

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 A COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO

Case No. 25564

**PRIDE ENERGY COMPANY'S OBJECTIONS TO EVIDENCE
OFFERED OUTSIDE THE EXPERTISE OF KENT WEINKAUF**

Applicant Pride Energy Co. ("Pride") hereby objects to testimony offered by Coterra Energy Co.'s witness who seeks to be qualified as a reservoir engineer, Kent Weinkauf. Mr. Weinkauf purports to testify about "Pride's operation experience in the Delaware basin, development costs and efficiencies, and offsetting modern well results." Case No. 25564, Coterra Exhibit C at 2 (pdf 77), ¶ 8. Mr. Weinkauf's experience and expertise as a reservoir engineer does not qualify him to testify about the foregoing topics. His testimony offered on these topics should therefore be excluded. In support of these objections, Pride states as follows:

1. Mr. Weinkauf will be offering testimony based on his education and experience as a reservoir engineer. *See* Coterra Exhibit C at 1-2, ¶¶ 1-5.
2. The University of Texas at Austin describes the study of reservoir engineering as follows:

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.

This research is coupled with closely related topics such as **formation evaluation, well testing, enhanced oil recovery, natural gas engineering, analytical and numerical simulation methods and**

reservoir characterization. This type of research is focused on conventional and unconventional reservoirs, conventional and heavy oil and other subsurface applications such as geological storage of carbon dioxide, coal bed methane, gas hydrates, in-situ mining and groundwater modeling and remediation.

University of Texas at Austin, *Reservoir Engineering*, available at <https://www.pge.utexas.edu/pge-research/reservoir-engineering/> (last visited Jan. 26, 2026) (emphasis added).

3. Paragraphs 8-13 of Mr. Weinkauf's testimony do not fall within the scope of reservoir engineering and therefore should be excluded from evidence.

4. In Paragraph 9, Mr. Weinkauf purports to testify about Pride's experience drilling horizontal wells within Lea and Eddy Counties. This testimony does not relate to reservoir engineering.

5. In Paragraph 10, Mr. Weinkauf purports to testify about reduced investment costs and operational costs. This testimony does not relate to reservoir engineering.

6. In Paragraphs 11, 12, and 13, Mr. Weinkauf purports to testify about development costs and facilities. This testimony does not relate to reservoir engineering.

WHEREFORE, Pride requests that the Division exclude any testimony by Mr. Weinkauf relating to the topics of Paragraphs 8-13 in Exhibit C, including the related exhibits offered by Mr. Weinkauf, Exhibits C-1, C-2, C-3, C-4, and C-5.

Respectfully submitted,

SPENCER FANE LLP

By: /s/Sharon T. Shaheen

Sharon T. Shaheen

Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshaheen@spencerfane.com
ec: dortiz@spencerfane.com

and

James Bruce
Post Office Box 1056
Santa Fe, NM 87504

jamesbruc@aol.com

Attorney for PRIDE ENERGY COMPANY

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing and Pride's related exhibit package were served on the following counsel of record, by electronic mail on January 26, 2026.

Sharon T. Shaheen

Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
agrakin@hollandhart.com
pmvance@hollandhart.com

Attorneys for MRC Permian Company

Darin C. Savage
Andrew D. Schill
William E. Zimsky
Abadie & Schill, PC
214 McKenzie Street

Santa Fe, New Mexico 87501
darin@abadieschill.com
andrew@abadieschill.com
bill@abadieschill.com

Attorneys for Coterra Energy Operating Co.

Elizabeth Ryan
Keri L. Hatley
ConocoPhillips
1048 Paseo de Peralta
Santa Fe, NM 87501
beth.ryan@conocophillips.com
keri.hatley@conocophillips.com

Attorneys for Mongoose Minerals, Marathon Oil Permian, COG Operating and Concho Oil and Gas

Dana S. Hardy
Jaclyn M. McLean
Hardy McLean LLC
125 Lincoln Avenue, Suite 223
Santa Fe, NM 87501
dhardy@hardymclean.com
jmclean@hardymclean.com

Attorneys for Marathon Oil Permian, COG Operating, Concho Oil and Gas, and Mongoose Minerals