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

APPLICATIONS OF TAP ROCK RESOURCES, LLC FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO.

Case No. 21568 Case No. 21572 Case No. 22653

APPLICATIONS OF CHEVRON U.S.A. INC. FOR COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 22409 Case No. 22410 Case No. 22411 Case No. 22412

MOTION TO VACATE PRE-HEARING ORDER AND RESET HEARING AS STATUS CONFERENCE

Pride Energy Company ("Pride") hereby requests that the Division vacate the Further Amended Pre-Hearing Order entered May 18, 2023 ("Pre-Hearing Order") in the above-captioned matters and hear these matters as a status conference on August 3, 2023. In support, Pride states the following:

- 1. Pride recently leased from the Bureau of Land Management the SE/4 SE/4 of Section 9, T24S, R34E, Lea County, New Mexico ("Tract"), which adjoins one or more of the proposed spacing units in these matters.
- 2. Upon information and belief, Applicants did not include the Tract in the development proposed in the above-referenced applications, because the Tract was not leased at the time the applications were filed.
- 3. Pride believes the Tract should be included in the development proposed by Applicants to avoid stranding federal minerals.

4. Pride has conferred with counsel for the Applicants and all parties who have entered appearances. Applicant Chevron U.S.A. Inc. supports this Motion. Applicant Tap Rock Resources, LLC has not yet provided its position on the Motion. COG Operating LLC does not oppose the Motion. Coterra Energy Inc. does not oppose the Motion, but reserves judgement on the question of whether to include Pride's additional tract in the development until there has been further discussion on that matter.

WHEREFORE, Pride requests that the Pre-Hearing Order be vacated and that these matters be set for a status conference on August 3, 2023.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen
Sharon T. Shaheen
ec: William McGinnis
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@montand.com
wmcginnis@montand.com

Attorneys for Pride Energy Company

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by email upon the following on July 11, 2023:

Earl E. DeBrine, Jr.
Deanna M. Bennett
Jamie Allen
MODRALL SPERLING
500 Fourth Street NW, Ste. 1000
Albuquerque, NM 87103-2168
edebrine@modrall.com
dbennett@modrall.com
jallen@modrall.com

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504 jamesbruc@aol.com

Attorney for Tap Rock Resources, LLC

Attorneys for Chevron U.S.A Inc.

Darin C. Savage
William E. Zimsky
Andrew D. Schill
ABADIE SCHILL
214 McKenzie Street
Santa Fe, NM 87501
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Coterra Energy Inc.

Ocean Munds-Dry
Beth Ryan
CONOCOPHILLIPS
1048 Paseo de Peralta
Santa Fe, NM 87501
Ocean.Munds-Dry@ConocoPhillips.com
Beth.Ryan@ConocoPhillips.com

Joby Rittenhouse CONOCOPHILLIPS 600 W. Illinois Ave. Midland, TX 79701 Joby.Rittenhous@ConocoPhillips.com

Attorneys for COG Operating LLC

/s/ Sharon T. Shaheen