

Exhibit 5.1

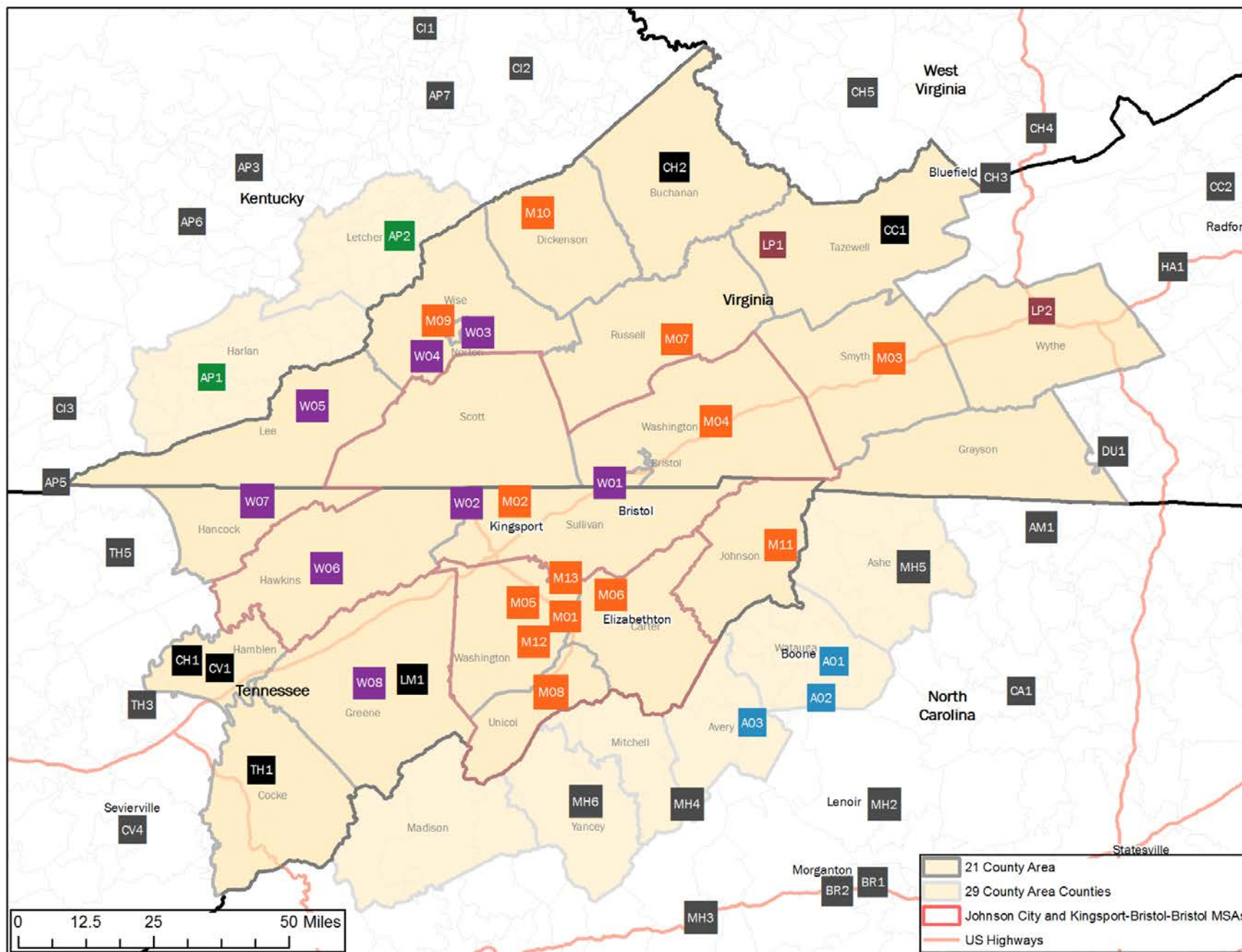
A. Service Area Definitions

Service areas were derived for each Wellmont and Mountain States hospital using patient discharge data for CY2014 from Tennessee and Virginia for all hospitals using standard methodologies for sorting zip codes from largest to smallest number of discharges.

Service areas were defined based on 75% and 90% discharge areas for general acute care patients (less normal newborns defined as DRG 795) and all payers. Service areas for Quillen and Woodridge were defined the services they provide. Service areas are depicted for each hospital using maps and a table of the zip codes.

Summary statistics on licensed and staffed beds, occupancy and ADC were developed from reports filed by Wellmont and Mountain States with state agencies in Tennessee and Virginia¹; trend data are provided and summary statistics are reported for the latest available year (2013).

¹Sources: Tennessee Joint Annual Reports FY10-FY13; Virginia Health Information Reports FY10-FY13. The Tennessee Joint annual reports can be found at <https://apps.health.tn.gov/publicjars/default.aspx>. The Virginia Health Information Reports were provided by the Parties.



System	State	Hospital Name	Symbol
Mountain States Health Alliance	TN	Johnson City Medical Center	M01
	TN	Indian Path Medical Center	M02
	VA	Smyth County Community Hospital	M03
	VA	Johnston Memorial Hospital	M04
	TN	Franklin Woods Community Hospital	M05
	TN	Sycamore Shoals Hospital	M06
	VA	Russell County Medical Center	M07
	TN	Unicoi County Memorial Hospital	M08
	VA	Norton Community Hospital	M09
	VA	Dickenson Community Hospital	M10
	TN	Johnson County Community Hospital	M11
	TN	Woodridge Hospital	M12
	TN	Quillen Rehabilitation Hospital***	M13
Wellmont Health System	TN	Wellmont Bristol Regional Medical Center	W01
	TN	Wellmont Holston Valley Medical Center	W02
	VA	Mountain View Regional Medical Center	W03
	VA	Wellmont Lonesome Pine Hospital	W04
	VA	Lee Regional Medical Center (Closed) *	W05
	TN	Wellmont Hawkins County Memorial Hospital	W06
	TN	Wellmont Hancock County Hospital	W07
	TN	Takoma Regional Hospital (Independent) **	W08
Alliant Management Services	NC	Alleghany Memorial Hospital	AM1
Appalachian Regional Healthcare, Inc.	KY	Harlan ARH Hospital	AP1
	KY	Whitesburg ARH Hospital	AP2
	KY	Hazard ARH Regional Medical Center	AP3
	KY	Williamson ARH Hospital	
	KY	Middlesboro ARH Hospital	AP5
	KY	Mary Breckinridge ARH Hospital	AP6
	KY	McDowell ARH Hospital	AP7
Appalachian Regional Healthcare System	NC	Watauga Medical Center	A01
	NC	Blowing Rock Hospital	A02
	NC	Charles A. Cannon Memorial Hospital	A03
LifePoint Hospitals, Inc.	VA	Clinch Valley Medical Center	LP1
	VA	Wythe County Community Hospital	LP2
Carilion Clinic	VA	Carilion Tazewell Community Hospital	CC1
	VA	Carilion Giles Community Hospital	CC2

System	State	Hospital Name	Symbol
Community Health Systems, Inc.	TN	Lakeway Regional Hospital	CH1
	VA	Buchanan General Hospital	CH2
	WV	Bluefield Regional Medical Center	CH3
	WV	Princeton Community Hospital	CH4
	WV	Welch Community Hospital	CH5
Covenant Health	TN	Fort Sanders Regional Medical Center	
	TN	Morristown-Hamblen Healthcare System	CV1
	TN	Parkwest Medical Center	
	TN	Peninsula Hospital	
Tennova Healthcare	TN	LeConte Medical Center	CV4
	TN	Newport Medical Center	TH1
	TN	Physician Regional Medical Center	
	TN	Jefferson Memorial Hospital	TH3
	TN	Turkey Creek Medical Center	
	TN	Claiborne County Hospital	TH5
	TN	Blount Memorial Hospital	
	TN	University of Tennessee Medical Center	
	TN	Laughlin Memorial Hospital	LM1
	TN	East Tennessee Children's Hospital	
Blue Ridge HealthCare	TN	St. Jude Children's Research Hospital	
	NC	Valdese General Hospital	BR1
	NC	Grace Hospital	BR2
Carolinas HealthCare System	NC	Wilkes Regional Medical Center	CA1
Catholic Health Initiatives	KY	Saint Joseph - Martin	C11
	KY	Pikeville Medical Center	C12
	KY	Pineville Community Hospital Association	C13
	KY	Highlands Regional Medical Center	
Duke LifePoint Healthcare	VA	Twin County Regional Hospital	DU1
HCA	VA	LewisGale Hospital at Pulaski	HA1
Mission Health System	NC	Caldwell Memorial Hospital	MH2
	NC	McDowell Hospital	MH3
	NC	Blue Ridge Regional Hospital	MH4
	NC	Ashe Memorial Hospital	MH5
	NC	Yancey Community Medical Center	MH6
Vanderbilt Health	TN	Vanderbilt University Hospitals	

*Wellmont closed Lee Regional Medical Center ("LRMC") in 2013. The Lee County Hospital Authority purchased the LRMC building from Wellmont in 2015 with plans to reopen the hospital as an independent facility. LRMC is no longer a Wellmont facility and, if reopened, it would not be included in the COPA.

**Wellmont sold Takoma Regional Hospital ("Takoma") to Adventist Health System in 2014. Wellmont has publicly announced its plan to repurchase Takoma. However, as of the date of this filing, the transaction has not yet closed and may not close. The Parties anticipate that, if Takoma is acquired by Wellmont before the COPA is granted, that Takoma would be included in the COPA.

