

2/18/2026

Pre-hearing statement

Case #'s 25956, 25957

My name is Philip White, and my 130 acre unleased mineral interest represents 13.5% of this proposed 960 acre Unit.

My issues with case #'s 25956 & 25957:

I am OK with grouping the Wolfcamp A,B,C benches under the Permian Wolfcamp horizontal spacing unit. However, does the controversial Wolfcamp D fall under case 25956? Many would argue that the Wolfcamp D is not Permian at all, but in reality the Cline shale of Pennsylvanian age. Is this where case #25957, Lea; Penn (Gas) Pool enters the picture?

Does the Lea;Penn (Gas) Pool entail Wolfcamp D? Atoka? Morrow? Cline shale? Seriously, how can OCD expect me to pony up more than a million dollars per well based on such sloppy nomenclature? I strongly protest these bench characterizations, or should I say their lack thereof. Ongoing lease negotiations with a third party of 1/2 of my mineral interest conveying all Pennsylvanian rights from the top of the Wolfcamp D to the base of the Cline shale further complicates these designations. I hereby request that OCD create a special Wolfcamp/Cline pool for this pair of case applications. I also request that OCD create special pool rules to account for a common source of supply.

I also take issue with the AOII claim that the 10 proposed **Paloma** locations in Units F & H of section 28 will "efficiently locate surface facilities, reduce surface disturbance, consolidate roads, tanks, and pipelines..." ALL FALSE! Look at Google Maps. If AOII was truly concerned with these issues, they would use the existing infrastructure of their producing **Paloma** wells located at Units A,B,C,D of section 21 in this same 960 acre Unit. Roads, surface facilities, pipelines - all in place, ready to go with minimal surface disturbance. AOII's true motivation remains unknown.

I am 75 years old and spent most of January of this year in Presbyterian hospitals in Rio Rancho and Albuquerque fighting pneumonia, blood clots, and the evacuation of 4 liters of pleural effusion from my chest. AOII knew this, but pushed forward with their March 5 hearing without regard to my condition. I am now at 50% at best, and can in no way prepare exhibits or witnesses by next week. I ask OCD for a 6 month continuation for this hearing.

Respectfully,

Philip L. White

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case # 25956
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