

**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 Weinkauff. Mr. Weinkauff 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. Weinkauff'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. Weinkauff 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. Weinkauff's testimony do not fall within the scope of reservoir engineering and therefore should be excluded from evidence.

4. In Paragraph 9, Mr. Weinkauff 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. Weinkauff 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. Weinkauff 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. Weinkauff relating to the topics of Paragraphs 8-13 in Exhibit C, including the related exhibits offered by Mr. Weinkauff, Exhibits C-1, C-2, C-3, C-4, and C-5.

Respectfully submitted,

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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.

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