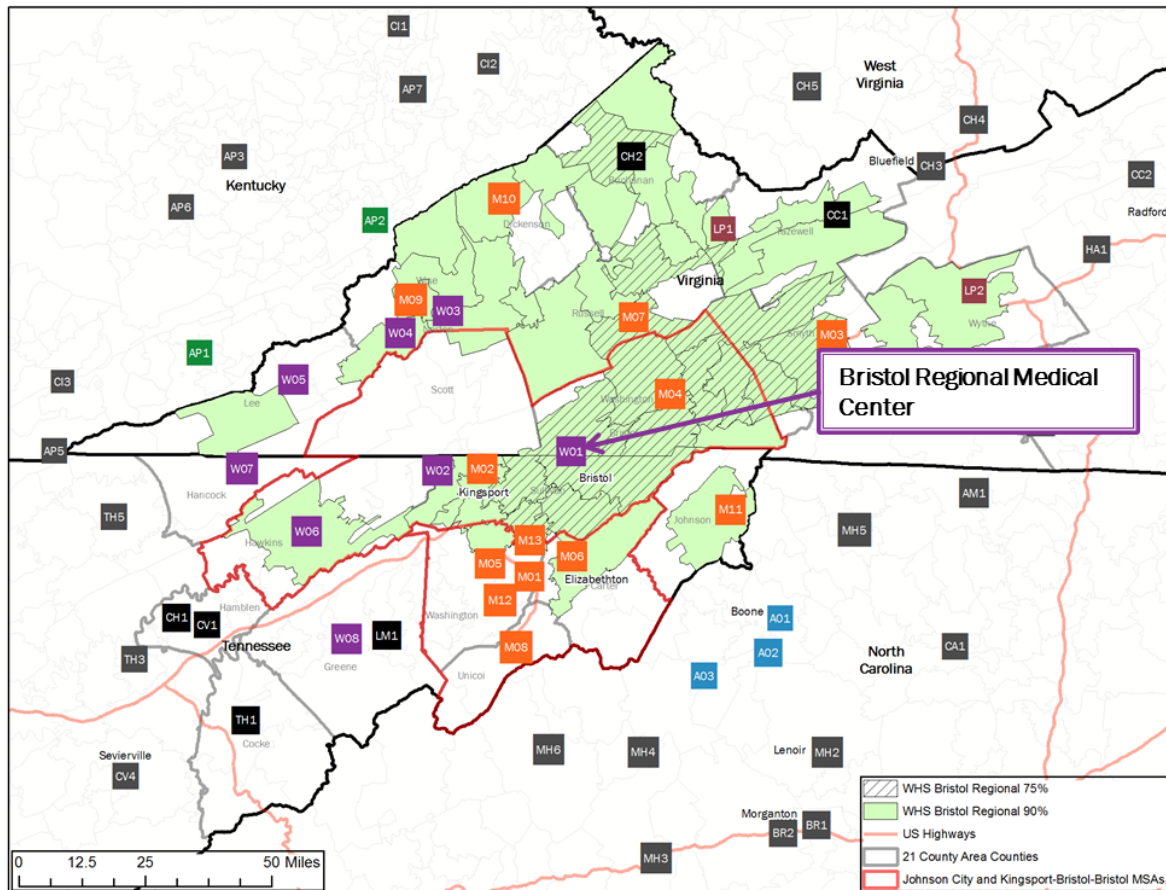
***Mountain States now has a joint venture with HealthSouth to operate Quillen Rehabilitation Hospital.

Some hospitals serving patients from the geographic service area are located outside the area depicted in the map. They are included in the legend for reference.

The Mountain Home VA Medical Center is also located in the Geographic Service Area but is not shown on this map. The Parties compete with this facility for the recruiting and hiring of staff, but do not compete with this facility for patients. The patients that may seek treatment at the Mountain Home VA Medical Center are limited to those individuals that meet certain government-established criteria.

B. Draw Area Maps and Summary Statistics

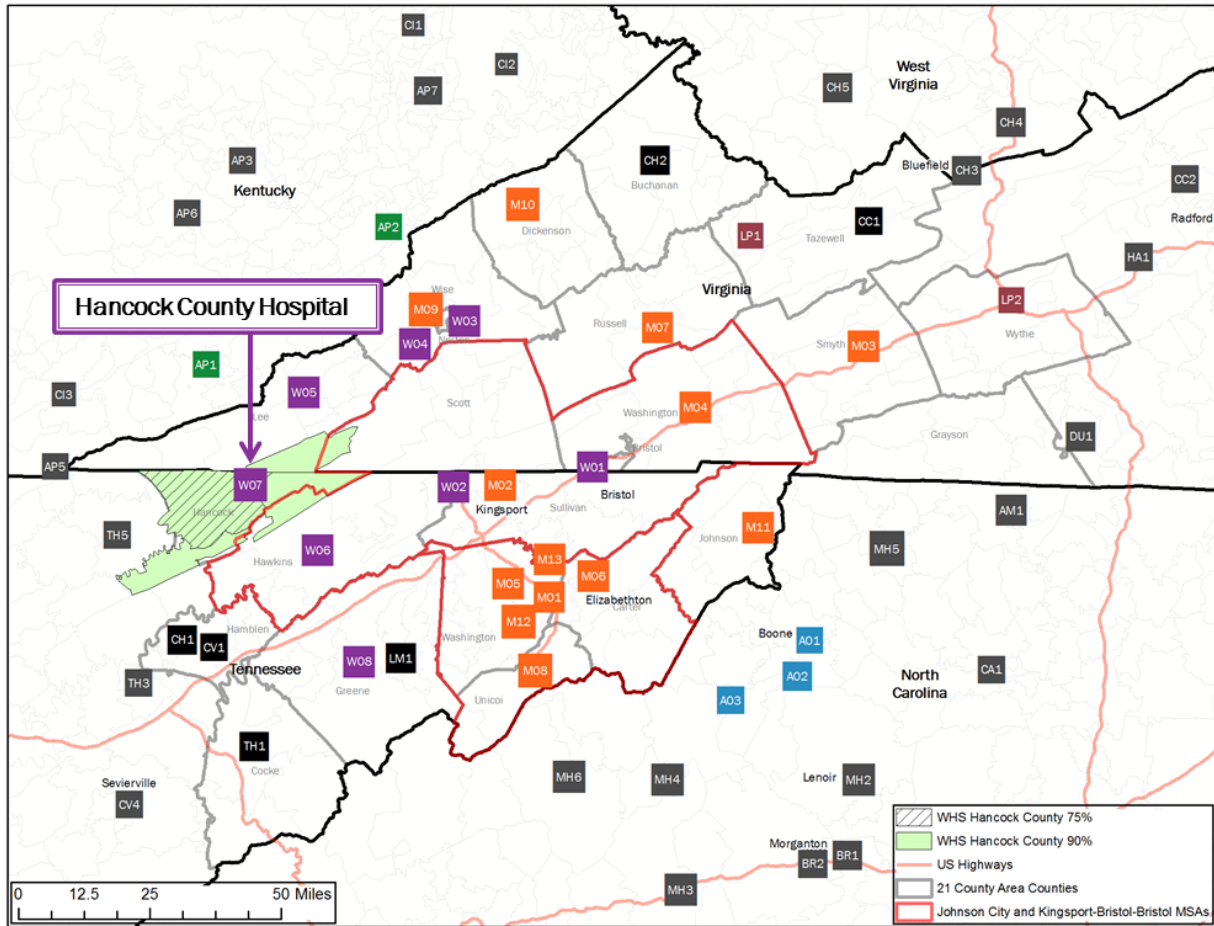
1. Bristol Regional Medical Center



Wellmont Bristol Regional Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	261	261	261	261
Licensed Beds	312	312	312	312
Staffed Beds Occupancy	64.2%	68.0%	66.6%	65.0%
Licensed Beds Occupancy	53.7%	56.9%	55.7%	54.4%
Average Daily Census	167	178	174	170
Patient Days	61,136	64,788	63,609	61,909
Discharges/Admissions	14,044	14,501	14,506	13,742
Average Length of Stay	4.4	4.5	4.4	4.5

Source: Tennessee Joint Annual Reports FY10-FY13

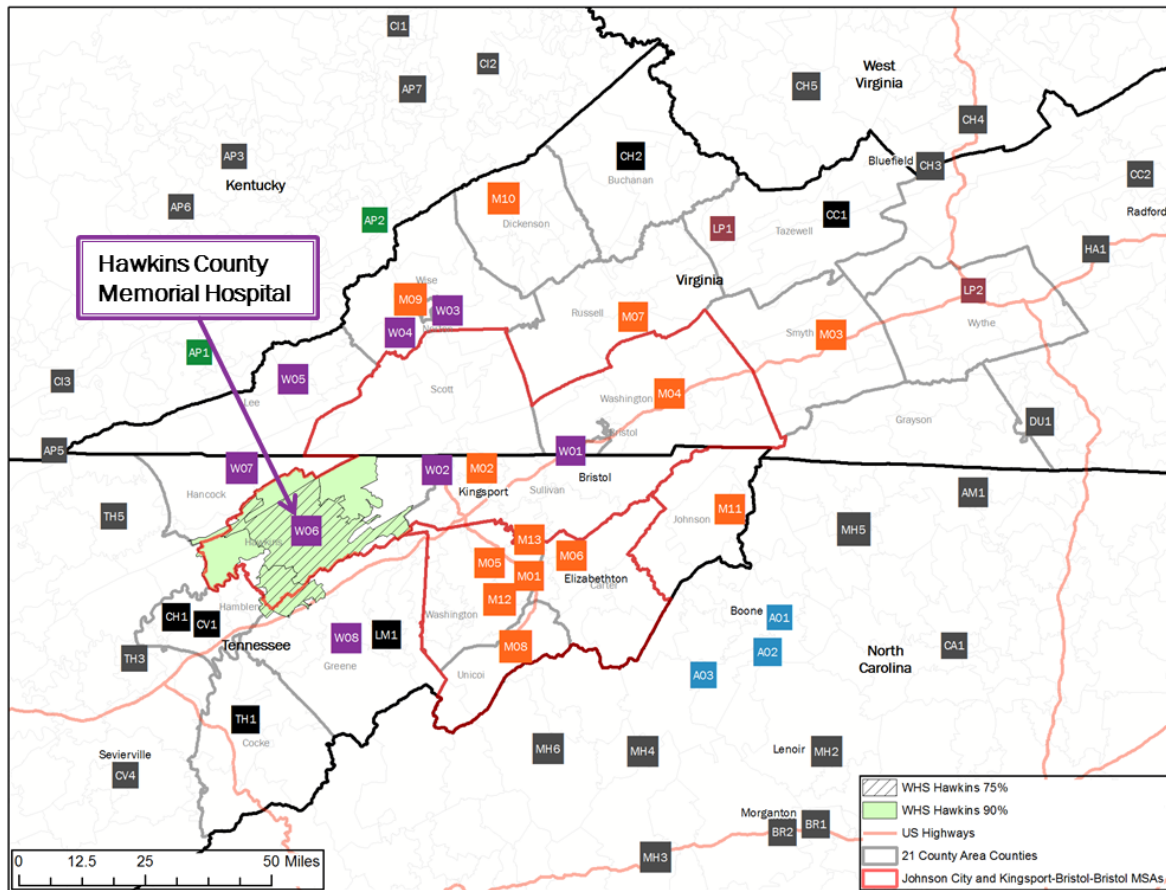
2. Hancock County Hospital



Wellmont Hancock County Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	10	10	10	10
Licensed Beds	10	10	10	10
Staffed Beds Occupancy	27.5%	22.1%	32.8%	30.9%
Licensed Beds Occupancy	27.5%	22.1%	32.8%	30.9%
Average Daily Census	3	2	3	3
Patient Days	1,003	808	1,199	1,127
Discharges/Admissions	327	245	261	242
Average Length of Stay	3.1	3.3	4.6	4.7

