

**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 AND FOR APPROVAL OF
A NON-STANDARD LOCATION,
EDDY COUNTY, NEW MEXICO**

Case No. 21989

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 24, 2021.

APPEARANCES

APPLICANT

LONGFELLOW ENERGY, LP

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OTHER INTERESTED PARTIES

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STATEMENT OF THE CASE

In Case No. 21954, Longfellow sought approval of an unorthodox or non-standard location (“NSL”) for the **Elvis State Com 29A 001H** (“Elvis 1H”). Longfellow understands that interested parties ConocoPhillips Co. (“Conoco”) and Spur Energy Partners (“Spur”) no longer object to Longfellow’s request for approval of the NSL. Consequently, Longfellow will be requesting that Case No. 21954 be dismissed and that the NSL application previously filed as an administrative application on May 13, 2021, be remanded for consideration administratively.

Similarly, with respect to **Case No. 21989**, Longfellow understands that interested parties Conoco and Spur no longer object to Longfellow’s request for compulsory pooling of the spacing

unit dedicated to the wells described below. Consequently, Longfellow anticipates presenting Case No. 21989 by affidavit on September 9, 2021.

In Case No. 21989, Longfellow seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Artesia; Glorieta-Yeso [96830]) in a standard 160- acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 N/2 of Section 29, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico.

Applicant proposes to drill the following wells: (1) **Elvis State Com 29A 001H** 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 (“Elvis 1H”); (2) **Elvis State Com 29A 002H** well, to be horizontally drilled from an approximate surface hole location 815’ FNL and 560’ FWL of Section 28, T17SR28E, to an approximate bottom hole location 577’ FNL and 100’ FWL of Section 29, T17SR28E (API# 30-015-48183) (“Elvis 2H”); and (3) **Elvis State Com 29A 003H** well, to be horizontally drilled from an approximate surface hole location 840’ FNL and 560’ FWL of Section 28, T17S-R28E, to an approximate bottom hole location 972’ FNL and 100’ FWL of Section 29, T17S-R28E (API# 30-015-48184) (“Elvis 3H”). The first and last take points for the wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

The completed laterals for the Elvis 2H and Elvis 3H will meet the setback requirements set forth in the statewide rules. As noted above, Longfellow has requested administrative approval of a NSL for the Elvis 1H.

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 14 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	8-10

PROCEDURAL MATTERS

There are no proposals or applications that compete with Longfellow’s well proposals in the instant applications. As it currently stands, Applicant does not anticipate opposition at the hearing in light of the recent resolution of its issues with Conoco and Spur. If there is no opposition by time of hearing, Applicant will present this matter by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 46278

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 46278
	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