

**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

PRE-HEARING STATEMENT

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

APPEARANCES

APPLICANT

Longfellow Energy, LP

ATTORNEYS

Sharon T. Shaheen
John F. McIntyre
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshahen@montand.com
jmcintyre@montand.com

INTERESTED PARTIES

Spur Energy Partners LLC;

SOC 1999 Partnership Limited and
SOC GP, LLC

ATTORNEYS

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

ConocoPhillips Company

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

STATEMENT OF THE CASE

In Case No. 22020, Longfellow Energy, LP (“Longfellow”) requests approval of a non-standard location for the Bonzo Federal Com 1924CDX 006H (“Bonzo”), to be drilled from a surface hole located approximately 1272’ FSL and 415’ FWL of Section 20, T-17S-R28E, to a bottom hole located approximately 142’ FSL and 2615’ FEL of Section 24, T-17S-R27E.

In companion Case No. 22021, Longfellow seeks an order pooling all mineral interests in the Yeso formation in a standard 480-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 19, Township 17 South, Range 28 East, and the SE/4 of Section 24, Township 17 South, Range 27 East, in Eddy County, New Mexico, and seeks to dedicate the unit to six wells including the Bonzo well.

COPC owns a 14.40% working interest in Longfellow’s proposed unit. COPC has not had sufficient time to fully evaluate Longfellow’s well proposals and development plan for its proposed unit. Additionally, Longfellow’s Bonzo well proposal (attached as **Exhibit A**) indicates the surface hole location is 1252 FSL and **397 FEL**. However, the surface hole location identified in Longfellow’s compulsory pooling application is 1272 FSL and **415 FWL**. This is a material discrepancy since the variance between the locations is over 4000’ and does not comply with notice requirements pursuant to 19.15.4.12 NMAC. Longfellow should rectify this material discrepancy by re-proposing the well prior to hearing so as not to impair due process rights afforded to all

interested parties in these matters. As such, COPC submitted a motion for continuance of the subject matters to the Oil Conservation Division’s August 19, 2021 hearing docket.

PROPOSED EVIDENCE

Witness	Occupation	Est. Time	Exhibits
Andrew Kendall	Landman	30 minutes	Approx. 4
Ephraim Schofield	Reservoir Engineer	30 minutes	Approx. 4

PROCEDURAL MATTERS

COPC objects to these matters being presented by affidavit on July 1, 2021. As such, COPC filed a motion to continue these matters to the August 19, 2021 hearing docket. COPC requests its motion for continuance be granted or a status conference on these matters be held on July 1, 2021.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy
Michael Rodriguez
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
mrodriguez@hinklelawfirm.com
Counsel for ConocoPhillips Company

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck
Post Office Box 2208
Santa Fe, NM 87504
505-998-4421
505-983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

Sharon T. Shaheen
John F. McIntyre
Post Office Box 2307
Santa Fe, NM 87504-2307
(505) 986-2678
sshhaheen@montand.com
jmcintyre@montand.com

/s/ Dana S. Hardy

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 33657

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 33657
	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>