

**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

ATTORNEY:

Sharon T. Shaheen  
Ricardo S. Gonzales  
**MONTGOMERY & ANDREWS, P.A.**  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
Telephone: (505) 986-2678

[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)

**OTHER INTERESTED PARTIES**

SPUR ENERGY PARTNERS, LLC

ATTORNEYS:

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart, LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
505-998-4421  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

CONOCOPHILLIPS COMPANY

ATTORNEYS

Dana S. Hardy  
Michael Rodriguez  
**HINKLE SHANOR, LLP**  
P.O. Box 2068  
Santa Fe, New Mexico 87504-2068  
Telephone: (505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

**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.**

By: /s/Sharon T. Shaheen

Sharon T. Shaheen  
Ricardo S. Gonzales  
P.O. Box 2307  
Santa Fe, New Mexico 87504-2307  
Telephone: (505) 982-2678  
[sshaheen@montand.com](mailto:sshaheen@montand.com)  
[rgonzales@montand.com](mailto:rgonzales@montand.com)

*Attorney 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 30, 2021:

Dana Hardy  
Michael Rodriguez  
HINKLE SHANOR, LLP  
P.O. Box 2068  
Santa Fe, NM 87504-2068  
(505) 982-4554  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[mrodriguez@hinklelawfirm.com](mailto:mrodriguez@hinklelawfirm.com)

*Attorneys for ConocoPhillips Company*

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
HOLLAND & HART, LLP  
P.O. Box 2208  
Santa Fe, New Mexico 87504  
(505) 988-4421  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)  
[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)  
[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

*Attorneys for Spur Energy Partners, LLC*

*/s/Sharon T. Shaheen* \_\_\_\_\_

**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 53389

**QUESTIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 53389
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

<b>Testimony</b>	
<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>