

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

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

**Case No. 25562**

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

**Case No. 25564**

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**PRIDE ENERGY COMPANY'S UNOPPOSED MOTION TO  
VACATE ORDER GRANTING UNOPPOSED MOTION TO AMEND PRE-HEARING  
ORDER AND RESET FOR A CONTESTED HEARING BETWEEN FEBRUARY 16 AND  
MARCH 5, 2026 OR AFTER MARCH 24, 2026**

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PRIDE ENERGY COMPANY (“Pride”) hereby requests that the Order granting Unopposed Motion to Amend Pre-Hearing Order, issued November 7, 2025, in the above-referenced cases be amended due to extraordinary circumstances. For the reasons stated below and in the attached supporting documentation, Pride requests that these matters be reset to a contested hearing date between February 16 and March 5, 2026 or after March 24, 2026. No party opposes this motion. In support of this request, Pride states the following:

1. These matters are set for a contested hearing on January 13, 2026. Exhibits and pre-hearing statements are due tomorrow, January 6, 2026.
2. The competing applications in these matters were filed on August 8, 2025.
3. After a status conference on September 25, 2025, the Division issued a pre-hearing order on the same day setting these cases for a contested hearing on November 3, 2025.

4. On November 7, 2025, at the request of counsel for Pride, for [REDACTED] reasons, the Division issued an order amending the September 25, 2025 pre-hearing order and resetting these cases for a contested hearing on January 13, 2025.

5. Undersigned counsel, who is entering an appearance concurrently with this motion, received a telephone call from co-counsel James Bruce this morning, stating that due to new and additional [REDACTED] reasons, he is unavailable and without access to materials relating to these matters until after February 4, 2026. *See* Self-Affirmed Statement of Sharon T. Shaheen, attached hereto as Exhibit A.<sup>1</sup>

6. Counsel for Coterra Energy Company (“Coterra”), Darin Savage, received a similar telephone call from Mr. Bruce, informing Mr. Savage that Mr. Bruce is unavailable due to [REDACTED] reasons until after February 4, 2026. *See* Self-Affirmed Statement of Darin Savage, attached hereto as Exhibit B.

7. Counsel for Pride and Coterra have conferred and agree that these cases should be continued to a later date to allow counsel for Pride sufficient time for recovery and preparation for the contested hearing. Pride and Coterra continue to have discussions in an effort to resolve their differences prior to the contested hearing date.

8. Other parties who have entered an appearance do not object to this request.

WHEREFORE, Pride requests that these matters be reset to a contested hearing date between February 16 and March 5, 2026 or after March 24. If granted, the parties will file motions to continue in their respective cases.

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<sup>1</sup> The filed versions of Exhibits A and B have been redacted to protect the confidentiality of [REDACTED] information.

Respectfully submitted,

**SPENCER FANE LLP**

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

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*Attorneys for PRIDE ENERGY COMPANY*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record, by electronic mail on January 5, 2026:

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/s/ Sharon S. Shaheen

Sharon T. Shaheen

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

**Case No. 25564**

**SELF-AFFIRMED STATEMENT OF SHARON T. SHAHEEN**

I, Sharon T. Shaheen, do hereby state and affirm the following:

1. I am over the age of 18 and have the capacity to execute this statement, which is based on my personal knowledge.
2. This morning, at approximately 8:38 a.m., I received a call from Jim Bruce informing me [REDACTED]  
[REDACTED]  
[REDACTED]
3. Mr. Bruce informed me about the upcoming contested hearing in the above-reference cases currently set for January 13, 2026, and the related deadline for filing exhibits and a prehearing statement on January 6, 2026 and asked me to enter an appearance.
4. Mr. Bruce also informed me that he has no access to his computer or files relating to this matter.
5. Because Mr. Bruce has no access to his computer or files relating to this matter, he cannot provide me with any draft documents that are due tomorrow in this matter.

**EXHIBIT A**

I affirm under penalty of perjury under the laws of the State of New Mexico that this statement is true and correct.

Sharon T. Shaheen  
Sharon T. Shaheen

Jan. 5, 2026  
Date

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LEA COUNTY, NEW MEXICO**

**Case No. 25564**

**SELF-AFFIRMED STATEMENT OF DARIN SAVAGE**

I, Darin Savage, do hereby state and affirm the following:

1. I am over the age of 18 and have the capacity to execute this statement, which is based on my personal knowledge.
2. This morning, at approximately 8:05 a.m. MST, I missed a call from Jim Bruce, counsel for Pride Energy Company; his voice mail asked me to return his call. When I called him back at approximately 8:13 a.m. MST, Mr. Bruce explained to me that [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]
3. Mr. Bruce informed me that he would be calling Sharon Shaheen to ask her to make an appearance on behalf of Pride Energy Company in the above-referenced cases, because he said that he could not type nor had access to a computer and his case file, and therefore would not be able to submit exhibits or documentation by the prescribe deadline for the subject cases nor participate in the hearing by said deadline.

**EXHIBIT B**

4. I affirm under penalty of perjury under the laws of the State of New Mexico that this statement is true and correct to the best of my knowledge and understanding.

Darin C. Savage

Darin C. Savage

Phone: 970-385-4401

Email: darin@abadieschill.com

Jan. 5, 2026

Date