

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

**APPLICATIONS OF ROCKWOOD ENERGY , L.P.
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

CASE NO. 25243 - 25246

**APPLICATIONS OF CITERRA ENERGY OPERATING
CO. FOR COMPULSORY POOLING AND APPROVAL
OF OVERLAPPING SPACING UNITS, LEA COUNTY,
NEW MEXICO.**

CASE NO. 25520 & 25525

**APPLICATIONS OF CITERRA ENERGY OPERATING
CO. FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.**

CASE NO. 25521 - 25524

**ENTRY OF APPEARANCE
AND
MOTION TO VACATE OR AMEND PRE-HEARING ORDER**

James Bruce hereby enters his appearance in the above cases on behalf of Marshall & Winston ("M&W"), and for other relief, and in support thereof, states:

1. The above cases involve competing applications for the pooling of lands in Township 18 South, Range 35 East, NMPM and Township 19 South, Range 35 East, NMPM. These cases are set for hearing on August 12 and 13, 2025.

2. M&W owns interests in some of the lands being pooled. It also is an interest owner in the existing Blue Box Fed. Com. Well No. 505H, which is being overlapped by Coterra Energy Operating Co.'s ("Coterra") well unit for Case No. 25520.

3. Coterra sent well proposals to M&W by a letter dated July 25, 2025, received by M&W on July 28, 2025. **Exhibit 1.**

4. Coterra sent a notice of the hearing to M&W by a letter dated July 25, 2025, received by M&W on August 1, 2025. **Exhibit 2.**

5. M&W requests that the Pre-Hearing Order ("PHO") in this case be vacated or amended to provide for a later hearing date, for the following reasons:

(a) The proposal letter was not sent to M&W 30-45 days prior to Coterra's applications, as required by Division practice. In fact, the letters were sent after the filing of the

applications. Thus, M&W has not had adequate time to review and analyze Coterra's proposals and their potential effect on existing wells.

(b) Coterra's notice letter was mailed less than 20 days before the hearing. Therefore it does not comply with Division Rules.

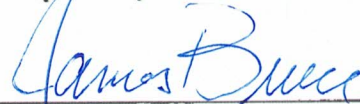
(c) M&W did not have sufficient time to prepare for hearing and could not prepare and file exhibits and testimony for submission to the Division in a timely manner.

6. For the foregoing reasons, in order to protect M&W's correlative rights, the PHO should be vacated, or should be amended to provide for a later hearing date. If this motion is granted M&W will a motion to continue these cases via the fee permitting portal.

7. Counsel for Coterra does not take a position on this motion. Counsel for Rockwood Energy, L.P. ("Rockwood") does not oppose the granting of this motion as to Coterra's cases, but desires its cases be heard next week.

WHEREFORE, M&W requests that the PHO be vacated, or amended to set the subject cases case for a later hearing docket.

Respectfully submitted,



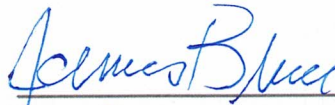
James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
Phone: (505) 982-2043
Cell: (505) 660-6612

jamesbruc@aol.com

Attorney for Marshall & Winston, Inc.

CERTIFICATE OF SERVICE

I certify that the forgoing pleading was served on all counsel of record this 7th day of February, 2025.



James Bruce

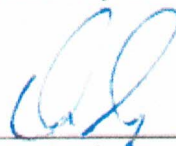
SELF-AFFIRMED STATEMENT OF OMAR SANCHEZ

Omar Sanchez deposes and states:

1. I am over the age of 18 and have personal knowledge of the matters stated herein.
2. I am the Land Manager for M&W, and am authorized to make this statement on its behalf.
3. Exhibits 1 and 2 attached to this motion are true and correct copies of correspondence received from Coterra, and were compiled from company business records. The "received" dates on the exhibits were stamped on the correspondence by M&W on the dates indicated.

