

Feb 6, 1996

Elements of Potential Resolution

- ① Mrs. Blanchard keeps her property
- ② ~~Reduce~~ Reduce settlement amount by
 $\$800 \times \frac{150}{100} \text{ acres} = \$120,000$. Total
settlement = \$530,000
- ③ Complete release of all claims - past, present,
future, known and unknown
- ④ Right of 1st refusal to purchase all or part of
property for \$800 per acre, in the
event of sale or environmental claim
by plaintiff, her successors, or any third
parties (including governmental agencies).
- ⑤ One lease - royalty existing lease
Royalty increase to 20% below 8,000 ft;
No claims for one year
- ⑥ The Motion for Judgment continued -
will be dismissed only after Execution
of settlement
- ⑦ All other terms of settlement remain the
same, except where inconsistent with
the above.
- ⑧ No environmental remediation or
removal of pipelines or surface
restoration

BBB

