BEFORE THE OIL CONSERVATION DIVISION
EXAMINER HEARING SEPTEMBER 15, 2026

CASE NO. 26288

(LONGFELLOW) PETTY FEDERAL
REOPEN ORDER NO. R-24036

EDDY COUNTY, NEW MEXICO

SPUR ENERGY PARTNERS

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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO RE-OPEN ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26288

APPLICATION OF LONGFELLOW ENERGY LP TO EXTEND THE DRILLING DEADLINE UNDER ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26328

TABLE OF CONTENTS

- **Enduring Exhibit C:** Notice Affidavit
- **Enduring Exhibit D:** Affidavit of Publication

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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO RE-OPEN ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26288
ORDER NO. R-24036

APPLICATION

Spur Energy Partners LLC ("Spur" or "Applicant") (OGRID 328947), through its undersigned attorneys, hereby files this application with the Oil Conservation Division to re-open Order No. R-24036 ("Order") to require Longfellow Energy, LP ("Longfellow") to comply with the terms and requirements of the Order or amend the Order to reflect its revised drilling and development plans following Spur's objection to its notice of deviation from the Order, as required by Division guidance. In support of its application, Spur states:

1. Division Order No. R-24036, entered on December 1, 2025, in Case No. 25572, created a standard 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Longfellow (OGRID 372210) operator of the Unit.

2. Order No. R-24036 further pooled the uncommitted interests in the Yeso formation in the Unit and dedicated the Unit to the proposed initial following wells:

- **Petty Federal Com 31CD 001H well**, to be horizontally drilled from a surface hole location approximately 441' FWL and 1,717' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 2,628' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 002H well**, to be horizontally drilled from a surface hole location approximately 441' FWL and 1,697' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 2,319' FSL of Section 31-16S-31E;

- **Petty Federal Com 31CD 003H well**, to be horizontally drilled from a surface hole location approximately 441' FWL and 1,677' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 2,159' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 004H well**, to be horizontally drilled from a surface hole location approximately 441' FWL and 1,657' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 1,785' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 005H well**, to be horizontally drilled from a surface hole location approximately 441' FWL and 1,637' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 1,410' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 006H well**, to be horizontally drilled from a surface hole location approximately 1,085' FWL and 676' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 1,250' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 007H well**, to be horizontally drilled from a surface hole location approximately 1,086' FWL and 656' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 875' FSL of Section 31-16S-31E;
- **Petty Federal Com 31CD 008H well**, to be horizontally drilled from a surface hole location approximately 1,086' FWL and 636' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 500' FSL of Section 31-16S-31E; and
- **Petty Federal Com 31CD 009H well**, to be horizontally drilled from a surface hole location approximately 1,087' FWL and 616' FSL of Section 32-16S-31E and a bottomhole location approximately 20' FWL & 340' FSL of Section 31-16S-31E.

3. Spur owns a 37.511173% interest in the Unit—a substantial interest.

4. Under its initial well proposal, Longfellow proposed to drill these nine initial wells it dedicated to the Unit "back to back." *See* Case No. 25572, Exhibit A-4 at 1 ("Longfellow hereby proposes to drill and complete the following wells '<u>back to back</u>.'") (emphasis added).

5. Under the terms of the Order, Longfellow is required to drill all nine of these initial wells within the one-year deadline established under the Order and to complete all nine wells within one year of drilling each well. *See* Order No. R-24036, ¶ 20.

6. The Division has made clear in its guidance that where multiple initial wells are proposed, operators are required to actually drill each well to comply with the terms of the Order. *See* NOTICE—OCD Clarification of Compulsory Pooling Processes Updates, July 12, 2024.

7. Division rules are not discretionary. "Paragraph twenty, as seen above, is intended to mean that all wells the operator proposed in Exhibit A shall be spudded within one (1) year **total** from the date of the OCD Director signature. Each well is then to be completed within one (1) year calculated of its own spud date. The above paragraph does **not** grant an operator permission to drill only what the Operator may deem as the defining well within this timeline." *Id.* (Emphasis retained).

8. The Division also provided subsequent additional guidance for operators to follow "on the process for uncontested applications for minor deviations from development plans associated with compulsory pooling orders," and specified that it is applicable to "uncontested" matters "where an operator needs to deviate from the development plan to accommodate scheduling issues with well(s) drilling or completion schedule, or to remove *less than 20%* of the proposed wells from the development plan." *Id.* (emphasis added).

9. The Division was clear—operators cannot drill "only what the operator may deem as the defining well." *Id*. Spur has concerns that this is precisely what Longfellow intends to do: drill only its recently updated initial well. Longfellow moved the target interval for the Petty 31CD Fed Com 006H Well (API No. 30-015-58054) into the lower Paddock in position to serve as a proximity well—a different target bench at a different surface location—because it would be the only initial well and would be necessary to perfect the enlarged spacing unit. **Exhibit A** at 1.

10. The Division's forgoing guidance on compulsory pooling orders does not authorize an operator to completely overhaul its drilling and development plan, well sequencing, unit

spacing, or to drop 90% of its proposed initial wells that had been authorized and approved under the pooling order. Here, in conflict with Order No. R-24036 and the Division's plain guidance, Longfellow is proposing to do just that.

11. On March 30, 2026, Longfellow issued a well proposal for a single initial well under Order No. R-24036 that does not reflect the well that it actually intends to drill (as stated in subsequent communications and reflected in OCD well permitting approvals), which will have a different target bench within the Yeso and different footages, spacing and, therefore, different sequencing than what was applied for and approved in Order No. R-24036.[1]

12. Pursuant to the Division's November 1, 2025 Notice on "Procedure for Deviation from Orders," the Division made clear that even for purported minor deviations "where an operator needs to deviate from the development plan to accommodate scheduling issues with well(s) drilling or completion schedule, or to remove less than 20% of the proposed wells from the development plan," Longfellow is required to go to hearing to resolve an objection.

13. Longfellow provided notice to Spur of a purported "minor deviation" from the Order, Spur objected, and the Division informed Longfellow that it was required to go to hearing to resolve the objection. **<u>Exhibit B</u>**. Longfellow counsel informed Spur counsel, however, that it will not file an application for hearing to resolve Spur's objection, despite the Division's published guidance and clear instruction to do so. **<u>Exhibit C</u>**.

---

[1] Order No. R-24036 provides that the Petty 31CD Fed Com 006H Well will have a TVD of "~5244" putting it in the Blinebry. Longfellow issued a well proposal on March 30, 2026, under the Order for a single well—the 006H Well—at a depth and location that matches the Order, but is drilling a the 006H to target the Lower Paddock at a TVD of approximately 4,885 feet, according to its directional survey dated October 28, 2025, that was included in its federal APD packet that was submitted to OCD on March 6, 2026, and approved April 13, 2026. That will change the sequencing and spacing of the entire planned drilling package in the spacing unit.

14. In addition, the estimated costs for the single proposed initial well has grown—without explanation—by approximately $1 million over what Longfellow originally estimated in its July 9, 2025 AFE, which was presented at the hearing on September 16, 2025.

15. Due to the potential for the imposition of a 200% risk charge against its more than one-third interest in this Unit, Spur timely elected to participate in the initial proposed well, but did so under protest on the basis that the well proposal was not in compliance with the requirements of Order No. R-24036. It also is not a valid well proposal because it does not reflect the well that Longfellow proposed to drill.

16. Based on Longfellow's own concessions, Spur has grave concerns that Longfellow's modified and uncertain plans—that have not been approved by the Division and are not incorporated into any compulsory pooling order—will adversely impact its correlative rights and result in waste due to improper spacing, well sequencing, and parent-child effects that were not an issue under the plan approved by the Division in the Order. For example, not only has Longfellow changed its plans for the initial well, it has also stated that it intends to file an unspecified future amendment or amendments to the Order. *See* **Exhibit D** at ¶¶ 19-20 (Longfellow Resp. to Spur Motion for Stay).

17. Longfellow's plan to make incremental amendments in a piecemeal fashion prevents working interest owners from fairly evaluating deviations from the approved development plan under the Order.

18. Adherence to the Division rules and requirements that govern pooling and the prevention of waste and impairment of correlative rights is critical and failure to do so directly impacts Spur's 37% working interest in this Unit. Longfellow should be required to comply with the express provisions of Order No. R-24036 and/or follow the Division's guidance on compulsory

pooling orders and file an application to amend Order No. R-24036 to correctly reflect its updated drilling and development plan.

WHEREFORE, Applicant requests that this application be set for hearing before an Examiner of the Oil Conservation Division on July 9, 2026, and, after notice and hearing as required by law, the Division enter an order granting this application and:

- Requiring Longfellow to comply with the terms of the Order or to file an application to amend the Order to reflect its actual drilling plans;
- Ruling that Longfellow's March 30, 2026 well proposal under Order No. R-24036 is invalid;
- Suspending the effect of Order No. R-24036 until Longfellow complies with its terms or files an application to amend the Order to reflect its actual drilling and development plans;
- Staying the effect the APD for the Petty 31CD Fed Com 006H Well (API No. 30-015-58054) under 19.15.7.9 NMAC; and
- Such other relief as the evidence supports and the Division deems advisable.

Respectfully submitted,

HOLLAND & HART LLP

By:______________________________

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
agrankin@hollandhart.com
pmvance@hollandhart.com
arstarnes@hollandhart.com

ATTORNEYS FOR SPUR ENERGY PARTNERS LLC

CASE _______: **Application of Spur Energy Partners LLC to Re-Open Order No. R-24036, Eddy County, New Mexico.** Applicant in the above-styled cause seeks to re-open Order No. R-24036 to require Longfellow Energy, LP ("Longfellow") to comply with the terms and requirements of Order No. R-24036 ("Order") or amend the Order to reflect its revised drilling and development plans following Spur's objection to its notice of deviation from the Order, as required by Division guidance. Division Order No. R-24036, entered on December 1, 2025, in Case No. 25572, created a standard 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Longfellow (OGRID 372210) operator of the Unit. Longfellow should be required to comply with the express provisions of Order No. R-24036 or follow the Division's guidance on compulsory pooling orders and file an application to amend Order No. R-24036 to correctly reflect its updated drilling and development plan. Said area is located approximately 6 miles northeast of Loco Hills, New Mexico.

Subject: FW: Petty 6H Well Proposal

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Monday, April 6, 2026 8:35:11 AM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: RE: Petty 6H Well Proposal

I apologize for the confusion, that was my mistake. The 6H was a LOWER Blinebry, that was swapped to a Paddock. Th 5H was a Paddock that became a LOWER Blinebry. The rest of the development remained unchanged.

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Thursday, April 2, 2026 4:05 PM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: RE: Petty 6H Well Proposal

If that's the case, then the same zone spacing for the blinebry and paddock has changed.

Based on the footages in the CPO, is your new plan as outlined below?

PADDOCK: 6H (defining well) will be 1250' FSL, thus infill 8H will be 750' south (at 500' FSL) and infill 2H will be 1069' north (at 2319' FSL)

UPPER BLINEBRY: 3H to 5H spacing will be 749' and 5H to 9H will be 1070'?

LOWER BLINEBRY: Spacing unchanged.

Emma Whelton
Landman - Business Development

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Thursday, April 2, 2026 3:39 PM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: Re: Petty 6H Well Proposal

Hey Emma,

The 5H and the 6H just swapped. We are planning the 5H to be the Upper Blinberry that was initially the 6H. The reason we swapped the wells was we wanted the proximity well to be drilled first into the Paddock since we are only drilling one initial well.

Hope this helps, please let me know if there are any follow ups.

Thank you,
Stuart Gaston

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Thursday, April 2, 2026 2:28:29 PM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: FW: Petty 6H Well Proposal

Stuart,

See additional below/attached question from our team on the Petty well proposal.

Thanks,

Emma Whelton
Landman - Business Development

From: Matt Van Wie <MattV@spurenergy.com>
Sent: Thursday, April 2, 2026 2:15 PM
To: Emma Whelton <emma.whelton@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Emma,

Based on the email information below and the CPO R-24036 (attached), it appears the 6H has simply changed TVD (target interval).

This HSU was pooled as a 3 paddock / 3 upper Blinebry / 3 lower Blinebry wine-racked development (see attached powerpoint) … and without any further information, it now stands at 4 paddocks / 2 upper Blinebry / 3 lower Blinebry … with serious concerns on Paddock spacing (and potentially material change in development).

Given this is a full cube (9-well) proposed development where we have material interest, can Longfellow please provide information/details on how this 6H shift will alter (if any) future infill wells.

Thanks,
Matt V.

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Tuesday, March 31, 2026 11:30:28 AM
To: Seth Ireland <Seth@spurenergy.com>; Michael Sliva <michael@spurenergy.com>
Subject: FW: Petty 6H Well Proposal

Emma Whelton
Landman - Business Development

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Tuesday, March 31, 2026 11:30 AM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Hi Emma,

I apologize for the confusion. The well of record switched from the 5H to the 6H well after the CPO was issued. The 6H is now the following:

Petty Federal Com 31CD 006H, with an approximate true vertical depth of 4,969', as a horizontal well in the Yeso formation (with an approximate measured depth of 10,280') Surface Hole Location is 1,085' FWL & 676' FSL of Section 32-16S-31E; with a Bottom Hole Location of 20' FWL & 1,250' FSL of Section 31-16S-31E. **Being a Paddock Target**

Please let me know if y'all have any questions or need any additional information.

Thanks,
Stuart Gaston

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Tuesday, March 31, 2026 10:34 AM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Stuart,

Can you and your team please confirm the proposed TVD and landing zone for the Petty 6H? The pooling documents have it as an upper blinebry.

Thanks,

Emma Whelton
Landman - Business Development

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Monday, March 30, 2026 2:08 PM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Hello Emma,

Thank you for reaching out. Please find attached our form JOA for review. I will be adding the Exhibit information specific to this Unit prior to execution. If you have any questions, concerns, or need any additional information, please feel free to reach out.

Thanks,

Stuart Gaston

Senior Landman

8115 Preston Road, Suite 800
Dallas, TX 75225
(972) 532-8205
(432) 413-5210

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Monday, March 30, 2026 2:04 PM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: Petty 6H Well Proposal

Stuart,

We are in receipt of Longfellow's attached well proposal for the Petty 6H. While my team is evaluating and deciding if we want to participate via JOA or COP, would you mind sending over your JOA for our review?

Thanks,

Emma Whelton
Landman - Business Development
SPUR ENERGY PARTNERS LLC
9655 Katy Freeway, Suite 500 | Houston, TX 77024
(832) 930-8532 (Office)
(713) 397-3355 (Cell)
emma.whelton@spurenergy.com

CAUTION External Email - Don't click on contents unless you know they are safe

CAUTION External Email - Don't click on contents unless you know they are safe

CAUTION External Email - Don't click on contents unless you know they are safe

EXHIBIT B

From:	Tschantz, Freya, EMNRD
To:	Miguel Suazo; Jacob Everhart
Cc:	Adam Rankin; Paula M. Vance; Raylee Starnes
Subject:	Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036
Date:	Wednesday, May 6, 2026 2:38:29 PM
Attachments:	image001.png Longfellow - Notice Letter - Deviation from Order R-24036 (4896-6916-7783 v1).pdf

External Email

Good afternoon,

Because Spur has filed an objection, the requested deviation cannot be approved administratively.
Longfellow will need to submit an application requesting a hearing to amend Order R-24036.
Please let me know if you have any questions. Thank you.

Respectfully,

Freya Tschantz, Law Clerk
EMNRD-Oil Conservation Division
1220 South St. Francis Drive, 3rd Floor
Santa Fe, NM 87505
(505) 469-5527
Freya.Tschantz@emnrd.nm.gov

EXHIBIT C

From:	Miguel Suazo
To:	Adam Rankin
Cc:	Paula M. Vance; Raylee Starnes; Tschantz, Freya, EMNRD; Jacob Everhart; Engineer, OCD, EMNRD; ocd.hearings@emnrd.nm.gov
Subject:	RE: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036
Date:	Monday, June 1, 2026 8:12:56 AM
Attachments:	image001.png

External Email

Adam:

Longfellow does not agree with the premise of your question. Longfellow does not agree that the 006H well, or Longfellow's present drilling schedule under Order No. R-24036, constitutes a proposed deviation requiring an application for hearing on the July docket. Longfellow will continue to comply with Order No. R-24036 and all applicable Division rules. To the extent Longfellow proposes any future change that requires Division approval under Order No. R-24036 or applicable rules, Longfellow will seek approval through the appropriate Division procedure.

Thanks.

Miguel Suazo | Shareholder
Beatty & Wozniak, P.C.
505.946.2090 | Direct

From: Adam Rankin <AGRankin@hollandhart.com>
Sent: Friday, May 29, 2026 4:52 PM
To: Miguel Suazo <msuazo@bwenergylaw.com>
Cc: Paula M. Vance <PMVance@hollandhart.com>; Raylee Starnes <ARStarnes@hollandhart.com>; Tschantz, Freya, EMNRD <Freya.Tschantz@emnrd.nm.gov>; Jacob Everhart <jeverhart@bwenergylaw.com>; Engineer, OCD, EMNRD <ocd.engineer@emnrd.nm.gov>; ocd.hearings@emnrd.nm.gov
Subject: RE: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036

CAUTION: EXTERNAL SOURCE

Miguel,

Can you please confirm Longfellow will file an application for hearing on the July hearing docket to approve its proposed deviation from Order No. R-24036, as required.

Adam Rankin

Partner, Holland & Hart LLP

agrankin@hollandhart.com | **T:** (505) 954-7294 | **M:** (505) 570-0377

From: Tschantz, Freya, EMNRD <Freya.Tschantz@emnrd.nm.gov>
Sent: Wednesday, May 6, 2026 2:38 PM
To: Miguel Suazo <msuazo@bwenergylaw.com>; Jacob Everhart <jeverhart@bwenergylaw.com>
Cc: Adam Rankin <AGRankin@hollandhart.com>; Paula M. Vance <PMVance@hollandhart.com>; Raylee Starnes <ARStarnes@hollandhart.com>
Subject: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036

External Email

Good afternoon,

Because Spur has filed an objection, the requested deviation cannot be approved administratively. Longfellow will need to submit an application requesting a hearing to amend Order R-24036. Please let me know if you have any questions. Thank you.

Respectfully,

Freya Tschantz, Law Clerk
EMNRD-Oil Conservation Division
1220 South St. Francis Drive, 3rd Floor
Santa Fe, NM 87505
(505) 469-5527
Freya.Tschantz@emnrd.nm.gov

EXHIBIT D

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

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

CASE NO. 25572
ORDER NO. R-24036

RESPONSE TO SPUR'S EMERGENCY MOTION FOR STAY

Longfellow Energy, LP, OGRID No. 372210 ("Longfellow"), through its undersigned attorneys, hereby files this (1) response to Spur Energy Partners LLC ("Spur") Emergency Motion to Stay ("Motion") Oil Conservation Division ("OCD") Order No. R-24036 ("Order") and request to stay the Division approved Application for Permit to Drill ("APD") for the Petty 31CD Fed Com Well (API No. 30-015-58054) under 19.17.7.9 NMAC [sic], and (2) Spur's proposed order requesting the same. Longfellow provides a proposed order denying the entirety of Spur's Motion and requests for relief, set forth as **Exhibit A.**

The Motion should be denied. Spur seeks extraordinary relief without identifying a valid procedural vehicle, without establishing an emergency, and without demonstrating any actual, non-economic, irreparable injury. Instead, Spur attempts to convert the emergency-stay process into a collateral attack on valid Division approvals and into a shortcut for litigating alleged operational-deviation issues that are reserved to the Division in the first instance. The Division should reject that effort, and allow Longfellow to continue operations under the existing Order and approved APD.

FACTUAL BACKGROUND

1. The Division issued Order No. R-24036, attached as **Exhibit B**, on December 1, 2025, in Case No. 25572, which created standard 302.07-acre, more or less, horizontal spacing

unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Longfellow as operator of the Unit.

2. Order No. R-24036 pooled the uncommitted interests in the Yeso formation in the Unit, and dedicated the Unit to the following wells: **Petty Federal Com 31CD 001H well, Petty Federal Com 31CD 002H well, Petty Federal Com 31CD 003H well, Petty Federal Com 31CD 004H well, Petty Federal Com 31CD 005H well, Petty Federal Com 31CD 006H well, Petty Federal Com 31CD 007H well, Petty Federal Com 31CD 008H well,** and **Petty Federal Com 31CD 009H well.**

3. Spur owns a 37.511173% working interest in the Unit. Spur did not enter an appearance or object to Longfellow's pooling application before entry of the Order.

4. Order No. R-24036 ¶ 20 provides "Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."

5. Order No. R-24036 ¶ 20 does not require Longfellow to drill the well(s) in any particular sequence, contrary to what Spur asserts. Rather, Order No. R-24036 requires only that Longfellow drill each well prior to November 30, 2026 (one-year from approval), or in the alternative, that Longfellow request an extension from the OCD before Order No. R-24036 expires.

6. Longfellow has not informed Spur, the additional parties entitled to notice, or the Division that it does not intend to drill all nine wells identified in Order No. R-24036 or that it intends to pursue an extension.

7. Order No. R-24036 ¶ 22 provides "Operator may propose *reasonable deviations from the development plan* *<u>via notice to the OCD and all parties that required notice of the original</u>*

<u>*compulsory pooling application*</u> in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing." (emphasis added).

8. The Division has provided guidance to operators seeking *minor* deviations by allowing operators to proceed without a hearing by (1) providing notice, (2) monitoring objections, and (3) submitting the application for deviation to Division permitting with all required documentation. *See* "NOTICE—Procedure for Deviation from Orders, November 1, 2025." Attached as **Exhibit C**. Division guidance under this NOTICE is limited to deviations involving the accommodation of scheduling issues with well(s) drilling or completion schedules, or when an operator is seeking to remove less than 20% of the proposed wells from the development plan. *Id.*

9. Spur references the July 12, 2024, "NOTICE—OCD Clarification of Compulsory Pooling Processes Updates" issued by the Division, attached as **Exhibit D**, but the Division has subsequently issued additional clarifying guidance on deviation from orders under the November 1, 2025, Notice.

10. The Division has not issued dispositive guidance defining what constitutes a "minor" or "major" deviation from orders outside of the two options explicitly provided for.

11. Longfellow sent well proposals and election letters to Spur on March 30, 2026, for the **Petty 31CD 006H** well.

12. The March 30, 2026, election letters were consistent with the approved Division and BLM APD and associated drilling and engineering design for the **Petty 31CD 006H** well that Longfellow revised to reflect the Lower Paddock lateral placement instead of the Blineberry. Both pools are in the Yeso formation originally pooled under Order No. R-24036.

13. Spur elected to participate in the **Petty 31CD 006H** well "under protest." The "protest" was due to the well's landing placement revision and due to an increase in AFE costs associated with the well as originally proposed during the September 16, 2025, hearing by affidavit and the costs associated with the well as proposed in the March 30, 2026, election letters.

14. The Order provides the Division approved procedure for reconciling project costs against actual costs in ¶ 26 which lays out the following procedure: (1) Longfellow has 180 days to submit to each pooled working interest owner an itemized schedule of the *actual* well costs, and (2) the *actual* well costs will be considered reasonable unless a pooled working interest owner files a written objection no later than 45 days after receipt. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

15. The correct process for objecting to the *actual* well costs occurs after the well is completed, not when the well is currently being drilled.

16. Longfellow discovered a looming BLM lease expiration that was set to expire during the first half of May 2026, which would result in the Unit falling apart.

17. Longfellow made plans to schedule and perform the drilling of the **Petty 31CD 006H** well to ensure the federal lease would be extended and the Unit would not be impacted due to its removal.

18. On May 1, 2026, Longfellow and Spur met to primarily to discuss joint resolution options for the Unit development that included acreage trades, a buyout of Spur's interest, and secondarily to discuss Longfellow's plans to spud the **Petty 31CD 006H** well due to the BLM lease expiration. During this meeting, Longfellow provided a DRAFT notice of minor deviation letter accompanied with a revised gunbarrel diagram for the well(s).

19. The DRAFT notice letter functioned as a demonstrative exhibit to convey the changes in landing to the **Petty 31CD 006H** well initially prior to spud as a form of good faith transparency between Longfellow—the Unit operator—and Spur as working interest owner, and also the contemplated changes in landing to the remaining wells to be accomplished via an amendment to Order No. R-24036 prior to its expiration.

20. The changes in the well(s) landing and placement depicted on the gunbarrel diagram in the May 1, 2026, meeting was intended by Longfellow to demonstrate to Spur the comprehensive modifications to be made via amendment to Order No. R-24036 after the **Petty 31CD 006H** well was drilled to maintain the integrity of the Unit.

21. Longfellow determined that the slight revision to the lateral placement of the **Petty 31CD 006H** well in the Yeso formation would not, in reasonable probability, alter the ultimate drainage of the Unit, and such expeditious action would be necessary and amicable to Spur to preserve the federal lease and Unit, as a whole.

22. Longfellow provided a minor-deviation notice out of an abundance of caution but maintains the lateral re-placement does not actually rise to a deviation requiring approval, because (a) no formation change — both Blineberry and Lower Paddock are within the Yeso formation pooled under R-24036 (and per the May 1 letter itself, within Pool Code 96831, Cedar Lake; Glorieta-Yeso), (b) no change in surface hole or bottomhole location, (c) no change in number of wells, and (d) no reasonable probability of altering ultimate Unit drainage.

23. Since Longfellow has commenced drilling of the **Petty 31CD 006H** well no less than six months before the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the Order.