I understand that this Self-Affirmed Statement will be used as written testimony in this matter. I affirm that my testimony in paragraphs 1 through 3 above is true and correct and is made under penalty of perjury under the laws of the State of New Mexico. My testimony is made as of the date handwritten next to my signature below.

August 7, 2025
Date



Omar Sanchez



Coterra Energy Inc.
Permian Business Unit
6001 Deauville Blvd
Suite 300N
Midland, TX 79706

T 432.571.7800
coterra.com

RECEIVED JUL 28 2025

July 25, 2025

Marshall & Winston, Inc.

Attn: Land Department
6 Desta Drive, Suite 3100
Midland, TX 79701

Via Certified Mail

Re: **Proposal to Drill
Yeti State Com 223H & 224H
Sections 26 & 35, Township 18 South, Range 35 East and
Sections 2 & 11, Township 19 South, Range 35 East
Lea County, NM**

Dear Working Interest Owner,

Coterra Energy Operating Co., as Operator, hereby proposes to drill and complete the Yeti State Com 223H & 224H wells, from a legal or otherwise approved location beginning in Section 11, Township 19 South, Range 35 East and terminating in Section 26, Township 18 South, Range 35 East, Lea County, New Mexico.

The intended surface hole location, bottom hole location, formation, and depths for the wells are as follows:

Well	Location	Formation	TVD
Yeti State Com 223H	SHL: SE 1/2 Section 11, T19S, R35E BHL: 1820' FEL & 100' FNL Section 26, T18S, R35E	Bone Spring	9,300'
Yeti State Com 224H	SHL: SE 1/2 Section 11, T19S, R35E BHL: 466' FEL & 100' FNL Section 26, T18S, R35E	Bone Spring	9,300'

Coterra reserves the right to modify the locations and drilling plans described above in order to address compliance with topography, cultural, or environmental concerns, among others, which might require modification of Coterra's proposal. Coterra will advise you of any such modifications.

Enclosed are Coterra's detailed AFEs reflecting estimated costs for each well associated with this proposal. Coterra is proposing to drill these wells under the modified terms of the 1989 AAPL Operating Agreement.

The Operating Agreement has the following general provisions:

- 100%/300%/300% Non-Consenting Penalty
- \$8,000/\$800 Drilling and Producing Rate
- Coterra Energy Operating Co. designated as Operator

EXHIBIT

1

If you intend to participate, please approve, and return the following within thirty (30) days of receipt of this proposal:

1. One (1) executed original of each Election to Participate
2. One (1) executed original of each of the enclosed AFEs
3. Well Data Requirements Sheet

If you elect to participate and purchase your own well control insurance, you must provide a certificate of such insurance to Coterra prior to commencement of drilling operations; otherwise, you will be covered by insurance procured by Coterra and will be responsible for your share of the cost.

Please mail all original signed documents to the following address:

Attn: Kevin Gavigan
Coterra Energy Inc.
6001 Deauville Blvd.
Suite 300N
Midland, TX 79706

If you do not wish to participate in the subject wells, please contact the undersigned to discuss a potential farmout or acquisition of your interest.

Please call the undersigned with any questions or comments.

Respectfully,

Kevin Gavigan

Kevin Gavigan
Landman - Senior
432.620.1667 Kevin.Gavigan@Coterra.com

**ELECTION TO PARTICIPATE
Yeti State Com 223H**

Marshall & Winston, Inc. elects **TO** participate in the proposed Yeti State Com 223H.

Marshall & Winston, Inc. elects **NOT** to participate in the proposed Yeti State Com 223H.

Dated this _____ day of _____, 2025.

Signature: _____

Title: _____

If your election above is TO participate in the proposed Yeti State Com 223H well, then:

Marshall & Winston, Inc. elects **TO** be covered by well control insurance procured by Coterra Energy Inc.

Marshall & Winston, Inc. elects **NOT** to be covered by well control insurance procured by Coterra Energy Operating Co. and agrees to provide Coterra Energy Inc. with a certificate of insurance prior to commencement of drilling operations or be deemed to have elected to be covered by well control insurance procured by Coterra Energy Inc.

