

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

**APPLICATION OF SPUR ENERGY PARTNERS
LLC TO RESCIND THE APPROVAL OF
ADMINISTRATIVE ORDER NSL-8185,
EDDY COUNTY, NEW MEXICO.**

CASE NO. 22091

**APPLICATION OF SPUR ENERGY
PARTNERS LLC FOR COMPULSORY
POOLING, EDDY COUNTY, NEW MEXICO.**

CASE NO. 22092

**SPUR ENERGY PARTNERS LLC’S CONSOLIDATED
PRE-HEARING STATEMENT**

Spur Energy Partners LLC (“Spur”) (OGRID No. 328947), the applicant in the above-referenced case, submits this consolidated Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Spur Energy Partners LLC

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn A. Luck

Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

OTHER PARTIES

Longfellow Energy, LP

ConocoPhillips Company

ATTORNEY

Sharon T. Shaheen
John F. McIntyre
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2678
sshhaheen@montand.com
jmcintyre@montand.com

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

STATEMENT OF CASE

Spur intends to dismiss its competing compulsory pooling case in Case No. 22092. Separately, Spur and Longfellow have reached agreement whereby Longfellow has agreed to relocate its proposed Bonzo Federal Com 1924 CDX #006H well to a location that is 15 feet farther from the proposed spacing unit boundary. In exchange, Spur will dismiss Case No. 22091 upon confirmation on the record at the hearing that Longfellow will do so.

APPLICANT'S PROPOSED EVIDENCE

<u>WITNESS</u> Name and Expertise	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
N/A	N/A	N/A

PROCEDURAL MATTERS

Spur will dismiss Case No. 22092 in advance of the hearing on October 7, 2021. Separately, Spur will dismiss Case No. 22091 upon confirmation on the record that Longfellow will move its Bonzo Federal Com 1924 CDX #006H as agreed.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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

ATTORNEYS FOR SPUR ENERGY PARTNERS LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 30, 2021, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Sharon T. Shaheen
Ricardo S. Gonzales
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 986-2678
sshaheen@montand.com
rgonzales@montand.com

Attorneys for Longfellow Energy, LP

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

Attorneys for ConocoPhillips Company



Adam G. Rankin

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 53366

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 53366
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>