

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

**APPLICATION OF LONGFELLOW ENERGY, LP
FOR APPROVAL OF A NON-STANDARD LOCATION,
EDDY COUNTY, NEW MEXICO**

Case No. 22020

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

Case No. 22021

**APPLICATION OF SPUR ENERGY PARTNERS LLC
TO RESCIND 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

LONGFELLOW'S PRE-HEARING STATEMENT

LONGFELLOW ENERGY, LP, OGRID No. 372210 ("Longfellow"), provides this consolidated Pre-Hearing Statement in the above-referenced cases as required by the rules of the Division.

APPEARANCES

APPLICANT

LONGFELLOW ENERGY, LP

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STATEMENT OF THE CASE

In Case No. 22021, Applicant Longfellow Energy, LP (“Longfellow”) proposes to compulsory pool the Yeso formation (Red Lake; Glorieta-Yeso [96836]) in a standard 480-acre, more or less, horizontal spacing and proration unit (“HSU”) 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, NMPM, in Eddy County, New Mexico. The parties have resolved their respective differences, and Longfellow understands that Case Nos. 22020, 22091, and 22092 will be

dismissed. Longfellow plans to present this case by affidavit, with the understanding that the other parties no longer object to proceeding by affidavit.

In **Case No. 22021**, *Application of Longfellow Energy, LP for Compulsory Pooling, Eddy County, New Mexico*, Applicant proposes to drill the following six 1.5-mile wells in the HSU:

- (1) **Bonzo Federal Com 1924CDX 001H** well, to be horizontally drilled from an approximate surface hole location 1397' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 2272' FSL and 2607' FEL of Section 24, T17S-R27E ("Bonzo 1H");
- (2) **Bonzo Federal Com 1924CDX 002H** well, to be horizontally drilled from an approximate surface hole location 1372' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 1846' FSL and 2609' FEL of Section 24, T17S-R27E ("Bonzo 2H");
- (3) **Bonzo Federal Com 1924CDX 003H** well, to be horizontally drilled from an approximate surface hole location 1347' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 1400' FSL and 2610' FEL of Section 24, T17S-R27E ("Bonzo 3H");
- (4) **Bonzo Federal Com 1924CDX 004H** well, to be horizontally drilled from an approximate surface hole location 1322' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 994' FSL and 2612' FEL of Section 24, T17S-R27E ("Bonzo 4H");
- (5) **Bonzo Federal Com 1924CDX 005H** well, to be horizontally drilled from an approximate surface hole location 1297' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 570' FSL and 2614' FEL of Section 24, T17S-R27E ("Bonzo 5H"); and
- (6) **Bonzo Federal Com 1924CDX 006H** well, to be horizontally drilled from an approximate surface hole location 1272' FSL and 415' FWL of Section 20, T-17S-R28E, to an approximate bottom hole location 142' FSL and 2615' FEL of Section 24, T17S-R27E ("Bonzo 6H").

The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells. The first and last take points for the proposed wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells. The completed laterals for the Bonzo 1H, 2H, 3H, 4H, and 5H comply with the standard setbacks. The

completed lateral proposed for the Bonzo 6H does not satisfy the standard setback. The Division has approved the unorthodox location in Administrative Order NSL-8185.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Landman Ryan Reynolds	Direct Written Testimony	10-12
Geologist Jennifer Eker	Direct Written Testimony	7-8

OTHER INTERESTED PARTIES:

WITNESSES	EST. TIME	EXHIBITS
TBD	TBD	TBD

PROCEDURAL MATTERS

Longfellow understands that Case Nos. 22020, 22091, and 22092 will be dismissed. Assuming no opposition at the time of hearing, Longfellow will be presenting Case No. 22021 by affidavit.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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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 30, 2021:

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

Action 53388

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 53388
	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)	10