

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

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

Case No. 25562

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

Case No. 25564

UNOPPOSED MOTION TO AMEND PRE-HEARING ORDER

Pride Energy Company ("Pride") moves the Division to approve the amendment of the Pre-Hearing Order in the above matter, and in support thereof states:

1. This matter is set for hearing as a trailing case on the November 18, 2025 special docket, per the Pre-Hearing Order entered on September 25, 2025. It concerns counter-applications to pool the Wolfbone formation underlying the W/2 of Section 12 and the W/2 of Section 13, Township 19 South, Range 34 East, N.M.P.M., one filed by Pride and one filed by Coterra Energy Operating Co. ("Coterra").

2. Because both parties are dealing with two productive intervals within the Wolfbone Pool, the Third Bone Spring and Upper Wolfcamp, and a depth severance creating non-uniform ownership between the two zones, the two parties planned to utilize percentages of allocation across the depth severance to protect correlative rights.

3. With the recent issuance of Commission Order R-24080 in Case No. 25371, which addressed the use of an allocation formula for the Wolfbone Pool involving a depth severance, as

also found in the present cases, Pride and Coterra need additional time to review the implications of this order and how it will affect the presentation of the competing cases.

4. Order R-24080 approved drilling wells on both sides of the depth severance, in the Third Bone Spring and Upper Wolfcamp, which Pride and Coterra view as drilling unnecessary wells in the Wolfbone Pool, and inapplicable to developing the Wolfbone in these Cases 25562 and 25564. Again, the parties need some additional time to sort out the proper approach in light of Order R-24080.

5. Pride and Coterra have entered discussions and negotiations regarding the nature of the proposed allocation formula for protecting correlative rights across the depth severance present in these cases.

6. In addition, the undersigned is suffering from a detached retina in his right eye. I had one surgery, but a follow-up surgery is needed, which I will have on November 3rd. Although the surgery itself is relatively easy, the recovery period is a month long, and during the first two weeks I have to lie on my stomach for 50 minutes each hour per day with my face in the pillow, or if sitting keep my head facing my feet.¹ Also, for the first 7 days or so I am not supposed to read anything. This will make it extremely difficult to prepare for a hearing on November 18th.

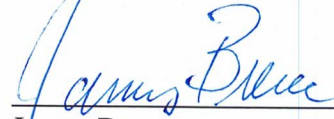
7. As a result, Pride submits this motion requesting an amendment of the Pre-Hearing Order so that the parties have additional time to sort out the legal matters that both of them are having to navigate.

8. Coterra agrees to this motion. Other interested persons do not object.

¹ This is necessary to keep the gas injected during surgery pressing the retina against the back wall of the eye.

WHEREFORE, for the foregoing reasons, Pride respectfully requests that the Pre-Hearing Order be amended to provide for a special hearing date in January 2025. If granted each party will file a motion to continue its cases.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on October 30th, 2025:

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