Source: Tennessee Joint Annual Reports FY10-FY13

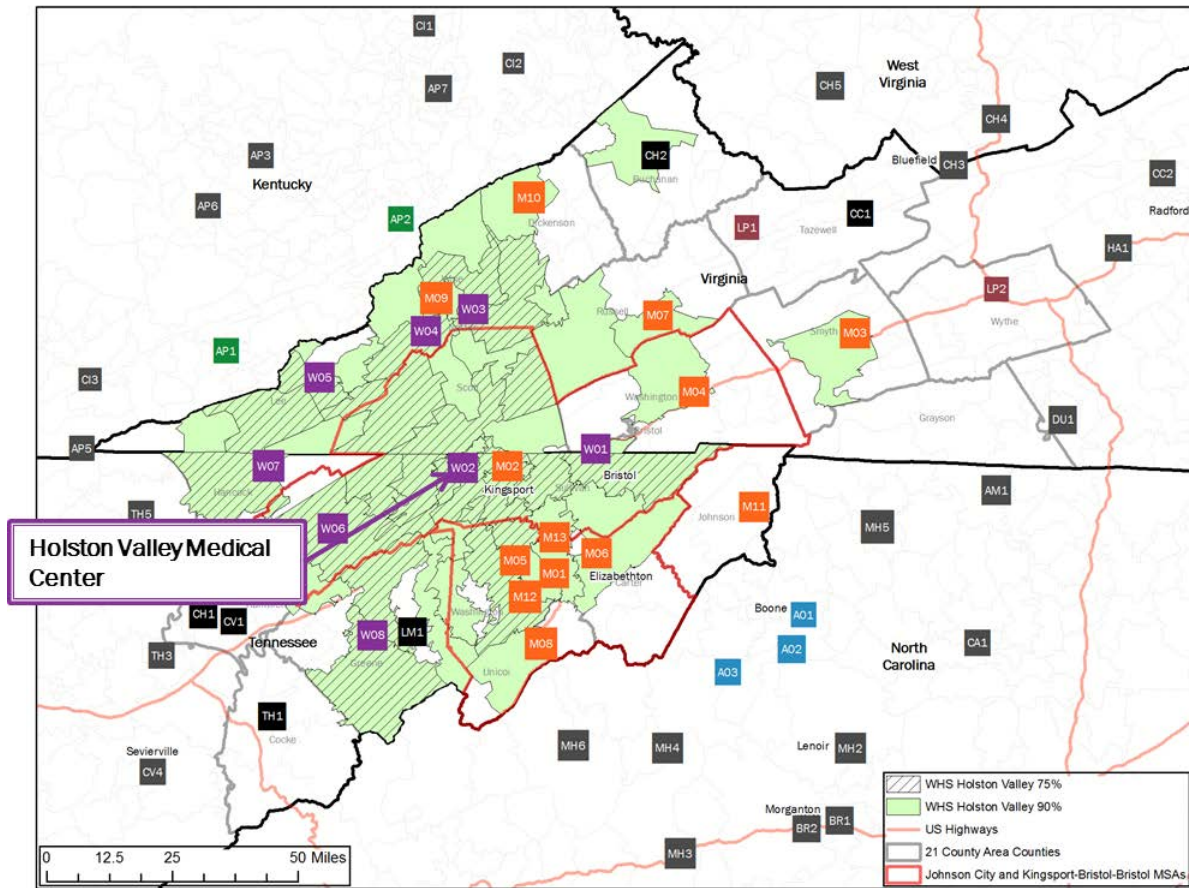
3. Hawkins County Memorial Hospital



Wellmont Hawkins County Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	46	46	46	46
Licensed Beds	50	50	50	50
Staffed Beds Occupancy	30.8%	30.7%	21.0%	18.7%
Licensed Beds Occupancy	28.3%	28.2%	19.3%	17.2%
Average Daily Census	14	14	10	9
Patient Days	5,165	5,153	3,530	3,139
Discharges/Admissions	1,710	1,603	1,291	1,241
Average Length of Stay	3.0	3.2	2.7	2.5

Source: Tennessee Joint Annual Reports FY10-FY13

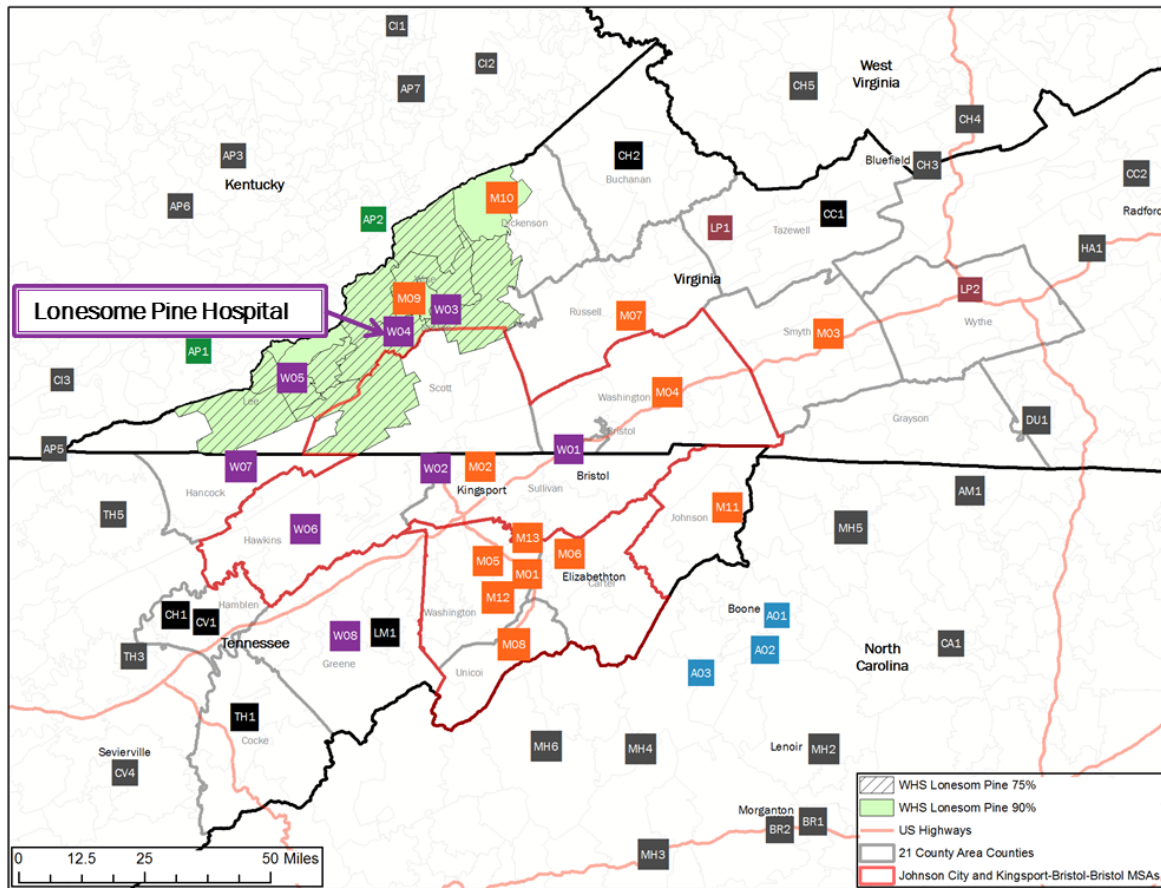
4. Holston Valley Medical Center



Wellmont Holston Valley Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	339	339	339	339
Licensed Beds	505	505	505	505
Staffed Beds Occupancy	69.1%	72.8%	69.9%	66.4%
Licensed Beds Occupancy	46.4%	48.9%	46.9%	44.6%
Average Daily Census	234	247	237	225
Patient Days	85,555	90,104	86,711	82,127
Discharges/Admissions	18,612	19,150	18,451	17,825
Average Length of Stay	4.6	4.7	4.7	4.6

Source: Tennessee Joint Annual Reports FY10-FY13

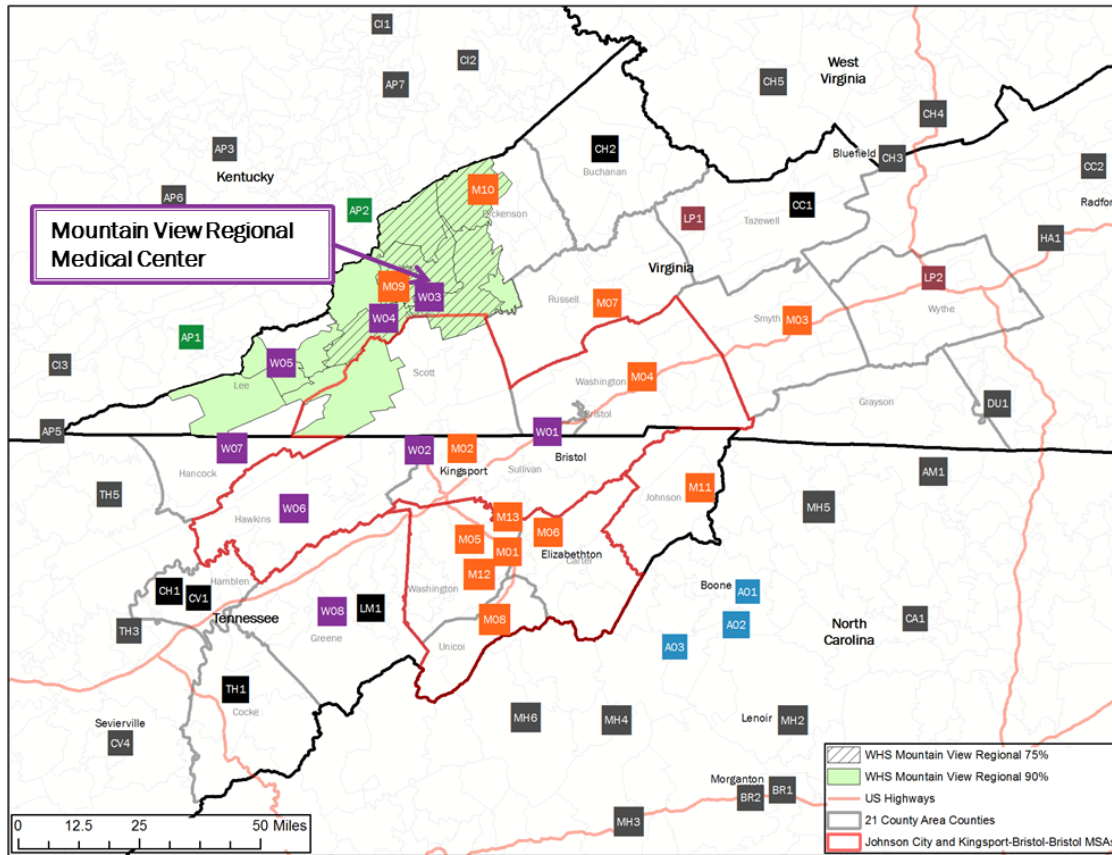
5. Lonesome Pine Hospital



Wellmont Lonesome Pine Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	48	48	60	21
Licensed Beds	60	60	60	60
Staffed Beds Occupancy	45.9%	42.6%	26.0%	49.6%
Licensed Beds Occupancy	36.7%	34.0%	26.0%	17.4%
Average Daily Census	22	20	16	10
Patient Days	8,041	7,455	5,715	3,799
Discharges/Admissions	2,529	2,392	1,955	1,484
Average Length of Stay	3.2	3.1	2.9	2.6