**ELECTION TO PARTICIPATE
Yeti State Com 224H**

_____ Marshall & Winston, Inc. elects **TO** participate in the proposed Yeti State Com 224H.

_____ Marshall & Winston, Inc. elects **NOT** to participate in the proposed Yeti State Com 224H.

Dated this _____ day of _____, 2025.

Signature: _____

Title: _____

If your election above is TO participate in the proposed Yeti State Com 224H well, then:

_____ Marshall & Winston, Inc. elects **TO** be covered by well control insurance procured by Coterra Energy Inc.

_____ Marshall & Winston, Inc. elects **NOT** to be covered by well control insurance procured by Coterra Energy Operating Co. and agrees to provide Coterra Energy Inc. with a certificate of insurance prior to commencement of drilling operations **or** be deemed to have elected to be covered by well control insurance procured by Coterra Energy Inc.



1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 2680, 26



EXHIBIT 2.15 (continued)



MODRALL SPERLING

L A W Y E R S

RECEIVED AUG 01 2025

July 25, 2025

Deana M. Bennett
505.848.1834
dmb@modrall.com

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING, AND TO THE EXTENT
NECESSARY, APPROVAL OF OVERLAPPING SPACING
UNITS, LEA COUNTY, NEW MEXICO.

CASE NO. 25520
(Sombrero State Com
#221H)

APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

CASE NO. 25521
(Sombrero State Com
#222H)

APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

CASE NO. 25522
(Sombrero State Com
#223H)

APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.

CASE NO. 25523
(Sombrero State Com
#224H)

EXHIBIT

2

Modrall Sperling
Roehl Harris & Sisk P.A.

500 Fourth Street NW
Suite 1000
Albuquerque,
New Mexico 87102

PO Box 2168
Albuquerque,
New Mexico 87103-2168

Tel: 505.848.1800
www.modrall.com

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**APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NO. 25524
(Yeti State Com #223H)

**APPLICATION OF COTERRA ENERGY OPERATING CO.
FOR COMPULSORY POOLING, AND TO THE EXTENT
NECESSARY, APPROVAL OF OVERLAPPING SPACING
UNITS, LEA COUNTY, NEW MEXICO.**

CASE NO. 25525
(Yeti State Com #224H)

TO: AFFECTED PARTIES

I am writing to follow up on a letter I sent on July 24, 2025, enclosing applications for the above captioned cases. The case numbers in the July 24 letters and on the enclosed applications had certain typographical errors. The case numbers above are the correct case numbers. I have also included the August 13 Docket from the Oil Conservation Division which identifies the cases and case numbers.

Please feel free to reach out to me with any questions.

As noted in the letters I sent, these cases will be set for a contested hearing on August 13, 2025. These applications, along with other applications Coterra has filed, compete with the applications of Rockwood Energy, LP, Case Nos. 25241-25246, which are set for contested hearing on August 12, 2025 beginning at 1:30 p.m. The hearing will be conducted in a hybrid fashion, both in-person at the Energy, Minerals, Natural Resources Department, Wendell Chino Building, Pecos Hall, 1220 South St. Francis Drive, 1st Floor, Santa Fe, NM 87505 and via the WebEx virtual meeting platform. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: <https://www.emnrd.nm.gov/ocd/hearing-info/>.

As a party who may be affected by these applications, we are notifying you of your right to appear at the hearing and participate in these cases, including the right to present evidence either in support of or in opposition to the applications. Failure to appear at the hearing may preclude you from any involvement in these cases at a later date.

Page 3

You are further notified that if you desire to appear in these cases, then you are requested to file a Pre-Hearing Statement with the Division at least four business days in advance of a scheduled hearing before the Division or the Commission, but in no event later than 5:00 p.m. mountain time, on the Thursday preceding the scheduled hearing date, with a copy delivered to the undersigned.

Sincerely,

A handwritten signature in cursive script that reads "Deana M. Bennett".

Deana M. Bennett

Attorney for Applicant