#### **AFFIDAVIT OF NANCY CHAFFIN HUNTER**

 My name is Nancy Chaffin Hunter. I am currently the Coordinator of Acquisitions and Metadata Services at Colorado State University Libraries ("CSU Libraries") in Fort Collins, Colorado. I have served in this position since December 2012, and am responsible for overseeing acquisitions and cataloguing. I previously served as a Metadata Librarian for CSU Libraries from February 2001 to November 2012. Based on my job duties and experience in these positions, I have personal knowledge of the below statements.

2. CSU Libraries maintains records of the dates on which books are received and catalogued through its Integrated Library System ("ILS") software, which has been in use since before February 8, 2000. These records are maintained in the ordinary course of business of CSU Libraries, and I am personally familiar with these records in the ordinary course of my job duties for CSU Libraries.

3. I have been asked to confirm when the following book was catalogued and publicly available at CSU Libraries: Proceedings: Production Operations Symposium, 2-4 April 1995, Oklahoma City, Oklahoma, published by the Society of Petroleum Engineers, Inc. ("the Book"). I have reviewed CSU Libraries' records relating to the Book. Attached as Appendix A is a true and correct copy of certain pages of the Book. Attached as Appendix B is a true and correct copy of a portion of a publicly accessible CSU Libraries webpage showing the bibliographic

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bibliographic entry for the Book in CSU Libraries' ILS software. Attached as Exhibit D is a true and correct copy of a screenshot that I generated of the item record for the Book in CSU Libraries' ILS software.

4. The title listed in Appendices B, C, and D has a minor typographical error that refers to "Operations" instead of "Operation" within the phrase "Production Operation Symposium." However, other information confirms that the records shown in Appendices B, C, and D refer to the Book. The remainder of the title (including "2-4 April 1995" and "Oklahoma City, OK" shown in Appendices B, C, and D matches what is shown on the cover page in Appendix A, and the 1995 copyright date in Appendices B, C, and D matches the 1995 date shown on the copyright page in Appendix A. Also, the unique identifier "S-A-23B-11-08-013" listed alongside field 945 in Appendix B and near the bottom of Appendix D corresponds to the number shown on the title page in Appendix A.

5. CSU Libraries' records confirm that the Book was catalogued, and therefore made available to the public, at CSU Libraries on February 8, 2000. Appendix B shows this date as "02-08-00" in part "**|b**" alongside the first field 998, and as

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software records, and this date field is not editable. Appendix C also shows these dates as "CAT DATE 02-08-2000" and "Created: 02-08-2000," respectively. Appendix D also shows the second date as "Created: 02-08-2000."

6. Books are made available to the public as soon as they are catalogued, which often occurs on the same day that they are entered into the CSU Libraries ILS software, as CSU Libraries' records show was the case for the Book.

7. I declare under penalty of perjury that the foregoing is true and correct.



# PROCEEDINGS

## **Production Operation Symposium**

2–4 April 1995 Oklahoma City, OK

SOCIETY OF PET S-A-23B-11-08-013 S (SPE), INC.



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Discussion of the papers is invited. Three copies of any discussion should be sent to the Society of Petroleum Engineers office. Such discussion may be presented at the Conference and, with the paper, may be considered for publication in one of the SPE journals.

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