

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

**APPLICATION OF LONGFELLOW
ENERGY, LP FOR APPROVAL OF NON-
STANDARD LOCATION, EDDY COUNTY,
NEW MEXICO.**

CASE NO. 22020

SPUR ENERGY PARTNERS LLC'S PRE-HEARING STATEMENT

Spur Energy Partners LLC ("Spur") (OGRID No. 328947), the applicant in the above-referenced case, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

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STATEMENT OF CASE

In **Case No. 22020**, Applicant Longfellow Energy, LP seeks an order approving a Non-Standard Location for its proposed Bonzo Federal Com 1924 CDX 006H, which will be located approximately 1272 feet FSL and 415 feet FWL of Section 20, Township 17 South, Range 28 East, and a bottom hole located approximately 142 feet FSL and 2615 feet FEL of Section 24, all in Township 17 South, Range 28 East. The first take point will be located approximately 155 feet FSL and 100 feet FEL of said Section 19, and the last take point will be located approximately 142 feet FSL and 2535 feet FEL of Section 24. The completed lateral will be located approximately 142 feet from the south boundary of the proposed horizontal spacing unit, which constitutes an unorthodox location because it is closer than the 330-foot setback allowed for oil wells.

Spur is a working interest owner in Sections 25 and 30 all within Township 17 South, Range 28 East that immediately offset the unorthodox location of the proposed Bonzo Federal Com 1924 CDX 006H. Spur objects to the non-standard location because the proposed location of the completed lateral, 142 feet from the south boundary of the spacing unit, will impair Spur's correlative rights. Longfellow's application in Case No. 22020 should be denied.

APPLICANT'S PROPOSED EVIDENCE

<u>WITNESS</u> Name and Expertise	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Norm Pennington, Engineer	Approx. 30 mins.	Approx. 4

PROCEDURAL MATTERS

Spur objects to Longfellow Energy Case No. 22020 proceeding to hearing by affidavit and requests that the July 1, 2021 setting be converted to a status conference to identify a future date for a contested hearing.

Respectfully submitted,

HOLLAND & HART LLP

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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QUESTIONS

Action 33681

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 33681
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witness	Not answered.
Testimony time (in minutes)	Not answered.