24. Drilling operations have commenced, and any stay of those operations would result in loss and damage to the wellbore integrity, increased fluid and control risks, increased capital expenditure due to rig standby and crew per diems, extended demobilization and remobilization costs, and cascading contractual risks to working interest owners (e.g., service provider contracts, completion crew contracts, and so forth).

25. Longfellow's actions to drill the **Petty 31CD 006H** well and preserve the federal lease will prevent waste and protect correlative rights due to the development of the federal minerals as part of the planned Unit.

26. Spur's motion would result in waste due to the loss of the federal lease within the unit, which would impact the overall recovery of the Unit as originally proposed by Longfellow.

27. Spur's motion fails to show irreparable harm apart from purely economic harm. *See* Spur Emer. Mot. St. at ¶¶ 13, 17.

28. Since Longfellow intends to commence drilling of the remaining wells prior to the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the order.

29. Longfellow asserts that the drilling of the wells at different times within the stipulated one-year window in Order No. R-24036 is both contemplated and allowed by Division guidance.

30. Longfellow asserts that its plan to drill the Unit wells at differing times within the initially stipulated one-year window in Order No. R-24036 does not constitute removal of more than 20% of the proposed wells from the development plan.

31. Since Longfellow is not removing any wells from the Unit, Longfellow remains compliant with the order.

32. Longfellow asserts that any deadlines associated with drilling or completing that are imposed by the Division should be considered as a mandate from the Division for the operator to conduct the work "no later than" the one-year deadline, rather than a mandate to conduct the work "on or about" the one-year deadline of the Order.

33. Longfellow concludes that neither notice nor Order amendment is required for its actions governing the **Petty 31CD 006H** well as such revision does not rise to even a "minor" deviation.

ARGUMENT

1. Spur Identifies No Valid Procedural Basis to Stay Both a Final Pooling Order and a Valid APD Through an Emergency Motion

Spur's threshold problem is procedural. Spur asks the Division to stay both a final compulsory pooling order and the effect of an approved APD. But the Motion does not identify any Division rule that authorizes this relief in the posture presented here.

Rule 19.15.4.23(B) NMAC authorizes the Director to stay Division or Commission orders only when a stay is necessary to prevent waste, protect correlative rights, protect public health or the environment, or prevent gross negative consequences to an affected party. Spur does not satisfy that standard. The Order itself was issued after notice and hearing, approved Longfellow's development of the Unit, and necessarily reflected the Division's determination that the pooled development would prevent waste and protect correlative rights. Spur's disagreement with the timing, sequencing, cost, or intra-formation landing placement of the 006H Well does not justify staying the Order on an emergency basis.

Nor does 19.15.14.10(B) NMAC provide the relief Spur seeks. That provision allows the Division to impose conditions on an approved permit to drill, deepen, or plug back. It does not create a private right for a non-operator working-interest owner to suspend a valid APD by

emergency motion, nor does it convert ordinary operational disputes into collateral attacks on approved permits. Likewise, 19.15.2.11(B) NMAC addresses emergency hearing timing; it is not an independent source of substantive stay authority.

Because Spur has identified no rule authorizing the requested stay of both the Order and the APD, the Motion should be denied for that reason alone. If the Division determines that any future amendment, deviation, or hearing is appropriate, that determination can be made through the Division's ordinary procedures. It does not require, and does not justify, emergency suspension of ongoing operations under an approved APD.

2. Spur Has Not Shown an Emergency or Irreparable Harm

Spur's Motion depends on a chain of unsupported assumptions. Spur first assumes that any revision to a well's lateral placement automatically constitutes a deviation requiring notice and hearing. Spur next asserts that the revised lateral placement of the 006H Well will irreparably harm Spur, impair its correlative rights, and cause waste, but it offers no substantive explanation of how Spur will actually be affected. *See* Spur Em. Mot. ¶ 13. Spur then characterizes these alleged circumstances as an emergency requiring immediate Division intervention that would effectively halt ongoing drilling operations.

Spur's own cited authority confirms why that showing is insufficient. In *Tenneco Oil Co. v. New Mexico Water Quality Control Commission*, the New Mexico Court of Appeals recognized that a stay of administrative action is discretionary and requires a showing of, among other things, irreparable harm, lack of substantial harm to other interested persons, and no harm to the public interest. 1986-NMCA-033, ¶ 10. The court further held that "[t]he mere fact that an administrative regulation or order may cause injury or inconvenience to applicant is insufficient to warrant suspension of an agency regulation by the granting of a stay," and that "[m]ere allegations of irreparable harm are not, of course, sufficient." *Id.* ¶¶ 11–12. Here, Spur offers only conclusory

assertions of harm tied to AFE costs, well sequencing, alleged parent-child effects, and lateral placement within the same pooled formation. Those assertions do not establish the immediate, non-speculative injury required for extraordinary stay relief, particularly where the requested stay would itself create concrete operational, contractual, leasehold, and waste-prevention risks for Longfellow and the participating working interest owners.

The New Mexico standard governing extraordinary injunctive relief confirms the point. Injunctions are "harsh and drastic remedies" available only upon a showing of irreparable injury for which there is no adequate and complete remedy at law. *State ex rel. State Highway & Transp. Dep't of N.M. v. City of Sunland Park*, 2000-NMCA-044, ¶ 18, 129 N.M. 151, 3 P.3d 128. An irreparable injury is one that cannot be compensated or measured by any certain pecuniary standard, and the injury must be actual and substantial, or an affirmative prospect of such injury, not a mere possibility of harm. *Id*. ¶ 19. The party seeking relief must present evidence of irreparability and inadequacy of remedy; conclusory assertions are not enough. *Id*.

Spur has not made that showing. Spur alleges concerns regarding spacing, sequencing, parent-child effects, costs, and correlative rights, but it does not provide evidence that the approved 006H Well will cause actual and imminent non-economic injury. Spur's cost objection is particularly unsuitable for emergency relief because Division rules already provide a mechanism for reporting actual well costs and resolving objections to the reasonableness of those costs. *See* 19.15.13.13 NMAC. A dispute over AFE increases does not justify stopping a permitted well.

Spur's participation "under protest" also does not create emergency rights that the Division's rules do not otherwise provide. Spur elected to participate in the 006H Well. That election preserves Spur's economic position in the well; it does not transform an unsupported objection into irreparable harm or authorize an emergency stay.

3. Longfellow Remains in Compliance with the Order and the Approved APD

Spur's Motion repeatedly suggests that Longfellow has abandoned the approved development plan or is attempting to drop 90% of the approved wells. That is incorrect. Longfellow is not removing any well from the Unit. Longfellow has not stated that it will drill only the 006H Well. Longfellow remains within the Order's one-year deadline to commence drilling and intends to address any future changes for remaining wells through appropriate Division procedures before those wells are drilled.

Spur also misreads the Order as requiring "back-to-back" drilling. Paragraph 20 does not impose a particular drilling sequence. It requires the operator to commence drilling the well(s) within one year after the date of the Order and to complete each well no later than one year after commencement of that well. Spur's reliance on language from Longfellow's initial proposal does not rewrite the Order or create a new emergency-stay remedy.

The 006H Well's revised landing placement also does not invalidate the Order or APD. The 006H Well remains within the Yeso formation pooled by the Order. Longfellow has determined that the lateral-placement adjustment will not, in reasonable probability, alter ultimate Unit drainage or impair Spur's correlative rights. And the 006H Well is being drilled under approved federal and Division permitting. Those approvals remain valid unless and until the Division determines otherwise through a proper procedural vehicle.

Spur's attempt to treat Longfellow's May 1 courtesy communication as formal notice requiring a protested hearing is equally misplaced. The draft notice letter was provided to Spur as part of ongoing commercial discussions and in the interest of transparency. It was not served on all parties entitled to notice of the original pooling application, was not served by certified mail, and was not submitted as a formal notice intended to trigger Paragraph 22 of the Order. Spur cannot

manufacture a protest process from a draft negotiation document and then use that manufactured protest to halt drilling operations.

Longfellow does not dispute that its initial well proposal described a “back-to-back” drilling sequence. That language reflected Longfellow's anticipated execution plan, not a binding contractual commitment, and Order R-24036 did not adopt or incorporate that phrase as a condition of approval. The Order's only sequencing constraint is in Paragraph 20, which requires commencement of drilling within one year and completion of each Well within one year of its respective spud date. See also Ex. D (July 12, 2024 Notice) (confirming that “all wells the operator proposed in Exhibit A shall be spudded within one (1) year total from the date of the OCD Director signature”). Longfellow intends to spud all nine Unit wells by November 30, 2026, consistent with the Order’s terms and OCD’s official interpretation. Longfellow asserts that the proper Division procedure for Spur to follow in effort to reconcile projected and *actual* costs is the process outlined in ¶ 26 in Order No. R-24036.

4. Threshold Deviation Determinations Belong to the Division, Not to Spur

The Division’s rules reserve enforcement and operational-deviation determinations to the Division. Rule 19.15.2.16 NMAC provides that Division personnel have authority and duty to enforce Division rules and may allow minor deviations from approved field operational plans upon a showing by an operator that changes are necessary to avoid waste or protect public health or the environment. Rule 19.15.7.9(C) NMAC further provides that forms approved or processed by BLM for wells on federal lands or accessing federal minerals are subject to Division approval in the same manner and to the same extent as corresponding Division forms.

Those rules underscore why Spur’s requested relief is improper. Spur asks the Division to accept Spur’s threshold characterization of the 006H Well’s lateral-placement revision as an

actionable, protested deviation before the Division has made that determination. That approach would allow a non-operator to usurp the Division's role, convert courtesy communications into formal notices, and stop approved operations based on speculation. Nothing in the Division's rules requires that result.

At most, Spur has raised issues that can be addressed through ordinary Division processes if and when the Division determines additional process is necessary. That is not an emergency. It is not a basis to stay a valid pooling order. And it is not a basis to suspend an approved APD while active drilling operations are underway.

5. A Stay Would Create the Concrete Harm Spur Has Failed to Show

The equities also weigh decisively against the requested stay. Spur's alleged harm is speculative. Longfellow's harm from a stay is immediate and concrete. Drilling operations have commenced, and an abrupt suspension would introduce operational, contractual, and leasehold risks that the Division should not impose absent a compelling and properly supported showing by Spur.

Operationally, sudden interruption of active drilling can threaten wellbore integrity; increase the risk of stuck pipe, tight-hole conditions, formation swelling or sloughing, and loss of well path; degrade drilling-fluid characteristics; impair pressure control; and complicate directional drilling and geosteering. Those risks are not abstract. They arise directly from stopping an active drilling operation midstream.

Contractually and economically, a stay would expose Longfellow and participating working-interest owners to rig standby charges, potential rig-release and remobilization costs, crew and service-company scheduling disruptions, equipment and supply-chain delays, and cascading obligations tied to water, fuel, tubulars, trucking, disposal, and completion services. The stay

would also risk federal leasehold consequences that could impair the Unit as a whole and frustrate the very resource-development objectives the Order was designed to advance.

In short, Spur asks the Division to impose the concrete waste, operational disruption, and leasehold risk that Spur has failed to prove it will suffer. Rule 19.15.4.23(B) NMAC does not support that result. The Motion should be denied.

CONCLUSION AND REQUESTED RELIEF

For the foregoing reasons, Longfellow respectfully requests that the Division deny Spur's Emergency Motion for Stay in full, deny Spur's request to stay the Order and the APD, deny Spur's request to invalidate Longfellow's March 30, 2026, well proposal, and grant such other relief as the Division deems just and proper. If the Division sets the Motion for hearing, Longfellow requests that no stay issue pending hearing.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:____________________________________

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Raj K. Lahoti
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com
rlahoti@bwenergylaw.com

Attorneys for Longfellow Energy LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 15th day of May 2026, as follows:

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
agrankin@hollandhart.com
pmvance@hollandhart.com
rstarnes@hollandhart.com
Attorneys for Spur Energy Partners, LLC

____
Rachael Ketchledge

EXHIBIT A

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

APPLICATION OF LONGFELLOW ENERGY LP FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 25572
ORDER NO. R-24036

***[PROPOSED]* ORDER DENYING REQUEST FOR STAY OF ORDER NO. R-24036 AND DIVISION APPROVED APD**

This matter, having come before the Division Director and/or the Chair of the Oil Conservation Commission on a response motion filed by Longfellow Energy, LP ("Longfellow") pursuant to 19.15.7.9 NMAC, and having considered the response motion and otherwise being fully informed in the premises, the Director finds and concludes that a temporary stay of the Order No. R-24036 and the Division's administrative approval for the following well is not necessary or appropriate to prevent waste and to protect correlative rights, as such prevention and protection is inherent in the valid existing pooling Order and APD:

- **Petty Federal Com 31CD 006H** (API No. 30-015-58054) to be dedicated to a 302.07-acre, more or less, horizontal well spacing unit in the Yeso formation comprised of the S/2 of Section 31, T16S, R31E, Eddy County, New Mexico.

IT IS THEREFORE ORDERED that Spur Energy Partners LLC's Emergency Motion to Stay is hereby DENIED, and Division Order No. R-24036, together with the Division's administrative approval of the APD for the above-referenced well, shall remain in full force and effect without the additional requirement to provide notice to the Division or previously noticed affected parties for slight deviations therefrom. This Order is without prejudice to any party seeking further relief through the procedures otherwise available under Division rules and applicable law.

EXHIBIT B

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

IN THE MATTER OF APPLICATION FOR COMPULSORY POOLING SUBMITTED BY LONGFELLOW ENERGY, LP

CASE NO. 25572
ORDER NO. R-24036

ORDER

The Director of the New Mexico Oil Conservation Division ("OCD"), having heard this matter through a Hearing Examiner on September 16, 2025, and after considering the testimony, evidence, and recommendation of the Hearing and Technical Examiners, issues the following Order.

FINDINGS OF FACT

1. Longfellow Energy, LP ("Operator") submitted an application ("Application") to compulsory pool the uncommitted oil and gas interests within the spacing unit ("Unit") described in Exhibit A. Operator seeks to be designated the operator of the Unit.

2. Operator will dedicate the well(s) described in Exhibit A ("Well(s)") to the Unit.

3. Operator proposes the supervision and risk charges for the Well(s) described in Exhibit A.

4. Operator identified the owners of uncommitted interests in oil and gas minerals in the Unit and provided evidence that notice was given.

5. The Application was heard by the Hearing Examiner on the date specified above, during which Operator presented evidence through affidavits in support of the Application. No other party presented evidence at the hearing.

CONCLUSIONS OF LAW

6. OCD has jurisdiction to issue this Order pursuant to NMSA 1978, Section 70-2-17.

7. Operator is the owner of an oil and gas working interest within the Unit.

8. Operator satisfied the notice requirements for the Application and the hearing as required by 19.15.4.12 NMAC.

9. OCD satisfied the notice requirements for the hearing as required by 19.15.4.9 NMAC.

10. Operator has the right to drill the Well(s) to a common source of supply at the depth(s) and location(s) in the Unit described in Exhibit A.

11. The Unit contains separately owned uncommitted interests in oil and gas minerals.

12. Some of the owners of the uncommitted interests have not agreed to commit their interests to the Unit.

13. The pooling of uncommitted interests in the Unit will prevent waste and protect correlative rights, including the drilling of unnecessary wells.

14. This Order affords to the owner of an uncommitted interest the opportunity to produce his just and equitable share of the oil or gas in the pool.

ORDER

15. The uncommitted interests in the Unit are pooled as set forth in Exhibit A.

16. The Unit shall be dedicated to the Well(s) set forth in Exhibit A.

17. Operator is designated as operator of the Unit and the Well(s).

18. If the location of a well will be unorthodox under the spacing rules in effect at the time of completion, Operator shall obtain the OCD's approval for a non-standard location in accordance with 19.15.16.15(C) NMAC.

19. If the Unit is a non-standard horizontal spacing unit which has not been approved under this Order, Operator shall obtain the OCD's approval for a non-standard horizontal spacing unit in accordance with 19.15.16.15(B)(5) NMAC.

20. Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.

21. This Order shall terminate automatically if the Operator fails to comply with the preceding paragraph unless the Operator requests an extension by notifying the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the extension is automatically granted up to one year. If a protest is received the extension is not granted and the Operator must set the case for a hearing.

22. Operator may propose reasonable deviations from the development plan via notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing.

23. The infill well requirements in 19.15.13.9 NMAC through 19.15.13.12 NMAC shall be applicable.

24. Operator shall submit each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").

25. No later than thirty (30) days after Operator submits the Estimated Well Costs, the owner of a Pooled Working Interest shall elect whether to pay its share of the Estimated Well Costs or its share of the actual costs to drill, complete and equip the well ("Actual Well Costs") out of production from the well. An owner of a Pooled Working Interest who elects to pay its share of the Estimated Well Costs shall render payment to Operator no later than thirty (30) days after the expiration of the election period, and shall be liable for operating costs, but not risk charges, for the well. An owner of a Pooled Working Interest who fails to pay its share of the Estimated Well Costs or who elects to pay its share of the Actual Well Costs out of production from the well shall be considered to be a "Non-Consenting Pooled Working Interest."

26. No later than one hundred eighty (180) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the Actual Well Costs. The Actual Well Costs shall be considered to be the Reasonable Well Costs unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

27. No later than sixty (60) days after the expiration of the period to file a written objection to the Actual Well Costs or OCD's order determining the Reasonable Well Costs, whichever is later, each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs shall pay to Operator its share of the Reasonable Well Costs that exceed the Estimated Well Costs, or Operator shall pay to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs its share of the Estimated Well Costs that exceed the Reasonable Well Costs.

28. The reasonable charges for supervision to drill and produce a well ("Supervision Charges") shall not exceed the rates specified in Exhibit A, provided however that the rates shall be

adjusted annually pursuant to the COPAS form entitled "Accounting Procedure-Joint Operations."

29. No later than within ninety (90) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the reasonable charges for operating and maintaining the well ("Operating Charges"), provided however that Operating Charges shall not include the Reasonable Well Costs or Supervision Charges. The Operating Charges shall be considered final unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Operating Charges after public notice and hearing.

30. Operator may withhold the following costs and charges from the share of production due to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs: (a) the proportionate share of the Supervision Charges; and (b) the proportionate share of the Operating Charges.

31. Operator may withhold the following costs and charges from the share of production due to each owner of a Non-Consenting Pooled Working Interest: (a) the proportionate share of the Reasonable Well Costs; (b) the proportionate share of the Supervision and Operating Charges; and (c) the percentage of the Reasonable Well Costs specified as the charge for risk described in Exhibit A.

32. Operator shall distribute a proportionate share of the costs and charges withheld pursuant to the preceding paragraph to each Pooled Working Interest that paid its share of the Estimated Well Costs.

33. Each year on the anniversary of this Order, and no later than ninety (90) days after each payout, Operator shall provide to each owner of a Non-Consenting Pooled Working Interest a schedule of the revenue attributable to a well and the Supervision and Operating Costs charged against that revenue.

34. Any cost or charge that is paid out of production shall be withheld only from the share due to an owner of a Pooled Working Interest. No cost or charge shall be withheld from the share due to an owner of a royalty interests. For the purpose of this Order, an unleased mineral interest shall consist of a seven-eighths (7/8) working interest and a one-eighth (1/8) royalty interest.

35. Except as provided above, Operator shall hold the revenue attributable to a well that is not disbursed for any reason for the account of the person(s) entitled to the revenue as provided in the Oil and Gas Proceeds Payment Act, NMSA 1978, Sections 70-10-1 et seq., and relinquish

such revenue as provided in the Uniform Unclaimed Property Act, NMSA 1978, Sections 7-8A-1 et seq.

36. The Unit shall terminate if (a) the owners of all Pooled Working Interests reach a voluntary agreement; or (b) the well(s) drilled on the Unit are plugged and abandoned in accordance with the applicable rules. Operator shall inform OCD no later than thirty (30) days after such occurrence.

37. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Albert Chang

ALBERT C. S. CHANG
DIRECTOR
AC/dm

Date: 12/1/2025

EXHIBIT B

COMPULSORY POOLING APPLICATION CHECKLIST

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS

Case: 25572	APPLICANT'S RESPONSE
Date	**September 11, 2025**
Applicant	**Longfellow Energy, L.P.**
Designated Operator & OGRID (affiliation if applicable)	**Longfellow Energy, L.P., 372210**
Applicant's Counsel:	Spencer Fane, LLP (Sharon T. Shaheen)
Case Title:	Application of Longfellow Energy, L.P. for Compulsory Pooling, Eddy County, New Mexico
Entries of Appearance/Intervenors:	None at this time
Well Family	Petty Federal Com 31CD
Formation/Pool	
Formation Name(s) or Vertical Extent:	Yeso Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Yeso Formation
Pool Name and Pool Code (Only if NSP is requested):	
Well Location Setback Rules (Only if NSP is Requested):	
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320 acres
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	East-West
Description: TRS/County	S/2 of Section 31, Township 16 South, Range 31 East in Eddy County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe and is approval of non-standard unit requested in this application?	Yes
Other Situations	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	Yes, N2 S2 of Section 31
Proximity Defining Well: if yes, description	Yes, Petty Federal Com 31CD 006H well
Applicant's Ownership in Each Tract	Tract 1: 100%; Tract 2: 90%; Tract 3: 0.00%; Tract 4: 0.00%; Tract 5: 0.00%; Tract 6: 0.00%
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	Add wells as needed
Well #1	Petty Federal Com 31CD 001H well, API No. 30-015-XXXXX SHL: 411’ FWL and 1,717’ FSL of Section 32-16S-31E BHL: 20’ FWL & 2,628’ FSL of Section 31-16S-31E Completion Target: Yeso at ~5,867' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2628' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2628' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5867'), MD (~11272')
Well #2	Petty Federal Com 31CD 002H well, API No. 30-015-XXXXX SHL: 411’ FWL and 1,697’ FSL of Section 32-16S-31E BHL: 20’ FWL & 2,319’ FSL of Section 31-16S-31E Completion Target: Yeso at ~4,961' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2319' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2319' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4961'), MD (~10337')

Well #3	Petty Federal Com 31CD 003H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,677' FSL of Section 32-16S-31E BHL: 20' FWL & 2,159' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,226' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2159' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2159' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5226'), MD (~10562')
Well #4	Petty Federal Com 31CD 004H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,657' FSL of Section 32-16S-31E BHL: 20' FWL & 1785' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,875' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1785' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1785' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5875'), MD (~11165')
Well #5	Petty Federal Com 31CD 005H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,637' FSL of Section 32-16S-31E BHL: 20' FWL & 1410' FSL of Section 31-16S-31E Completion Target: Yeso at ~4969' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1410' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1410' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4969'), MD (~10280')
Well #6	Petty Federal Com 31CD 006H well, API No. 30-015-XXXXX SHL: 1085' FWL and 676' FSL of Section 32-16S-31E BHL: 20' FWL & 1250' FSL of Section 31-16S-31E Completion Target: Yeso at ~5244' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1250' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1250' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5244'), MD (~10572')
Well #7	Petty Federal Com 31CD 007H well, API No. 30-015-XXXXX SHL: 1086' FWL and 656' FSL of Section 32-16S-31E BHL: 20' FWL & 875' FSL of Section 31-16S-31E Completion Target: Yeso at ~5894' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~875' FSL and 100' FEL of Section 31, T16S-31E LTP: ~875' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5894'), MD (~10572')
Well #8	Petty Federal Com 31CD 008H well, API No. 30-015-XXXXX SHL: 1086' FWL and 636' FSL of Section 32-16S-31E BHL: 20' FWL & 500' FSL of Section 31-16S-31E Completion Target: Yeso at ~4987' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~500' FSL and 100' FEL of Section 31, T16S-31E LTP: ~500' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4987'), MD (~10267')
Well #9	Petty Federal Com 31CD 009H well, API No. 30-015-XXXXX SHL: 1087' FWL and 616' FSL of Section 32-16S-31E BHL: 20' FWL & 340' FSL of Section 31-16S-31E Completion Target: Yeso at ~5243' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~340' FSL and 100' FEL of Section 31, T16S-31E LTP: ~340' FSL and 100' FWL of Section 31, T16S-31E

Completion Target (Formation, TVD and MD)	Yeso- TVD (~5243'), MD (~10541')
AFE Capex and Operating Costs	
Drilling Supervision/Month $	$12,000; *see* Exhibit A, ¶ 19
Production Supervision/Month $	$1200; *see* Exhibit A, ¶ 19
Justification for Supervision Costs	*See* AFE at Exhibit A-4
Requested Risk Charge	200%; *see* Exhibit A, ¶ 20
Notice of Hearing	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibits C, C-1, C-2, and C-3
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C-4
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibit A-2
Tract List (including lease numbers and owners)	Exhibits A-2 and A-3
If approval of Non-Standard Spacing Unit is requested, Tract List (including lease numbers and owners) of Tracts subject to	n/a
Pooled Parties (including ownership type)	Exhibit A-3
Unlocatable Parties to be Pooled	*See* Exhibit C-2
Ownership Depth Severance (including percentage above & below)	n/a
Joinder	
Sample Copy of Proposal Letter	Exhibit A-4
List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-3
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	Exhibit A-4
Cost Estimate to Drill and Complete	*See* AFE at Exhibit A-4
Cost Estimate to Equip Well	See AFE at Exhibit A-4
Cost Estimate for Production Facilities	n/a
Geology	
Summary (including special considerations)	*See* Exhibit B, ¶ 11
Spacing Unit Schematic	Exhibit A-2(b)
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-4
Well Orientation (with rationale)	Exhibit B, ¶ 11(d)
Target Formation	Exhibits B-3 & B-4
HSU Cross Section	Exhibit B-3
Depth Severance Discussion	n/a
Forms, Figures and Tables	
C-102	Exhibit A-1
Tracts	Exhibits A-2, A-3
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit A-3
General Location Map (including basin)	Exhibit B-1
Well Bore Location Map	*See* Exhibit A-1, Exhibit B-5
Structure Contour Map - Subsea Depth	Exhibit B-2
Cross Section Location Map (including wells)	Exhibit B-5
Cross Section (including Landing Zone)	Exhibit B-3
Additional Information	
Special Provisions/Stipulations	n/a
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Sharon T. Shaheen
Signed Name (Attorney or Party Representative):	*Sharon T. Shaheen*
Date:	Sept. 4, 2025

EXHIBIT C

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Melanie A. Kenderdine
Cabinet Secretary

Ben Shelton
Deputy Secretary

Erin Taylor
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division

Notice: Procedure for Deviation from Orders

DATE: November 1, 2025

OCD hereby provides the following guidance on the process for uncontested applications for minor deviations from development plans associated with compulsory pooling orders, without a hearing. It aligns with historical practices where amendments did not require a hearing unless protested, while ensuring transparency and opportunity for input from affected parties.

