

**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

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

CASE NO. 21989

CONOCOPHILLIPS COMPANY'S MOTION FOR CONTINUANCE

ConocoPhillips Company ("COPC") requests a continuance of the subject matters to the Oil Conservation Division's August 19, 2021 hearing docket. In support of this request, COPC states the following:

1. Longfellow Energy, LP's ("Longfellow") application in Case No. 21954 seeks compulsory pooling and approval of a non-standard location for 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.

2. It is COPC's understanding that Longfellow intends to dismiss the compulsory pooling portion of Case No. 21954 at hearing and proceed with its request for approval of a non-standard location since it filed a separate compulsory pooling application (Case No. 21989) for its Elvis State Com 29A 001H, 002H, and 003H wells. Longfellow's application in Case No. 21989 is set for hearing on July 1, 2021.

3. On June 17, 2021, the Division held a status conference in Case No. 21954 and subsequently entered a scheduling order setting the case for hearing on July 1, 2021 so that Longfellow's application for approval of a non-standard location can be heard in conjunction with its compulsory pooling application in Case No. 21989.

4. COPC owns a 12.50% working interest in Longfellow's proposed Elvis spacing unit ("Elvis Unit").

5. COPC is an affected party to Longfellow's non-standard location application since it owns an 18.75% working interest in adjacent acreage to Longfellow's proposed Elvis spacing unit.

6. Since the status conference on June 17, 2021, COPC and Longfellow have not resolved their differences in these matters.

7. Further, COPC has not had sufficient time to fully evaluate Longfellow's well proposals and development plan for the Elvis Unit.

8. COPC has also not had sufficient time to fully evaluate how the non-standard location of Longfellow's Elvis State Com 29A 0001H well will impact COPC's correlative rights within the acreage adjacent to the Elvis Unit.

9. Longfellow may argue in response to this motion that it will be prejudiced by a continuance since the Elvis State Com 29A 001H well is on its July 2021 drill schedule. However, Longfellow filed its non-standard location and compulsory pooling applications approximately one month ago, and its compulsory pooling application (Case No. 21989) has not been previously continued or set for a status conference. COPC is unaware of any basis that prevented Longfellow from commencing the application and hearing process earlier to account for potential delays.

Further, Longfellow's discretionary drilling schedule cannot supersede COPC's correlative rights within the Elvis Unit and in adjacent acreage.

10. As a result of the above, COPC requests that the Division set these matters for hearing on the August 19th hearing docket.

11. Spur Energy Partners LLC does not oppose this motion.

For the foregoing reasons, COPC requests the Division grant its motion to continue Case Nos. 21954 and 21989 to the August 19, 2021 hearing docket.

Respectfully submitted,

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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:

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