

3/12/2024  
pre-hearing statement  
Case nos. 25956, 25957

1. list of disputes:
  - a. the sloppy nomenclature of the "Penn (Gas) Pool" as previously described;
  - b. the stranded SENE sec 28 contains at least 67K bbls. oil and 127 MCF gas from the 3rd Bone Spring. Philip White intends to cause to be drilled a vertical well in the center of SENE to produce these hydrocarbons and needs 10 acres of surface for equipment. This is in conflict with Avant's idea of surface locations in this same 40 acre tract for 4 horizontal wells. (SEE Exhibit A)

2. 10 of witnesses — Philip L. White O&R ID 119957  
Qualifications — President of The Blanco Co.  
from 1974-2015 O&R ID 113369
3. see Exhibit A; see above for written testimony.

Philip L. White

TOWNSHIP 20 RANGE 34 COUNTY Lea STATE NM

REMARKS: Exhibit A C.E.S. NOS. 25926 25957 COMPANY

