

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

**APPLICATION OF LONGFELLOW ENERGY, LP
FOR COMPULSORY POOLING AND FOR APPROVAL OF
A NON-STANDARD LOCATION,
EDDY COUNTY, NEW MEXICO**

Case No. 21954

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

LONGFELLOW ENERGY, LP

ATTORNEY:

Sharon T. Shaheen, Esq.
Ricardo S. Gonzales
MONTGOMERY & ANDREWS, P.A.
P.O. Box 2307
Santa Fe, New Mexico 87504-2307
Telephone: (505) 986-2678
sshaheen@montand.com
rgonzales@montand.com

OTHER INTERESTED PARTIES

CONOCOPHILLIPS COMPANY

ATTORNEY:

Dana Hardy
Michael Rodriguez
HINKLE SHANOR, LLP
P.O. Box 2068
Santa Fe, New Mexico 87504-2068
Telephone: (505) 982-4554
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com

SPUR ENERGY PARTNERS, LLC

ATTORNEY:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
HOLLAND & HART, LLP
P.O. Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

STATEMENT OF THE CASE

In this case, Longfellow seeks approval of an unorthodox or non-standard location (“NSL”) for the **Elvis State Com 29A 001H** (“Elvis 1H”) to be drilled in a standard 160-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 N/2 of Section 29, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico, for development of the Yeso formation (Artesia; Glorieta-Yeso [96830]). Initially, Applicant also sought an order from the Division pooling all uncommitted interests in the HSU for purposes of drilling only the Elvis 1H well. However, at hearing, Applicant anticipates requesting dismissal of that part of the instant application seeking to pool interests in the HSU. Instead, Applicant has filed an application in Case No. 21989, seeking to pool all uncommitted interests in this HSU for the purpose of drilling three wells in the HSU, including the Elvis 1H. Case No. 21989 is set for the July 1, 2021 docket.

Longfellow seeks approval of a NSL because the completed interval of the Elvis 1H will be closer than 330’ from the outer boundary of the HSU. Longfellow proposes to drill the Elvis 1H horizontally from an approximate surface hole location 790’ FNL and 560’ FWL of Section

28, T17S-R28E, to an approximate bottom hole location 181' FNL and 100' FWL of Section 29, T17S-R28E. The first and last take points for the well will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Landman Ryan Reynolds	Written Testimony	4-5
Geologist Jennifer Eker	Written Testimony	4-5
Engineer David Mitchell	Written Testimony	4-5

OTHER INTERESTED PARTIES:

WITNESSES	EST. TIME	EXHIBITS
TBD		

PROCEDURAL MATTERS

If there is no opposition by time of hearing, Applicant will present this matter by affidavit. Otherwise, Longfellow's witnesses will appear at hearing on June 17, 2021 for cross-examination.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen
 Sharon T. Shaheen
 Ricardo S. Gonzales
 P.O. Box 2307
 Santa Fe, New Mexico 87504-2307
 Telephone: (505) 982-2678
sshaheen@montand.com
rgonzales@montand.com

Attorneys for Longfellow Energy, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 10, 2021:

Dana Hardy
Michael Rodriguez
Hinkle Shanor, LLP
P.O. Box 2068
Santa Fe, NM 87504-2068
(505) 982-4554
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com

Attorneys for ConocoPhillips Company

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

*Attorneys for Spur Energy Partners,
LLC*

/s/Sharon T. Shaheen

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 31450

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 31450
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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