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June 5, 2007

The Honorable Sharon McCally
334th Judicial District Court
Harris County Civil Courthouse
201 Caroline, 15th Floor
Houston, Texas 77002

VIA HAND DELIVERY

RE: Cause No. 2006-01984; Mosh Holdings, L.P. v. Pioneer Natural Resource Company, et al; In the 334th Judicial District Court of Harris County, Texas

Dear Judge McCally:

At last Thursday's hearing, you asked whether the defendants would agree to allow the Court to hold its decision on the Settlement Agreement in abeyance until the Plaintiffs and Intervenor resolved their claims against JPMorgan, as Trustee of the Mesa Offshore Trust. After consultation with my client, Woodside cannot agree to the bifurcated proceedings suggested by the Court.

Woodside's primary concern is that many of the issues resolved in the lawsuit against the Trustee might affect its ability to fully defend itself in a subsequent action. The doctrine of collateral estoppel may prevent Woodside from entering evidence and arguing issues that it believes are integral to its defense. If important issues are to be decided that may affect Woodside, Woodside wants to participate in the proceeding and be able to defend itself. Therefore, Woodside must respectfully decline the Court's invitation to bifurcate with abeyance.

F **C** **H** **A** **R** **L** **E** **D**
CHARLES BACARISSE
District Clerk

JUN 05 2007

Harris County, Texas

By _____ Deputy

Very truly yours,

GORDON, ARATA, MCCOLLAM,
DUPLANTIS & EAGAN, L.L.P

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CLS/jah

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