

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

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16169**

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16170**

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16171**

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16172**

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16173**

**IN THE MATTER OF THE APPLICATION OF PRIDE ENERGY COMPANY  
FOR COMPULSORY POOLING, NON-STANDARD SPACING AND  
PRORATION UNIT, AND UNORTHODOX LOCATION LEA COUNTY, NEW  
MEXICO.**

**CASE NO. 16174**

**PRE-HEARING STATEMENT**

This Pre-hearing Statement is submitted by Pride Energy Company by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

APPLICANT:

Pride Energy Company  
P.O. Box 701950  
Tulsa, OK 74170

ATTORNEY:

Ernest L. Padilla  
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OPPOSITION OR OTHER PARTY:

Devon Energy Production Company

ATTORNEY:

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### **STATEMENT OF CASE**

APPLICANT:

The captioned cases should be consolidated for hearing together with Devon Energy Production Company's OCD Cases Nos. 16099-160104.

Both parties have competing applications. Pride Energy's applications for Bone Spring and Wolfcamp development call for drilling 1-mile laterals in Section 16, Township 25 South, Range 32 East, NMPM, Lea County, New Mexico. Devon's applications call for drilling 2-mile laterals in Sections 16 and 21.

Pride Energy will present evidence and testimony showing that development pursuant to its applications will result in more efficient recovery of oil and gas, and ultimate recoveries. Therefore, development through 1-mile laterals will be in the best interests of conservation of oil and gas.

OPPOSITION OR OTHER PARTY:

See Devon Energy Prehearing Statement.

**PROPOSED EVIDENCE**

**APPLICANT**

WITNESSES	EST. TIME	EXHIBITS
Steve Morris, Petroleum Engineer	1.0 hr.	AFEs Facility Maps Recovery Efficiencies And Estimates EUR comparisons
Jay Leaver, Geologist	.5 hr.	Structure and Isopach maps
Matt Pride, Corporate Officer		Drilling Program

**OPPOSITION**

See Devon Energy Prehearing Statement.

WITNESSES	EST. TIME	EXHIBITS
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**PROCEDURAL MATTERS**

Whether Pride Energy and Devon Energy’s cases will be heard together on June 12, 2018 as discussed at an earlier status conference with Mike McMillan.

PADILLA LAW FIRM, P.A.

*/s/ Ernest L. Padilla*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 24<sup>th</sup> day of May, 2018.

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*/s/Ernest L. Padilla*  
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