Source: Virginia Health Information Reports FY10-FY13

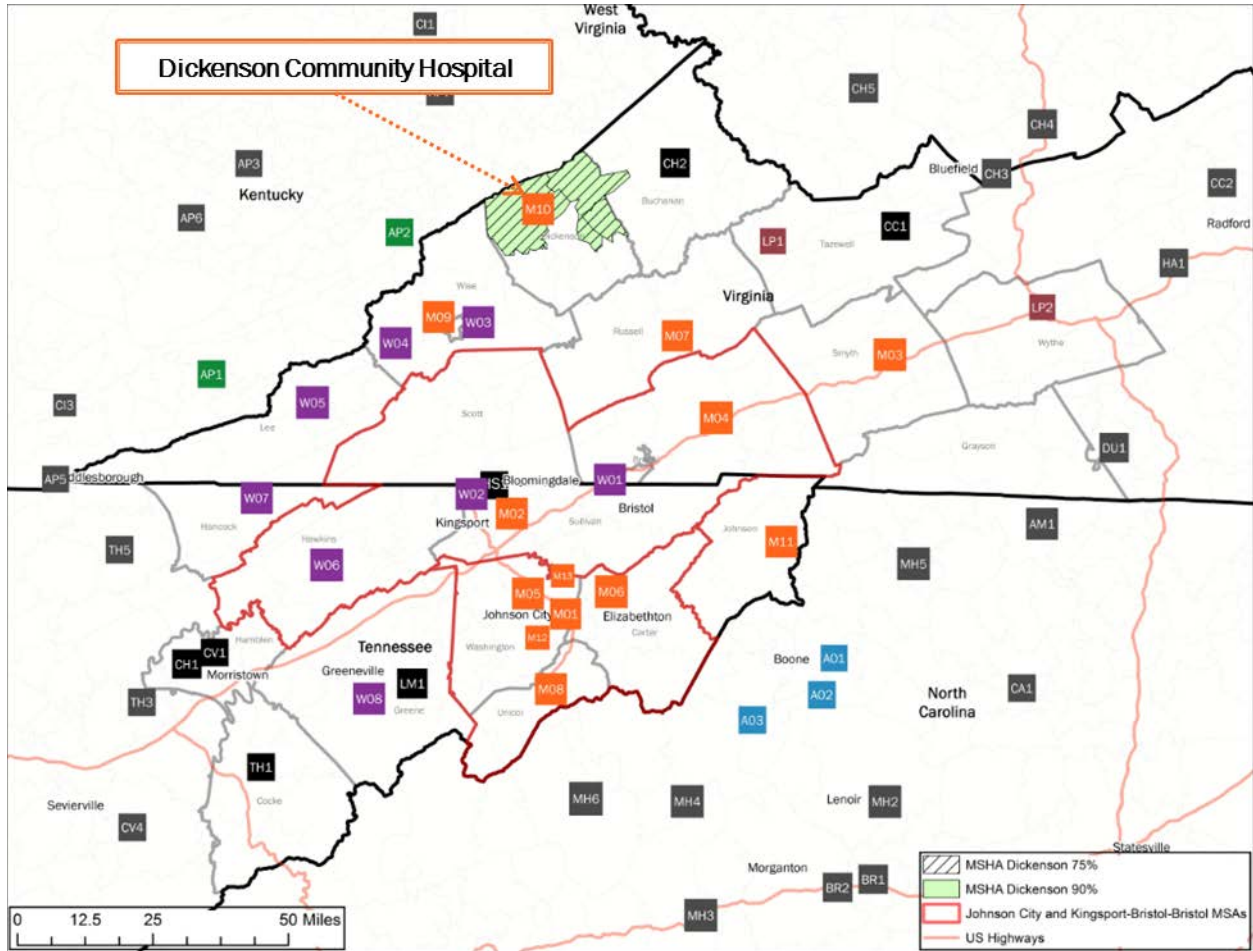
6. Mountain View Regional Medical Center



Wellmont Mountain View Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	17	16	16	18
Licensed Beds	78	74	74	74
Staffed Beds Occupancy	95.6%	98.3%	107.7%	69.5%
Licensed Beds Occupancy	20.8%	21.2%	23.3%	16.9%
Average Daily Census	16	16	17	13
Patient Days	5,929	5,739	6,305	4,565
Discharges/Admissions	1,615	1,716	1,583	1,573
Average Length of Stay	3.7	3.3	4.0	2.9

Source: Virginia Health Information Reports FY10-FY13

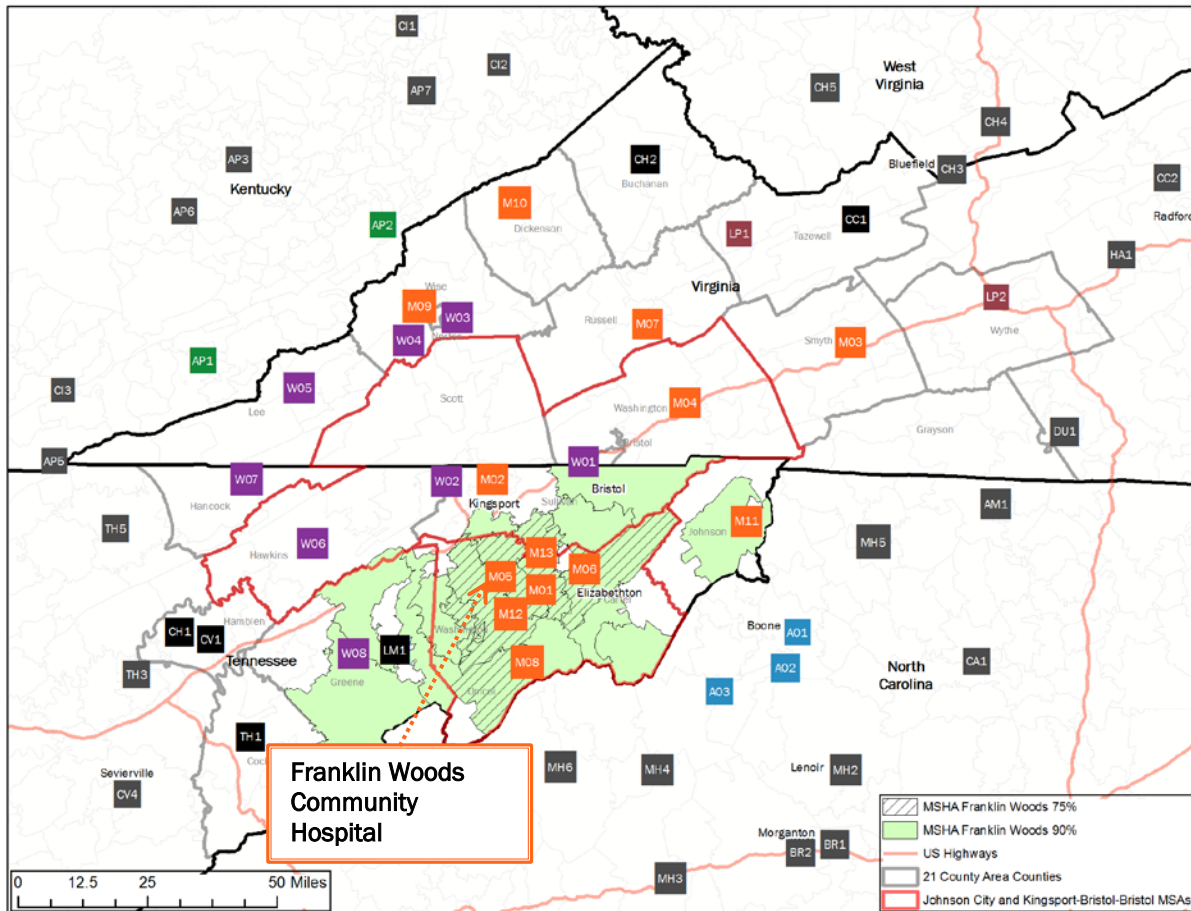
7. Dickenson Community Hospital



Mountain States Dickenson Community Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	1	2	1	2
Licensed Beds	25	25	25	25
Staffed Beds Occupancy	2.7%	0.3%	3.8%	1.6%
Licensed Beds Occupancy	0.1%	0.0%	0.2%	0.1%
Average Daily Census	0	0	0	0
Patient Days	10	2	14	12
Discharges/Admissions	8	1	11	9
Average Length of Stay	1.3	2.0	1.3	1.3

Source: Virginia Health Information Reports FY10-FY13

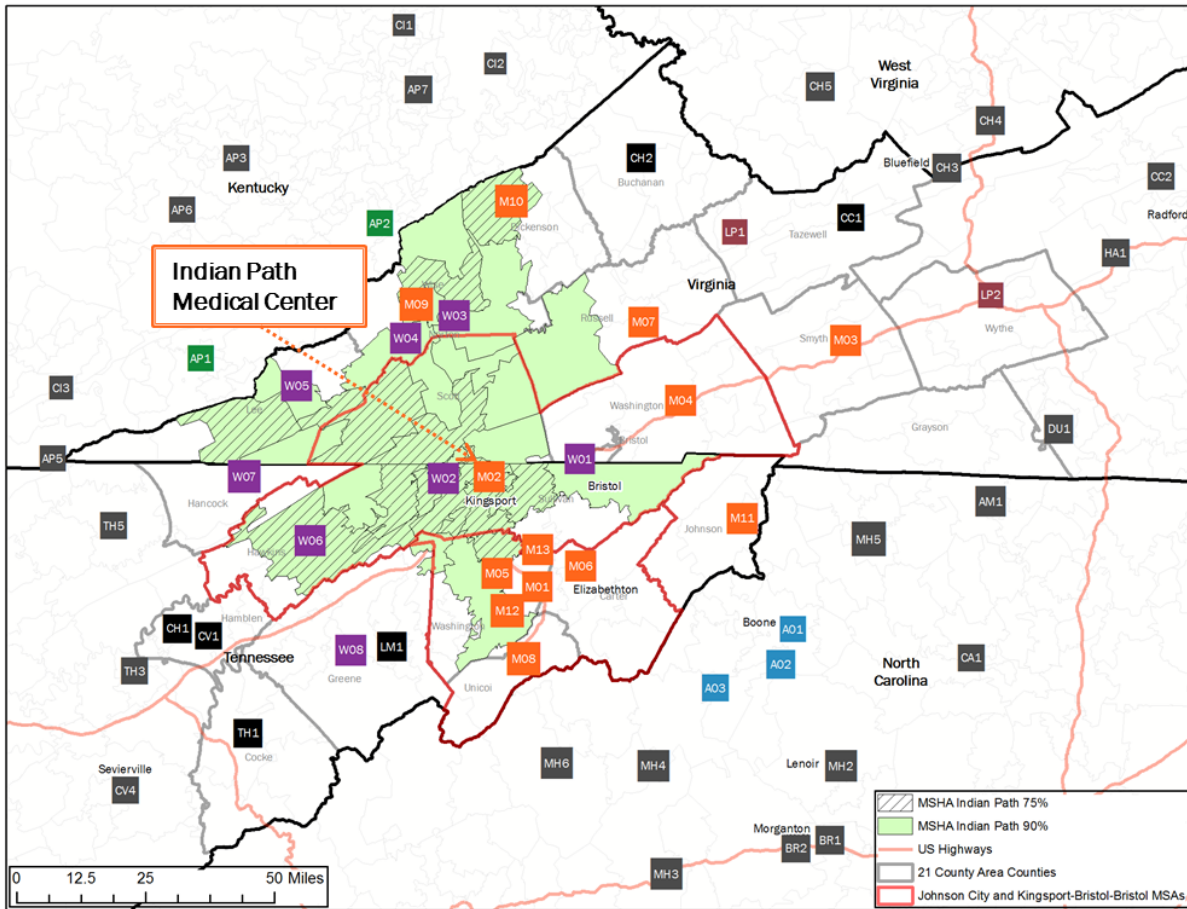
8. Franklin Woods Community Hospital



Mountain States Franklin Woods Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds		80	80	77
Licensed Beds		80	80	80
Staffed Beds Occupancy		50.0%	48.6%	54.1%
Licensed Beds Occupancy		50.0%	48.6%	52.1%
Average Daily Census		40	39	42
Patient Days		14,612	14,233	15,199
Discharges/Admissions		3,721	3,719	4,189
Average Length of Stay		3.9	3.8	3.6

