

C. Craig Folson
3612 McFarlin
Dallas, Texas 75205

February 26, 2020

BY FEDERAL EXPRESS

Oil Conservation Commission
1220 South Saint Francis Drive
Santa Fe, NM 87505

Re: Applications of Devon Energy Production Company, L.P. for compulsory
pooling, Eddy County, New Mexico Case Nos. 21126 and 21127

Ladies and Gentlemen

Please accept this as the Prehearing Statement of C. Craig Folson filed in response Devon Energy Production Company's Applications in the two cases referenced in the caption. I will appear pro se and will testify. I would not expect my direct testimony to exceed 20-30 minutes.

My concerns and my case include the following:

- The Applications both state that "Applicant has sought and been unable to obtain voluntary agreement..." Applicant did not contact me regarding either of the proposed pooling proposals prior to filing the Applications.
- The title to the leasehold ownership under the subject land is complicated, with cascades of transactions, some recorded and some merely contractual, with some of these affecting some depths and not others. Applicant's predecessors in interest have shared with me title opinions over the years that were erroneous and inconsistent. The Application imposes penalties on working interest ownership but not on other ownership. To evaluate the proposals for pooling, I need to understand what Applicant has determined my ownership to be and how that determination was made.

Regards,



C. Craig Folson

cc: Michael H. Feldewert, Attorney for Devon Energy Production Company, L.P.



February 14, 2020

VIA CERTIFIED MAIL
CERTIFIED RECEIPT REQUESTED

TO: ALL INTEREST OWNERS SUBJECT TO POOLING PROCEEDINGS

Re: Application of Devon Energy Production Company, L.P. for compulsory pooling, Eddy County, New Mexico.
Shetland 2-11 State Fed Com #333H, #6131I, #713H Wells

Ladies & Gentlemen:

This letter is to advise you that Devon Energy Production Company, L.P., has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on March 5, 2020, and the status of the hearing can be monitored through the Division's website. Division hearings will commence at 8:15 a.m. in Porter Hall at the Oil Conservation Division's Santa Fe Offices located at 1220 South Saint Francis Drive, Santa Fe, New Mexico 87505. You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

Parties appearing in cases are required by Division Rule 19.15.4.13.B to file a Pre-hearing Statement four business days in advance of a scheduled hearing. This statement must be filed at the Division's Santa Fe office at the above specified address and should include: the names of the parties and their attorneys; a concise statement of the case; the names of all witnesses the party will call to testify at the hearing; the approximate time the party will need to present its case; and identification of any procedural matters that are to be resolved prior to the hearing.

If you have any questions about this matter, please contact Tim Prout at (405) 552-3113, or at Tim.Prout@dvn.com.

Sincerely,

for

Michael H. Feldewert
ATTORNEY FOR DEVON ENERGY PRODUCTION
COMPANY, L.P.