

**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

ConocoPhillips Company (“Conoco”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Longfellow Energy, LP

ATTORNEYS

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INTERESTED PARTIES

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ConocoPhillips Company

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STATEMENT OF THE CASE

Longfellow Energy, LP (“Longfellow”) requests approval for the Non-Standard Location of its Elvis State Com 29A 0001H well, to be horizontally drilled 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.

Conoco is an affected interest owner in adjacent acreage to Longfellow’s development and would be negatively impacted by the location of Longfellow’s proposed well. Conoco timely objected to Longfellow’s administrative application for non-standard location approval. However, since Longfellow filed for administrative approval of its non-standard location concurrent with its application for hearing on the matter less than a month ago, Conoco has not had sufficient time to properly evaluate the impact Longfellow’s non-standard well location will have on its acreage and certainly has not had sufficient time to prepare for a hearing on the matter.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
None.			

PROCEDURAL MATTERS

Conoco objects to this matter being presented on June 17th. As such, Conoco filed a motion to continue this matter to the July 15th hearing docket. Conoco requests its motion for continuance be granted or a status conference on the matter be held on June 17th.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

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Counsel for ConocoPhillips Company

CERTIFICATE OF SERVICE

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

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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 31453

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 31453
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	0
Testimony time (in minutes)	0