

**STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION**

**AMENDED APPLICATIONS OF PRIDE ENERGY COMPANY
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO**

Case No. 23327

**MOTION TO ADD AMENDED APPLICATION TO PRE-HEARING ORDER AND
CONTESTED HEARING SET FOR MARCH 16, 2023**

Applicant Pride Energy Company (“Pride”), OGRID No. 151323, through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and Samantha H. Catalano), hereby requests that the Division add the amended application in the above-referenced case to the pre-hearing order entered in Case Nos. 22879-22880, 23176-23179 and to the contested hearing currently set for March 16, 2023. *See* Amended Pre-Hearing Order (Dec. 2, 2022). In support, Pride states as follows:

1. Pride filed an amended application with the Oil Conservation Division (“OCD” or “Division”) on January 11, 2023, seeking an order pooling all uncommitted mineral interests in the Bone Spring formation (Tonto; Bone Spring [59475]) in a standard 240-acre, more or less, horizontal spacing unit (“HSU”) comprised of the W/2 E/2 of Section 16 and the W/2 NE/4 of Section 21, all in Township 19 South, Range 33 East, Lea County, New Mexico (“Amended Application”).

2. The Amended Application amends the application in Case No. 22879 by adding the W/2 NE/4 of Section 21 and thereby increasing the size of the previously proposed spacing unit. At the status conference on January 5, 2023, all parties and the OCD were informed that Pride planned to amend its application and add the amended application to the contested hearing currently set for March 16, 2022.

3. The Amended Application is currently on the new case docket on March 2, 2023. Pride anticipates filing a motion continuing this case to the current contested hearing date, March 16, 2023. Pride further anticipates requesting dismissal of Case No. 22879.

4. All other interested parties to this case have been contacted for their positions on this Motion. COG Operating LLC, XTO, the MRC entities, Yates Energy, and Jalapeno Corporation do not object. Marathon and Mewbourne do not object to consolidating the competing cases for hearing, including the Amended Application; however, Marathon and Mewbourne object to holding the contested hearing on March 16, 2022 as provided in the Amended Pre-Hearing Order.

WHEREFORE, Pride requests that the OCD add the amended application in the above-referenced case to the pre-hearing order entered in Case Nos. 22879-22880, 23176-23179 and to the contested hearing currently set for March 16, 2023.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on January 25, 2023:

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