Source: Tennessee Joint Annual Reports FY11-FY13

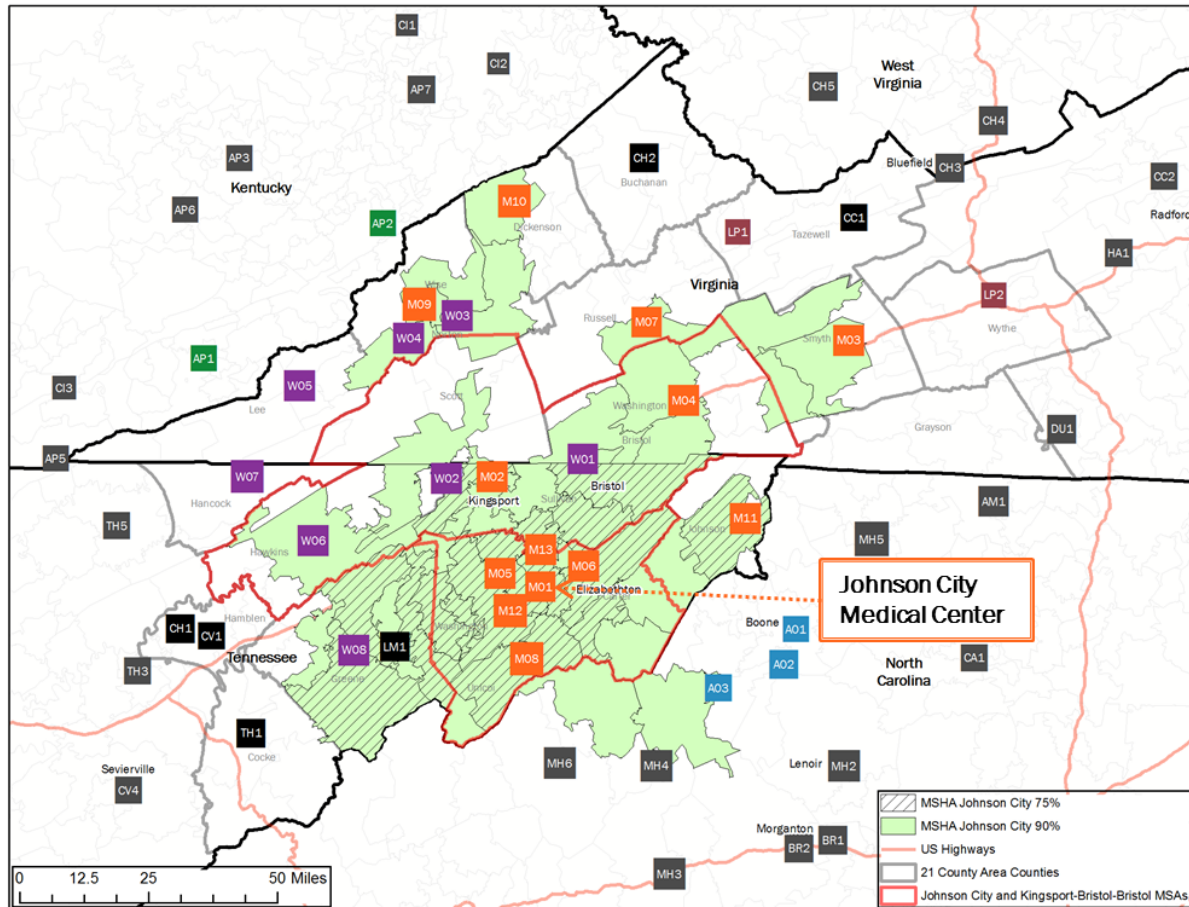
9. Indian Path Medical Center



Mountain States Indian Path Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	191	189	169	168
Licensed Beds	239	239	239	239
Staffed Beds Occupancy	40.9%	33.8%	39.5%	37.4%
Licensed Beds Occupancy	32.7%	26.7%	27.9%	26.3%
Average Daily Census	78	64	67	63
Patient Days	28,532	23,303	24,432	22,907
Discharges/Admissions	6,549	6,149	6,146	5,877
Average Length of Stay	4.4	3.8	4.0	3.9

Source: Tennessee Joint Annual Reports FY10-FY13

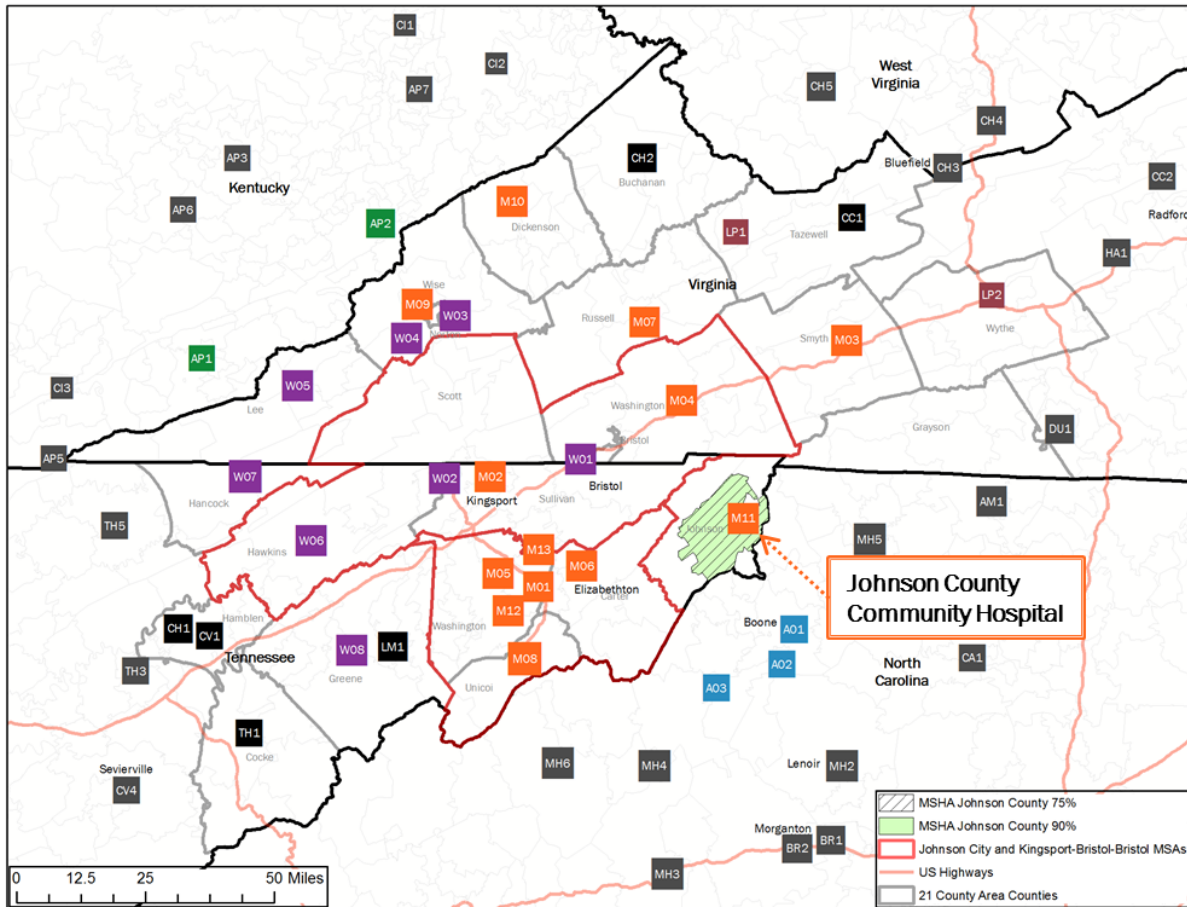
10. Johnson City Medical Center



Mountain States Johnson City Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	501	501	501	497
Licensed Beds	501	501	501	501
Staffed Beds Occupancy	75.8%	72.8%	72.4%	69.3%
Licensed Beds Occupancy	75.8%	72.8%	72.4%	68.7%
Average Daily Census	380	365	363	344
Patient Days	138,664	133,172	132,677	125,692
Discharges/Admissions	27,129	26,103	25,751	23,644
Average Length of Stay	5.1	5.1	5.2	5.3

