

FOULSTON & SIEFKIN L.L.P.  
Bank of America Center  
100 North Broadway, Suite 700  
Wichita, Kansas 67202-2295  
(316) 267-6371

IN THE TWENTY-SIXTH JUDICIAL DISTRICT  
DISTRICT COURT, STEVENS COUNTY, KANSAS  
CIVIL DEPARTMENT

JOHN STEPHEN ALFORD and  
ROBERT LARRABEE, individually and  
on behalf of Plaintiff Class as more fully  
described in the Petition,

*Plaintiffs,*

v.

PIONEER NATURAL RESOURCES  
USA, INC.

*Defendants.*

Case No. 93 CV 37

**SUPPLEMENTAL AFFIDAVIT OF JOHN C. DUNN**

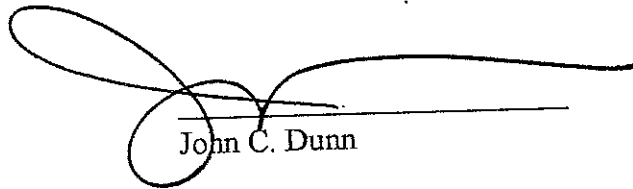
My name is John C. Dunn. I submit this "Supplemental Affidavit" to provide further clarification for the Court and the parties.

1. In my limited work regarding Robert Larrabee et al., v. Mesa Petroleum Company (Case No. 4950, Stevens County, Kansas), my work was limited to a specific topic -- "rate of return". I did not learn anything about the intent of the parties to the settlement agreement in that case.

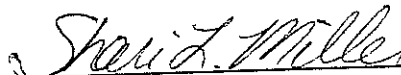
2. In the Expert's Report I have provided in the present proceeding, I did not rely on information of any kind (whether written, oral, demonstrative or otherwise) from my work or role in Robert Larrabee et al., v. Mesa Petroleum Company (Case No. 4950, Stevens County, Kansas).

3. The sole basis for my testimony in the present proceeding is described in my Expert Report in these proceedings and my response to an inquiry from Plaintiffs' counsel, which accompanied the letter from Jim H. Goering to Gregory J. Stucky dated April 18, 2001.

FURTHER AFFIANT SAYETH NAUGHT.

  
\_\_\_\_\_  
John C. Dunn

Subscribed and sworn to before me this 11<sup>th</sup> day of May, 2001.

  
\_\_\_\_\_  
Notary Public

My commission expires:

