

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

**APPLICATIONS OF CENTENNIAL RESOURCE
PRODUCTION, LLC FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

Case Nos. 22252-22253

**RESPONSE TO ATLAS OBO ENERGY LP'S
OPPOSED MOTION FOR CONTINUANCE**

Centennial Resource Production, LLC (“Centennial”) files this response in opposition to Atlas OBO Energy LP’s (“Atlas”) motion for a continuance of these consolidated cases, as follows:

ARGUMENT

1. Atlas requests that the pooling hearing in these consolidated matters should be continued based only on the facts that: (1) Atlas only recently engaged counsel in this matter, and (2) Atlas received notice of the Applications on October 22, 2021. Atlas Motion, at p. 1.
2. Atlas provides no grounds under either Division precedent or the Division rules to continue these cases based on these two allegations.
3. Centennial timely mailed notice of the applications and the hearing to Atlas, as reflected in the exhibits filed by Centennial with the Division today in preparation for the November 4 hearing.
4. The Division has primary jurisdiction over the appropriate spacing units for horizontal development in New Mexico and the pooling of the interests in these cases.
5. Atlas has not proposed competing well development plans.
6. There exists no basis to continue the pooling hearing for these pooling cases.

7. Centennial would be prejudiced by delaying this hearing because it has leases in the subject units that will expire as of April 1, 2022.

8. Accordingly, and in response to Atlas's objections to these cases proceeding by affidavit, Centennial will make its witnesses available at the hearing in these matters currently set for the November 4 Division docket.

WHEREFORE, Centennial respectfully requests that the Division deny Atlas's motion to continue the scheduled pooling hearing in these consolidated cases.

Respectfully submitted,

HOLLAND & HART LLP



By: _____

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**ATTORNEYS FOR CENTENNIAL RESOURCE
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CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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A handwritten signature in blue ink, appearing to read "Kaitlyn A. Luck", is written over a horizontal line.

Kaitlyn A. Luck