This guidance is limited to uncontested applications where an operator needs to deviate from the development plan to accommodate scheduling issues with well(s) drilling or completion schedule, or to remove less than 20% of the proposed wells from the development plan.

Operators seeking these qualifying minor deviations may proceed without a hearing by following these steps:

1. Provide Notice to Affected Parties and OCD pursuant to 19.15.4 NMAC.
2. Monitor for Objections that might arise under 19.15.4.12.B NMAC.
3. Submit the Application for Deviation to OCD Permitting with all required Documentation.

OCD may issue an amended order without a hearing if OCD determines that the application is proper and may be granted without a hearing.

This notice clarifies OCD's July 12, 2024, Notice titled "OCD Clarification of Compulsory Pooling Processes Updates". That Notice stated:

> In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

State of New Mexico
Energy, Minerals and Natural Resources Department

Specifically, Operators may need to reasonably deviate from the submitted development plan to:
- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

For further inquiries, contact OCD.Engineer@emnrd.nm.gov.

Albert Chang

ALBERT C.S. CHANG
DIRECTOR

EXHIBIT D

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Dylan M. Fuge
Deputy Secretary

Dylan Fuge, Division Director (Acting)
Oil Conservation Division

NOTICE

OCD Clarification of Compulsory Pooling Processes Updates

July 12, 2024

The Oil Conservation Division ("OCD") is providing additional clarifications on the Compulsory Pooling notice it issued on April 24, 2024, due to questions it received following the notice. The information below provides additional updates to clarifying aspects of the processes and procedures. The guidance does not replace but is additive to that prior notice.

These updates will be effective as of the August 8, 2024, hearing date.

Clarification of timelines related to Compulsory Pooling Orders:
OCD has received multiple inquiries regarding paragraph twenty of the standard compulsory pooling orders and how this is to be interpreted for drilling timelines with multiple wells. The relevant paragraph reads as follows:

> *"The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."*

OCD's template Order, paragraph two, declares all wells in Exhibit A as the "Well(s)." "Well(s)" is used as some cases propose a singular well and some cases propose multiple wells in Exhibit A. If multiple wells are in Exhibit A provided by the applicant, then "Wells" is the correct way to read it through the rest of the order.

Paragraph twenty, as seen above, is intended to mean that all wells the operator proposed in Exhibit A shall be spudded within one (1) year **total** from the date of the OCD Director signature. Each well is then to be completed within one (1) year calculated of its own spud date. The above paragraph does **not** grant an operator permission to drill only what the Operator may deem as the defining well within this timeline. An example can be seen below:

Wells in Exbit A	Signature Date	Spud Deadline	Actual Spud Date	Completion Date
Well #1	1/1/2024	1/1/2025	5/20/2024	5/20/2025
Well #2	1/1/2024	1/1/2025	6/15/2024	6/15/2025
Well #3	1/1/2024	1/1/2025	6/17/2024	6/17/2025
Well #4	1/1/2024	1/1/2025	6/19/2024	6/19/2025
Well #5	1/1/2024	1/1/2025	6/21/2024	6/21/2025

OCD intends to revise the referenced Order paragraph to accommodate contemporary drilling schedules if operators provide development plan summaries in support of the compulsory pooling applications. In any contested or uncontested hearing an applicant can now present a development plan and associated timelines with each well being proposed so plans can be fully evaluated by the OCD for complete

EXHIBIT D

development potential. The development plan shall not exceed five (5) years. For contested cases this allows for proper comparison of competing plans. OCD requests this same development table be included in uncontested applications to allow for proper authorization in compulsory pooling Orders and allows for timely utilization of pooled minerals. Development plans should be included as an exhibit in support of the application. Applications which do not include a development plan will be considered to propose all listed wells as initial wells to be drilled and completed according to paragraph twenty, above.

Development Table	
Well Name	Timeline of Spud (Estimated)
Well 1	Within 1 year of signature
Well 2	Within 1 year of signature
Well 3	Within 1 year of signature
Well 4	Within 1 year of signature
Well 5	Within 1 year of signature
Well 6	Within 2 years of signature
Well 7	Within 2 years of signature
Well 8	Within 2 years of signature
Well 9	Within 2 years of signature
Well 10	Within 3 years of signature
Well 11	Within 3 years of signature
Well 12	Within 3 years of signature
Well 13	Within 3 years of signature
Well 14	Within 4 years of signature
Well 15	Within 4 years of signature
Well 16	Within 4 years of signature

In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

Specifically, Operators may need to reasonably deviate from the submitted development plan to:

- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO RE-OPEN ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26288

APPLICATION OF LONGFELLOW ENERGY LP TO EXTEND THE DRILLING DEADLINE UNDER ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26328

SELF-AFFIRMED STATEMENT OF NASH BELL

1. My name is Nash Bell, and I work for Spur Energy Partners LLC ("Spur"), as the senior Vice President of land. I am familiar with the application filed in this case and have personal knowledge of the information provided in this self-affirmed statement.

2. I have previously testified before the New Mexico Oil Conservation Division ("Division") as an expert witness in petroleum land matters. My credentials as a petroleum landman have been accepted by the Division and made a matter of record.

3. My testimony in this proceeding addresses lease terms, acreage ownership, the regulatory record, the procedural history of Order No. R-24036 (the "Order"), and the business-level evidence demonstrating that the Order does not reflect Longfellow's actual drilling plans.

4. Spur filed its application to ensure that the Order, which governs the pooled parties' rights and interests as well as Longfellow's obligations as operator of the spacing unit and

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. A
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

approved initial wells, matches Longfellow's actual plan of development so Spur and the pooled parties have an Order they can rely on to protect their interests.

I. Procedural Background and Overview

5. In Case No. 25572, Spur's interest was pooled into a standard 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and Longfellow (OGRID 372210) was designated as operator of the Unit. Spur owns a 37.511173% interest in the Unit and is a pooled working interest owner under the Order.

6. I note that with nearly 38% working interest in the Unit, Spur has a slightly greater working interest ownership in the Unit than Longfellow does, with approximately 35.7% working interest ownership. As a substantial working interest owner pooled under the Order, Spur has correlative rights protected under NMSA 1978, § 70-2-12 and is entitled to notice and opportunity to participate in any material modification of the approved development plan.

7. Under its initial well proposal—and according to its plan of development presented to the Division—Longfellow proposed to drill and complete nine initial wells "back to back": the Petty Federal Com 31CD 001H through 009H wells.

8. The Division issued Order No. R-24036 on December 1, 2025, pooling Spur's interest and approving Longfellow's plan of development, designating all nine wells as initial wells under the Order.

9. The Order was the product of an uncontested hearing on September 16, 2025, at which Spur and all other parties relied on Longfellow's representations of a nine-well, full-cube development plan targeting three separate benches within the Yeso Formation in a wine-rack configuration: 3 Paddock / 3 Upper Blinebry / 3 Lower Blinebry with a specific proposed internal

spacing for each target bench. Spur did not contest the hearing because it relied on Longfellow's commitment to this comprehensive development plan.

10. Paragraph 20 of the Order requires Longfellow to "commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."

11. The Division's July 12, 2024 guidance further clarifies that Paragraph 20 "is intended to mean that all wells the operator proposed in Exhibit A shall be spudded within one (1) year total from the date of the OCD Director signature." The guidance also states that this provision "does not grant an operator permission to drill only what the Operator may deem as the defining well within this timeline." This means all nine of Longfellow's wells must be spudded by December 1, 2026.

12. As Spur has understood since at least April 2026 from communications with Longfellow, Longfellow does not plan to drill all nine initial wells within the Order's deadlines. Instead, it has drilled and completed just one well—the 006H well—but in a different target bench and at different internal spacing than originally proposed and approved under the Order. *See* **Spur Exhibit A-2b**. Based on documents provided in response to Spur's subpoena, Longfellow instead appears to intend to drill the remainder of the eight approved initial wells sequentially in 2027, more than a year after the initial well was drilled, and to complete each well shortly thereafter. Spur's understanding has now been confirmed through Longfellow's application to amend the Order by extending the applicable deadlines in Case No. 26328.

13. As outlined in Matthew Van Wie's self-affirmed statement, Longfellow's unilateral change in its drilling plan and timing will degrade ultimate recovery the unit, especially with respect to the proposed 008H well, which is now a fully bounded infill well with existing

production in the adjacent spacing unit immediately to the south and from the offsetting producing 006H well within the unit. As Mr. Van Wie explains in his statement, any further delays in drilling and completing the 008H well and the other proposed initial wells, or additional unilateral changes to the plan of development, could result in further degradation to production and ultimate recovery from the Unit, impairing Spur's correlative rights.

14. Because Longfellow's plans to develop this Unit is a bit of a step out from offsetting Yeso formation production in the area—the nearest Yeso production is about two sections away—Spur has a substantial interest in the outcome of this development. With a nearly 38% working interest in the Unit, Spur wants to be sure the Unit is developed in a manner that minimizes waste and protects its correlative rights.

15. Accordingly, Spur seeks to achieve two specific outcomes from this hearing. First, to confirm Longfellow's current plan of development and timing for its wells so we have a clear understanding on the record of what their plans are, why they changed, and what, if anything, might alter or change their plans going forward. Second, we want to make sure Longfellow's actual plan of development matches what is provided for in the Order so Spur and the other pooled working interest owners have an Order with deadlines we can rely on.

I. Longfellow Implemented an Unauthorized Deviation from the Approved Development Plan.

16. Just three months after the Order was signed, on March 30, 2026, Longfellow issued a well proposal pursuant to the Order for a single well—the Petty Federal Com 31CD 006H well. The proposal initially indicated the target formation for this well was the Blinebry, as reflected in the Order, but when Spur asked to confirm the total vertical depth ("TVD") and landing

zone for the Petty 006H, Longfellow revealed for the first time that this well would now target the lower Paddock.

17. Longfellow's Stuart Gaston stated in an April 2, 2026 email to Spur that Longfellow "wanted the proximity well to be drilled first into the Paddock since [it is] only drilling one initial well." A true and correct copy of this email correspondence is attached to this statement as **Spur Exhibit A-1**.

18. Drilling only a single initial well constitutes a major deviation from the approved development plan—dropping approximately 90% of the proposed initial wells—far exceeding the Division's 20% threshold for minor deviations.

19. The original well proposal under the Order designated the 006H well at a total vertical depth ("TVD") of approximately 5,244 feet, targeting the Blinebry formation.

20. However, Longfellow's Application for Permit to Drill ("APD"), submitted on March 6, 2026 and approved on April 13, 2026, targets the lower Paddock formation at approximately 4,885 feet TVD. This APD was based on a directional survey dated October 28, 2025, and was generated before the Order was even signed on December 1, 2025. That means Longfellow knew even before the Order was issued that it was changing its entire development plan for this acreage and that it would not match the development plan presented to the Division in Case No. 25572.

21. While Longfellow's revised plan appears to maintain the initial proposed 3 Paddock / 3 Upper Blinebry / 3 Lower Blinebry wine-rack spacing configuration, the change in the target formation for the 006H well substantially shifts the wine-rack spacing architecture. A true and correct copy of Longfellow's revised development plan is outlined in Longfellow's Petty Target Modification document, obtained through discovery, which is attached to this statement as **Spur**

Exhibit A-2. *See also* Petty CD_Pre-Post Gunbarrel 4.27.2026, attached to this statement as **Spur Exhibit A-2a**. However, Longfellow's plans remain somewhat unclear as its drilling schedule appears to reflect a proposed 3 Paddock / 2 Upper Blinebry / 4 Lower Blinebry wine-rack spacing configuration, which would be completely at odds with the development plan approved in Order No. R-24036. *See* Petty Development Schedule attached to this statement as **Spur Exhibit A-2b**.

22. Mr. Gaston's admission is direct evidence that Longfellow understood only one well would be drilled as an initial well under the Order, directly contradicting Longfellow's nine-well, back-to-back drilling commitment to the Division and working interest owners. Longfellow later attempted to characterize this statement as referring merely to "sequencing," but this characterization is belied by the plain language of Mr. Gaston's email and by Longfellow's subsequent filing of Case No. 26328 seeking an extension of the drilling deadline after having drilled only the 006H well. Longfellow's own internal drilling schedule also confirms their plan to drill only a single initial well under the Order in 2026, showing that it planned to defer drilling the remaining initial wells until at least June 2027. *See* **Spur Exhibit A-2b**.

23. On March 31, 2026, Mr. Gaston also wrote: "I apologize for the confusion. The well of record switched from the 5H to the 6H well after the CPO was issued." A true and correct copy of this email is attached to this statement as **Spur Exhibit A-3.** Longfellow's own landman thereby admitted that the development plan was changed after the compulsory pooling order was issued.

24. On April 6, 2026, Longfellow's geologist, Jacob DeHamer, emailed Stuart Gaston internally: "So we look like idiots…i had forgotten that we changed the pad layout after the proposals. Footages remain the same, but Landing Zones did get completely swapped around,

including the swap of the 6H and 5H." A true and correct copy of this internal email is attached to this statement as **Spur Exhibit A-4**.

25. This internal communication confirms that Longfellow changed the pad layout—including swapping landing zones—after the well proposals and the pooling order were issued.

26. Additionally, on May 13, 2026, Mr. DeHamer confirmed internally: "DC and I check the approved APDs and they match the current development plan. We revised everything with the BLM when we noticed the changes needed to be made. <u>These do not match the CPO (which we already knew)</u>." A true and correct copy of this email is attached to this statement as **Spur Exhibit A-5** (emphasis added). This is a clear admission from Longfellow's own technical team that the approved APDs do not match the compulsory pooling order, and that Longfellow already knew this.

27. Longfellow additionally prepared a revised directional plan in October of 2025, already reflecting a departure from the development plan proposed in Case No. 25572, which culminated in Order No. R-24036 issued on December 1, 2025. On October 30, 2025, Longfellow's James Follis transmitted via email the revised directional plan for the Petty 4H well. Longfellow's David Cain subsequently approved the creation of revised permit packages and casing revisions based upon the new directional plan. A true and correct copy of the email exchange is attached to this statement as **Spur Exhibit A-6**.

28. Longfellow therefore knew of its intent to deviate from the approved development plan before the Order was even signed. Despite this knowledge, Longfellow waited until May 1, 2026—five months after the Order issued—to issue a deviation notice, and even then characterized its sweeping changes as a "minor deviation." A true and correct copy of Longfellow's Deviation Notice is attached to this statement as **Spur Exhibit A-7**.

29. Longfellow's own Response to Spur's Emergency Motion, at Paragraph 20, concedes that the May 1, 2026 gun-barrel diagram "was intended by Longfellow to demonstrate to Spur the comprehensive modifications to be made via amendment to Order No. R-24036 after the Petty 31CD 006H well was drilled." A true and correct copy of Longfellow's Response is attached to this statement as **Spur Exhibit A-8** (emphasis added).

30. Longfellow's own words confirm that it knew it would need to amend the Order, yet it proceeded to drill the 006H well without first obtaining that amendment. This is precisely the type of unilateral action that the Division's deviation procedures are designed to prevent.

31. Nevertheless, on June 1, 2026, Longfellow stated that it disagreed that its "present drilling schedule . . . constitutes a proposed deviation requiring an application for hearing." A true and correct copy of Longfellow's Counsel's email is attached to this statement as **Spur Exhibit A-9**.

32. However, under Order No. R-24036, Paragraph 22 the plain language provides that "If a protest is received the deviation is not granted and the Operator must set the case for a hearing." The Division's November 1, 2025 "Procedure for Deviation from Orders" guidance reiterates this requirement. Longfellow's refusal to follow these established procedures is a direct violation of the Order and the Division's own guidance.

II. Longfellow Has Refused to Follow Division Procedures and Mischaracterized Lease Expiration Issues

33. Longfellow's Response to Spur's Emergency Motion claimed the federal lease was "set to expire during the first half of May 2026" and cited a "looming BLM lease expiration" as justification for its deviation from the approved development plan.

34. However, Longfellow's own Vice President of Land, Rebecca English, informed Spur via email on April 15, 2026 that the Bureau of Land Management ("BLM") had identified a possibility of May 2025 production that "would mean the new deadline is May 2027." A true and correct copy of this correspondence is attached to this statement as **Spur Exhibit A-10**.

35. The BLM's Christopher Walls confirmed in a May 18, 2026 email to Spur that "If we do terminate the unit, the leases will be extended until May 31st 2027." A true and correct copy of Mr. Walls's email is attached to this statement as **Spur Exhibit A-11**.

36. That means as of May 18, 2026, Longfellow was informed by the BLM that the federal lease at issue would not expire until May 2027 at the earliest. This is five months after the one-year deadline to drill all initial wells under the Order (November 30, 2026). Neither the April 15, 2026 date communicated by Longfellow's own Vice President of Land nor the BLM's confirmed May 2027 deadline supports Longfellow's claim that the lease was "set to expire during the first half of May 2026." The "lease emergency" narrative was manufactured.

37. Further evidence of Longfellow's true intentions is found in its own correspondence with state regulators. On January 20, 2026, Longfellow's David Cain emailed the New Mexico State Land Office describing Longfellow's plans for the Petty wells: "We are trying to drill and produce a single well from each pad prior to July 1st 2026, with the rest of the wells being drilled later in 2026 or 2027." A true and correct copy of Mr. Cain's email is attached to this statement as **Spur Exhibit A-12**. This is

direct evidence that Longfellow planned to drill only one initial well, contradicting its prior representations to the Division that all nine wells would be drilled "back to back."

38. On April 26, 2026, Mr. DeHamer wrote to Ms. English, Mr. Gaston, and Mercer regarding the Petty CD unit: "When we made the call to swap to the 1 well per DSU, switching the CL wells, I noticed our horizontal well placement was off." A true and correct copy of this email is attached to this statement as **Spur Exhibit A-13** (emphasis added). The phrase "swap to the 1 well per DSU" is Longfellow's own internal description of its strategy (one initial well per development spacing unit) rather than the nine-well back-to-back plan it represented to the Division.

39. Longfellow's manufactured urgency regarding a purported BLM lease expiration concern does not justify bypassing the Division's established deviation procedures. It is clear from the documentary record that as early as January 2026 Longfellow has known it intended to drill only one initial well, and since at least March 2026 that the federal lease does not expire until May 2027.

III. Longfellow's Own Submissions and Filings Confirm Abandonment of the Nine-Well Plan and Ongoing Harm to Spur's Correlative Rights

40. Spur ultimately elected to participate in the drilling of the newly proposed well but did so under protest,[1] noting that the proposed well was not compliant with the Order. The proposal does not even match the well that Longfellow actually intended to drill—the TVD in the well proposal does not match the actual TVD for the 006H well.

[1] Spur's participation under protest does not waive or moot its objections or its right to seek enforcement of the Order and Division processes. Spur reserves all rights with respect to the Order and its terms.

At a minimum, Longfellow's well proposal under the Order should match the well (footages and TVDs) Longfellow actually intends to drill.

41. On July 6, 2026, Longfellow filed an application in Case No. 26328 to extend the deadline to commence drilling the wells to December 1, 2027, or one additional year beyond the original deadline. The application states that "[g]ood cause exists to extend the deadline to commence drilling the initial Wells under the Pooling Order."

42. This is Longfellow's first request for an extension of the drilling deadline.

43. This filing directly contradicts Longfellow's prior sworn representations that it "intends to spud all nine Unit wells by November 30, 2026." True and correct copies of Longfellow's sworn representations are attached to this statement as **Spur Exhibit A-14**.

44. Under the original Order's Paragraphs 20 and 21, if the operator fails to drill within one year, the Order terminates automatically unless an extension is obtained. Longfellow's extension application confirms that it cannot and does not intend to comply with the one-year drilling deadline for all nine wells.

45. This confirms Spur's contention that Longfellow only intended to drill one "defining well"—the 006H—and has abandoned its back-to-back development plan as originally proposed and approved by the Division.

46. Separately, in Case No. 26252, Longfellow proposed an 8-well development for its Allman 2930 CDX wells on a 480-acre horizontal spacing unit in the same general area (T16S-R31E, Eddy County), with a detailed multi-year drilling timeline: the Allman 2930 CDX 005H within one year of signature; the Allman 2930

CDX 001H, 003H, 006H, and 007H within three years of signature; and the Allman 2930 CDX 002H, 004H, and 008H within five years of signature. This application was filed for a July 9, 2026 hearing. A true and correct copy of the Case No. 26252 application is attached to this statement as **Spur Exhibit A-15**.

47. The Allman application demonstrates that Longfellow knows how to submit a realistic, multi-year development plan with transparent phasing and specific timelines. Yet for the Petty wells under Order No. R-24036, all nine wells were classified as "initial wells" to be drilled "back to back" within one year. The application included no phasing, no multi-year plan, and no disclosure that Longfellow never intended to develop them all in that timeframe.

48. If Longfellow is capable of presenting a transparent multi-year development plan for the Allman wells, it should be required to do the same for the Petty wells. The Division should re-open Order No. R-24036 to require an amended development plan that accurately reflects Longfellow's actual drilling intentions.

49. Spur's 37.511173% working interest in the Unit represents a material financial stake in the development of the Petty wells—it is a greater working interest ownership stake even than Longfellow. Spur tracked Case No. 25572 hearing and relied on Longfellow's nine-well, wine-rack development plan in choosing not to contest the application.

50. If Longfellow is allowed to entirely rework and overhaul its drilling plan without first obtaining Division approval, Spur (the most significant non-operator interest owner in the spacing unit) will be denied the opportunity to raise and evaluate potential land and geology issues that accompany Longfellow's unapproved alterations.

51. The Division's mandate under NMSA 1978, § 70-2-12, includes the protection of correlative rights and prevention of waste. Re-opening Order No. R-24036 to require Longfellow to comply with its terms or amend the Order will fulfill this statutory mandate.

52. Spur's correlative rights will be negatively and irreparably impacted if Longfellow's unapproved deviations are allowed to proceed without allowing Spur to participate in a hearing on the merits of these revisions.

53. The granting of this application will prevent waste and protect correlative rights.

54. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.

Nash Bell

9/8/26

Date

39401729.v1

SPUR EXHIBIT A-1

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Thursday, April 2, 2026 3:39:15 PM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: Re: Petty 6H Well Proposal

Hey Emma,

The 5H and the 6H just swapped. We are planning the 5H to be the Upper Blinberry that was initially the 6H. The reason we swapped the wells was we wanted the proximity well to be drilled first into the Paddock since we are only drilling one initial well.

Hope this helps, please let me know if there are any follow ups.

Thank you,
Stuart Gaston

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Thursday, April 2, 2026 2:28:29 PM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>

Subject: FW: Petty 6H Well Proposal

Stuart,

See additional below/attached question from our team on the Petty well proposal.

Thanks,

Emma Whelton
Landman - Business Development

From: Matt Van Wie <MattV@spurenergy.com>
Sent: Thursday, April 2, 2026 2:15 PM
To: Emma Whelton <emma.whelton@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Emma,

Based on the email information below and the CPO R-24036 (attached), it appears the 6H has simply changed TVD (target interval).

This HSU was pooled as a 3 paddock / 3 upper Blinebry / 3 lower Blinebry wine-racked development (see attached powerpoint) … and without any further information, it now stands at 4 paddocks / 2 upper Blinebry / 3 lower Blinebry … with serious concerns on Paddock spacing (and potentially material change in development).

Given this is a full cube (9-well) proposed development where we have material interest, can Longfellow please provide information/details on how this 6H shift will alter (if any) future infill wells.

Thanks,
Matt V.

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Tuesday, March 31, 2026 11:30:28 AM
To: Seth Ireland <Seth@spurenergy.com>; Michael Sliva <michael@spurenergy.com>
Subject: FW: Petty 6H Well Proposal

Emma Whelton

Landman - Business Development

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Tuesday, March 31, 2026 11:30 AM
To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Hi Emma,

I apologize for the confusion. The well of record switched from the 5H to the 6H well after the CPO was issued. The 6H is now the following:

Petty Federal Com 31CD 006H, with an approximate true vertical depth of 4,969', as a horizontal well in the Yeso formation (with an approximate measured depth of 10,280') Surface Hole Location is 1,085' FWL & 676' FSL of Section 32-16S-31E; with a Bottom Hole Location of 20' FWL & 1,250' FSL of Section 31-16S-31E. **Being a Paddock Target**

Please let me know if y'all have any questions or need any additional information.

