

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

**APPLICATION OF LONGFELLOW ENERGY, LP
FOR COMPULSORY POOLING,
EDDY COUNTY, NEW MEXICO**

Case No. 21860

PRE-HEARING STATEMENT

LONGFELLOW ENERGY, LP (“Longfellow”), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

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STATEMENT OF THE CASE

In this case, Longfellow seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso, Northeast [96836]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. Applicant proposes to drill the following wells:

- (1) **Marley State Com 31 AB 001H** well, to be horizontally drilled from an approximate surface hole location 1578’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 361’ FNL and 100’ FWL of Section 31, T17S-R28E;
- (2) **Marley State Com 31 AB 002H** well, to be horizontally drilled from an approximate surface hole location 1603’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 843’ FNL and 100’ FWL of Section 31, T17S-R28E;
- (3) **Marley State Com 31 AB 003H** well, to be horizontally drilled from an approximate surface hole location 1628’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1325’ FNL and 100’ FWL of Section 31, T17S-R28E;

(4) **Marley State Com 31 AB 004H** well, to be horizontally drilled from an approximate surface hole location 1653’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1807’ FNL and 100’ FWL of Section 31, T17S-R28E; and

(5) **Marley State Com 31 AB 005H** well, to be horizontally drilled from an approximate surface hole location 1678’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 2288’ FNL and 100’ FWL of Section 31, T17S-R28E.

The completed intervals and first and last take points for all wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells. A depth severance within the Yeso formation exists in the NW/4 NW4 of Section 31. All of Longfellow’s proposed well laterals will be located below (deeper) than that depth severance.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 15 miles west of Loco Hills, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Landman Ryan Reynolds		8-10
Geologist Jennifer Eker		7-8

OTHER PARTIES:

WITNESSES	EST. TIME	EXHIBITS
TBD		

PROCEDURAL MATTERS

Longfellow will present its direct testimony in writing. Its witnesses will appear at hearing for cross-examination.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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Attorneys for Longfellow Energy, LP

CERTIFICATE OF SERVICE

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State of New Mexico
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QUESTIONS

Action 31449

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 31449
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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