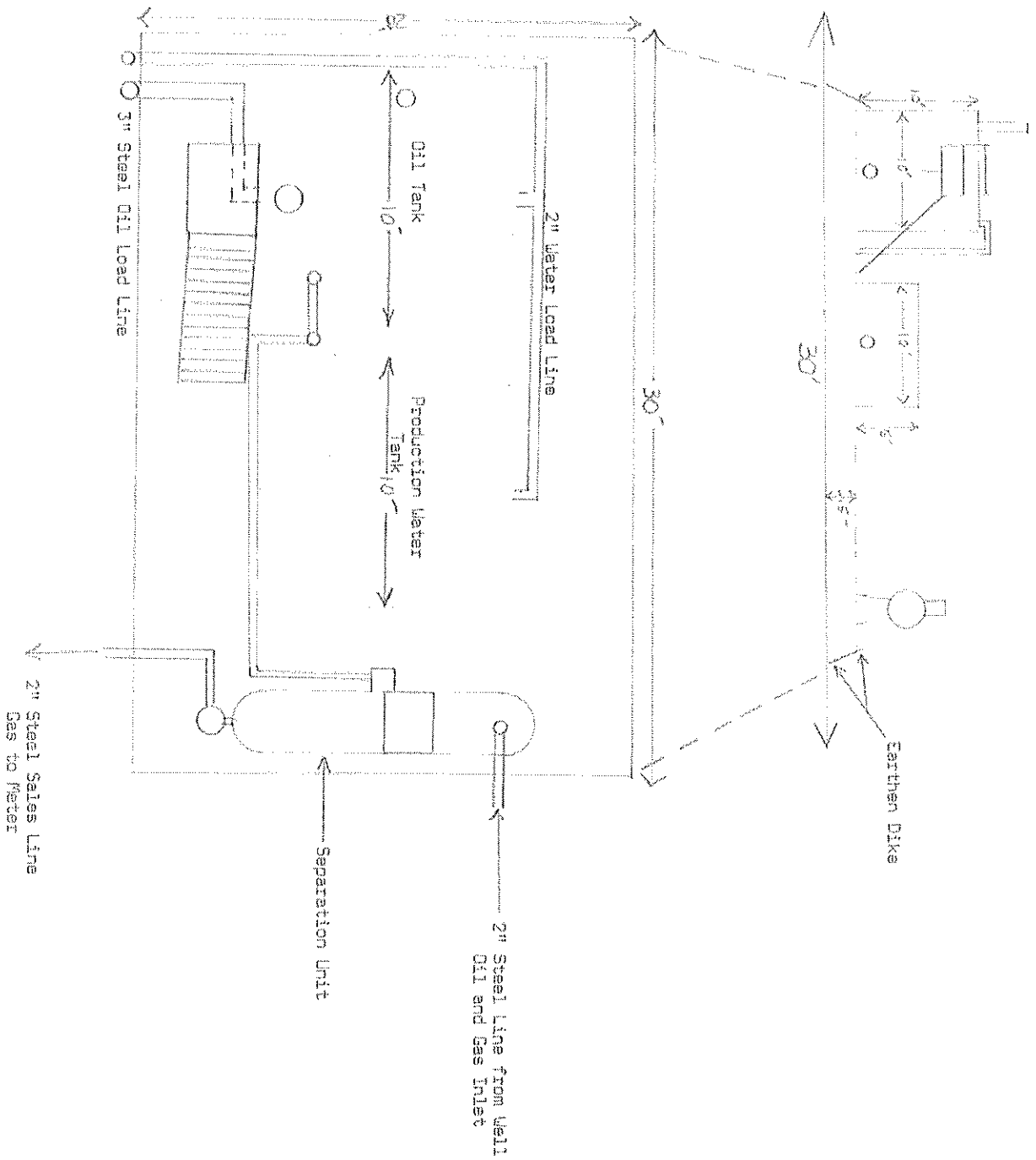
Photographs of Existing Astorhurst # 1 Well, Tank Battery and Metering Facility

Astorhurst #1 Tank Battery Construction and Reclamation

The Astorhurst No. 1 well has been completed and reclaimed. It is equipped with 1-1/2" tubing run inside 4-1/2", 10.5#/ft. casing. It will produce by means of a plunger lift system. The flow line and sales line will be 2" coated steel pipe and will be cathodically protected.