Thanks,
Stuart Gaston

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Tuesday, March 31, 2026 10:34 AM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Stuart,

Can you and your team please confirm the proposed TVD and landing zone for the Petty 6H? The pooling documents have it as an upper blinebry.

Thanks,

Emma Whelton
Landman - Business Development

From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Monday, March 30, 2026 2:08 PM

To: Emma Whelton <emma.whelton@spurenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

Hello Emma,

Thank you for reaching out. Please find attached our form JOA for review. I will be adding the Exhibit information specific to this Unit prior to execution. If you have any questions, concerns, or need any additional information, please feel free to reach out.

Thanks,

Stuart Gaston
Senior Landman

8115 Preston Road, Suite 800
Dallas, TX 75225
(972) 532-8205
(432) 413-5210

From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Monday, March 30, 2026 2:04 PM
To: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Mark Hicks <mark@spurenergy.com>
Subject: Petty 6H Well Proposal

Stuart,

We are in receipt of Longfellow's attached well proposal for the Petty 6H. While my team is evaluating and deciding if we want to participate via JOA or COP, would you mind sending over your JOA for our review?

Thanks,

Emma Whelton
Landman - Business Development
SPUR ENERGY PARTNERS LLC
9655 Katy Freeway, Suite 500 | Houston, TX 77024

(832) 930-8532 (Office)
(713) 397-3355 (Cell)
emma.whelton@spurenergy.com

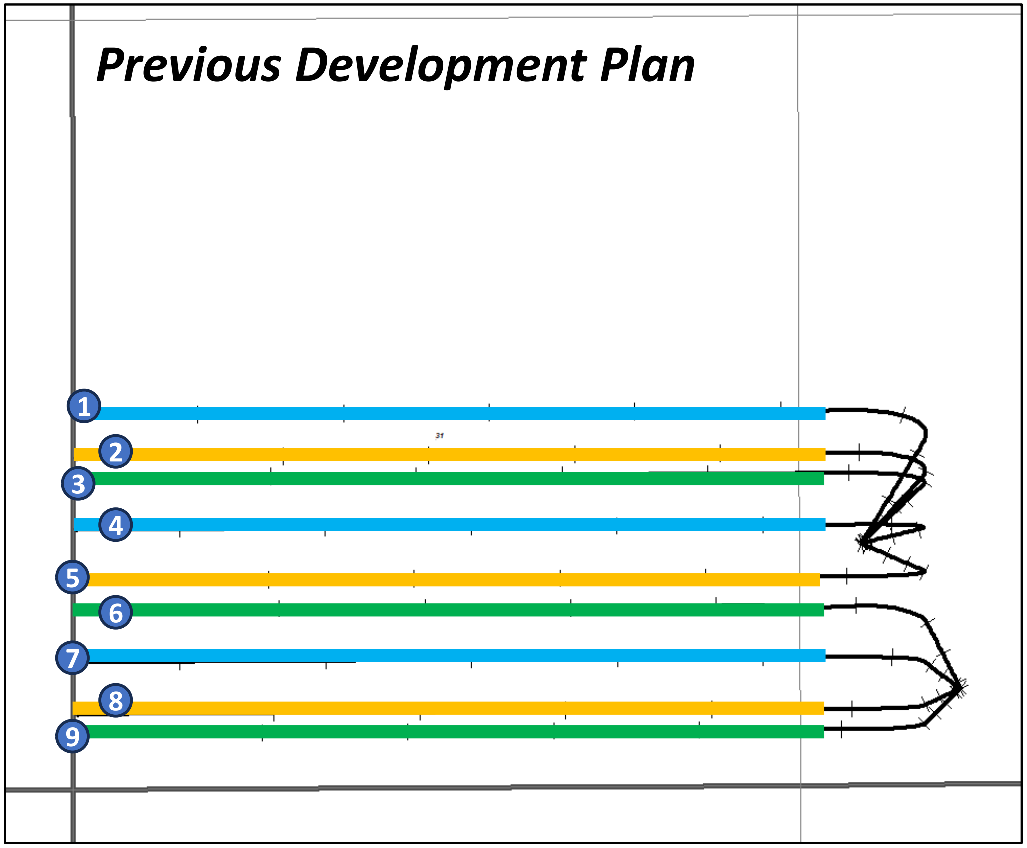
Disclaimer

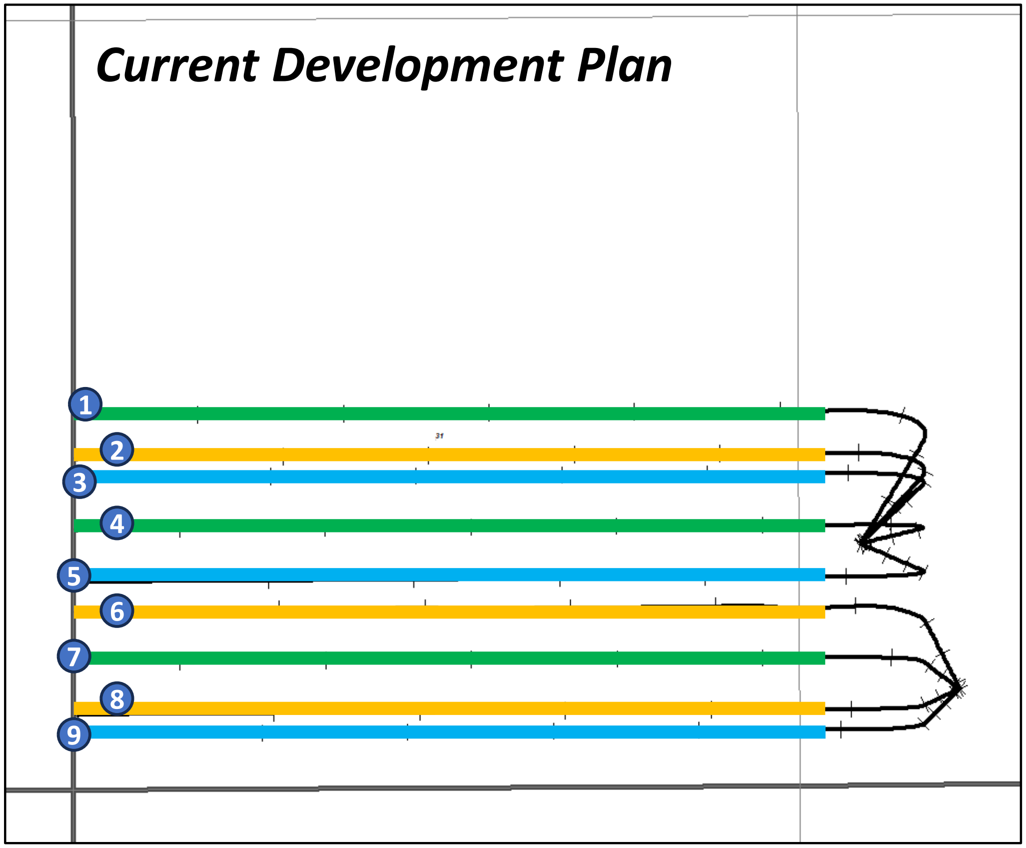
CAUTION External Email - Don’t click on contents unless you know they are safe

CAUTION External Email - Don’t click on contents unless you know they are safe

SPUR EXHIBIT A-2

Petty CD Target Modifications



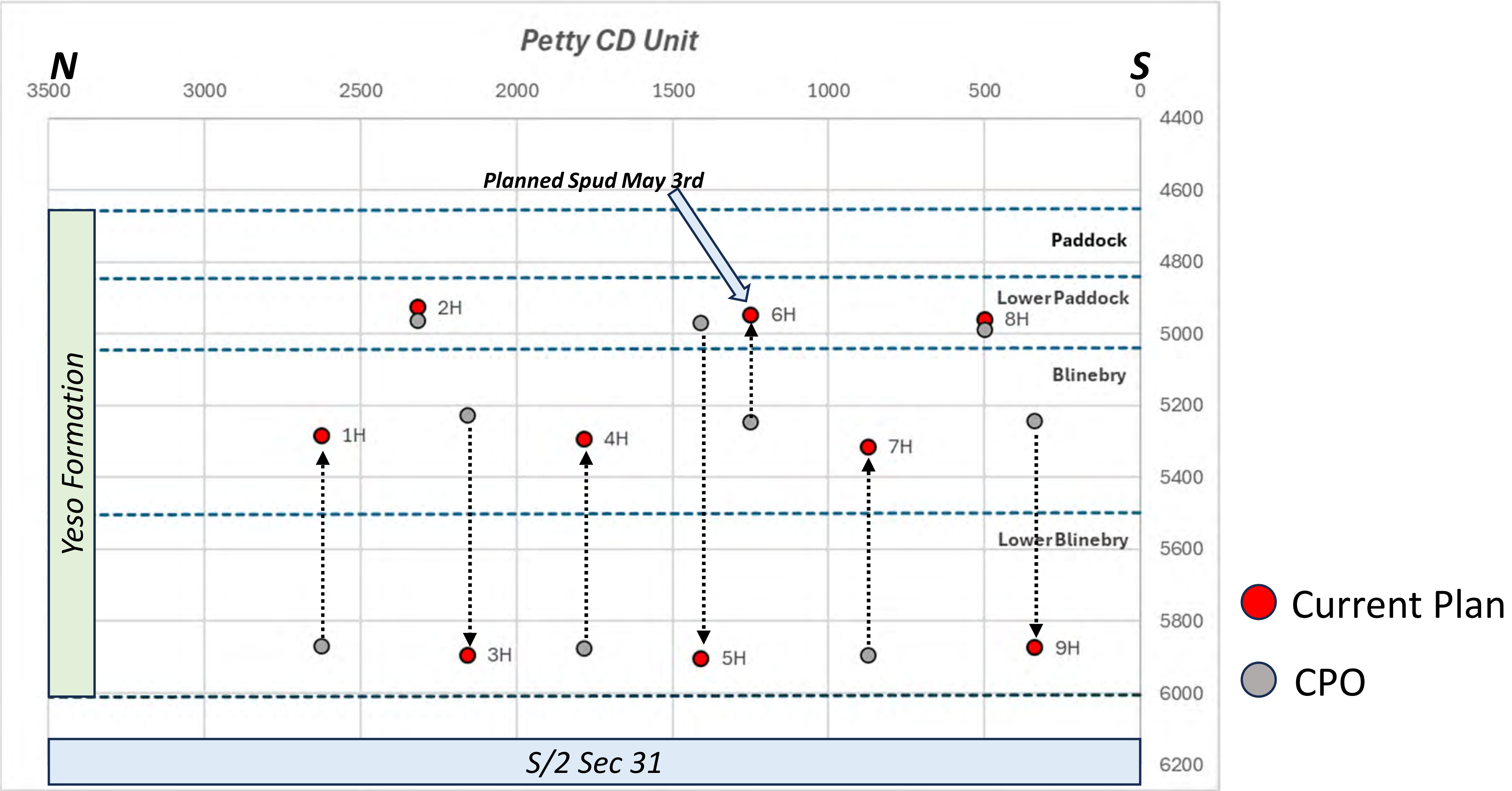


Upper Blinebry
Lower Blinebry
Paddock

Upper Blinebry
Lower Blinebry
Paddock

SPUR EXHIBIT A-2a

Petty CD Development



SPUR EXHIBIT A-2b

Area	Location	Lateral	Miles	Bench	Cum. Net Wells	SPUD	RR	DRILLING
Cedar Lake	Petty CD	1-Mile	1.00	PDK	0.5	5/10/2026	5/19/2026	2026
Cedar Lake	Petty CD	1-Mile	1.00	PDK	12.4	6/19/2027	6/28/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	UBBY	12.9	6/29/2027	7/7/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	LBBY	13.4	7/8/2027	7/16/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	UBBY	13.9	7/17/2027	7/25/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	PDK	14.4	7/26/2027	8/3/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	LBBY	12.4	8/5/2027	8/15/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	LBBY	12.9	8/17/2027	8/27/2027	2027
Cedar Lake	Petty CD	1-Mile	1.00	LBBY	13.4	8/29/2027	9/8/2027	2027

SPUR EXHIBIT A-3

[redacted]

External Email

[redacted]

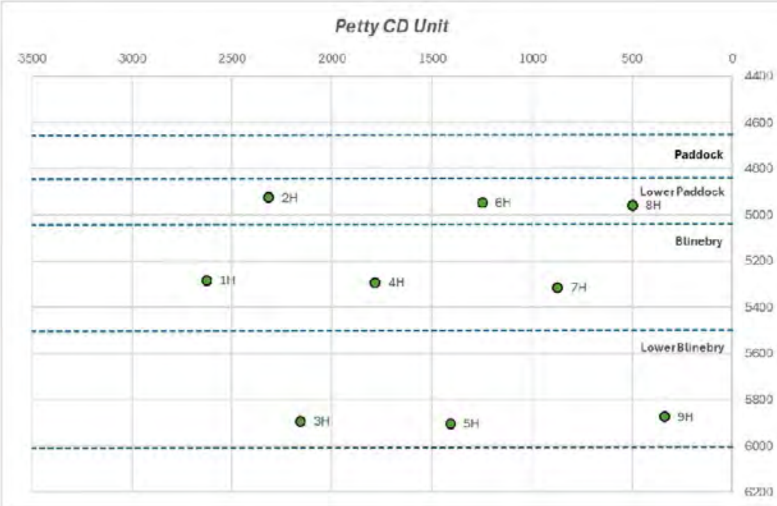
From: Emma Whelton <emma.whelton@spurenergy.com>
Sent: Monday, April 6, 2026 2:02 PM
To: Seth Ireland <Seth@spurenergy.com>; Mark Hicks <mark@spurenergy.com>; Matt Van Wie <MattV@spurenergy.com>; Michael Sliva <michael@spurenergy.com>
Subject: RE: Petty 6H Well Proposal

FYI, their landman just called me basically saying that their Geo had the spacing all wrong...He just sent this across:

Below is the updated information from our geo.

Footages remain the same, but Landing Zones did get completely swapped around, including the swap of the 6H and 5H. This does tighten up the spacing in some areas to 750' btwn benches; however, we have proven that spacing in the Loco Hills area

Well Spots (BHL)				
Well	**Footage**	**TVD**	**Target**	**Offset**
1H	2628	5282	Upper Blinebry	309
2H	2319	4925	Lower Paddock	160
3H	2159	5892	Lower Blinebry	374
4H	1785	5291	Upper Blinebry	375
5H	1410	5902	Lower Blinebry	160
6H	1250	4945	Lower Paddock	375
7H	875	5313	Upper Blinebry	375
8H	500	4957	Lower Paddock	160
9H	340	5871	Lower Blinebry	340



I am sorry for all the confusion on this one.

Please let me know if you have any follow up questions.

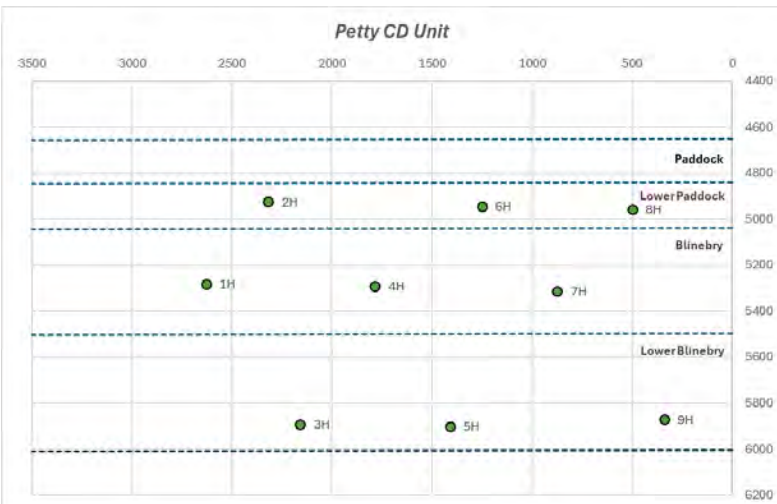
Emma Whelton
Landman - Business Development

From: Jacob DeHamer
To: Stuart Gaston
Subject: RE: Petty CD
Date: Monday, April 6, 2026 9:23:08 AM
Attachments: image003.png
image005.png

So we look like idiots.....i had forgotten that we changed the pad layout after the proposals.

Footages remain the same, but Landing Zones did get completely swapped around, including the swap of the 6H and 5H. This does tighten up the spacing in some areas to 750' btwn benches; however, we have proven that spacing in other areas.

Well Spots (BHL)				
Well	**Footage**	**TVD**	**Target**	**Offset**
1H	2628	5282	Upper Blinebry	309
2H	2319	4925	Lower Paddock	160
3H	2159	5892	Lower Blinebry	374
4H	1785	5291	Upper Blinebry	375
5H	1410	5902	Lower Blinebry	160
6H	1250	4945	Lower Paddock	375
7H	875	5313	Upper Blinebry	375
8H	500	4957	Lower Paddock	160
9H	340	5871	Lower Blinebry	340



From: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Sent: Monday, April 6, 2026 8:44 AM
To: Jacob DeHamer <jacob.dehamer@longfellowenergy.com>

Subject: Petty CD

Stuart Gaston
Senior Landman

LONGFELLOW ENERGY, L.P.

8115 Preston Road, Suite 800
Dallas, TX 75225
(972) 532-8205
(432) 413-5210

SPUR EXHIBIT A-5

From: Jacob DeHamer
To: Rebecca English; David Cain; Jack Mercer
Cc: Stuart Gaston; David Mitchell
Subject: RE: Petty CD Permits
Date: Wednesday, May 13, 2026 8:26:24 AM
Attachments: image001.png
image005.png
image003.png
Petty CD_Pre-Post Gunbarrell_4.27.2026.pptx

All,
DC and I check the approved APDs and they match the current development plan. We revised everything with the BLM when we noticed the changes needed to be made.

These do not match the CPO (which we already knew). I've attached the gunbarrell showing both.

Jake

From: Rebecca English <rebecca.english@longfellowenergy.com>
Sent: Wednesday, May 13, 2026 8:36 AM
To: David Cain <david.cain@longfellowenergy.com>; Jack Mercer <jack.mercer@longfellowenergy.com>; Jacob DeHamer <jacob.dehamer@longfellowenergy.com>
Cc: Stuart Gaston <stuart.gaston@longfellowenergy.com>; David Mitchell <david.mitchell@longfellowenergy.com>
Subject: RE: Petty CD Permits

I'm adding Jake. I want to make sure I understand the situation. @Jacob DeHamer do our APDs match the CPO or the way we want to drill?

Rebecca L. English
Vice President, Land
Office 972.366.0951 | Cell 405.550.0214
8115 Preston Road | Suite 800 | Dallas, TX 75225

From: David Cain <david.cain@longfellowenergy.com>
Sent: Monday, May 11, 2026 1:27 PM
To: Rebecca English <rebecca.english@longfellowenergy.com>; Jack Mercer <jack.mercer@longfellowenergy.com>
Cc: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Subject: RE: Petty CD Permits

I think we switched the formations/TVDs on the 005H and 006H in our plans, so that the 006H becomes the paddock. But I don't think we are revising our drill permits. So no, the permits on the 005H and 006H are not reflective of our drill plan for the unit. The rest should be, but might want to double-check with Jake in case something else has changed.

Thanks,
DC

From: Rebecca English <rebecca.english@longfellowenergy.com>
Sent: Monday, May 11, 2026 11:52 AM
To: Jack Mercer <jack.mercer@longfellowenergy.com>; David Cain <david.cain@longfellowenergy.com>
Cc: Stuart Gaston <stuart.gaston@longfellowenergy.com>
Subject: RE: Petty CD Permits

Can you confirm for me that those APDs are the correct ones? Aka, the formations are correct?

Rebecca L. English
Vice President, Land
Office 972.366.0951 | Cell 405.550.0214
8115 Preston Road | Suite 800 | Dallas, TX 75225

From: Jack Mercer <jack.mercer@longfellowenergy.com>
Sent: Monday, May 11, 2026 11:25 AM
To: David Cain <david.cain@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Stuart Gaston <stuart.gaston@longfellowenergy.com>
Subject: RE: Petty CD Permits

Excellent. Thank you.

From: David Cain <david.cain@longfellowenergy.com>
Sent: Monday, May 11, 2026 11:17 AM
To: Jack Mercer <jack.mercer@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Stuart Gaston <stuart.gaston@longfellowenergy.com>
Subject: RE: Petty CD Permits

They have all been approved by the BLM and uploaded to the OCD site, waiting for OCD approval and API/UWI issuance.

BLM Approval dates are:

LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/009H	2026/5/1 16:44:45	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/008H	2026/4/8 14:16:27	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/007H	2026/4/8 14:16:23	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/006H	2026/3/6 16:16:39	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/005H	2026/4/8 14:16:17	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/004H	2026/4/8 14:16:11	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/003H	2026/4/8 14:15:37	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/002H	2026/5/1 16:44:38	APPROVED
LONGFELLOW ENERGY LP	Carlsbad	PETTY 31CD FED COM/001H	2026/5/1 16:44:09	APPROVED

From: Jack Mercer <jack.mercer@longfellowenergy.com>
Sent: Monday, May 11, 2026 11:04 AM
To: David Cain <david.cain@longfellowenergy.com>
Cc: Rebecca English <rebecca.english@longfellowenergy.com>; Stuart Gaston <stuart.gaston@longfellowenergy.com>
Subject: Petty CD Permits

DC – Could you let us know where we stand with the remaining Petty CD APD's? Submitted? In queue?

Thank you,

Jack Mercer
Landman

LONGFELLOW ENERGY, L.P.

Cell: 214-364-3043
8115 Preston Road, Suite 800
Dallas, TX 75225

SPUR EXHIBIT A-6

From: David Cain
To: James Follis; Jacob DeHamer
Subject: RE: Petty Federal Com 31CD wells - Revised Directional Plans
Date: Thursday, October 30, 2025 2:44:14 PM

This is looking good James!

Thanks for the changes. You are good to make the casing revisions and prepare the revised permit packages.

DC

From: James Follis <James.Follis@longfellowenergy.com>
Sent: Thursday, October 30, 2025 9:29 AM
To: Jacob DeHamer <jacob.dehamer@longfellowenergy.com>
Cc: David Cain <david.cain@longfellowenergy.com>
Subject: RE: Petty Federal Com 31CD wells - Revised Directional Plans

Jake,

Please find attached the newly revised Petty 4H directional plan. Please review and let me know if this one works for you.

Thanks,

James

From: Jacob DeHamer <jacob.dehamer@longfellowenergy.com>
Sent: Wednesday, October 29, 2025 1:51 PM
To: James Follis <James.Follis@longfellowenergy.com>
Subject: RE: Petty Federal Com 31CD wells - Revised Directional Plans

James
Took a look. I had the 4H landed a little high in the Upper Blinebry. Can we revise just that one.

Updated Prog attached.

Everything else checks out.

Jake

From: James Follis <James.Follis@longfellowenergy.com>
Sent: Wednesday, October 29, 2025 8:22 AM
To: David Cain <david.cain@longfellowenergy.com>; Jacob DeHamer <jacob.dehamer@longfellowenergy.com>
Cc: David Mitchell <david.mitchell@longfellowenergy.com>
Subject: Petty Federal Com 31CD wells - Revised Directional Plans

Please review and load to make sure that this is what we are looking for and let me know.

Thanks,

LONGFELLOW ENERGY, L.P.

James S. Follis

Preston Commons East
Suite 800
8115 Preston Road
Dallas, Texas 75225
(972) 590-9905 – Office
(405) 306-6169 – Cell
james.follis@longfellowenergy.com

SPUR EXHIBIT A-7

BEATTY & WOZNIAK, P.C.

ATTORNEYS AT LAW

1675 BROADWAY, SUITE 600
DENVER, COLORADO 80202
TELEPHONE 303-407-4499
FAX 1-800-886-6566
www.bwenergylaw.com

OFFICE LOCATIONS

COLORADO

NEW MEXICO

WYOMING

MIGUEL A. SUAZO
ALSO ADMITTED IN TX, CO

JACOB L. EVERHART
ALSO ADMITTED IN CO, ND, & UT

May 1, 2026

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL AFFECTED PERSONS

RE: Minor Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036

Case Number 25572
Order Number R-24036
S/2 of Section 31, Township 16 South, Range 31 East in Eddy County, New Mexico
Cedar Lake; Glorieta-Yeso [Pool Code: 96831]

To Whom It May Concern,

Pursuant to Case Number 25572 (Attachment A), Order Number R-24036 (Attachment B) and the New Mexico Oil Conservation Division's (the "Division") November 1, 2025, Notice: Procedure for Deviation from Orders, Longfellow Energy, LP ("Longfellow") hereby provides notice in accordance with 19.15.4.12.B NMAC and 19.15.4.12.C NMAC of its plan for minor deviations associated with the compulsory orders issued under R-24036.

The minor deviation involves modifying the landing target for the Petty Federal Com 31CD 006H well (API 30-015-58054) (the "Well") from the Blineberry to the Lower Paddock. The Bureau of Land Management and the Division approved the APD (Attachment C) for the Well on April 13, 2026, which reflects the proposed deviation provided herein. The deviation will not impact the number of wells in the unit or the number of wells in a landing zone, as originally proposed. The surface hole location and take points remain unchanged and remain entirely within the originally pooled Cedar Lake; Glorieta-Yeso [Pool Code: 96831] formation.

