

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

**APPLICATION OF LONGFELLOW ENERGY, LP
TO AMEND ORDER NO. R-21837,
EDDY COUNTY, NEW MEXICO**

**Case No. _____
Order No. R-21837
(Re-Open)**

APPLICATION

Longfellow Energy, LP, OGRID No. 372210 (“Longfellow”), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and Troy S. Lawton), hereby files this application with the Oil Conservation Division to amend Order No. R-21837 entered in Case No. 21860 to extend the time for drilling the (1) **Marley State Com 31 AB 001H** (“Marley 31 AB 001H Well”); (2) **Marley State Com 31 AB 002H** (“Marley 31 AB 002H Well”); (3) **Marley State Com 31 AB 003H** (“Marley 31 AB 003H Well”); (4) **Marley State Com 31 AB 004H** (“Marley 31 AB 004H Well”); and the (5) **Marley State Com 31 AB 005H** (“Marley 31 AB 005H Well”) (collectively, the "Marley State Com 31 AB Wells") approved in Order No. R-21837. In support of its application, Longfellow states as follows:

1. Order No. R-21837 pooled uncommitted interest owners 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, dedicated to the Marley State Com 31 AB Wells.
2. Longfellow is a working interest owner in the HSU and has the right to drill thereon.

3. Order No. R-21837 designated Longfellow as the operator of the Marley State Com 31 AB Wells, and the HSU.

4. The Division hearing in the original proceeding, Case No. 21860, was held on September 9, 2021.

5. The Division entered Order No. R-21837 in Case No. 21860 on September 20, 2021, and thus the deadline for drilling is September 20, 2022.

6. Longfellow requests the Division to re-open the matter to extend the time to commence drilling the Marley State Com 31 AB Wells to be no later than September 20, 2023, which will be a one-year extension from the time to commence drilling approved in Order No. R-21837.

7. Paragraph 19 of Order No. R-21837 states, "The Operator shall commence drilling the Well(s) within one (1) year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well." Paragraph 20 of Order No. R-21837 states, "This Order shall terminate automatically if Operator fails to comply with Paragraph 19 unless Operator obtains an extension by amending this Order for good cause shown."

8. Under Order No. R-21837, Longfellow would be required to commence drilling the wells by September 20, 2022.

9. Good cause exists for the Division to grant the extension.

10. Longfellow requests an extension of time because there have been delays relating to the planned surface location caused by a surface owner of off-lease fee lands, which engaged in protracted negotiations for a surface agreement, but ultimately declined to enter into the agreement for undisclosed reasons. The unavailability of the planned surface location has also resulted in a need to revise permits and relocate water pipelines. Longfellow has re-entered into negotiations

with the surface owner and anticipates reaching a final agreement in the next three to four months, at which time it can begin the re-permitting and surface location preparation that will be necessary before drilling. For these reasons, Longfellow requests that the time for drilling be extended by one year.

WHEREFORE, Longfellow requests that this application be set for hearing before an Examiner of the Oil Conservation Division on August 4, 2022, and that, after notice and hearing as required by law, the Division enter an order amending Order No. R-21837 to extend the time to commence drilling the Marley State Com 31 AB Wells to be no later than September 20, 2023.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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Application of Longfellow Energy, LP to Amend Order No. R-21837, Eddy County, New Mexico (Re-Open). Applicant in the above-styled cause seeks to re-open Case No. 21860 for the limited purpose of amending Order No. R-21837 to extend by one year, through September 20, 2023, the time to commence drilling the (1) **Marley State Com 31 AB 001H** well; (2) **Marley State Com 31 AB 002H** well; (3) **Marley State Com 31 AB 003H** well; (4) **Marley State Com 31 AB 004H** well; and the (5) **Marley State Com 31 AB 005H** well, proposed to be drilled into the Yeso formation (Red Lake; Glorieta-Yeso, Northeast [96836]) underlying the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. The well and lands are located approximately 15 miles west of Loco Hills, New Mexico.