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

APPLICATION OF CENTENNIAL RESOURCE PRODUCTION, LLC FOR A NON-STANDARD SPACING AND PRORATION UNIT AND COMPULSORY POOLING, LEA COUNTY, NEW MEXICO

Case No. 16265

PRE-HEARING STATEMENT

WELDON BAIRD and the BEULAH M. BAIRD TRUST ("Baird Trust") provisionally

provide this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

WELDON BAIRD and BEULAH M. BAIRD TRUST WELDON BAIRD and BEULAH M. BAIRD TRUST'S ATTORNEY:

Sharon T. Shaheen, Esq. Montgomery & Andrews, P.A. P.O. Box 2307 Santa Fe, NM 87504-2307 Telephone: (505) 982-3873 Email: sshaheen@montand.com

APPLICANT

CENTENNIAL RESOURCE PRODUCTION, LLC

APPLICANT'S ATTORNEY:

Michael H. Feldewert, Esq. Adam G. Rankin, Esq. Holland & Hart, LLP P.O. Box 2208 Santa Fe, NM 87504-2208 Telephone: (505) 988-4421 Email: <u>mfeldewert@hollandhart.com</u> agrankin@hollandhart.com

STATEMENT OF THE CASE

Applicant Centennial Resource Production, LLC an order (1) creating a 240-acre, more or

less, spacing and proration unit comprised of the E/2 SE/4 of Section 1 and the E/2 E/2 of Section

12, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico; and (2) pooling all mineral interests in the Bone Spring formation underlying this acreage.

The Baird Trust is the owner of a leased mineral interest within Applicant's proposed unit, which expires August 5, 2018. Upon information and belief, Applicant did not exercise due diligence to negotiate a voluntary agreement. No witness testimony by the Trust or on its behalf is anticipated, but the Trust reserves the right to cross-examine Applicant's witnesses.

PROPOSED EVIDENCE

OPPONENT: WELDON BAIRD AND BEULAH M. BAIRD TRUST

WITNESSES

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EST. TIME

EXHIBITS

5-6

APPLICANT: CENTENNIAL RESOURCE PRODUCTION, LLC

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By:

Sharon T. Shaheen P.O. Box 2307 Santa Fe, New Mexico 87504-2307 Telephone: (505) 986-2678 Email: sshaheen@montand.com

Attorney for Weldon Baird and Beulah M. Baird Trust

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of July, 2018, a true copy of the foregoing pleading was served via email to counsel of record as follows:

Michael H. Feldewert, Esq. Adam G. Rankin Holland & Hart, LLP P.O. Box 2208 Santa Fe, New Mexico 87504-2208 Telephone: (505) 988-4421 Email: <u>mfeldewert@hollandhart.com</u> <u>agrankin@hollandhart.com</u>

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Attorneys for Centennial Resource Production, LLC

Sharon T. Shaheen

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No. 16265

ENTRY OF APPEARANCE

COMES NOW Sharon T. Shaheen, of Montgomery & Andrews, P.A., and hereby enters

her appearance on behalf of Weldon Baird and the Beulah M. Baird Trust, in the above captioned

matter.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By:

Sharon T. Shaheen P.O. Box 2307 Santa Fe, New Mexico 87504-2307

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Attorneys for Centennial Resource Production, LLC

Sharon T. Shaheen