Longfellow requests this deviation to accommodate minor adjustments to its development plan arising from the Well's drilling and completion schedule, including the need to account for certain federal leases within the unit that are scheduled to expire in May 2026. To the extent additional deviations from the approved well plan or the Order become necessary, Longfellow intends to seek such relief through the appropriate hearing process and amended orders.

This Application would have been filed with, and received by, the Division either on the date of this letter as referenced above, or no later than two (2) days after the date referenced above. Email correspondence for this matter can be sent to the Division at OCD.Engineer@emnrd.nm.gov.

Any objections that you have to these applications must be filed in writing with the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505, within twenty (20) days from the date the Division receives the above-referenced applications. If no objection is received within the twenty-day period, the OCD may issue an amended order without a hearing.

If you have any questions about this application, please contact the following:

Rebecca L. English – Vice President, Land
Longfellow Energy, LP
(972) 366 – 0951
Rebecca.English@longfellowenergy.com

Very truly yours,
BEATTY & WOZNIAK, P.C.

Miguel A. Suazo
msuazo@bwenergylaw.com

Jacob L. Everhart
jeverhart@bwenergylaw.com

Attorney(s) for Longfellow Energy, LP

Attachments:

- Attachment A – Original Case No. 25572
- Attachment B – Order Number R-24036
- Attachment C – Approved Petty Federal Com 31CD 006H APD

SPUR EXHIBIT A-8

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

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

CASE NO. 25572
ORDER NO. R-24036

RESPONSE TO SPUR'S EMERGENCY MOTION FOR STAY

Longfellow Energy, LP, OGRID No. 372210 ("Longfellow"), through its undersigned attorneys, hereby files this (1) response to Spur Energy Partners LLC ("Spur") Emergency Motion to Stay ("Motion") Oil Conservation Division ("OCD") Order No. R-24036 ("Order") and request to stay the Division approved Application for Permit to Drill ("APD") for the Petty 31CD Fed Com Well (API No. 30-015-58054) under 19.17.7.9 NMAC [sic], and (2) Spur's proposed order requesting the same. Longfellow provides a proposed order denying the entirety of Spur's Motion and requests for relief, set forth as **Exhibit A.**

The Motion should be denied. Spur seeks extraordinary relief without identifying a valid procedural vehicle, without establishing an emergency, and without demonstrating any actual, non-economic, irreparable injury. Instead, Spur attempts to convert the emergency-stay process into a collateral attack on valid Division approvals and into a shortcut for litigating alleged operational-deviation issues that are reserved to the Division in the first instance. The Division should reject that effort, and allow Longfellow to continue operations under the existing Order and approved APD.

FACTUAL BACKGROUND

1. The Division issued Order No. R-24036, attached as **Exhibit B**, on December 1, 2025, in Case No. 25572, which created standard 302.07-acre, more or less, horizontal spacing

unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Longfellow as operator of the Unit.

2. Order No. R-24036 pooled the uncommitted interests in the Yeso formation in the Unit, and dedicated the Unit to the following wells: **Petty Federal Com 31CD 001H well, Petty Federal Com 31CD 002H well, Petty Federal Com 31CD 003H well, Petty Federal Com 31CD 004H well, Petty Federal Com 31CD 005H well, Petty Federal Com 31CD 006H well, Petty Federal Com 31CD 007H well, Petty Federal Com 31CD 008H well,** and **Petty Federal Com 31CD 009H well.**

3. Spur owns a 37.511173% working interest in the Unit. Spur did not enter an appearance or object to Longfellow's pooling application before entry of the Order.

4. Order No. R-24036 ¶ 20 provides "Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."

5. Order No. R-24036 ¶ 20 does not require Longfellow to drill the well(s) in any particular sequence, contrary to what Spur asserts. Rather, Order No. R-24036 requires only that Longfellow drill each well prior to November 30, 2026 (one-year from approval), or in the alternative, that Longfellow request an extension from the OCD before Order No. R-24036 expires.

6. Longfellow has not informed Spur, the additional parties entitled to notice, or the Division that it does not intend to drill all nine wells identified in Order No. R-24036 or that it intends to pursue an extension.

7. Order No. R-24036 ¶ 22 provides "Operator may propose *reasonable deviations from the development plan* *<u>via notice to the OCD and all parties that required notice of the original</u>*

compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing." (emphasis added).

8. The Division has provided guidance to operators seeking *minor* deviations by allowing operators to proceed without a hearing by (1) providing notice, (2) monitoring objections, and (3) submitting the application for deviation to Division permitting with all required documentation. *See* "NOTICE—Procedure for Deviation from Orders, November 1, 2025." Attached as **Exhibit C**. Division guidance under this NOTICE is limited to deviations involving the accommodation of scheduling issues with well(s) drilling or completion schedules, or when an operator is seeking to remove less than 20% of the proposed wells from the development plan. *Id.*

9. Spur references the July 12, 2024, "NOTICE—OCD Clarification of Compulsory Pooling Processes Updates" issued by the Division, attached as **Exhibit D**, but the Division has subsequently issued additional clarifying guidance on deviation from orders under the November 1, 2025, Notice.

10. The Division has not issued dispositive guidance defining what constitutes a "minor" or "major" deviation from orders outside of the two options explicitly provided for.

11. Longfellow sent well proposals and election letters to Spur on March 30, 2026, for the **Petty 31CD 006H** well.

12. The March 30, 2026, election letters were consistent with the approved Division and BLM APD and associated drilling and engineering design for the **Petty 31CD 006H** well that Longfellow revised to reflect the Lower Paddock lateral placement instead of the Blineberry. Both pools are in the Yeso formation originally pooled under Order No. R-24036.

13. Spur elected to participate in the **Petty 31CD 006H** well "under protest." The "protest" was due to the well's landing placement revision and due to an increase in AFE costs associated with the well as originally proposed during the September 16, 2025, hearing by affidavit and the costs associated with the well as proposed in the March 30, 2026, election letters.

14. The Order provides the Division approved procedure for reconciling project costs against actual costs in ¶ 26 which lays out the following procedure: (1) Longfellow has 180 days to submit to each pooled working interest owner an itemized schedule of the *actual* well costs, and (2) the *actual* well costs will be considered reasonable unless a pooled working interest owner files a written objection no later than 45 days after receipt. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

15. The correct process for objecting to the *actual* well costs occurs after the well is completed, not when the well is currently being drilled.

16. Longfellow discovered a looming BLM lease expiration that was set to expire during the first half of May 2026, which would result in the Unit falling apart.

17. Longfellow made plans to schedule and perform the drilling of the **Petty 31CD 006H** well to ensure the federal lease would be extended and the Unit would not be impacted due to its removal.

18. On May 1, 2026, Longfellow and Spur met to primarily to discuss joint resolution options for the Unit development that included acreage trades, a buyout of Spur's interest, and secondarily to discuss Longfellow's plans to spud the **Petty 31CD 006H** well due to the BLM lease expiration. During this meeting, Longfellow provided a DRAFT notice of minor deviation letter accompanied with a revised gunbarrel diagram for the well(s).

19. The DRAFT notice letter functioned as a demonstrative exhibit to convey the changes in landing to the **Petty 31CD 006H** well initially prior to spud as a form of good faith transparency between Longfellow—the Unit operator—and Spur as working interest owner, and also the contemplated changes in landing to the remaining wells to be accomplished via an amendment to Order No. R-24036 prior to its expiration.

20. The changes in the well(s) landing and placement depicted on the gunbarrel diagram in the May 1, 2026, meeting was intended by Longfellow to demonstrate to Spur the comprehensive modifications to be made via amendment to Order No. R-24036 after the **Petty 31CD 006H** well was drilled to maintain the integrity of the Unit.

21. Longfellow determined that the slight revision to the lateral placement of the **Petty 31CD 006H** well in the Yeso formation would not, in reasonable probability, alter the ultimate drainage of the Unit, and such expeditious action would be necessary and amicable to Spur to preserve the federal lease and Unit, as a whole.

22. Longfellow provided a minor-deviation notice out of an abundance of caution but maintains the lateral re-placement does not actually rise to a deviation requiring approval, because (a) no formation change — both Blineberry and Lower Paddock are within the Yeso formation pooled under R-24036 (and per the May 1 letter itself, within Pool Code 96831, Cedar Lake; Glorieta-Yeso), (b) no change in surface hole or bottomhole location, (c) no change in number of wells, and (d) no reasonable probability of altering ultimate Unit drainage.

23. Since Longfellow has commenced drilling of the **Petty 31CD 006H** well no less than six months before the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the Order.

24. Drilling operations have commenced, and any stay of those operations would result in loss and damage to the wellbore integrity, increased fluid and control risks, increased capital expenditure due to rig standby and crew per diems, extended demobilization and remobilization costs, and cascading contractual risks to working interest owners (e.g., service provider contracts, completion crew contracts, and so forth).

25. Longfellow's actions to drill the **Petty 31CD 006H** well and preserve the federal lease will prevent waste and protect correlative rights due to the development of the federal minerals as part of the planned Unit.

26. Spur's motion would result in waste due to the loss of the federal lease within the unit, which would impact the overall recovery of the Unit as originally proposed by Longfellow.

27. Spur's motion fails to show irreparable harm apart from purely economic harm. *See* Spur Emer. Mot. St. at ¶¶ 13, 17.

28. Since Longfellow intends to commence drilling of the remaining wells prior to the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the order.

29. Longfellow asserts that the drilling of the wells at different times within the stipulated one-year window in Order No. R-24036 is both contemplated and allowed by Division guidance.

30. Longfellow asserts that its plan to drill the Unit wells at differing times within the initially stipulated one-year window in Order No. R-24036 does not constitute removal of more than 20% of the proposed wells from the development plan.

31. Since Longfellow is not removing any wells from the Unit, Longfellow remains compliant with the order.

32. Longfellow asserts that any deadlines associated with drilling or completing that are imposed by the Division should be considered as a mandate from the Division for the operator to conduct the work "no later than" the one-year deadline, rather than a mandate to conduct the work "on or about" the one-year deadline of the Order.

33. Longfellow concludes that neither notice nor Order amendment is required for its actions governing the **Petty 31CD 006H** well as such revision does not rise to even a "minor" deviation.

ARGUMENT

1. Spur Identifies No Valid Procedural Basis to Stay Both a Final Pooling Order and a Valid APD Through an Emergency Motion

Spur's threshold problem is procedural. Spur asks the Division to stay both a final compulsory pooling order and the effect of an approved APD. But the Motion does not identify any Division rule that authorizes this relief in the posture presented here.

Rule 19.15.4.23(B) NMAC authorizes the Director to stay Division or Commission orders only when a stay is necessary to prevent waste, protect correlative rights, protect public health or the environment, or prevent gross negative consequences to an affected party. Spur does not satisfy that standard. The Order itself was issued after notice and hearing, approved Longfellow's development of the Unit, and necessarily reflected the Division's determination that the pooled development would prevent waste and protect correlative rights. Spur's disagreement with the timing, sequencing, cost, or intra-formation landing placement of the 006H Well does not justify staying the Order on an emergency basis.

Nor does 19.15.14.10(B) NMAC provide the relief Spur seeks. That provision allows the Division to impose conditions on an approved permit to drill, deepen, or plug back. It does not create a private right for a non-operator working-interest owner to suspend a valid APD by

emergency motion, nor does it convert ordinary operational disputes into collateral attacks on approved permits. Likewise, 19.15.2.11(B) NMAC addresses emergency hearing timing; it is not an independent source of substantive stay authority.

Because Spur has identified no rule authorizing the requested stay of both the Order and the APD, the Motion should be denied for that reason alone. If the Division determines that any future amendment, deviation, or hearing is appropriate, that determination can be made through the Division's ordinary procedures. It does not require, and does not justify, emergency suspension of ongoing operations under an approved APD.

2. Spur Has Not Shown an Emergency or Irreparable Harm

Spur's Motion depends on a chain of unsupported assumptions. Spur first assumes that any revision to a well's lateral placement automatically constitutes a deviation requiring notice and hearing. Spur next asserts that the revised lateral placement of the 006H Well will irreparably harm Spur, impair its correlative rights, and cause waste, but it offers no substantive explanation of how Spur will actually be affected. *See* Spur Em. Mot. ¶ 13. Spur then characterizes these alleged circumstances as an emergency requiring immediate Division intervention that would effectively halt ongoing drilling operations.

Spur's own cited authority confirms why that showing is insufficient. In *Tenneco Oil Co. v. New Mexico Water Quality Control Commission*, the New Mexico Court of Appeals recognized that a stay of administrative action is discretionary and requires a showing of, among other things, irreparable harm, lack of substantial harm to other interested persons, and no harm to the public interest. 1986-NMCA-033, ¶ 10. The court further held that "[t]he mere fact that an administrative regulation or order may cause injury or inconvenience to applicant is insufficient to warrant suspension of an agency regulation by the granting of a stay," and that "[m]ere allegations of irreparable harm are not, of course, sufficient." *Id.* ¶¶ 11–12. Here, Spur offers only conclusory

assertions of harm tied to AFE costs, well sequencing, alleged parent-child effects, and lateral placement within the same pooled formation. Those assertions do not establish the immediate, non-speculative injury required for extraordinary stay relief, particularly where the requested stay would itself create concrete operational, contractual, leasehold, and waste-prevention risks for Longfellow and the participating working interest owners.

The New Mexico standard governing extraordinary injunctive relief confirms the point. Injunctions are "harsh and drastic remedies" available only upon a showing of irreparable injury for which there is no adequate and complete remedy at law. *State ex rel. State Highway & Transp. Dep't of N.M. v. City of Sunland Park*, 2000-NMCA-044, ¶ 18, 129 N.M. 151, 3 P.3d 128. An irreparable injury is one that cannot be compensated or measured by any certain pecuniary standard, and the injury must be actual and substantial, or an affirmative prospect of such injury, not a mere possibility of harm. *Id*. ¶ 19. The party seeking relief must present evidence of irreparability and inadequacy of remedy; conclusory assertions are not enough. *Id*.

Spur has not made that showing. Spur alleges concerns regarding spacing, sequencing, parent-child effects, costs, and correlative rights, but it does not provide evidence that the approved 006H Well will cause actual and imminent non-economic injury. Spur's cost objection is particularly unsuitable for emergency relief because Division rules already provide a mechanism for reporting actual well costs and resolving objections to the reasonableness of those costs. *See* 19.15.13.13 NMAC. A dispute over AFE increases does not justify stopping a permitted well.

Spur's participation "under protest" also does not create emergency rights that the Division's rules do not otherwise provide. Spur elected to participate in the 006H Well. That election preserves Spur's economic position in the well; it does not transform an unsupported objection into irreparable harm or authorize an emergency stay.

3. Longfellow Remains in Compliance with the Order and the Approved APD

Spur's Motion repeatedly suggests that Longfellow has abandoned the approved development plan or is attempting to drop 90% of the approved wells. That is incorrect. Longfellow is not removing any well from the Unit. Longfellow has not stated that it will drill only the 006H Well. Longfellow remains within the Order's one-year deadline to commence drilling and intends to address any future changes for remaining wells through appropriate Division procedures before those wells are drilled.

Spur also misreads the Order as requiring "back-to-back" drilling. Paragraph 20 does not impose a particular drilling sequence. It requires the operator to commence drilling the well(s) within one year after the date of the Order and to complete each well no later than one year after commencement of that well. Spur's reliance on language from Longfellow's initial proposal does not rewrite the Order or create a new emergency-stay remedy.

The 006H Well's revised landing placement also does not invalidate the Order or APD. The 006H Well remains within the Yeso formation pooled by the Order. Longfellow has determined that the lateral-placement adjustment will not, in reasonable probability, alter ultimate Unit drainage or impair Spur's correlative rights. And the 006H Well is being drilled under approved federal and Division permitting. Those approvals remain valid unless and until the Division determines otherwise through a proper procedural vehicle.

Spur's attempt to treat Longfellow's May 1 courtesy communication as formal notice requiring a protested hearing is equally misplaced. The draft notice letter was provided to Spur as part of ongoing commercial discussions and in the interest of transparency. It was not served on all parties entitled to notice of the original pooling application, was not served by certified mail, and was not submitted as a formal notice intended to trigger Paragraph 22 of the Order. Spur cannot

manufacture a protest process from a draft negotiation document and then use that manufactured protest to halt drilling operations.

Longfellow does not dispute that its initial well proposal described a “back-to-back” drilling sequence. That language reflected Longfellow's anticipated execution plan, not a binding contractual commitment, and Order R-24036 did not adopt or incorporate that phrase as a condition of approval. The Order's only sequencing constraint is in Paragraph 20, which requires commencement of drilling within one year and completion of each Well within one year of its respective spud date. See also Ex. D (July 12, 2024 Notice) (confirming that “all wells the operator proposed in Exhibit A shall be spudded within one (1) year total from the date of the OCD Director signature”). Longfellow intends to spud all nine Unit wells by November 30, 2026, consistent with the Order’s terms and OCD’s official interpretation. Longfellow asserts that the proper Division procedure for Spur to follow in effort to reconcile projected and *actual* costs is the process outlined in ¶ 26 in Order No. R-24036.

4. Threshold Deviation Determinations Belong to the Division, Not to Spur

The Division’s rules reserve enforcement and operational-deviation determinations to the Division. Rule 19.15.2.16 NMAC provides that Division personnel have authority and duty to enforce Division rules and may allow minor deviations from approved field operational plans upon a showing by an operator that changes are necessary to avoid waste or protect public health or the environment. Rule 19.15.7.9(C) NMAC further provides that forms approved or processed by BLM for wells on federal lands or accessing federal minerals are subject to Division approval in the same manner and to the same extent as corresponding Division forms.

Those rules underscore why Spur’s requested relief is improper. Spur asks the Division to accept Spur’s threshold characterization of the 006H Well’s lateral-placement revision as an

actionable, protested deviation before the Division has made that determination. That approach would allow a non-operator to usurp the Division's role, convert courtesy communications into formal notices, and stop approved operations based on speculation. Nothing in the Division's rules requires that result.

At most, Spur has raised issues that can be addressed through ordinary Division processes if and when the Division determines additional process is necessary. That is not an emergency. It is not a basis to stay a valid pooling order. And it is not a basis to suspend an approved APD while active drilling operations are underway.

5. A Stay Would Create the Concrete Harm Spur Has Failed to Show

The equities also weigh decisively against the requested stay. Spur's alleged harm is speculative. Longfellow's harm from a stay is immediate and concrete. Drilling operations have commenced, and an abrupt suspension would introduce operational, contractual, and leasehold risks that the Division should not impose absent a compelling and properly supported showing by Spur.

Operationally, sudden interruption of active drilling can threaten wellbore integrity; increase the risk of stuck pipe, tight-hole conditions, formation swelling or sloughing, and loss of well path; degrade drilling-fluid characteristics; impair pressure control; and complicate directional drilling and geosteering. Those risks are not abstract. They arise directly from stopping an active drilling operation midstream.

Contractually and economically, a stay would expose Longfellow and participating working-interest owners to rig standby charges, potential rig-release and remobilization costs, crew and service-company scheduling disruptions, equipment and supply-chain delays, and cascading obligations tied to water, fuel, tubulars, trucking, disposal, and completion services. The stay

would also risk federal leasehold consequences that could impair the Unit as a whole and frustrate the very resource-development objectives the Order was designed to advance.

In short, Spur asks the Division to impose the concrete waste, operational disruption, and leasehold risk that Spur has failed to prove it will suffer. Rule 19.15.4.23(B) NMAC does not support that result. The Motion should be denied.

CONCLUSION AND REQUESTED RELIEF

For the foregoing reasons, Longfellow respectfully requests that the Division deny Spur's Emergency Motion for Stay in full, deny Spur's request to stay the Order and the APD, deny Spur's request to invalidate Longfellow's March 30, 2026, well proposal, and grant such other relief as the Division deems just and proper. If the Division sets the Motion for hearing, Longfellow requests that no stay issue pending hearing.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:______________________________

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Raj K. Lahoti
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com
rlahoti@bwenergylaw.com

Attorneys for Longfellow Energy LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 15th day of May 2026, as follows:

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
agrankin@hollandhart.com
pmvance@hollandhart.com
rstarnes@hollandhart.com
Attorneys for Spur Energy Partners, LLC

Rachael Ketchledge

EXHIBIT A

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

APPLICATION OF LONGFELLOW ENERGY LP FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 25572
ORDER NO. R-24036

[PROPOSED] ORDER DENYING REQUEST FOR STAY OF ORDER NO. R-24036 AND DIVISION APPROVED APD

This matter, having come before the Division Director and/or the Chair of the Oil Conservation Commission on a response motion filed by Longfellow Energy, LP ("Longfellow") pursuant to 19.15.7.9 NMAC, and having considered the response motion and otherwise being fully informed in the premises, the Director finds and concludes that a temporary stay of the Order No. R-24036 and the Division's administrative approval for the following well is not necessary or appropriate to prevent waste and to protect correlative rights, as such prevention and protection is inherent in the valid existing pooling Order and APD:

- **Petty Federal Com 31CD 006H** (API No. 30-015-58054) to be dedicated to a 302.07-acre, more or less, horizontal well spacing unit in the Yeso formation comprised of the S/2 of Section 31, T16S, R31E, Eddy County, New Mexico.

IT IS THEREFORE ORDERED that Spur Energy Partners LLC's Emergency Motion to Stay is hereby DENIED, and Division Order No. R-24036, together with the Division's administrative approval of the APD for the above-referenced well, shall remain in full force and effect without the additional requirement to provide notice to the Division or previously noticed affected parties for slight deviations therefrom. This Order is without prejudice to any party seeking further relief through the procedures otherwise available under Division rules and applicable law.

EXHIBIT B

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

IN THE MATTER OF APPLICATION FOR COMPULSORY POOLING SUBMITTED BY LONGFELLOW ENERGY, LP	**CASE NO. 25572** **ORDER NO. R-24036**

ORDER

The Director of the New Mexico Oil Conservation Division ("OCD"), having heard this matter through a Hearing Examiner on September 16, 2025, and after considering the testimony, evidence, and recommendation of the Hearing and Technical Examiners, issues the following Order.

FINDINGS OF FACT

1. Longfellow Energy, LP ("Operator") submitted an application ("Application") to compulsory pool the uncommitted oil and gas interests within the spacing unit ("Unit") described in Exhibit A. Operator seeks to be designated the operator of the Unit.

2. Operator will dedicate the well(s) described in Exhibit A ("Well(s)") to the Unit.

3. Operator proposes the supervision and risk charges for the Well(s) described in Exhibit A.

4. Operator identified the owners of uncommitted interests in oil and gas minerals in the Unit and provided evidence that notice was given.

5. The Application was heard by the Hearing Examiner on the date specified above, during which Operator presented evidence through affidavits in support of the Application. No other party presented evidence at the hearing.

CONCLUSIONS OF LAW

6. OCD has jurisdiction to issue this Order pursuant to NMSA 1978, Section 70-2-17.

7. Operator is the owner of an oil and gas working interest within the Unit.

8. Operator satisfied the notice requirements for the Application and the hearing as required by 19.15.4.12 NMAC.

9. OCD satisfied the notice requirements for the hearing as required by 19.15.4.9 NMAC.

10. Operator has the right to drill the Well(s) to a common source of supply at the depth(s) and location(s) in the Unit described in Exhibit A.

11. The Unit contains separately owned uncommitted interests in oil and gas minerals.

12. Some of the owners of the uncommitted interests have not agreed to commit their interests to the Unit.

13. The pooling of uncommitted interests in the Unit will prevent waste and protect correlative rights, including the drilling of unnecessary wells.

14. This Order affords to the owner of an uncommitted interest the opportunity to produce his just and equitable share of the oil or gas in the pool.

ORDER

15. The uncommitted interests in the Unit are pooled as set forth in Exhibit A.

16. The Unit shall be dedicated to the Well(s) set forth in Exhibit A.

17. Operator is designated as operator of the Unit and the Well(s).

18. If the location of a well will be unorthodox under the spacing rules in effect at the time of completion, Operator shall obtain the OCD's approval for a non-standard location in accordance with 19.15.16.15(C) NMAC.

19. If the Unit is a non-standard horizontal spacing unit which has not been approved under this Order, Operator shall obtain the OCD's approval for a non-standard horizontal spacing unit in accordance with 19.15.16.15(B)(5) NMAC.

20. Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.

21. This Order shall terminate automatically if the Operator fails to comply with the preceding paragraph unless the Operator requests an extension by notifying the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the extension is automatically granted up to one year. If a protest is received the extension is not granted and the Operator must set the case for a hearing.

22. Operator may propose reasonable deviations from the development plan via notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing.

23. The infill well requirements in 19.15.13.9 NMAC through 19.15.13.12 NMAC shall be applicable.

24. Operator shall submit each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").

25. No later than thirty (30) days after Operator submits the Estimated Well Costs, the owner of a Pooled Working Interest shall elect whether to pay its share of the Estimated Well Costs or its share of the actual costs to drill, complete and equip the well ("Actual Well Costs") out of production from the well. An owner of a Pooled Working Interest who elects to pay its share of the Estimated Well Costs shall render payment to Operator no later than thirty (30) days after the expiration of the election period, and shall be liable for operating costs, but not risk charges, for the well. An owner of a Pooled Working Interest who fails to pay its share of the Estimated Well Costs or who elects to pay its share of the Actual Well Costs out of production from the well shall be considered to be a "Non-Consenting Pooled Working Interest."

