

**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

**COTERRA ENERGY OPERATING CO.'S RESPONSE IN OPPOSITION TO PRIDE'S
ENERGY COMPANY'S OBJECTION TO EVIDENCE OFFERED OUTSIDE OF THE
SCOPE OF THE EXPERTISE OF KENT WEINKAUF**

Coterra Energy Operating Co. ("Coterra"), through its undersigned attorneys, submits its Response in opposition to Pride Energy Company's Objection to Evidence Offered Outside the Scope of the Expertise of Kent Weinkauff ("Objection").

1. In its Objection, Pride Energy Company's ("Pride") alleges that Paragraphs 8-13 of the Self-Affirmed Statement of Kent Weinkauff¹ are outside the scope of the expertise of a reservoir engineer. Those paragraphs address the economics, efficiencies, and comparative merits of the competing development proposals.

2. Mr. Weinkauff received his Bachelor of Science in Petroleum Engineering from the University of Tulsa in 2018. Weinkauff Statement at ¶ 3 [p. 76 of the Hearing Packet]). For the past seven years he has worked as a reservoir engineer for Coterra Energy, Inc., which is the parent company of Coterra Energy Operating Co. *Id.* at ¶ 4.

3. As noted by Pride, the study of reservoir engineering includes the following topics:

¹ Exhibit C of Coterra's Hearing Packet (pp. 76-83), referred to herein as "Weinkauff Statement."

Reservoir engineering research includes topics such as how to extract oil and gas efficiently from reservoirs taking into account geology, well locations, well type, well performance, injection and production strategies, production history, reservoir characteristics, fluid characteristics, data analytics, economics, and many other factors. (Emphasis added.)

Objection at ¶ 2 (citing to the website of the University of Texas at Austin). Thus, by Pride's own admission, reservoir engineering expressly encompasses "economics, as well as many other factors" related to "how to extract oil and gas efficiently from reservoirs." These are precisely the subjects addressed in Paragraphs 8-13 of Mr. Weinkauff's Statement, wherein he evaluates and compares the competing proposals submitted by Coterra and Pride, including project economics, development efficiencies, cost savings associated with a three-well development plan, facilitates costs, and the costs of Pride's proposed flowline. These topics are routine touchstones for reservoir engineering, particularly where engineers are tasked with optimizing development plans to efficiently allocate capital and maximize recovery.

4. Mr. Weinkauff is particularly qualified to testify regarding the economics of oil and gas development not only because of his reservoir engineering background, but also due to his education and professional experience. In addition to his reservoir engineering degree, Mr. Weinkauff holds a Bachelor of Science in Business and Finance, with a minor in Energy Management, from the University of Tulsa (2014).² He has also served as a Senior Reservoir Engineer on Coterra's Asset Evaluation Team ("AET"), which evaluates acquisitions, divestitures, and asset trades. In that role, Mr. Weinkauff evaluated more than \$315 Billion in company and asset transactions. *Id.* at ¶ 4 (Hearing Packet at pp. 76-77).

5. Finally, in Paragraph 9 and Coterra Ex. C-1, Mr. Weinkauff testifies to certain factual matters based on his review of Coterra's company records, including Coterra's recent track

² Weinkauff Statement at ¶ 3 (Hearing Packet at p. 76).

record in 2025 of drilling or completing more than 120 lateral wells, with lateral lengths ranging from 4,500' to over 15,000.' This testimony is factual in nature and does not require specialized expertise. Similarly, Mr. Weinkauff's testimony regarding Pride's more limited history of completing only ten wells with Lea and Eddy County is derived from public records and likewise constitutes factual testimony for which no expert qualification is required.

6. Pride's Objection improperly attempts to narrow the scope of reservoir engineering in a manner inconsistent with both academic definitions and industry practice. The testimony challenged by Pride squarely falls within Mr. Weinkauff's qualifications and experience and is directly relevant to the Division's evaluation of the competing development proposals. Based on the foregoing, Coterra respectfully requests that the Division deny Pride's Objection in its entirety.

Respectfully submitted,

ABADIE & SCHILL, PC

/s/ William E. Zimsky

William E. Zimsky

Andrew D. Schill

William E. Zimsky

214 McKenzie Street

Santa Fe, New Mexico 87501

Telephone: 970.385.4401

Facsimile: 970.385.4901

bill@abadieschill.com

andrew@abadieschill.com

darin@abadieschill.com

Attorneys for Coterra Energy Operating Co.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed with the New Mexico Oil Conservation Division and was served on counsel of record via electronic mail on January 26, 2026:

James Bruce
jamesbruce@aol.com
Sharon T. Shaheen
sshaheen@spencerfane.com
cc: dortiz@spencerfane.com
Attorneys for Pride Energy Company

Elizabeth Ryan – beth.ryan@conocophillips.com
Keri L. Hatley – keri.hatley@conocophillips.com
***Attorneys for Mongoose Minerals; Concho Oil and Gas; and
COG Operating***

Adam G. Rankin
Paula M. Vance
agrarkin@hollandhart.com
pmvance@hollandhart.com
Attorneys for MRC Permian Company

/s/ William E. Zimsky
William E. Zimsky