

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

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

Case No. 21860

SUPPLEMENTAL PRE-HEARING STATEMENT

LONGFELLOW ENERGY, LP (“Longfellow”) provides this supplemental Pre-Hearing Statement to update the previous pre-hearing statement, which was filed as required by the rules of the Division on June 10, 2021.

APPEARANCES

APPLICANT

LONGFELLOW ENERGY, LP

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OTHER INTERESTED PARTIES

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CONTANGO RESOURCES, INC.

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STATEMENT OF THE CASE

In this case, Longfellow seeks an order forcepooling the spacing unit and wells described below. Longfellow has reached an agreement with interested party Contango Resources, Inc. (“Contango”) and understands that Contango no longer opposes this case being presented by affidavit. In addition, V-F Petroleum, Inc. withdrew its appearance on or about June 28, 2021. Spur Energy Partners (“Spur”) also entered an appearance in this case, but does not oppose this matter being presented by affidavit.

In this case, Longfellow seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso, Northeast [96836]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. Applicant proposes to drill the following wells:

(1) **Marley State Com 31 AB 001H** well, to be horizontally drilled from an approximate surface hole location 1578' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 361' FNL and 100' FWL of Section 31, T17S-R28E;

(2) **Marley State Com 31 AB 002H** well, to be horizontally drilled from an approximate surface hole location 1603' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 843' FNL and 100' FWL of Section 31, T17S-R28E;

(3) **Marley State Com 31 AB 003H** well, to be horizontally drilled from an approximate surface hole location 1628' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1325' FNL and 100' FWL of Section 31, T17S-R28E;

(4) **Marley State Com 31 AB 004H** well, to be horizontally drilled from an approximate surface hole location 1653' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1807' FNL and 100' FWL of Section 31, T17S-R28E; and

(5) **Marley State Com 31 AB 005H** well, to be horizontally drilled from an approximate surface hole location 1678' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 2288' FNL and 100' FWL of Section 31, T17S-R28E.

The completed intervals and first and last take points for all wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells. A depth severance within the Yeso formation exists in the NW/4 NW4 of Section 31. All of Longfellow's proposed well laterals will be located below (deeper) than that depth severance.

Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 15 miles west of Loco Hills, New Mexico.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Landman Ryan Reynolds	By affidavit	8-10
Geologist Jennifer Eker	By affidavit	7-8

OTHER PARTIES:

WITNESSES

EST. TIME

EXHIBITS

TBD

PROCEDURAL MATTERS

Assuming no opposition by time of hearing, Longfellow will present this case by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

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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 September 2, 2021:

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QUESTIONS
 Action 46272

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 46272
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	0