26. No later than one hundred eighty (180) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the Actual Well Costs. The Actual Well Costs shall be considered to be the Reasonable Well Costs unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

27. No later than sixty (60) days after the expiration of the period to file a written objection to the Actual Well Costs or OCD's order determining the Reasonable Well Costs, whichever is later, each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs shall pay to Operator its share of the Reasonable Well Costs that exceed the Estimated Well Costs, or Operator shall pay to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs its share of the Estimated Well Costs that exceed the Reasonable Well Costs.

28. The reasonable charges for supervision to drill and produce a well ("Supervision Charges") shall not exceed the rates specified in Exhibit A, provided however that the rates shall be

adjusted annually pursuant to the COPAS form entitled “Accounting Procedure-Joint Operations.”

29. No later than within ninety (90) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the reasonable charges for operating and maintaining the well ("Operating Charges"), provided however that Operating Charges shall not include the Reasonable Well Costs or Supervision Charges. The Operating Charges shall be considered final unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Operating Charges after public notice and hearing.

30. Operator may withhold the following costs and charges from the share of production due to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs: (a) the proportionate share of the Supervision Charges; and (b) the proportionate share of the Operating Charges.

31. Operator may withhold the following costs and charges from the share of production due to each owner of a Non-Consenting Pooled Working Interest: (a) the proportionate share of the Reasonable Well Costs; (b) the proportionate share of the Supervision and Operating Charges; and (c) the percentage of the Reasonable Well Costs specified as the charge for risk described in Exhibit A.

32. Operator shall distribute a proportionate share of the costs and charges withheld pursuant to the preceding paragraph to each Pooled Working Interest that paid its share of the Estimated Well Costs.

33. Each year on the anniversary of this Order, and no later than ninety (90) days after each payout, Operator shall provide to each owner of a Non-Consenting Pooled Working Interest a schedule of the revenue attributable to a well and the Supervision and Operating Costs charged against that revenue.

34. Any cost or charge that is paid out of production shall be withheld only from the share due to an owner of a Pooled Working Interest. No cost or charge shall be withheld from the share due to an owner of a royalty interests. For the purpose of this Order, an unleased mineral interest shall consist of a seven-eighths (7/8) working interest and a one-eighth (1/8) royalty interest.

35. Except as provided above, Operator shall hold the revenue attributable to a well that is not disbursed for any reason for the account of the person(s) entitled to the revenue as provided in the Oil and Gas Proceeds Payment Act, NMSA 1978, Sections 70-10-1 et seq., and relinquish

such revenue as provided in the Uniform Unclaimed Property Act, NMSA 1978, Sections 7-8A-1 et seq.

36. The Unit shall terminate if (a) the owners of all Pooled Working Interests reach a voluntary agreement; or (b) the well(s) drilled on the Unit are plugged and abandoned in accordance with the applicable rules. Operator shall inform OCD no later than thirty (30) days after such occurrence.

37. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Albert Chang

ALBERT C. S. CHANG
DIRECTOR
AC/dm

Date: 12/1/2025

COMPULSORY POOLING APPLICATION CHECKLIST

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS	
Case: 25572	**APPLICANT'S RESPONSE**
Date	**September 11, 2025**
Applicant	**Longfellow Energy, L.P.**
Designated Operator & OGRID (affiliation if applicable)	**Longfellow Energy, L.P., 372210**
Applicant's Counsel:	Spencer Fane, LLP (Sharon T. Shaheen)
Case Title:	Application of Longfellow Energy, L.P. for Compulsory Pooling, Eddy County, New Mexico
Entries of Appearance/Intervenors:	None at this time
Well Family	Petty Federal Com 31CD
Formation/Pool	
Formation Name(s) or Vertical Extent:	Yeso Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Yeso Formation
Pool Name and Pool Code (Only if NSP is requested):	
Well Location Setback Rules (Only if NSP is Requested):	
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320 acres
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	East-West
Description: TRS/County	S/2 of Section 31, Township 16 South, Range 31 East in Eddy County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe and is approval of non-standard unit requested in this application?	Yes
Other Situations	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	Yes, N2 S2 of Section 31
Proximity Defining Well: if yes, description	Yes, Petty Federal Com 31CD 006H well
Applicant's Ownership in Each Tract	Tract 1: 100%; Tract 2: 90%; Tract 3: 0.00%; Tract 4: 0.00%; Tract 5: 0.00%; Tract 6: 0.00%
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	Add wells as needed
Well #1	Petty Federal Com 31CD 001H well, API No. 30-015-XXXXX SHL: 411’ FWL and 1,717’ FSL of Section 32-16S-31E BHL: 20’ FWL & 2,628’ FSL of Section 31-16S-31E Completion Target: Yeso at ~5,867' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2628' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2628' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5867'), MD (~11272')
Well #2	Petty Federal Com 31CD 002H well, API No. 30-015-XXXXX SHL: 411’ FWL and 1,697’ FSL of Section 32-16S-31E BHL: 20’ FWL & 2,319’ FSL of Section 31-16S-31E Completion Target: Yeso at ~4,961' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2319' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2319' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4961'), MD (~10337')

Well #3	Petty Federal Com 31CD 003H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,677' FSL of Section 32-16S-31E BHL: 20' FWL & 2,159' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,226' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2159' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2159' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5226'), MD (~10562')
Well #4	Petty Federal Com 31CD 004H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,657' FSL of Section 32-16S-31E BHL: 20' FWL & 1785' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,875' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1785' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1785' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5875'), MD (~11165')
Well #5	Petty Federal Com 31CD 005H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,637' FSL of Section 32-16S-31E BHL: 20' FWL & 1410' FSL of Section 31-16S-31E Completion Target: Yeso at ~4969' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1410' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1410' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4969'), MD (~10280')
Well #6	Petty Federal Com 31CD 006H well, API No. 30-015-XXXXX SHL: 1085' FWL and 676' FSL of Section 32-16S-31E BHL: 20' FWL & 1250' FSL of Section 31-16S-31E Completion Target: Yeso at ~5244' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1250' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1250' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5244'), MD (~10572')
Well #7	Petty Federal Com 31CD 007H well, API No. 30-015-XXXXX SHL: 1086' FWL and 656' FSL of Section 32-16S-31E BHL: 20' FWL & 875' FSL of Section 31-16S-31E Completion Target: Yeso at ~5894' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~875' FSL and 100' FEL of Section 31, T16S-31E LTP: ~875' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5894'), MD (~10572')
Well #8	Petty Federal Com 31CD 008H well, API No. 30-015-XXXXX SHL: 1086' FWL and 636' FSL of Section 32-16S-31E BHL: 20' FWL & 500' FSL of Section 31-16S-31E Completion Target: Yeso at ~4987' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~500' FSL and 100' FEL of Section 31, T16S-31E LTP: ~500' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4987'), MD (~10267')
Well #9	Petty Federal Com 31CD 009H well, API No. 30-015-XXXXX SHL: 1087' FWL and 616' FSL of Section 32-16S-31E BHL: 20' FWL & 340' FSL of Section 31-16S-31E Completion Target: Yeso at ~5243' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~340' FSL and 100' FEL of Section 31, T16S-31E LTP: ~340' FSL and 100' FWL of Section 31, T16S-31E

EXHIBIT B

Completion Target (Formation, TVD and MD)	Yeso- TVD (~5243'), MD (~10541')
AFE Capex and Operating Costs	
Drilling Supervision/Month $	$12,000; *see* Exhibit A, ¶ 19
Production Supervision/Month $	$1200; *see* Exhibit A, ¶ 19
Justification for Supervision Costs	*See* AFE at Exhibit A-4
Requested Risk Charge	200%; *see* Exhibit A, ¶ 20
Notice of Hearing	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibits C, C-1, C-2, and C-3
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C-4
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibit A-2
Tract List (including lease numbers and owners)	Exhibits A-2 and A-3
If approval of Non-Standard Spacing Unit is requested, Tract List (including lease numbers and owners) of Tracts subject to	n/a
Pooled Parties (including ownership type)	Exhibit A-3
Unlocatable Parties to be Pooled	*See* Exhibit C-2
Ownership Depth Severance (including percentage above & below)	n/a
Joinder	
Sample Copy of Proposal Letter	Exhibit A-4
List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-3
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	Exhibit A-4
Cost Estimate to Drill and Complete	*See* AFE at Exhibit A-4
Cost Estimate to Equip Well	See AFE at Exhibit A-4
Cost Estimate for Production Facilities	n/a
Geology	
Summary (including special considerations)	*See* Exhibit B, ¶ 11
Spacing Unit Schematic	Exhibit A-2(b)
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-4
Well Orientation (with rationale)	Exhibit B, ¶ 11(d)
Target Formation	Exhibits B-3 & B-4
HSU Cross Section	Exhibit B-3
Depth Severance Discussion	n/a
Forms, Figures and Tables	
C-102	Exhibit A-1
Tracts	Exhibits A-2, A-3
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit A-3
General Location Map (including basin)	Exhibit B-1
Well Bore Location Map	*See* Exhibit A-1, Exhibit B-5
Structure Contour Map - Subsea Depth	Exhibit B-2
Cross Section Location Map (including wells)	Exhibit B-5
Cross Section (including Landing Zone)	Exhibit B-3
Additional Information	
Special Provisions/Stipulations	n/a
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Sharon T. Shaheen
Signed Name (Attorney or Party Representative):	*Sharon T. Shaheen*
Date:	Sept. 4, 2025

EXHIBIT C

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Melanie A. Kenderdine
Cabinet Secretary

Ben Shelton
Deputy Secretary

Erin Taylor
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division

Notice: Procedure for Deviation from Orders

DATE: November 1, 2025

OCD hereby provides the following guidance on the process for uncontested applications for minor deviations from development plans associated with compulsory pooling orders, without a hearing. It aligns with historical practices where amendments did not require a hearing unless protested, while ensuring transparency and opportunity for input from affected parties.

This guidance is limited to uncontested applications where an operator needs to deviate from the development plan to accommodate scheduling issues with well(s) drilling or completion schedule, or to remove less than 20% of the proposed wells from the development plan.

Operators seeking these qualifying minor deviations may proceed without a hearing by following these steps:

1. Provide Notice to Affected Parties and OCD pursuant to 19.15.4 NMAC.
2. Monitor for Objections that might arise under 19.15.4.12.B NMAC.
3. Submit the Application for Deviation to OCD Permitting with all required Documentation.

OCD may issue an amended order without a hearing if OCD determines that the application is proper and may be granted without a hearing.

This notice clarifies OCD's July 12, 2024, Notice titled "OCD Clarification of Compulsory Pooling Processes Updates". That Notice stated:

> In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

1220 South St. Francis Drive, 3rd Floor ▪ Santa Fe, New Mexico 87505
Phone (505) 476-3441 ▪ www.emnrd.state.nm.us/ocd

EXHIBIT C

State of New Mexico
Energy, Minerals and Natural Resources Department

Specifically, Operators may need to reasonably deviate from the submitted development plan to:
- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

For further inquiries, contact OCD.Engineer@emnrd.nm.gov.

Albert Chang

ALBERT C.S. CHANG
DIRECTOR

EXHIBIT D

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Dylan M. Fuge
Deputy Secretary

Dylan Fuge, Division Director (Acting)
Oil Conservation Division

NOTICE
OCD Clarification of Compulsory Pooling Processes Updates
July 12, 2024

The Oil Conservation Division ("OCD") is providing additional clarifications on the Compulsory Pooling notice it issued on April 24, 2024, due to questions it received following the notice. The information below provides additional updates to clarifying aspects of the processes and procedures. The guidance does not replace but is additive to that prior notice.

These updates will be effective as of the August 8, 2024, hearing date.

Clarification of timelines related to Compulsory Pooling Orders:
OCD has received multiple inquiries regarding paragraph twenty of the standard compulsory pooling orders and how this is to be interpreted for drilling timelines with multiple wells. The relevant paragraph reads as follows:

> *"The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."*

OCD's template Order, paragraph two, declares all wells in Exhibit A as the "Well(s)." "Well(s)" is used as some cases propose a singular well and some cases propose multiple wells in Exhibit A. If multiple wells are in Exhibit A provided by the applicant, then "Wells" is the correct way to read it through the rest of the order.

Paragraph twenty, as seen above, is intended to mean that all wells the operator proposed in Exhibit A shall be spudded within one (1) year **total** from the date of the OCD Director signature. Each well is then to be completed within one (1) year calculated of its own spud date. The above paragraph does **not** grant an operator permission to drill only what the Operator may deem as the defining well within this timeline. An example can be seen below:

Wells in Exbit A	Signature Date	Spud Deadline	Actual Spud Date	Completion Date
Well #1	1/1/2024	1/1/2025	5/20/2024	5/20/2025
Well #2	1/1/2024	1/1/2025	6/15/2024	6/15/2025
Well #3	1/1/2024	1/1/2025	6/17/2024	6/17/2025
Well #4	1/1/2024	1/1/2025	6/19/2024	6/19/2025
Well #5	1/1/2024	1/1/2025	6/21/2024	6/21/2025

OCD intends to revise the referenced Order paragraph to accommodate contemporary drilling schedules if operators provide development plan summaries in support of the compulsory pooling applications. In any contested or uncontested hearing an applicant can now present a development plan and associated timelines with each well being proposed so plans can be fully evaluated by the OCD for complete

development potential. The development plan shall not exceed five (5) years. For contested cases this allows for proper comparison of competing plans. OCD requests this same development table be included in uncontested applications to allow for proper authorization in compulsory pooling Orders and allows for timely utilization of pooled minerals. Development plans should be included as an exhibit in support of the application. Applications which do not include a development plan will be considered to propose all listed wells as initial wells to be drilled and completed according to paragraph twenty, above.

Development Table	
Well Name	Timeline of Spud (Estimated)
Well 1	Within 1 year of signature
Well 2	Within 1 year of signature
Well 3	Within 1 year of signature
Well 4	Within 1 year of signature
Well 5	Within 1 year of signature
Well 6	Within 2 years of signature
Well 7	Within 2 years of signature
Well 8	Within 2 years of signature
Well 9	Within 2 years of signature
Well 10	Within 3 years of signature
Well 11	Within 3 years of signature
Well 12	Within 3 years of signature
Well 13	Within 3 years of signature
Well 14	Within 4 years of signature
Well 15	Within 4 years of signature
Well 16	Within 4 years of signature

In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

Specifically, Operators may need to reasonably deviate from the submitted development plan to:

- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

SPUR EXHIBIT A-9

From:	Miguel Suazo
To:	Adam Rankin
Cc:	Paula M. Vance; Raylee Starnes; Tschantz, Freya, EMNRD; Jacob Everhart; Engineer, OCD, EMNRD; ocd.hearings@emnrd.nm.gov
Subject:	RE: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036
Date:	Monday, June 1, 2026 8:12:56 AM
Attachments:	image001.png

External Email

Adam:

Longfellow does not agree with the premise of your question. Longfellow does not agree that the 006H well, or Longfellow's present drilling schedule under Order No. R-24036, constitutes a proposed deviation requiring an application for hearing on the July docket. Longfellow will continue to comply with Order No. R-24036 and all applicable Division rules. To the extent Longfellow proposes any future change that requires Division approval under Order No. R-24036 or applicable rules, Longfellow will seek approval through the appropriate Division procedure.

Thanks.

Miguel Suazo | Shareholder
Beatty & Wozniak, P.C.
505.946.2090 | Direct

From: Adam Rankin <AGRankin@hollandhart.com>
Sent: Friday, May 29, 2026 4:52 PM
To: Miguel Suazo <msuazo@bwenergylaw.com>
Cc: Paula M. Vance <PMVance@hollandhart.com>; Raylee Starnes <ARStarnes@hollandhart.com>; Tschantz, Freya, EMNRD <Freya.Tschantz@emnrd.nm.gov>; Jacob Everhart <jeverhart@bwenergylaw.com>; Engineer, OCD, EMNRD <ocd.engineer@emnrd.nm.gov>; ocd.hearings@emnrd.nm.gov
Subject: RE: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036

CAUTION: EXTERNAL SOURCE

Miguel,

Can you please confirm Longfellow will file an application for hearing on the July hearing docket to approve its proposed deviation from Order No. R-24036, as required.

Adam Rankin

Partner, Holland & Hart LLP

agrankin@hollandhart.com | **T:** (505) 954-7294 | **M:** (505) 570-0377

From: Tschantz, Freya, EMNRD <Freya.Tschantz@emnrd.nm.gov>
Sent: Wednesday, May 6, 2026 2:38 PM
To: Miguel Suazo <msuazo@bwenergylaw.com>; Jacob Everhart <jeverhart@bwenergylaw.com>
Cc: Adam Rankin <AGRankin@hollandhart.com>; Paula M. Vance <PMVance@hollandhart.com>; Raylee Starnes <ARStarnes@hollandhart.com>
Subject: Deviation from Development Plan Associated with Compulsory Pooling Order Number R-24036

External Email

Good afternoon,

Because Spur has filed an objection, the requested deviation cannot be approved administratively. Longfellow will need to submit an application requesting a hearing to amend Order R-24036. Please let me know if you have any questions. Thank you.

Respectfully,

Freya Tschantz, Law Clerk
EMNRD-Oil Conservation Division
1220 South St. Francis Drive, 3rd Floor
Santa Fe, NM 87505
(505) 469-5527
Freya.Tschantz@emnrd.nm.gov

SPUR EXHIBIT A-10

From:	Rebecca English <rebecca.english@longfellowenergy.com>
Sent:	Wednesday, April 15, 2026 2:34 PM
To:	Nash Bell
Subject:	RE: BLM NMNM 0060548 Expiration

Hey Nash,

Yes. The BLM did not proactively reach out to us. We are also not the RT holder in any of the leases out here, but simply have operating rights. We discovered this issue through review to drill our wells. As normal, we looked at production to confirm our leases were held. When we reviewed that, we saw that there had not been production in the Acacia Unit since July 2024. This prompted me to reach out to the BLM to discuss. In those discussions, they confirmed that there would be a 2 year non-production term and the leases would need production by July. Not necessarily July 1, but the month of July.

This has been an ongoing situation with the BLM. I have many emails, meetings, etc in which this was discussed. Most recently (as in just last month), I inquired with the BLM to give me the exact date in July that production ceased, because all I can see is monthly. The BLM responded back and noted that there was a possibility that there was barrels sold from the Acacia unit in May of 2025, which would mean the new deadline is May 2027 (2 years later). This is helpful, but still causes some hesitation on our part. Therefore, we are still drilling before the July deadline of this year.

I hope this helps. I am happy to jump on a call to explain more if needed.

LONGFELLOW ENERGY, LP

Rebecca L. English
Vice President, Land

Office 972.366.0951 | Cell 405.550.0214
8115 Preston Road | Suite 800 | Dallas, TX 75225

From: Nash Bell <Nash@spurenergy.com>
Sent: Tuesday, April 14, 2026 9:33 AM
To: Rebecca English <rebecca.english@longfellowenergy.com>
Subject: BLM NMNM 0060548 Expiration

Rebecca –

I am trying to get info for our file re the subject lease…it is my understanding that the BLM has determined the lease is set to expire on July 1, 2026…do you have any correspondence from them stating that? I am curious because we didn't receive anything from them (we are not RT holder) but it could compromise other SEP operating rights.

Nash Bell
Senior Vice President, Land
Spur Energy Partners LLC
9655 Katy Freeway, Suite 500 | Houston, Texas 77024
512.461.1874 (Cell)
832.930.8582 (Office)

SPUR ENERGY PARTNERS

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

This email has been scanned for viruses and malware, and may have been automatically archived by **Mimecast Ltd**, an innovator in Software as a Service (SaaS) for business. Providing a **safer** and **more useful** place for your human generated data. Specializing in; Security, archiving and compliance. To find out more Click Here.

CAUTION External Email - Don't click on contents unless you know they are safe

SPUR EXHIBIT A-11

Subject: FW: [EXTERNAL] Lease Status, 31-6S-31E, Eddy Co NM

From: Walls, Christopher <cwalls@blm.gov>
Sent: Monday, May 18, 2026 3:46 PM
To: Nash Bell <Nash@spurenergy.com>
Cc: Sanchez, Jennifer A <j1sanchez@blm.gov>
Subject: Re: [EXTERNAL] Lease Status, 31-6S-31E, Eddy Co NM

Nash,
As we discussed on the phone. Here is the last production we show from ONRR for the North Square Lake Unit. If we do terminate the unit, the leases will be extended until May 31st 2027.

07/31/2024	10651	ACACIA OPERATING	NMNM101360X	NORTH SQUARE LAKE UNIT	NM		30
05/31/2025	10651	ACACIA OPERATING	NMNM101360X	NORTH SQUARE LAKE UNIT	NM		30

Best regards,

Christopher Walls
Supervisory Petroleum Engineer
Bureau of Land Management
520 E. Greene Street
Carlsbad, NM 88220
Cell: 575-361-7452
Office: 575-234-2234
cwalls@blm.gov

From: Nash Bell <Nash@spurenergy.com>
Sent: Monday, May 18, 2026 12:55 PM
To: Walls, Christopher <cwalls@blm.gov>; Sanchez, Jennifer A <j1sanchez@blm.gov>
Subject: FW: [EXTERNAL] Lease Status, 31-6S-31E, Eddy Co NM

Chris/Jennifer –

My name is Nash Bell, SVP of Land at Spur Energy Partners LLC. I was referred to you by Jordan Yawn regarding the current status of the North Square Lake Secondary Unit Agreement (Unit No. NMNM101360X) in Eddy County, NM.

Spur holds operating rights in the following BLM leases that are currently associated with the unit:
- NMNM 0081277
- NMNM 102037
- NMLC 60543

Per Jordan, AFMSS2 still reflects multiple producing wells associated to the unit agreement, but the last production reported via S&P Global and OGOR appears to be July 2024. As you are likely aware, the current unit operator – Acacia Operating – has declared bankruptcy, which raises obvious questions about whether the unit is still actively producing and whether OGORs are being properly filed.

Jordan indicated that if the CFO submits a last production memo recommending termination effective August 2024, the leases would receive a 2-year extension running through August 2026 – a deadline that is essentially upon us.

I would really appreciate a call or any guidance you can provide on the following:

1. What is the current production status of the unit wells as reflected in your records?
2. Has a last production memo been initiated or is one pending?
3. Is there anything Spur, as an operating rights owner, can or should be doing given Acacia's bankruptcy situation?

This is time-sensitive for us and I want to make sure we are coordinating appropriately with your office. I am available at your convenience – cell is 512.461.1874.

Thanks,

Nash Bell
Senior Vice President, Land
Spur Energy Partners LLC
9655 Katy Freeway, Suite 500 | Houston, Texas 77024
512.461.1874 (Cell)
832.930.8582 (Office)

SPUR ENERGY PARTNERS

SPUR EXHIBIT A-12

From: Bordegaray, James
To: David Cain
Cc: Brian Wood; Rebecca English; David Mitchell; Kegel, Conrad J.; Armijo, Melissa
Subject: RE: Longfellow Well Pad Business Lease Timing and Priority
Date: Tuesday, January 20, 2026 12:50:30 PM
Attachments: image004.png
Expedite Questions.v18 November 2024.pdf

Hello David,
We process applications on a first in, first out basis. Assuming we have complete applications, turnaround time for a typical business lease is about 110 days. Remember, our office was closed the week of Christmas and a couple of days around the new year as well.

Again, processing time assumes legal road access and all the required application materials, including grazing consent or relinquishment. If you feel you'd like to request expedited processing, I've attached our current questionnaire to submit.

-jim-

Jim Bordegaray
Director
Commercial Resources Division
(505) 827-5777

From: David Cain <david.cain@longfellowenergy.com>
Sent: Tuesday, January 20, 2026 11:22 AM
To: Kegel, Conrad J. <cjkegel@nmslo.gov>; Bordegaray, James <jbordegaray@nmslo.gov>
Cc: Brian Wood <brian@permitswest.com>; Rebecca English <rebecca.english@longfellowenergy.com>; David Mitchell <david.mitchell@longfellowenergy.com>
Subject: [EXTERNAL] Longfellow Well Pad Business Lease Timing and Priority

Hi Conrad and Jim,

We have recently submitted multiple well pad business leases in S32 T16S 31E in Northern Eddy County. Two of these are on a critical path for us, where we are trying to drill and produce a single well from each pad prior to July 1st 2026, with the rest of the wells being drilled later in 2026 or 2027. The pads in question are BL-3319 (Petty 31CD Fed Com [Pad D]), the shapefiles for this location were provided to the SLO on Dec 15. The second application was submitted Dec 22, and I don't believe the shapefiles have been requested or it has a BL number assigned. The location is the Van Halen 33CD Fed Com [Pad D].

We are looking to have a conversation about priority, timing, and cost. As these two locations are much more important than any other BL application currently submitted by Longfellow, we want to confirm you are aware of our priorities, as we expect a total of 7 applications in this section, with 4 already submitted. Regarding the timing, I believe these applications are taking roughly 6 months to approve. If so, that would not give us enough time to meet our deadline, so we are expecting that we will need to request expedited service on these two pads. To submit our expedite request, we first need approval from Jim to request expediting, but we also need to estimate the base cost of these business leases. Just so we can better understand the cost/benefit. If these will cost $50,000 a year vs $30,000 a year, it will impact our expedite offer multiplier. Are you available for a quick conversation? We would also be happy to stop by your office for a face to face discussion.

The questions we're looking to answer are:

- Do we have a BL number and analyst assigned to the Van Halen 33CD Fed Com [Pad D]?
- What is the approximate approval time frame of these without expediting?
- Do you need a more formal notice of our priorities?
- Will you allow us to submit an expedite offer or have a more detailed conversation about the timing?
- Can you provide an estimated first year cost? To help us value our expedite multiplier of 12X or greater.

