

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

IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:

APPLICATION OF PRIDE ENERGY COMPANY
FOR COMPULSORY POOLING, LEA COUNTY,
NEW MEXICO.

Case No. 22853

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

Case No. 23295

AMENDED PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Pride Energy Company as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Pride Energy Co.
P.O. Box P.O. Box 701950
Tulsa, Oklahoma 74170

Attention: Matthew Pride
(918) 524-9200

APPLICANT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
jamesbruc@aol.com

OPPONENT

Cimarex Energy Co.

ConocoPhillips Company
COG Operating LLC
Concho Oil & Gas, LLC

Marathon Oil Permian LLC
Chevron U.S.A. Inc.

OPPONENT'S ATTORNEY

Darin Savage

Ocean Munds-Dry
Elizabeth Ryan
Jobediah Rittenhouse

Earl DeBrine
Deana Bennett

STATEMENT OF THE CASE

APPLICANT

In Case No. 22853 Pride Energy Company seeks an order pooling all mineral interest owners in the Wolfcamp formation (Upper Wolfcamp) in a horizontal spacing unit underlying the W/2W/2 of Section 12 and the W/2W/2 of Section 13, Township 19 South, Range 34 East, NMPM. The unit will be dedicated to the Go State. Com. Well No. 401H.

In Case No. 23295 Cimarex Energy Co. seeks an order pooling all mineral interest owners in the Bone Spring formation (Lower Third Bone Spring Sand) in a horizontal spacing unit underlying the W/2W/2 of Section 12 and the W/2W/2 of Section 13, Township 19 South, Range 34 East, NMPM. The unit will be dedicated to the Showbiz 13-12 State Com. Wells.

Also to be considered in each case will be the cost of drilling, completing, and equipping the well and the allocation of the cost thereof, as well as actual operating costs and charges for supervision, designation of applicant as operator of the well, and a 200% charge for the risk involved in drilling, completing, and equipping the well.

Cimarex basically asserts that Pride’s application should be denied because drilling its well will adversely affect the correlative rights of the owners of the Bone Spring formation. Pride disagrees, and asserts that if its application is denied the correlative rights of the Wolfcamp owners will have their rights adversely affected. Ownership between the Bone Spring and Wolfcamp differ.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Matthew Pride (landman)	15 min.	Approx.
Harvin Broughton (geologist)	15 min.	Approx.

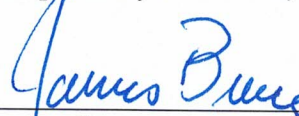
OPPONENT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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PROCEDURAL MATTERS

These matters should be consolidated for hearing

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Pride Energy Co.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 17th day of July, 2023 by e-mail:

Ocean Munds-Dry – ocean.munds-dry@conocophillips.com

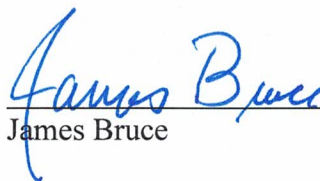
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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 239992

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 239992
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.