

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

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

CASE NO. 21860

RESPONDENT'S MOTION FOR CONTINUANCE

Contango Oil & Gas Company, a Respondent in this matter, moves for a continuance of the June 17, 2021 hearing on the Application of Applicant Longfellow Energy, LP to the hearing examiner's hearing docket of July 15, 2021, and in support would show as follows:

Respondent has been in discussions regarding Applicant's Application and Respondent and Applicant have not been able to resolve underlying issues regarding Applicant's proposed operations. Applicant's proposed operations have a high likelihood of having a negative impact on Respondent's existing operations both through decreased production, possible wellbore collision, and possible loss of correlative rights.

Respondent's rationale for requesting a continuance is twofold:

First, in at least one previous instance in late March 2021, an existing vertical wellbore owned and operated by Respondent was damaged by a horizontal well drilled, hydraulically fractured, and completed in a matter substantially similar in all respects to the well proposed by Applicant. As a result of this prior instance, Respondent has spent approximately \$150,000 repairing and securing the damaged well. The damage to Respondent's well also created a serious safety issue which requires additional examination.

As a result, Respondent needs additional time to analyze the overall effects that the damage to the previous well has on its production. Respondent's damaged well was returned to production on April 16, 2021; since its return to production, the well has produced approximately five times the amount of water it produced prior to being damaged. This additional water production

represents a real, tangible increase in cost of production associated with the damaged well. Additionally, Respondent needs additional time to monitor and gather well production data from the damaged well to ascertain how the damage affects longer-term oil production, well pressure, water production, and any other related issues.

Second, Respondent has engaged an external engineering expert who is currently running modeling and analysis covering the drainage radius of Respondent's wells in this area, including the wells close to Applicant's proposed unit. This modeling and analysis will give Respondent and, by extension, the hearing examiner, a clearer picture of the likely impact that Applicant's proposed horizontal well will have on Respondent's nearby wells, including impacts related to both current primary and future secondary recovering efforts, such as injection and waterflooding programs.

Respondent wishes to have additional time to prepare its evidence for the hearing and believes that continuance will further a goal of bringing this matter to a swift resolution. Applicant opposes Respondent's requested continuance. Respondent does not believe that the requested continuance would prejudice Applicant; its request for a continuance would serve the interests of preventing waste and protecting correlative rights and would allow Respondent to gather the additional evidence and data that the Examiner is very likely to request regarding the merits.

RESPECTFULLY SUBMITTED,

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I hereby certify that a true and correct copy
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