Source: Tennessee Joint Annual Reports FY10-FY13

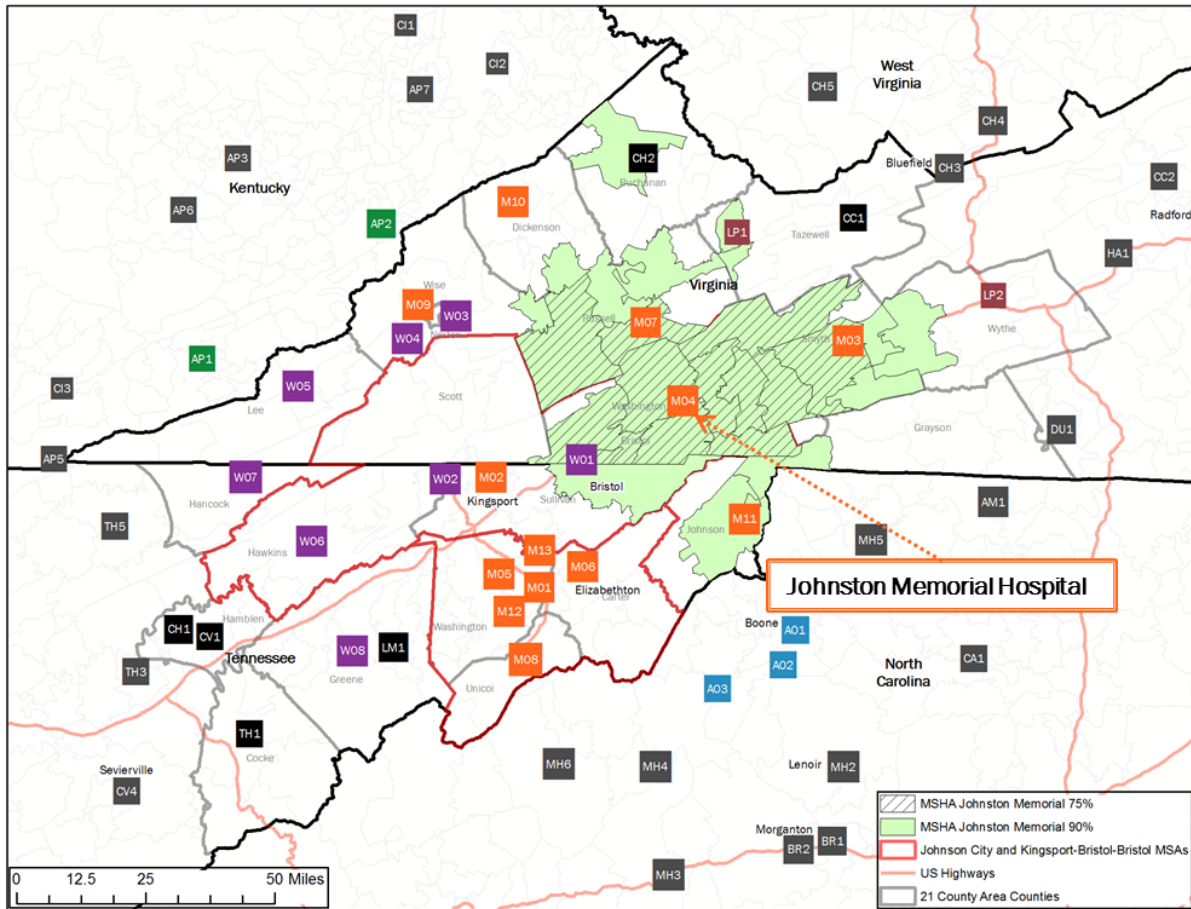
11. Johnson County Community Hospital



Mountain States Johnson County Community Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	2	2	2	2
Licensed Beds	2	2	2	2
Staffed Beds Occupancy	9.5%	5.9%	7.2%	6.0%
Licensed Beds Occupancy	9.5%	5.9%	7.2%	6.0%
Average Daily Census	0	0	0	0
Patient Days	69	43	53	44
Discharges/Admissions	29	20	26	23
Average Length of Stay	2.4	2.2	2.0	1.9

Source: Tennessee Joint Annual Reports FY10-FY13

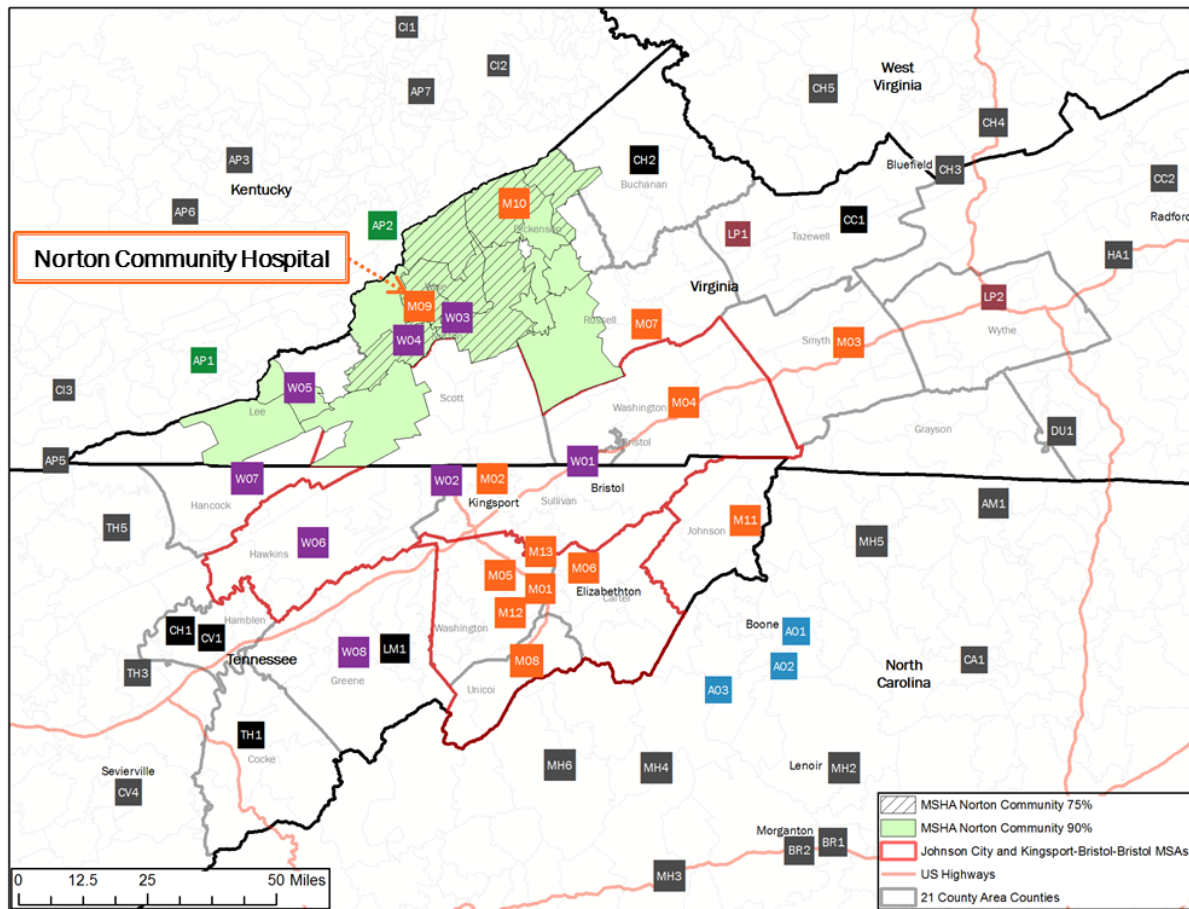
12. Johnston Memorial Hospital



Mountain States Johnston Memorial Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	100	116	116	112
Licensed Beds	135	116	116	116
Staffed Beds Occupancy	61.4%	51.6%	60.1%	58.3%
Licensed Beds Occupancy	45.5%	51.6%	60.1%	56.3%
Average Daily Census	61	60	70	65
Patient Days	22,427	21,866	25,511	23,822
Discharges/Admissions	5,883	6,156	7,053	7,215
Average Length of Stay	3.8	3.6	3.6	3.3

Source: Virginia Health Information Reports FY10-FY13

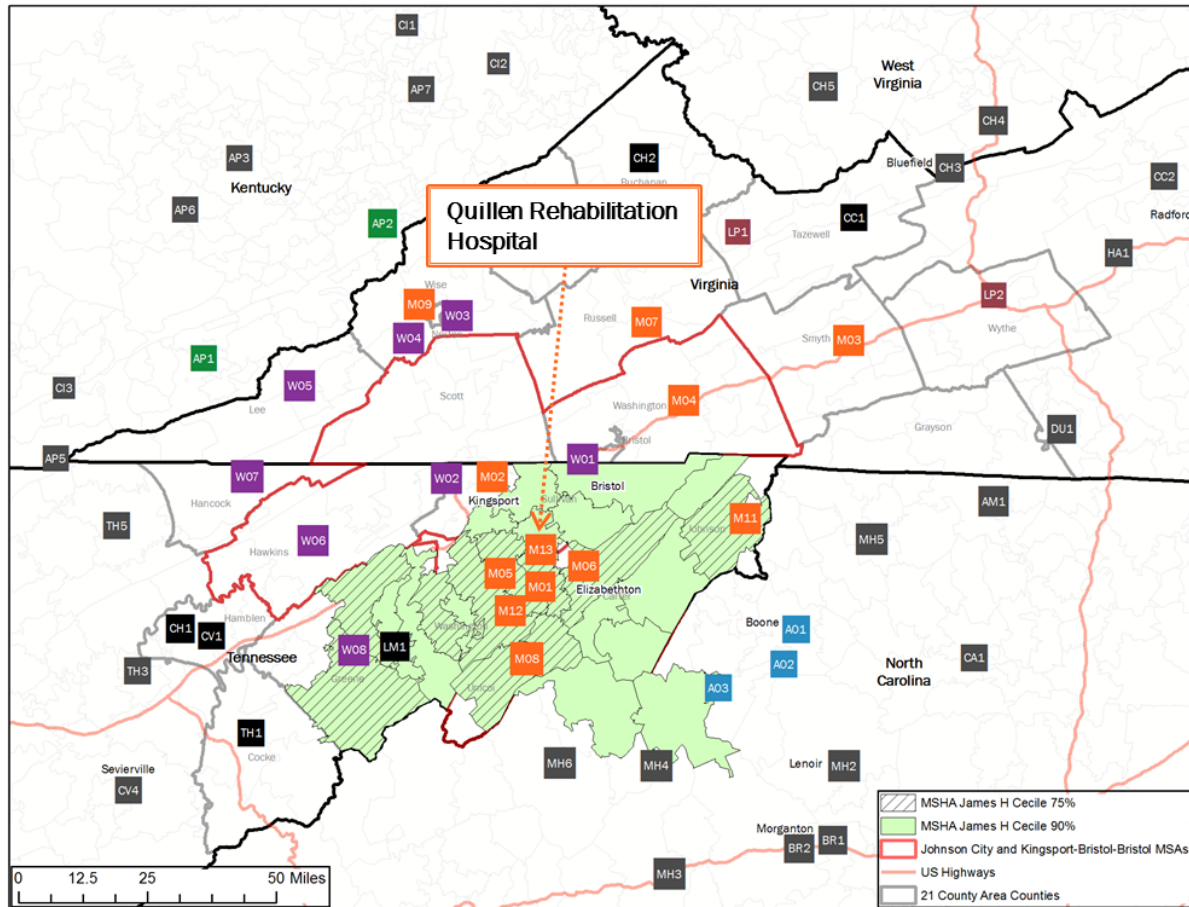
13. Norton Community Hospital



Mountain States Norton Community Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	40	40	50	50
Licensed Beds	129	129	129	129
Staffed Beds Occupancy	95.3%	94.9%	72.8%	70.5%
Licensed Beds Occupancy	29.6%	29.4%	28.2%	27.3%
Average Daily Census	38	38	36	35
Patient Days	13,916	13,858	13,320	12,859
Discharges/Admissions	4,308	4,375	4,149	3,685
Average Length of Stay	3.2	3.2	3.2	3.5

