

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

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

**Case No. 22020**

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

**Case No. 22021**

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**APPLICANT'S RESPONSE TO CONOCOPHILLIPS COMPANY'S  
OPPOSED MOTION FOR CONTINUANCE**

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Applicant LONGFELLOW ENERGY, LP ("Longfellow") hereby responds to ConocoPhillips Company's ("Conoco" or "COP") Motion for Continuance ("Motion") in the above-referenced matter. The Motion should be denied for all of the reasons stated below.

1. On June 24, 2021, COP filed its Motion, requesting the Division to continue Case Nos. 22020 and 22021 to the hearing docket set for August 19, 2021.
2. On June 24, 2021, Longfellow requested the Division to set a status conference for the cases referenced in the paragraph above on the July 1, 2021 docket.
3. The Division has set a status conference for Case Nos. 22020 and 22021 on the July 1, 2021 docket.
4. Upon information and belief, Spur Energy Partners, LLC ("Spur") has a competing proposal in the same HSU.
5. Longfellow requests the competing proposals between Longfellow and Spur be set for a contested hearing at a date and time to be determined by the Division at the status conference set for the July 1, 2021.

The Motion should therefore be denied, and this matter should be set for a contested hearing at a date and time to be determined by the Division at the July 1, 2021 status conference.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/ Sharon T. Shaheen

Sharon T. Shaheen

Ricardo S. Gonzales

Post Office Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)

[rgonzales@montand.com](mailto: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 28, 2021:

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

*Attorneys for SEP Permian, LLC and*

*Attorneys for SOC 1999 Partnership Limited  
and SOC GP, LLC, SEP Permian, LLC*

Dana S. Hardy  
Michael Rodriguez  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

*Attorneys for ConocoPhillips Company*

/s/Sharon T. Shaheen

Sharon T. Shaheen