The tank battery will be located behind the existing maintenance building. It will consist of 1—100 bbl steel tank, 1—50 bbl steel tank and a 2408 horizontal separator. The tank battery will be contained inside a 60' x 30' dike with 2-1/2' high walls. The total capacity of the dike will be 1500 cu. ft. or 265 bbls. The tank battery will be lined with clay overlaying the liner. All piping shall go over the dike instead of under or through it.

The tank battery and well will be surrounded by an 8' high board on board fence, which shall be locked at all times.















Additional Information

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December 23, 2008

United States Department of the Interior
National Park Service
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, OH 44141-3097

Attention John P. Debo, Jr.

Dear Mr. Debo:

Per your letter of November 10, 2008, below are your items along with our responses:

- 1). The Spill Prevention, Control, and Countermeasure Plan – The SPCC plan is referenced in the discussion as an attachment, but was not included in the materials. As these operations are being conducted on private property, implementation of a sound SPCC plan is perhaps the most important action the operator will take to avoid direct impacts to federal lands and waters.

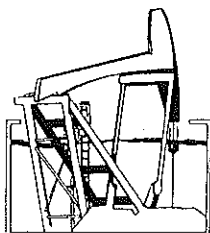
M&M #1: See attached. At this time we are only planning on drilling Astorhurst Unit #1, #2, and Prinios Unit #1.

- 2). Continued Production of the Astorhurst Unit #1 Well – The plan's maps and plats include the existing well, but the discussion needs to specifically include continued production and eventual plugging and reclamation for this well.

M&M #2: The Astorhurst Unit #1 is currently in production and will be operated, reclaimed and eventually plugged as outlined in the Plan of Operations.

- 3). Additional Detail on Gathering Lines – The plats show the gathering line routes and the discussion provides detail on lines themselves. The additional detail needed consists of a) burial depths, and b) corridor widths.

M&M #3: The Gathering lines will be buried at least 3' deep. During installation, an 8' corridor will be needed. The corridor will be completely reclaimed after installation.



Exploration and Production

- 4). Prinios Unit #1 Production Facility detail – The plan separates and excludes the Prinios Unit #1 from the discussion of dike construction. The discussion needs to be modified to expressly include the Prinios Unit #1 in the provisions for dikes and impermeable liners associated with storage tanks.

M&M #4: The Prinios Unit #1 production facility will conform to the standards of the Astorhurst production facility outlined in the Plan of Operations.

- 5). Additional Detail on the Access road for the Astorhurst Unit #2 – The plat provides the route and length of the road, but we need a description of a) the road type (e.g., single-lane gravel) and, b) the corridor width to accurately understand the proposal.

M&M #5: The Access Road for the Astorhurst Unit #2 well will be a 14' wide gravel road.

- 6). Complete Copies of State Drilling Permits – These will be a necessary part of the information provided to the Bureau of Land Management (BLM) as discussed in the next section.

M&M #6: The wells have not yet been permitted.

- 7). Photo Documentation of Existing Well – We recommend that M & M Royalty include photos of existing well #1 in the plan along with a statement that the new wells and facilities will be maintained in the same condition. Including photos is an excellent means of augmenting the description of operations in the plan.

M&M #7: See Attached.

Other Issues:

M & M Royalty, Ltd. has been working with Dave Lachance at the Milwaukee Field Office of the BLM's Eastern state office concerning this issue.

Please let me know if you have any questions.

Sincerely,

M & M Royalty, Ltd.



Matt Egnotovich
Member

ME/hle
Enclosure