Source: Virginia Health Information Reports FY10-FY13

14. Quillen Rehabilitation Hospital

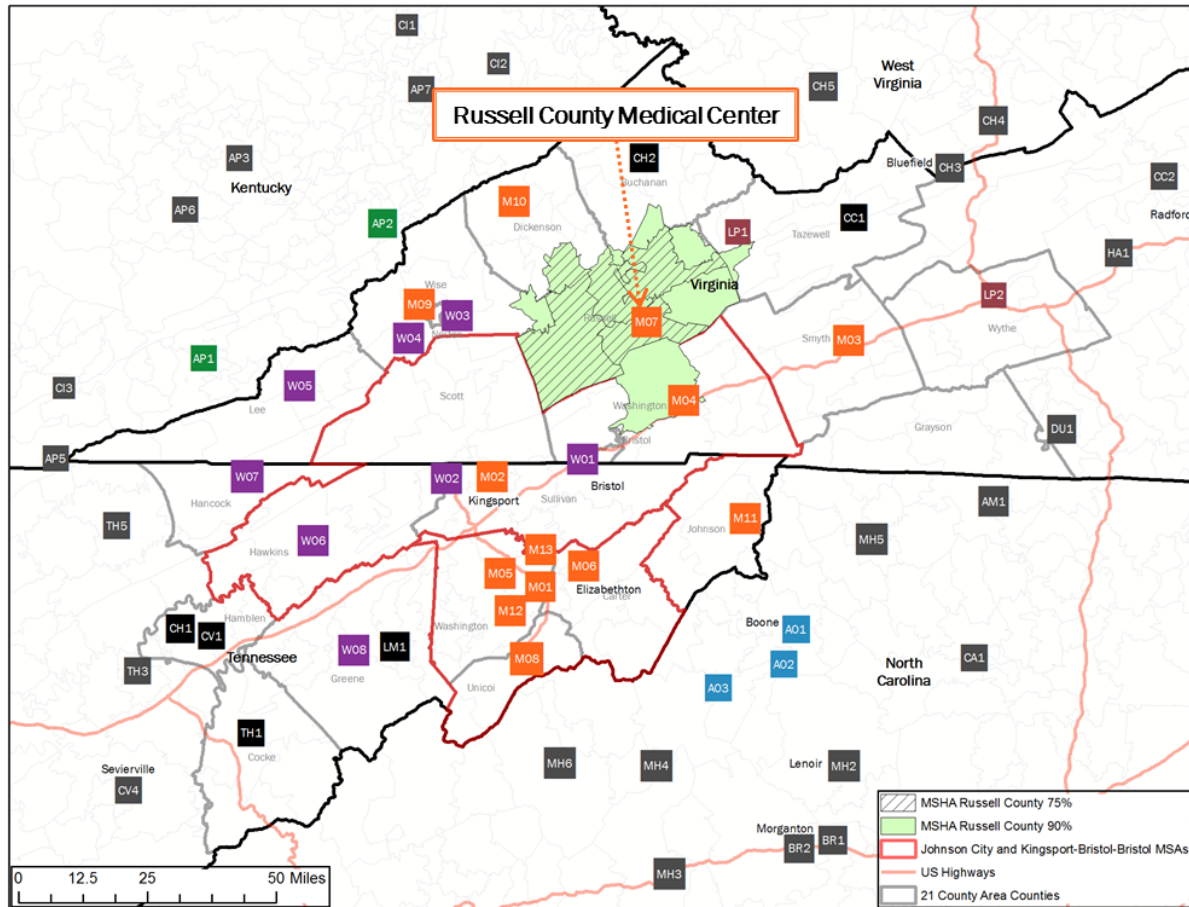


Mountain States James H. and Cecile C. Quillen Rehab Hospital Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds*	60	60	26	26
Licensed Beds	47	47	26	26
Staffed Beds Occupancy	45.3%	38.6%	81.0%	77.8%
Licensed Beds Occupancy	57.8%	49.3%	81.0%	77.8%
Average Daily Census	27	23	21	20
Patient Days	9,923	8,453	7,705	7,384
Discharges/Admissions	691	17,155	606	569
Average Length of Stay	14.4	12.9	12.7	13.0

*In FY10 and FY11, the number of staffed beds exceeds licensed beds because staffed beds include licensed SNF beds co-located at Quillen Rehab Hospital.

Source: Tennessee Joint Annual Reports FY10-FY13

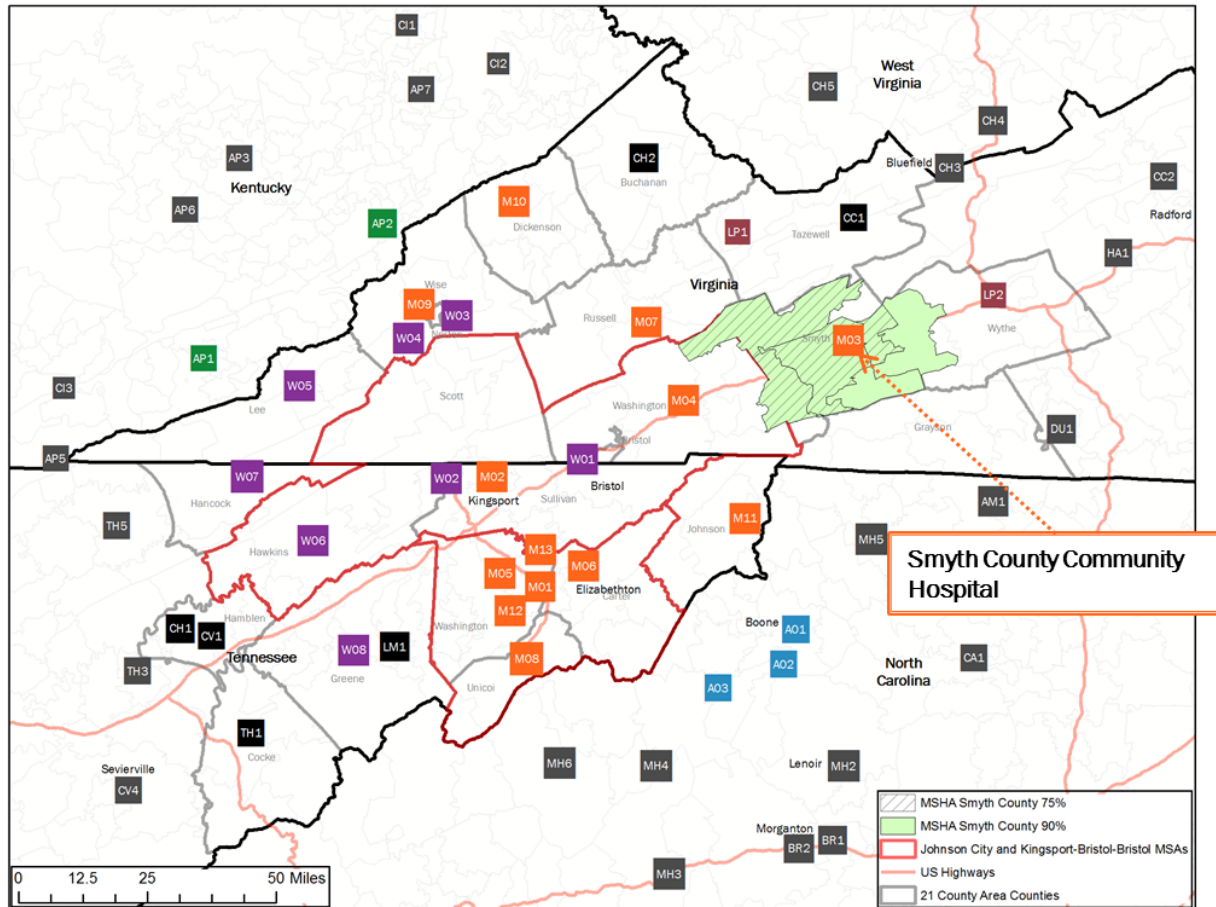
15. Russell County Medical Center



Mountain States Russell County Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	78	78	78	49
Licensed Beds	78	78	78	78
Staffed Beds Occupancy	44.9%	45.7%	43.3%	58.5%
Licensed Beds Occupancy	44.9%	45.7%	43.3%	36.7%
Average Daily Census	35	36	34	29
Patient Days	12,789	13,010	12,371	10,461
Discharges/Admissions	3,117	3,061	2,869	2,464
Average Length of Stay	4.1	4.3	4.3	4.2

Source: Virginia Health Information Reports FY10-FY13

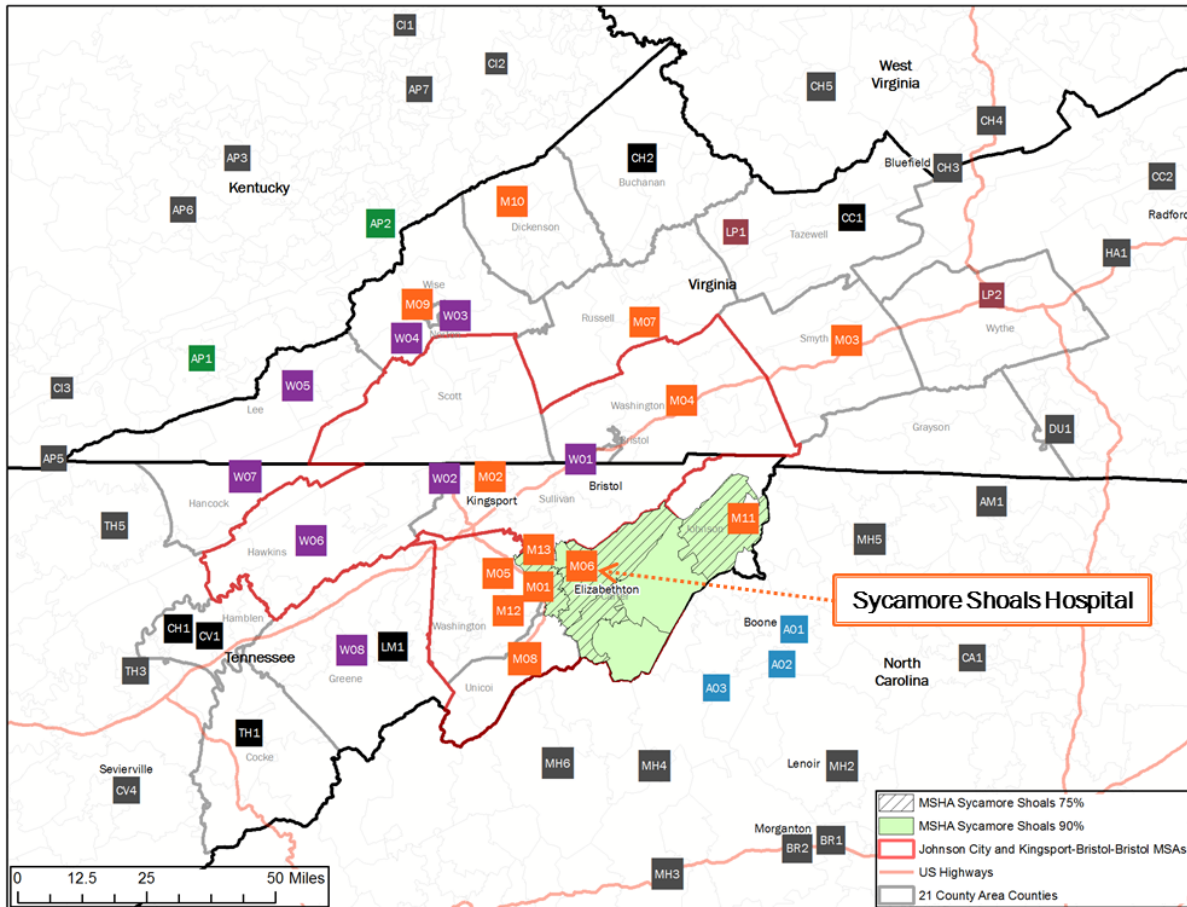
16. Smyth County Community Hospital



Mountain States Smyth County Comparative Statistics				
	FY2010	FY2011	FY2012	FY2013
Staffed Beds	54	44	44	44
Licensed Beds	170	170	139	44
Staffed Beds Occupancy	43.5%	51.3%	49.4%	48.1%
Licensed Beds Occupancy	13.8%	13.3%	15.6%	48.1%
Average Daily Census	23	23	22	21
Patient Days	8,569	8,234	7,951	7,729
Discharges/Admissions	2,498	2,275	1,962	1,713
Average Length of Stay	3.4	3.6	4.1	4.5

