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KOLETY HODENABEL
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IN THE TWENTY-SIXTH JUDICIAL DISTRICT
DISTRICT COURT, STEVENS COUNTY, KANSAS
CIVIL DEPARTMENT

JOHN STEPHEN ALFORD and)
ROBERT LARRABEE, individually)
and on behalf of Plaintiff)
Class as more fully described)
in the First Amended Petition,)
Plaintiffs,)
v.)
PIONEER NATURAL RESOURCES)
USA., INC.,)
Defendant.)

Case No. 93 CV 37

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

COME NOW Plaintiffs and move this Court for an order certifying this action as a class action under K.S.A. 60-223(b)(3), with the plaintiff class consisting of the following:

Each owner of a mineral interest burdened by an oil and gas lease owned in whole or in part by defendant Pioneer Natural Resources USA, Inc., the production from whose wells pass or have passed through defendant's Satanta Plant located in Grant County, Kansas. Plaintiffs exclude from the plaintiff class the United States of America insofar as its mineral interests are managed by the Minerals Management Service but otherwise include the instrumentalities of the United States of America and federally

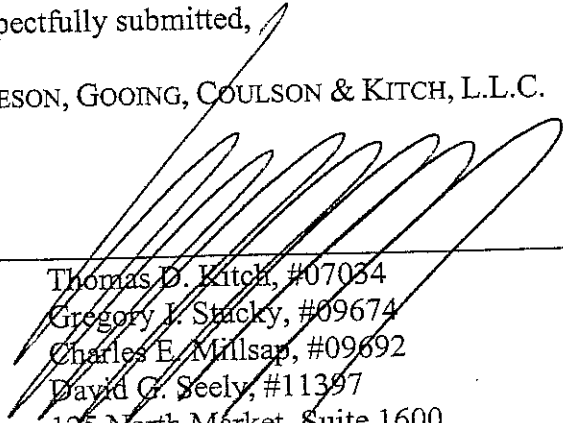
chartered corporations, including, but not limited to, the Farm
Credit Bank of Wichita and the Federal Land Bank.

Plaintiffs submit a Memorandum in support of this Motion.

Respectfully submitted,

FLEESON, GOING, COULSON & KITCH, L.L.C.

By _____



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Attorneys for Plaintiffs and Plaintiff Class

CERTIFICATE OF SERVICE

I certify that on August 1, 2000 a copy of this **Plaintiffs' Motion for Class Certification** was placed in the United States mail in Wichita, Kansas, first class postage prepaid, addressed to:

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