Please let me know if you need any further clarification or have any questions. We've been working with Allison Marks and the BLM on the lease holding requirements. We also have pooling orders approved or submitted for these units. The drill permits have been submitted.

Thank you,

David Cain
Sr. Engineering Technologist & Regulatory Specialist
Office 972-590-9918 Cell 972-765-9503
8115 Preston Road, Suite 800, Dallas, TX 75225
LONGFELLOW ENERGY, LP

SPUR EXHIBIT A-13

From:	Rebecca English
To:	Jacob DeHamer; Stuart Gaston; Jack Mercer
Subject:	RE: Spur Units
Date:	Monday, April 27, 2026 7:34:58 AM
Attachments:	image001.png image003.png image004.png

When you get here swing by and lets chat.

Rebecca L. English
Vice President, Land

Office 972.366.0951 | Cell 405.550.0214
8115 Preston Road | Suite 800 | Dallas, TX 75225

From: Jacob DeHamer <jacob.dehamer@longfellowenergy.com>
Sent: Sunday, April 26, 2026 5:27 PM
To: Rebecca English <rebecca.english@longfellowenergy.com>; Stuart Gaston <stuart.gaston@longfellowenergy.com>; Jack Mercer <jack.mercer@longfellowenergy.com>
Subject: Spur Units

Rebecca,
Sorry this took so long, been running in the red since I got back.

Regarding the pooling changes with Spur in them. Here is a quick summary

Petty CD:
We pooled the Petty CD in Sept '25. The pooling was for 9 wells (3 Paddock, 3 Upper Bline, 3 Lower Bline).

When we made the call to swap to the 1 well per DSU, switching the CL wells, I noticed our horizontal well placement was off. This only effected Landing Zones. No take points, surface locations, or well counts were changed. We consulted with the BLM to make sure our permit would be ok to change it (it was) and then moved on. As a result, we changed the LZ of a handful of the wells, still keeping 9 wells (3 Paddock, 3 Upper, and 3 Lower). I have before and after gun barrels that we can review tomorrow.

Van Halen AB:
The only change we made here was swapping the centerline well, changing the Van Halen AB 5H and 6H landing targets from Lower Bline to Paddock.

I will note that before we did this, I also checked in with Paula to make sure the LZ swap was ok. She said it was, as things change from a landing zone closer to target. She also told me this is why they don't recommend including Landing Zone or gun barrels in the pooling order exhibits.

Feel free to give me a call if you need more color. We can look at gun barrels first thing tomorrow.

Jake DeHamer
303.501.2324
8115 Preston Road, Suite 800, Dallas, TX 75225
LONGFELLOW ENERGY, L.P.

SPUR EXHIBIT A-14

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

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

CASE NO. 25572
ORDER NO. R-24036

RESPONSE TO SPUR'S EMERGENCY MOTION FOR STAY

Longfellow Energy, LP, OGRID No. 372210 ("Longfellow"), through its undersigned attorneys, hereby files this (1) response to Spur Energy Partners LLC ("Spur") Emergency Motion to Stay ("Motion") Oil Conservation Division ("OCD") Order No. R-24036 ("Order") and request to stay the Division approved Application for Permit to Drill ("APD") for the Petty 31CD Fed Com Well (API No. 30-015-58054) under 19.17.7.9 NMAC [sic], and (2) Spur's proposed order requesting the same. Longfellow provides a proposed order denying the entirety of Spur's Motion and requests for relief, set forth as **Exhibit A.**

The Motion should be denied. Spur seeks extraordinary relief without identifying a valid procedural vehicle, without establishing an emergency, and without demonstrating any actual, non-economic, irreparable injury. Instead, Spur attempts to convert the emergency-stay process into a collateral attack on valid Division approvals and into a shortcut for litigating alleged operational-deviation issues that are reserved to the Division in the first instance. The Division should reject that effort, and allow Longfellow to continue operations under the existing Order and approved APD.

FACTUAL BACKGROUND

1. The Division issued Order No. R-24036, attached as **Exhibit B**, on December 1, 2025, in Case No. 25572, which created standard 302.07-acre, more or less, horizontal spacing

unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), and designated Longfellow as operator of the Unit.

2. Order No. R-24036 pooled the uncommitted interests in the Yeso formation in the Unit, and dedicated the Unit to the following wells: **Petty Federal Com 31CD 001H well, Petty Federal Com 31CD 002H well, Petty Federal Com 31CD 003H well, Petty Federal Com 31CD 004H well, Petty Federal Com 31CD 005H well, Petty Federal Com 31CD 006H well, Petty Federal Com 31CD 007H well, Petty Federal Com 31CD 008H well,** and **Petty Federal Com 31CD 009H well.**

3. Spur owns a 37.511173% working interest in the Unit. Spur did not enter an appearance or object to Longfellow's pooling application before entry of the Order.

4. Order No. R-24036 ¶ 20 provides "Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."

5. Order No. R-24036 ¶ 20 does not require Longfellow to drill the well(s) in any particular sequence, contrary to what Spur asserts. Rather, Order No. R-24036 requires only that Longfellow drill each well prior to November 30, 2026 (one-year from approval), or in the alternative, that Longfellow request an extension from the OCD before Order No. R-24036 expires.

6. Longfellow has not informed Spur, the additional parties entitled to notice, or the Division that it does not intend to drill all nine wells identified in Order No. R-24036 or that it intends to pursue an extension.

7. Order No. R-24036 ¶ 22 provides "Operator may propose *reasonable deviations from the development plan* *<u>via notice to the OCD and all parties that required notice of the original</u>*

<u>*compulsory pooling application*</u> in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing." (emphasis added).

8. The Division has provided guidance to operators seeking *minor* deviations by allowing operators to proceed without a hearing by (1) providing notice, (2) monitoring objections, and (3) submitting the application for deviation to Division permitting with all required documentation. *See* "NOTICE—Procedure for Deviation from Orders, November 1, 2025." Attached as **Exhibit C**. Division guidance under this NOTICE is limited to deviations involving the accommodation of scheduling issues with well(s) drilling or completion schedules, or when an operator is seeking to remove less than 20% of the proposed wells from the development plan. *Id.*

9. Spur references the July 12, 2024, "NOTICE—OCD Clarification of Compulsory Pooling Processes Updates" issued by the Division, attached as **Exhibit D**, but the Division has subsequently issued additional clarifying guidance on deviation from orders under the November 1, 2025, Notice.

10. The Division has not issued dispositive guidance defining what constitutes a "minor" or "major" deviation from orders outside of the two options explicitly provided for.

11. Longfellow sent well proposals and election letters to Spur on March 30, 2026, for the **Petty 31CD 006H** well.

12. The March 30, 2026, election letters were consistent with the approved Division and BLM APD and associated drilling and engineering design for the **Petty 31CD 006H** well that Longfellow revised to reflect the Lower Paddock lateral placement instead of the Blineberry. Both pools are in the Yeso formation originally pooled under Order No. R-24036.

13. Spur elected to participate in the **Petty 31CD 006H** well "under protest." The "protest" was due to the well's landing placement revision and due to an increase in AFE costs associated with the well as originally proposed during the September 16, 2025, hearing by affidavit and the costs associated with the well as proposed in the March 30, 2026, election letters.

14. The Order provides the Division approved procedure for reconciling project costs against actual costs in ¶ 26 which lays out the following procedure: (1) Longfellow has 180 days to submit to each pooled working interest owner an itemized schedule of the *actual* well costs, and (2) the *actual* well costs will be considered reasonable unless a pooled working interest owner files a written objection no later than 45 days after receipt. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

15. The correct process for objecting to the *actual* well costs occurs after the well is completed, not when the well is currently being drilled.

16. Longfellow discovered a looming BLM lease expiration that was set to expire during the first half of May 2026, which would result in the Unit falling apart.

17. Longfellow made plans to schedule and perform the drilling of the **Petty 31CD 006H** well to ensure the federal lease would be extended and the Unit would not be impacted due to its removal.

18. On May 1, 2026, Longfellow and Spur met to primarily to discuss joint resolution options for the Unit development that included acreage trades, a buyout of Spur's interest, and secondarily to discuss Longfellow's plans to spud the **Petty 31CD 006H** well due to the BLM lease expiration. During this meeting, Longfellow provided a DRAFT notice of minor deviation letter accompanied with a revised gunbarrel diagram for the well(s).

19. The DRAFT notice letter functioned as a demonstrative exhibit to convey the changes in landing to the **Petty 31CD 006H** well initially prior to spud as a form of good faith transparency between Longfellow—the Unit operator—and Spur as working interest owner, and also the contemplated changes in landing to the remaining wells to be accomplished via an amendment to Order No. R-24036 prior to its expiration.

20. The changes in the well(s) landing and placement depicted on the gunbarrel diagram in the May 1, 2026, meeting was intended by Longfellow to demonstrate to Spur the comprehensive modifications to be made via amendment to Order No. R-24036 after the **Petty 31CD 006H** well was drilled to maintain the integrity of the Unit.

21. Longfellow determined that the slight revision to the lateral placement of the **Petty 31CD 006H** well in the Yeso formation would not, in reasonable probability, alter the ultimate drainage of the Unit, and such expeditious action would be necessary and amicable to Spur to preserve the federal lease and Unit, as a whole.

22. Longfellow provided a minor-deviation notice out of an abundance of caution but maintains the lateral re-placement does not actually rise to a deviation requiring approval, because (a) no formation change — both Blineberry and Lower Paddock are within the Yeso formation pooled under R-24036 (and per the May 1 letter itself, within Pool Code 96831, Cedar Lake; Glorieta-Yeso), (b) no change in surface hole or bottomhole location, (c) no change in number of wells, and (d) no reasonable probability of altering ultimate Unit drainage.

23. Since Longfellow has commenced drilling of the **Petty 31CD 006H** well no less than six months before the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the Order.

24. Drilling operations have commenced, and any stay of those operations would result in loss and damage to the wellbore integrity, increased fluid and control risks, increased capital expenditure due to rig standby and crew per diems, extended demobilization and remobilization costs, and cascading contractual risks to working interest owners (e.g., service provider contracts, completion crew contracts, and so forth).

25. Longfellow's actions to drill the **Petty 31CD 006H** well and preserve the federal lease will prevent waste and protect correlative rights due to the development of the federal minerals as part of the planned Unit.

26. Spur's motion would result in waste due to the loss of the federal lease within the unit, which would impact the overall recovery of the Unit as originally proposed by Longfellow.

27. Spur's motion fails to show irreparable harm apart from purely economic harm. *See* Spur Emer. Mot. St. at ¶¶ 13, 17.

28. Since Longfellow intends to commence drilling of the remaining wells prior to the November 30, 2026, deadline stipulated in Order No. R-24036, Longfellow remains compliant with the order.

29. Longfellow asserts that the drilling of the wells at different times within the stipulated one-year window in Order No. R-24036 is both contemplated and allowed by Division guidance.

30. Longfellow asserts that its plan to drill the Unit wells at differing times within the initially stipulated one-year window in Order No. R-24036 does not constitute removal of more than 20% of the proposed wells from the development plan.

31. Since Longfellow is not removing any wells from the Unit, Longfellow remains compliant with the order.

32. Longfellow asserts that any deadlines associated with drilling or completing that are imposed by the Division should be considered as a mandate from the Division for the operator to conduct the work "no later than" the one-year deadline, rather than a mandate to conduct the work "on or about" the one-year deadline of the Order.

33. Longfellow concludes that neither notice nor Order amendment is required for its actions governing the **Petty 31CD 006H** well as such revision does not rise to even a "minor" deviation.

ARGUMENT

1. Spur Identifies No Valid Procedural Basis to Stay Both a Final Pooling Order and a Valid APD Through an Emergency Motion

Spur's threshold problem is procedural. Spur asks the Division to stay both a final compulsory pooling order and the effect of an approved APD. But the Motion does not identify any Division rule that authorizes this relief in the posture presented here.

Rule 19.15.4.23(B) NMAC authorizes the Director to stay Division or Commission orders only when a stay is necessary to prevent waste, protect correlative rights, protect public health or the environment, or prevent gross negative consequences to an affected party. Spur does not satisfy that standard. The Order itself was issued after notice and hearing, approved Longfellow's development of the Unit, and necessarily reflected the Division's determination that the pooled development would prevent waste and protect correlative rights. Spur's disagreement with the timing, sequencing, cost, or intra-formation landing placement of the 006H Well does not justify staying the Order on an emergency basis.

Nor does 19.15.14.10(B) NMAC provide the relief Spur seeks. That provision allows the Division to impose conditions on an approved permit to drill, deepen, or plug back. It does not create a private right for a non-operator working-interest owner to suspend a valid APD by

emergency motion, nor does it convert ordinary operational disputes into collateral attacks on approved permits. Likewise, 19.15.2.11(B) NMAC addresses emergency hearing timing; it is not an independent source of substantive stay authority.

Because Spur has identified no rule authorizing the requested stay of both the Order and the APD, the Motion should be denied for that reason alone. If the Division determines that any future amendment, deviation, or hearing is appropriate, that determination can be made through the Division's ordinary procedures. It does not require, and does not justify, emergency suspension of ongoing operations under an approved APD.

2. Spur Has Not Shown an Emergency or Irreparable Harm

Spur's Motion depends on a chain of unsupported assumptions. Spur first assumes that any revision to a well's lateral placement automatically constitutes a deviation requiring notice and hearing. Spur next asserts that the revised lateral placement of the 006H Well will irreparably harm Spur, impair its correlative rights, and cause waste, but it offers no substantive explanation of how Spur will actually be affected. *See* Spur Em. Mot. ¶ 13. Spur then characterizes these alleged circumstances as an emergency requiring immediate Division intervention that would effectively halt ongoing drilling operations.

Spur's own cited authority confirms why that showing is insufficient. In *Tenneco Oil Co. v. New Mexico Water Quality Control Commission*, the New Mexico Court of Appeals recognized that a stay of administrative action is discretionary and requires a showing of, among other things, irreparable harm, lack of substantial harm to other interested persons, and no harm to the public interest. 1986-NMCA-033, ¶ 10. The court further held that "[t]he mere fact that an administrative regulation or order may cause injury or inconvenience to applicant is insufficient to warrant suspension of an agency regulation by the granting of a stay," and that "[m]ere allegations of irreparable harm are not, of course, sufficient." *Id.* ¶¶ 11–12. Here, Spur offers only conclusory

assertions of harm tied to AFE costs, well sequencing, alleged parent-child effects, and lateral placement within the same pooled formation. Those assertions do not establish the immediate, non-speculative injury required for extraordinary stay relief, particularly where the requested stay would itself create concrete operational, contractual, leasehold, and waste-prevention risks for Longfellow and the participating working interest owners.

The New Mexico standard governing extraordinary injunctive relief confirms the point. Injunctions are "harsh and drastic remedies" available only upon a showing of irreparable injury for which there is no adequate and complete remedy at law. *State ex rel. State Highway & Transp. Dep't of N.M. v. City of Sunland Park*, 2000-NMCA-044, ¶ 18, 129 N.M. 151, 3 P.3d 128. An irreparable injury is one that cannot be compensated or measured by any certain pecuniary standard, and the injury must be actual and substantial, or an affirmative prospect of such injury, not a mere possibility of harm. *Id*. ¶ 19. The party seeking relief must present evidence of irreparability and inadequacy of remedy; conclusory assertions are not enough. *Id*.

Spur has not made that showing. Spur alleges concerns regarding spacing, sequencing, parent-child effects, costs, and correlative rights, but it does not provide evidence that the approved 006H Well will cause actual and imminent non-economic injury. Spur's cost objection is particularly unsuitable for emergency relief because Division rules already provide a mechanism for reporting actual well costs and resolving objections to the reasonableness of those costs. *See* 19.15.13.13 NMAC. A dispute over AFE increases does not justify stopping a permitted well.

Spur's participation "under protest" also does not create emergency rights that the Division's rules do not otherwise provide. Spur elected to participate in the 006H Well. That election preserves Spur's economic position in the well; it does not transform an unsupported objection into irreparable harm or authorize an emergency stay.

3. Longfellow Remains in Compliance with the Order and the Approved APD

Spur's Motion repeatedly suggests that Longfellow has abandoned the approved development plan or is attempting to drop 90% of the approved wells. That is incorrect. Longfellow is not removing any well from the Unit. Longfellow has not stated that it will drill only the 006H Well. Longfellow remains within the Order's one-year deadline to commence drilling and intends to address any future changes for remaining wells through appropriate Division procedures before those wells are drilled.

Spur also misreads the Order as requiring "back-to-back" drilling. Paragraph 20 does not impose a particular drilling sequence. It requires the operator to commence drilling the well(s) within one year after the date of the Order and to complete each well no later than one year after commencement of that well. Spur's reliance on language from Longfellow's initial proposal does not rewrite the Order or create a new emergency-stay remedy.

The 006H Well's revised landing placement also does not invalidate the Order or APD. The 006H Well remains within the Yeso formation pooled by the Order. Longfellow has determined that the lateral-placement adjustment will not, in reasonable probability, alter ultimate Unit drainage or impair Spur's correlative rights. And the 006H Well is being drilled under approved federal and Division permitting. Those approvals remain valid unless and until the Division determines otherwise through a proper procedural vehicle.

Spur's attempt to treat Longfellow's May 1 courtesy communication as formal notice requiring a protested hearing is equally misplaced. The draft notice letter was provided to Spur as part of ongoing commercial discussions and in the interest of transparency. It was not served on all parties entitled to notice of the original pooling application, was not served by certified mail, and was not submitted as a formal notice intended to trigger Paragraph 22 of the Order. Spur cannot

manufacture a protest process from a draft negotiation document and then use that manufactured protest to halt drilling operations.

Longfellow does not dispute that its initial well proposal described a "back-to-back" drilling sequence. That language reflected Longfellow's anticipated execution plan, not a binding contractual commitment, and Order R-24036 did not adopt or incorporate that phrase as a condition of approval. The Order's only sequencing constraint is in Paragraph 20, which requires commencement of drilling within one year and completion of each Well within one year of its respective spud date. See also Ex. D (July 12, 2024 Notice) (confirming that "all wells the operator proposed in Exhibit A shall be spudded within one (1) year total from the date of the OCD Director signature"). Longfellow intends to spud all nine Unit wells by November 30, 2026, consistent with the Order's terms and OCD's official interpretation. Longfellow asserts that the proper Division procedure for Spur to follow in effort to reconcile projected and *actual* costs is the process outlined in ¶ 26 in Order No. R-24036.

4. Threshold Deviation Determinations Belong to the Division, Not to Spur

The Division's rules reserve enforcement and operational-deviation determinations to the Division. Rule 19.15.2.16 NMAC provides that Division personnel have authority and duty to enforce Division rules and may allow minor deviations from approved field operational plans upon a showing by an operator that changes are necessary to avoid waste or protect public health or the environment. Rule 19.15.7.9(C) NMAC further provides that forms approved or processed by BLM for wells on federal lands or accessing federal minerals are subject to Division approval in the same manner and to the same extent as corresponding Division forms.

Those rules underscore why Spur's requested relief is improper. Spur asks the Division to accept Spur's threshold characterization of the 006H Well's lateral-placement revision as an

actionable, protested deviation before the Division has made that determination. That approach would allow a non-operator to usurp the Division's role, convert courtesy communications into formal notices, and stop approved operations based on speculation. Nothing in the Division's rules requires that result.

At most, Spur has raised issues that can be addressed through ordinary Division processes if and when the Division determines additional process is necessary. That is not an emergency. It is not a basis to stay a valid pooling order. And it is not a basis to suspend an approved APD while active drilling operations are underway.

5. A Stay Would Create the Concrete Harm Spur Has Failed to Show

The equities also weigh decisively against the requested stay. Spur's alleged harm is speculative. Longfellow's harm from a stay is immediate and concrete. Drilling operations have commenced, and an abrupt suspension would introduce operational, contractual, and leasehold risks that the Division should not impose absent a compelling and properly supported showing by Spur.

Operationally, sudden interruption of active drilling can threaten wellbore integrity; increase the risk of stuck pipe, tight-hole conditions, formation swelling or sloughing, and loss of well path; degrade drilling-fluid characteristics; impair pressure control; and complicate directional drilling and geosteering. Those risks are not abstract. They arise directly from stopping an active drilling operation midstream.

Contractually and economically, a stay would expose Longfellow and participating working-interest owners to rig standby charges, potential rig-release and remobilization costs, crew and service-company scheduling disruptions, equipment and supply-chain delays, and cascading obligations tied to water, fuel, tubulars, trucking, disposal, and completion services. The stay

would also risk federal leasehold consequences that could impair the Unit as a whole and frustrate the very resource-development objectives the Order was designed to advance.

In short, Spur asks the Division to impose the concrete waste, operational disruption, and leasehold risk that Spur has failed to prove it will suffer. Rule 19.15.4.23(B) NMAC does not support that result. The Motion should be denied.

CONCLUSION AND REQUESTED RELIEF

For the foregoing reasons, Longfellow respectfully requests that the Division deny Spur's Emergency Motion for Stay in full, deny Spur's request to stay the Order and the APD, deny Spur's request to invalidate Longfellow's March 30, 2026, well proposal, and grant such other relief as the Division deems just and proper. If the Division sets the Motion for hearing, Longfellow requests that no stay issue pending hearing.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:______________________________

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Raj K. Lahoti
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com
rlahoti@bwenergylaw.com

Attorneys for Longfellow Energy LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing was served to counsel of record by electronic mail this 15th day of May 2026, as follows:

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
505-983-6043 Facsimile
agrankin@hollandhart.com
pmvance@hollandhart.com
rstarnes@hollandhart.com
Attorneys for Spur Energy Partners, LLC

Rachael Ketchledge

EXHIBIT A

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

APPLICATION OF LONGFELLOW ENERGY LP FOR COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO.

CASE NO. 25572
ORDER NO. R-24036

***[PROPOSED]* ORDER DENYING REQUEST FOR STAY OF ORDER NO. R-24036 AND DIVISION APPROVED APD**

This matter, having come before the Division Director and/or the Chair of the Oil Conservation Commission on a response motion filed by Longfellow Energy, LP ("Longfellow") pursuant to 19.15.7.9 NMAC, and having considered the response motion and otherwise being fully informed in the premises, the Director finds and concludes that a temporary stay of the Order No. R-24036 and the Division's administrative approval for the following well is not necessary or appropriate to prevent waste and to protect correlative rights, as such prevention and protection is inherent in the valid existing pooling Order and APD:

- **Petty Federal Com 31CD 006H** (API No. 30-015-58054) to be dedicated to a 302.07-acre, more or less, horizontal well spacing unit in the Yeso formation comprised of the S/2 of Section 31, T16S, R31E, Eddy County, New Mexico.

IT IS THEREFORE ORDERED that Spur Energy Partners LLC's Emergency Motion to Stay is hereby DENIED, and Division Order No. R-24036, together with the Division's administrative approval of the APD for the above-referenced well, shall remain in full force and effect without the additional requirement to provide notice to the Division or previously noticed affected parties for slight deviations therefrom. This Order is without prejudice to any party seeking further relief through the procedures otherwise available under Division rules and applicable law.

EXHIBIT B

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

IN THE MATTER OF APPLICATION FOR COMPULSORY POOLING SUBMITTED BY LONGFELLOW ENERGY, LP

CASE NO. 25572
ORDER NO. R-24036

ORDER

The Director of the New Mexico Oil Conservation Division ("OCD"), having heard this matter through a Hearing Examiner on September 16, 2025, and after considering the testimony, evidence, and recommendation of the Hearing and Technical Examiners, issues the following Order.

FINDINGS OF FACT

1. Longfellow Energy, LP ("Operator") submitted an application ("Application") to compulsory pool the uncommitted oil and gas interests within the spacing unit ("Unit") described in Exhibit A. Operator seeks to be designated the operator of the Unit.

2. Operator will dedicate the well(s) described in Exhibit A ("Well(s)") to the Unit.

3. Operator proposes the supervision and risk charges for the Well(s) described in Exhibit A.

4. Operator identified the owners of uncommitted interests in oil and gas minerals in the Unit and provided evidence that notice was given.

5. The Application was heard by the Hearing Examiner on the date specified above, during which Operator presented evidence through affidavits in support of the Application. No other party presented evidence at the hearing.

CONCLUSIONS OF LAW

6. OCD has jurisdiction to issue this Order pursuant to NMSA 1978, Section 70-2-17.

7. Operator is the owner of an oil and gas working interest within the Unit.

8. Operator satisfied the notice requirements for the Application and the hearing as required by 19.15.4.12 NMAC.

9. OCD satisfied the notice requirements for the hearing as required by 19.15.4.9 NMAC.

10. Operator has the right to drill the Well(s) to a common source of supply at the depth(s) and location(s) in the Unit described in Exhibit A.

11. The Unit contains separately owned uncommitted interests in oil and gas minerals.

12. Some of the owners of the uncommitted interests have not agreed to commit their interests to the Unit.

13. The pooling of uncommitted interests in the Unit will prevent waste and protect correlative rights, including the drilling of unnecessary wells.

14. This Order affords to the owner of an uncommitted interest the opportunity to produce his just and equitable share of the oil or gas in the pool.