Source: Virginia Health Information Reports FY10-FY13

17. Sycamore Shoals Hospital

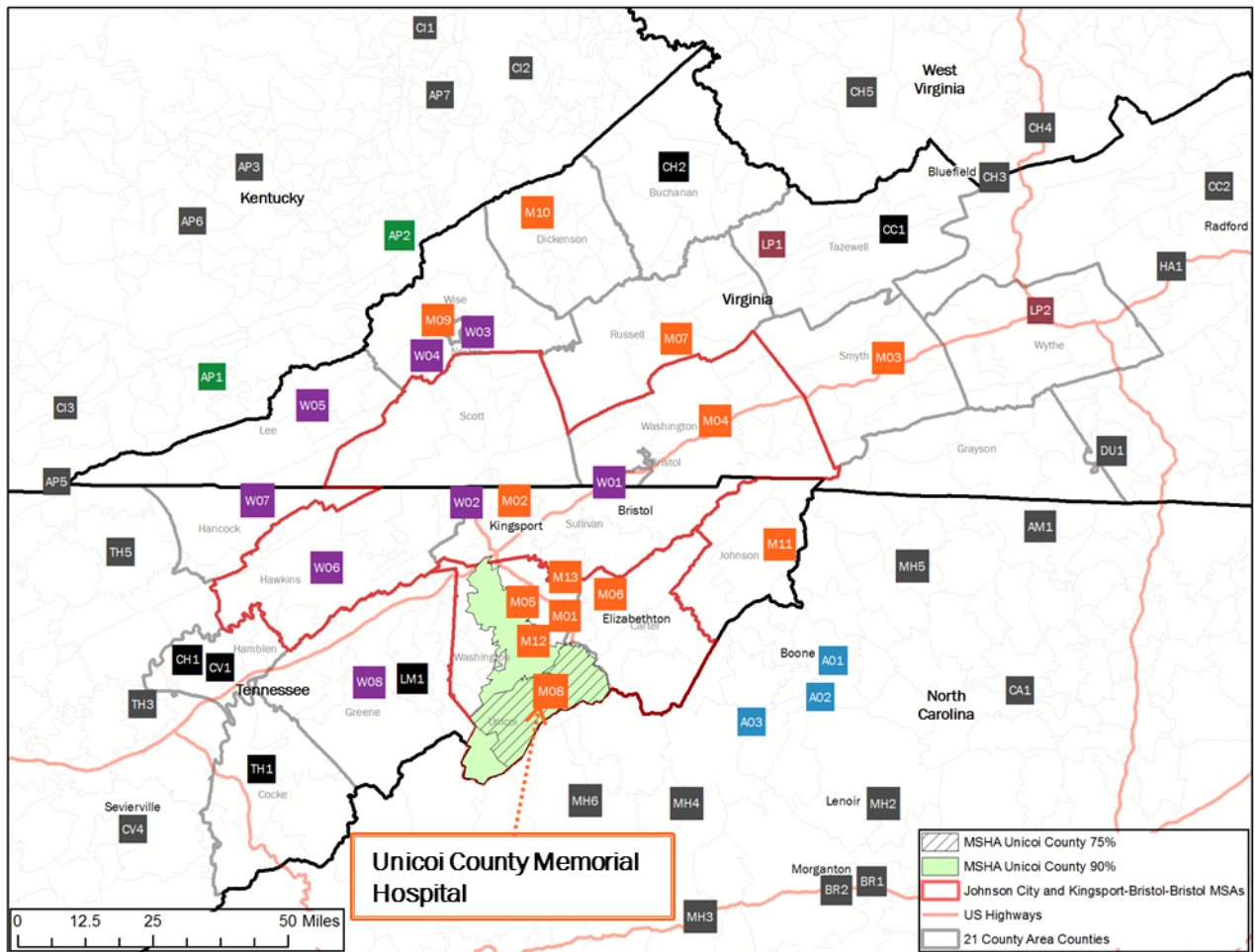


Mountain States Sycamore Shoals Comparative Statistics

	FY2010	FY2011	FY2012	FY2013
Staffed Beds	79	79	79	74
Licensed Beds	121	121	121	121
Staffed Beds Occupancy	53.2%	53.1%	52.6%	57.0%
Licensed Beds Occupancy	34.7%	34.7%	34.3%	34.9%
Average Daily Census	42	42	42	42
Patient Days	15,334	15,299	15,206	15,398
Discharges/Admissions	3,448	3,640	3,673	3,430
Average Length of Stay	4.4	4.2	4.1	4.5

Source: Tennessee Joint Annual Reports FY10-FY13

18. Unicoi County Memorial Hospital

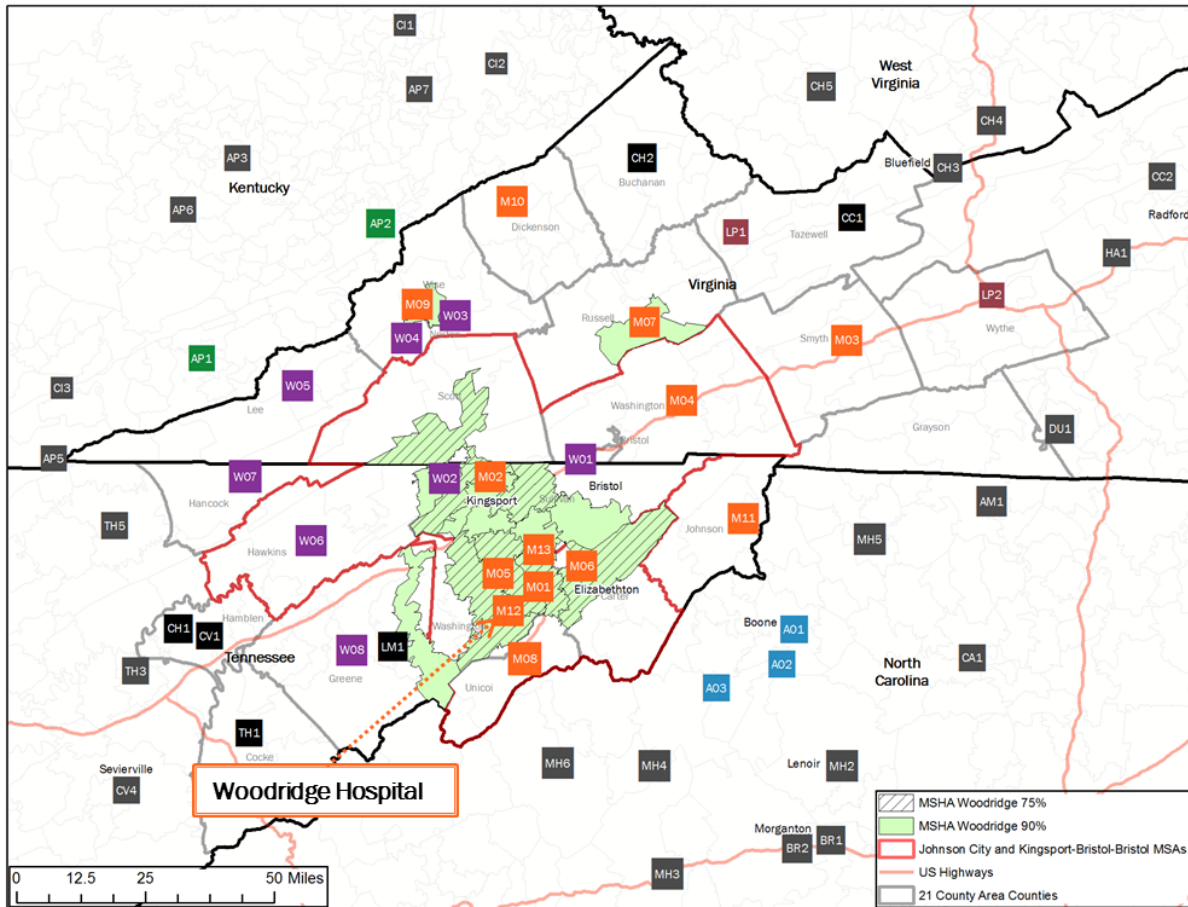


Mountain States Unicoi County Comparative Statistics

	FY2010	FY2011	FY2012	FY2013
Staffed Beds	25	10	7	7
Licensed Beds	48	48	48	48
Staffed Beds Occupancy	49.3%	126.6%	166.4%	169.7%
Licensed Beds Occupancy	25.7%	26.4%	24.3%	24.7%
Average Daily Census	12	13	12	12
Patient Days	4,499	4,622	4,262	4,336
Discharges/Admissions	1,223	1,221	1,098	1,060
Average Length of Stay	3.7	3.8	3.9	4.1

Source: Tennessee Joint Annual Reports FY10-FY13

19. Woodridge Hospital



Mountain States Woodridge Psychiatric Comparative Statistics

	FY2010	FY2011	FY2012	FY2013
Staffed Beds	84	84	84	80
Licensed Beds	84	84	84	84
Staffed Beds Occupancy	63.8%	64.7%	69.4%	76.0%
Licensed Beds Occupancy	63.8%	64.7%	69.4%	72.4%
Average Daily Census	54	54	58	61
Patient Days	19,572	19,827	21,329	22,182
Discharges/Admissions	3,310	3,412	3,573	3,824
Average Length of Stay	5.9	5.8	6.0	5.8

Source: Tennessee Joint Annual Reports FY10-FY13