

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

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

Case No. 23327

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

Case No. 23328

**PRE-HEARING STATEMENT**

Applicant Pride Energy Company (“Applicant” or “Pride”) provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

**APPLICANT**

Pride Energy Company

**ATTORNEYS**

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**OTHER INTERESTED PARTIES**

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Earthstone Operating, LLC  
Mewbourne Oil Company

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### STATEMENT OF THE CASE

**Case No. 23327: Amended Application of Pride Energy Company for Compulsory Pooling, Lea County, New Mexico.** Applicant seeks an order from the Division 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. Applicant proposes to dedicate the HSU to the **Tonto 16-21 Fed Com. Well No. 201H**, to be horizontally drilled from an approximate surface hole location 2412’ FSL and 1625’ FEL of Section 21, T19S-R33E, to an approximate bottom hole location 100’ FNL and 1980’ FEL of Section 16, T19S-R33E. The first take point will be located at approximately 2740’ FSL and 1980’ FEL of Section 21, T19S-R33E. The last take point will be located at approximately 100’ FNL and 1980’ FEL of Section 16, T19S-R33E.

**Case No. 23328: Amended Application of Pride Energy Company for Compulsory Pooling, Lea County, New Mexico.** Applicant seeks an order from the Division 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 E/2 E/2 of Section 16, and the E/2 NE/4 of Section 21, all in Township 19 South, Range 33 East, Lea County, New Mexico. Applicant proposes to dedicate the HSU to the **Tonto 16-21 Fed Com. Well No. 202H**, to be horizontally drilled from an approximate surface hole location 2412’ FSL and 1605’ FEL of Section 21, T19S-R33E, to an approximate bottom hole location 100’ FNL and 660’ FEL of Section 16, T19S-R33E. The first take point will be located at approximately 2740’ FSL and 660’ FEL of Section 21, T19S-R33E. The last take point will be located at approximately 100’ FNL and 660’ FEL of Section 16, T19S-R33E.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES

Matthew Pride, Landman

Harvin Broughton, Geologist

EXHIBITS

12-14 for both cases

14-16 for both cases

**PROCEDURAL MATTERS**

These cases are currently on the February 15, 2024 docket as a contested hearing with competing application(s) filed by Mewbourne Oil Company (“Mewbourne”). However, Pride understands that Mewbourne has assigned its operating rights in the pertinent acreage and will be dismissing its competing application(s). Pride therefore anticipates that its cases will be presented by affidavit, assuming no opposition by any other party at the time of hearing.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By:           /s/ Sharon T. Shaheen          

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*Attorneys for Pride Energy Company*

### **CERTIFICATE OF SERVICE**

I hereby certify that the following persons were served with the foregoing by email on February 8, 2024.

By: /s/ Sharon T. Shaheen

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QUESTIONS

Action 312843

**QUESTIONS**

|   |  |
|---|--|
| Operator:<br>PRIDE ENERGY COMPANY<br>P.O. Box 701950<br>Tulsa, OK 741701950 | OGRID:<br>151323   |
|   | Action Number:<br>312843                                 |
|   | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

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