ORDER

15. The uncommitted interests in the Unit are pooled as set forth in Exhibit A.

16. The Unit shall be dedicated to the Well(s) set forth in Exhibit A.

17. Operator is designated as operator of the Unit and the Well(s).

18. If the location of a well will be unorthodox under the spacing rules in effect at the time of completion, Operator shall obtain the OCD's approval for a non-standard location in accordance with 19.15.16.15(C) NMAC.

19. If the Unit is a non-standard horizontal spacing unit which has not been approved under this Order, Operator shall obtain the OCD's approval for a non-standard horizontal spacing unit in accordance with 19.15.16.15(B)(5) NMAC.

20. Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well.

21. This Order shall terminate automatically if the Operator fails to comply with the preceding paragraph unless the Operator requests an extension by notifying the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the extension is automatically granted up to one year. If a protest is received the extension is not granted and the Operator must set the case for a hearing.

22. Operator may propose reasonable deviations from the development plan via notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. Upon no objection after twenty (20) days the deviation is automatically granted. If a protest is received the deviation is not granted and the Operator must set the case for a hearing.

23. The infill well requirements in 19.15.13.9 NMAC through 19.15.13.12 NMAC shall be applicable.

24. Operator shall submit each owner of an uncommitted working interest in the pool ("Pooled Working Interest") an itemized schedule of estimated costs to drill, complete, and equip the well ("Estimated Well Costs").

25. No later than thirty (30) days after Operator submits the Estimated Well Costs, the owner of a Pooled Working Interest shall elect whether to pay its share of the Estimated Well Costs or its share of the actual costs to drill, complete and equip the well ("Actual Well Costs") out of production from the well. An owner of a Pooled Working Interest who elects to pay its share of the Estimated Well Costs shall render payment to Operator no later than thirty (30) days after the expiration of the election period, and shall be liable for operating costs, but not risk charges, for the well. An owner of a Pooled Working Interest who fails to pay its share of the Estimated Well Costs or who elects to pay its share of the Actual Well Costs out of production from the well shall be considered to be a "Non-Consenting Pooled Working Interest."

26. No later than one hundred eighty (180) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the Actual Well Costs. The Actual Well Costs shall be considered to be the Reasonable Well Costs unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Reasonable Well Costs after public notice and hearing.

27. No later than sixty (60) days after the expiration of the period to file a written objection to the Actual Well Costs or OCD's order determining the Reasonable Well Costs, whichever is later, each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs shall pay to Operator its share of the Reasonable Well Costs that exceed the Estimated Well Costs, or Operator shall pay to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs its share of the Estimated Well Costs that exceed the Reasonable Well Costs.

28. The reasonable charges for supervision to drill and produce a well ("Supervision Charges") shall not exceed the rates specified in Exhibit A, provided however that the rates shall be

adjusted annually pursuant to the COPAS form entitled "Accounting Procedure-Joint Operations."

29. No later than within ninety (90) days after Operator submits a Form C-105 for a well, Operator shall submit to each owner of a Pooled Working Interest an itemized schedule of the reasonable charges for operating and maintaining the well ("Operating Charges"), provided however that Operating Charges shall not include the Reasonable Well Costs or Supervision Charges. The Operating Charges shall be considered final unless an owner of a Pooled Working Interest files a written objection no later than forty-five (45) days after receipt of the schedule. If an owner of a Pooled Working Interest files a timely written objection, OCD shall determine the Operating Charges after public notice and hearing.

30. Operator may withhold the following costs and charges from the share of production due to each owner of a Pooled Working Interest who paid its share of the Estimated Well Costs: (a) the proportionate share of the Supervision Charges; and (b) the proportionate share of the Operating Charges.

31. Operator may withhold the following costs and charges from the share of production due to each owner of a Non-Consenting Pooled Working Interest: (a) the proportionate share of the Reasonable Well Costs; (b) the proportionate share of the Supervision and Operating Charges; and (c) the percentage of the Reasonable Well Costs specified as the charge for risk described in Exhibit A.

32. Operator shall distribute a proportionate share of the costs and charges withheld pursuant to the preceding paragraph to each Pooled Working Interest that paid its share of the Estimated Well Costs.

33. Each year on the anniversary of this Order, and no later than ninety (90) days after each payout, Operator shall provide to each owner of a Non-Consenting Pooled Working Interest a schedule of the revenue attributable to a well and the Supervision and Operating Costs charged against that revenue.

34. Any cost or charge that is paid out of production shall be withheld only from the share due to an owner of a Pooled Working Interest. No cost or charge shall be withheld from the share due to an owner of a royalty interests. For the purpose of this Order, an unleased mineral interest shall consist of a seven-eighths (7/8) working interest and a one-eighth (1/8) royalty interest.

35. Except as provided above, Operator shall hold the revenue attributable to a well that is not disbursed for any reason for the account of the person(s) entitled to the revenue as provided in the Oil and Gas Proceeds Payment Act, NMSA 1978, Sections 70-10-1 et seq., and relinquish

such revenue as provided in the Uniform Unclaimed Property Act, NMSA 1978, Sections 7-8A-1 et seq.

36. The Unit shall terminate if (a) the owners of all Pooled Working Interests reach a voluntary agreement; or (b) the well(s) drilled on the Unit are plugged and abandoned in accordance with the applicable rules. Operator shall inform OCD no later than thirty (30) days after such occurrence.

37. OCD retains jurisdiction of this matter for the entry of such orders as may be deemed necessary.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Albert Chang

ALBERT C. S. CHANG
DIRECTOR
AC/dm

Date: 12/1/2025

COMPULSORY POOLING APPLICATION CHECKLIST

ALL INFORMATION IN THE APPLICATION MUST BE SUPPORTED BY SIGNED AFFIDAVITS

Case: 25572	**APPLICANT'S RESPONSE**
Date	**September 11, 2025**
Applicant	**Longfellow Energy, L.P.**
Designated Operator & OGRID (affiliation if applicable)	**Longfellow Energy, L.P., 372210**
Applicant's Counsel:	Spencer Fane, LLP (Sharon T. Shaheen)
Case Title:	Application of Longfellow Energy, L.P. for Compulsory Pooling, Eddy County, New Mexico
Entries of Appearance/Intervenors:	None at this time
Well Family	Petty Federal Com 31CD
Formation/Pool	
Formation Name(s) or Vertical Extent:	Yeso Formation
Primary Product (Oil or Gas):	Oil
Pooling this vertical extent:	Yeso Formation
Pool Name and Pool Code (Only if NSP is requested):	
Well Location Setback Rules (Only if NSP is Requested):	
Spacing Unit	
Type (Horizontal/Vertical)	Horizontal
Size (Acres)	320 acres
Building Blocks:	Quarter-quarter section (40 ac)
Orientation:	East-West
Description: TRS/County	S/2 of Section 31, Township 16 South, Range 31 East in Eddy County, New Mexico
Standard Horizontal Well Spacing Unit (Y/N), If No, describe and is approval of non-standard unit requested in this application?	Yes
Other Situations	
Depth Severance: Y/N. If yes, description	No
Proximity Tracts: If yes, description	Yes, N2 S2 of Section 31
Proximity Defining Well: if yes, description	Yes, Petty Federal Com 31CD 006H well
Applicant's Ownership in Each Tract	Tract 1: 100%; Tract 2: 90%; Tract 3: 0.00%; Tract 4: 0.00%; Tract 5: 0.00%; Tract 6: 0.00%
Well(s)	
Name & API (if assigned), surface and bottom hole location, footages, completion target, orientation, completion status (standard or non-standard)	Add wells as needed
Well #1	Petty Federal Com 31CD 001H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,717' FSL of Section 32-16S-31E BHL: 20' FWL & 2,628' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,867' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2628' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2628' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5867'), MD (~11272')
Well #2	Petty Federal Com 31CD 002H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,697' FSL of Section 32-16S-31E BHL: 20' FWL & 2,319' FSL of Section 31-16S-31E Completion Target: Yeso at ~4,961' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2319' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2319' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4961'), MD (~10337')

Well #3	Petty Federal Com 31CD 003H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,677' FSL of Section 32-16S-31E BHL: 20' FWL & 2,159' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,226' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~2159' FSL and 100' FEL of Section 31, T16S-31E LTP: ~2159' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5226'), MD (~10562')
Well #4	Petty Federal Com 31CD 004H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,657' FSL of Section 32-16S-31E BHL: 20' FWL & 1785' FSL of Section 31-16S-31E Completion Target: Yeso at ~5,875' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1785' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1785' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5875'), MD (~11165')
Well #5	Petty Federal Com 31CD 005H well, API No. 30-015-XXXXX SHL: 411' FWL and 1,637' FSL of Section 32-16S-31E BHL: 20' FWL & 1410' FSL of Section 31-16S-31E Completion Target: Yeso at ~4969' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1410' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1410' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4969'), MD (~10280')
Well #6	Petty Federal Com 31CD 006H well, API No. 30-015-XXXXX SHL: 1085' FWL and 676' FSL of Section 32-16S-31E BHL: 20' FWL & 1250' FSL of Section 31-16S-31E Completion Target: Yeso at ~5244' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~1250' FSL and 100' FEL of Section 31, T16S-31E LTP: ~1250' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5244'), MD (~10572')
Well #7	Petty Federal Com 31CD 007H well, API No. 30-015-XXXXX SHL: 1086' FWL and 656' FSL of Section 32-16S-31E BHL: 20' FWL & 875' FSL of Section 31-16S-31E Completion Target: Yeso at ~5894' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~875' FSL and 100' FEL of Section 31, T16S-31E LTP: ~875' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~5894'), MD (~10572')
Well #8	Petty Federal Com 31CD 008H well, API No. 30-015-XXXXX SHL: 1086' FWL and 636' FSL of Section 32-16S-31E BHL: 20' FWL & 500' FSL of Section 31-16S-31E Completion Target: Yeso at ~4987' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~500' FSL and 100' FEL of Section 31, T16S-31E LTP: ~500' FSL and 100' FWL of Section 31, T16S-31E
Completion Target (Formation, TVD and MD)	Yeso- TVD (~4987'), MD (~10267')
Well #9	Petty Federal Com 31CD 009H well, API No. 30-015-XXXXX SHL: 1087' FWL and 616' FSL of Section 32-16S-31E BHL: 20' FWL & 340' FSL of Section 31-16S-31E Completion Target: Yeso at ~5243' Well Orientation: East to West Completion location expected to be standard
Horizontal Well First and Last Take Points	FTP: ~340' FSL and 100' FEL of Section 31, T16S-31E LTP: ~340' FSL and 100' FWL of Section 31, T16S-31E

Completion Target (Formation, TVD and MD)	Yeso- TVD (~5243'), MD (~10541')
AFE Capex and Operating Costs	
Drilling Supervision/Month $	$12,000; *see* Exhibit A, ¶ 19
Production Supervision/Month $	$1200; *see* Exhibit A, ¶ 19
Justification for Supervision Costs	*See* AFE at Exhibit A-4
Requested Risk Charge	200%; *see* Exhibit A, ¶ 20
Notice of Hearing	
Proposed Notice of Hearing	Submitted with online filing of Application
Proof of Mailed Notice of Hearing (20 days before hearing)	Exhibits C, C-1, C-2, and C-3
Proof of Published Notice of Hearing (10 days before hearing)	Exhibit C-4
Ownership Determination	
Land Ownership Schematic of the Spacing Unit	Exhibit A-2
Tract List (including lease numbers and owners)	Exhibits A-2 and A-3
If approval of Non-Standard Spacing Unit is requested, Tract List (including lease numbers and owners) of Tracts subject to	n/a
Pooled Parties (including ownership type)	Exhibit A-3
Unlocatable Parties to be Pooled	*See* Exhibit C-2
Ownership Depth Severance (including percentage above & below)	n/a
Joinder	
Sample Copy of Proposal Letter	Exhibit A-4
List of Interest Owners (ie Exhibit A of JOA)	Exhibit A-3
Chronology of Contact with Non-Joined Working Interests	Exhibit A-5
Overhead Rates In Proposal Letter	Exhibit A-4
Cost Estimate to Drill and Complete	*See* AFE at Exhibit A-4
Cost Estimate to Equip Well	See AFE at Exhibit A-4
Cost Estimate for Production Facilities	n/a
Geology	
Summary (including special considerations)	*See* Exhibit B, ¶ 11
Spacing Unit Schematic	Exhibit A-2(b)
Gunbarrel/Lateral Trajectory Schematic	Exhibit B-4
Well Orientation (with rationale)	Exhibit B, ¶ 11(d)
Target Formation	Exhibits B-3 & B-4
HSU Cross Section	Exhibit B-3
Depth Severance Discussion	n/a
Forms, Figures and Tables	
C-102	Exhibit A-1
Tracts	Exhibits A-2, A-3
Summary of Interests, Unit Recapitulation (Tracts)	Exhibit A-3
General Location Map (including basin)	Exhibit B-1
Well Bore Location Map	*See* Exhibit A-1, Exhibit B-5
Structure Contour Map - Subsea Depth	Exhibit B-2
Cross Section Location Map (including wells)	Exhibit B-5
Cross Section (including Landing Zone)	Exhibit B-3
Additional Information	
Special Provisions/Stipulations	n/a
CERTIFICATION: I hereby certify that the information provided in this checklist is complete and accurate.	
Printed Name (Attorney or Party Representative):	Sharon T. Shaheen
Signed Name (Attorney or Party Representative):	*Sharon T. Shaheen*
Date:	Sept. 4, 2025

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan-Grisham
Governor

Melanie A. Kenderdine
Cabinet Secretary

Ben Shelton
Deputy Secretary

Erin Taylor
Deputy Secretary

Albert C.S. Chang
Division Director
Oil Conservation Division

Notice: Procedure for Deviation from Orders

DATE: November 1, 2025

OCD hereby provides the following guidance on the process for uncontested applications for minor deviations from development plans associated with compulsory pooling orders, without a hearing. It aligns with historical practices where amendments did not require a hearing unless protested, while ensuring transparency and opportunity for input from affected parties.

This guidance is limited to uncontested applications where an operator needs to deviate from the development plan to accommodate scheduling issues with well(s) drilling or completion schedule, or to remove less than 20% of the proposed wells from the development plan.

Operators seeking these qualifying minor deviations may proceed without a hearing by following these steps:

1. Provide Notice to Affected Parties and OCD pursuant to 19.15.4 NMAC.
2. Monitor for Objections that might arise under 19.15.4.12.B NMAC.
3. Submit the Application for Deviation to OCD Permitting with all required Documentation.

OCD may issue an amended order without a hearing if OCD determines that the application is proper and may be granted without a hearing.

This notice clarifies OCD's July 12, 2024, Notice titled "OCD Clarification of Compulsory Pooling Processes Updates". That Notice stated:

> In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

EXHIBIT C

State of New Mexico
Energy, Minerals and Natural Resources Department

Specifically, Operators may need to reasonably deviate from the submitted development plan to:
- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

For further inquiries, contact OCD.Engineer@emnrd.nm.gov.

Albert Chang

ALBERT C.S. CHANG
DIRECTOR

EXHIBIT D

State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Dylan M. Fuge
Deputy Secretary

Dylan Fuge, Division Director (Acting)
Oil Conservation Division

NOTICE
OCD Clarification of Compulsory Pooling Processes Updates
July 12, 2024

The Oil Conservation Division ("OCD") is providing additional clarifications on the Compulsory Pooling notice it issued on April 24, 2024, due to questions it received following the notice. The information below provides additional updates to clarifying aspects of the processes and procedures. The guidance does not replace but is additive to that prior notice.

These updates will be effective as of the August 8, 2024, hearing date.

Clarification of timelines related to Compulsory Pooling Orders:
OCD has received multiple inquiries regarding paragraph twenty of the standard compulsory pooling orders and how this is to be interpreted for drilling timelines with multiple wells. The relevant paragraph reads as follows:

> *"The Operator shall commence drilling the Well(s) within one year after the date of this Order, and complete each Well no later than one (1) year after the commencement of drilling the Well."*

OCD's template Order, paragraph two, declares all wells in Exhibit A as the "Well(s)." "Well(s)" is used as some cases propose a singular well and some cases propose multiple wells in Exhibit A. If multiple wells are in Exhibit A provided by the applicant, then "Wells" is the correct way to read it through the rest of the order.

Paragraph twenty, as seen above, is intended to mean that all wells the operator proposed in Exhibit A shall be spudded within one (1) year **total** from the date of the OCD Director signature. Each well is then to be completed within one (1) year calculated of its own spud date. The above paragraph does **not** grant an operator permission to drill only what the Operator may deem as the defining well within this timeline. An example can be seen below:

Wells in Exbit A	Signature Date	Spud Deadline	Actual Spud Date	Completion Date
Well #1	1/1/2024	1/1/2025	5/20/2024	5/20/2025
Well #2	1/1/2024	1/1/2025	6/15/2024	6/15/2025
Well #3	1/1/2024	1/1/2025	6/17/2024	6/17/2025
Well #4	1/1/2024	1/1/2025	6/19/2024	6/19/2025
Well #5	1/1/2024	1/1/2025	6/21/2024	6/21/2025

OCD intends to revise the referenced Order paragraph to accommodate contemporary drilling schedules if operators provide development plan summaries in support of the compulsory pooling applications. In any contested or uncontested hearing an applicant can now present a development plan and associated timelines with each well being proposed so plans can be fully evaluated by the OCD for complete

development potential. The development plan shall not exceed five (5) years. For contested cases this allows for proper comparison of competing plans. OCD requests this same development table be included in uncontested applications to allow for proper authorization in compulsory pooling Orders and allows for timely utilization of pooled minerals. Development plans should be included as an exhibit in support of the application. Applications which do not include a development plan will be considered to propose all listed wells as initial wells to be drilled and completed according to paragraph twenty, above.

Development Table	
Well Name	Timeline of Spud (Estimated)
Well 1	Within 1 year of signature
Well 2	Within 1 year of signature
Well 3	Within 1 year of signature
Well 4	Within 1 year of signature
Well 5	Within 1 year of signature
Well 6	Within 2 years of signature
Well 7	Within 2 years of signature
Well 8	Within 2 years of signature
Well 9	Within 2 years of signature
Well 10	Within 3 years of signature
Well 11	Within 3 years of signature
Well 12	Within 3 years of signature
Well 13	Within 3 years of signature
Well 14	Within 4 years of signature
Well 15	Within 4 years of signature
Well 16	Within 4 years of signature

In connection with its allowance for submission of a multi-year development plan, the OCD recognizes that circumstances may arise where deviations from the development plan may be necessary. In recognition of that reality, it will allow operators the ability to request minor deviations to the development plan that was associated with an order through simple notice to the affected interests and the OCD. Minor deviations to development plans will not automatically trigger a subsequent hearing to amend the compulsory pooling order.

Specifically, Operators may need to reasonably deviate from the submitted development plan to:

- accommodate scheduling issues with a well(s) drilling or completion schedule, or
- remove less than 20% of the proposed wells from the development plan.

If an operator needs to deviate from the development plan for one of these reasons, they need only provide notice to the OCD and all parties that required notice of the original compulsory pooling application in accordance with 19.15.4.12.B and 19.15.4.12.C NMAC. In the event of objections to noticed deviations, the Operator must request a hearing and amendment of the Order. Modifications beyond those contemplated above will require a hearing and amendment. OCD also reserves the right to request the operator to file for a hearing amendment if conditions merit.

SPUR EXHIBIT A-15

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

APPLICATION OF LONGFELLOW ENERGY, LP, FOR APPROVAL OF STANDARD HORIZONTAL SPACING UNIT AND COMPULSORY POOLING, EDDY COUNTY, NEW MEXICO **CASE NO. ________**

APPLICATION

Longfellow Energy, LP, OGRID No. 372210 ("Longfellow" or "Applicant"), through its undersigned attorneys, hereby files this Application with the Oil Conservation Division ("Division") pursuant to the provisions of NMSA 1978, § 70-2-17, for an order (1) approving a 480-acre, more or less, standard horizontal spacing unit ("HSU") composed of the S/2 of Section 29 and the SE/4 of Section 30, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico (the "Application Lands"), and (2) pooling all uncommitted mineral interests in the Cedar Lake; Glorieta-Yeso Pool [96831], designated as an oil pool, underlying said HSU.

In support of its Application, Longfellow states the following:

1. Longfellow and/or its affiliates are working interest owners in the Application Lands and have the right to drill the well(s) thereon as the designated Operator of the Application Lands.

2. Longfellow seeks to dedicate all of the Application Lands to form a 480-acre, more or less, HSU.

3. Longfellow seeks to dedicate the above-referenced HSU to the following proposed wells:

A. **Allman 2930 CDX Fed Com 001H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of

Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East;

B. **Allman 2930 CDX Fed Com 002H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East;

C. **Allman 2930 CDX Fed Com 003H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East;

D. **Allman 2930 CDX Fed Com 004H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East;

E. **Allman 2930 CDX Fed Com 005H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East;

F. **Allman 2930 CDX Fed Com 006H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East;

G. **Allman 2930 CDX Fed Com 007H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East, and;

H. **Allman 2930 CDX Fed Com 008H** (API No. *Pending*), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East.

4. The **Allman 2930 CDX Fed Com 007H** and **Allman 2930 CDX Fed Com 008H** wells are orthodox in their locations as defined by 19.15.16.15(C) NMAC, and the take points and laterals comply with applicable setbacks under 19.15.16.15 NMAC.

5. The **Allman 2930 CDX Fed Com 001H, Allman 2930 CDX Fed Com 002H, Allman 2930 CDX Fed Com 003H, Allman 2930 CDX Fed Com 004H, Allman 2930 CDX Fed Com 005H,** and **Allman 2930 CDX Fed Com 006H** wells are unorthodox in their locations as defined by 19.15.16.15(C) NMAC. For these wells, Longfellow will submit Non-Standard Well Location Applications to the Division for administrative approval.

6. Longfellow proposes the following multi-year development plan:

Allman 2930 CDX Development Plan	
Well Name	**Timeline of Spud (Estimated)**
Allman 2930 CDX 005H	Within 1 year of signature
Allman 2930 CDX 001H	Within 3 years of signature
Allman 2930 CDX 003H	Within 3 years of signature
Allman 2930 CDX 006H	Within 3 years of signature
Allman 2930 CDX 007H	Within 3 years of signature
Allman 2930 CDX 002H	Within 5 years of signature
Allman 2930 CDX 004H	Within 5 years of signature
Allman 2930 CDX 008H	Within 5 years of signature

7. Longfellow has made good faith efforts to obtain voluntary agreement from all interest owners in the Cedar Lake; Glorieta-Yeso Pool underlying the proposed spacing unit, but has been unable to secure agreement from all parties to participate in the drilling of the wells or otherwise commit their interests.

8. The pooling of all interests in the Cedar Lake; Glorieta-Yeso Oil Pool within the proposed unit will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

9. To provide for its just and fair share of oil and gas underlying the Application Lands, Longfellow requests that all uncommitted interests in this HSU be pooled and that Longfellow be designated as the operator of the proposed horizontal wells and HSU.

WHEREFORE, Longfellow requests this Application be set for hearing on July 9, 2026, before an Examiner of the Oil Conservation Division, and after notice and hearing as required by law, the Division enter an order:

a. Approving the horizontal well spacing unit and pooling all uncommitted interests in the Cedar Lake; Glorieta-Yeso Oil Pool underlying the HSU within the Application Lands;

b. Approving the **Allman 2930 CDX Fed Com 001H, Allman 2930 CDX Fed Com 002H, Allman 2930 CDX Fed Com 003H, Allman 2930 CDX Fed Com 004H, Allman 2930 CDX Fed Com 005H, Allman 2930 CDX Fed Com 006H, Allman 2930 CDX Fed Com 007H,** and **Allman 2930 CDX Fed Com 008H** as the initial wells for the HSU; and approving the provided development plan;

c. Designating Longfellow as operator of the HSU and the horizontal wells to be drilled thereon;

d. Authorizing Longfellow to recover its costs of drilling, completing, and equipping the wells;

e. Approving the actual operating charges and costs of supervision while drilling and after completion, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and

f. Imposing a 200% charge for the risk assumed by Longfellow in drilling, equipping, and completing the wells against any working interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

By:____________________________________

Miguel A. Suazo
James P. Parrot
Jacob L. Everhart
Ryan McKee
Raj K. Lahoti
500 Don Gaspar Ave.,
Santa Fe, NM 87505
(505) 946-2090
msuazo@bwenergylaw.com
jparrot@bwenergylaw.com
jeverhart@bwenergylaw.com
rmckee@bwenergylaw.com
rlahoti@bwenergylaw.com
Attorneys for Longfellow Energy, LP

Application of Longfellow Energy, LP, for approval of a Standard Horizontal Spacing Unit and Compulsory Pooling, Eddy County, New Mexico. Applicant in the above-styled cause seeks an order from the Division: (1) approving a 480-acre, more or less, standard horizontal spacing unit and proration unit composed of the S/2 of Section 29 and the SE/4 of Section 30, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico, and (2) pooling all uncommitted mineral interests in the Cedar Lake; Glorieta-Yeso Pool [96831], designated as an oil pool, underlying said HSU. The proposed wells to be dedicated to the horizontal spacing unit are the: **Allman 2930 CDX Fed Com 001H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 002H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 003H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 004H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the NE/4 SW/4 (Unit K) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the NW/4 SE/4 (Unit J) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 005H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 006H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East; **Allman 2930 CDX Fed Com 007H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East; and the **Allman 2930 CDX Fed Com 008H** (API No. Pending), which is an oil well that will be horizontally drilled from a surface location in the SW/4 SW/4 (Unit M) of Section 28, Township 16 South, Range 31 East, to a bottom hole location in the Cedar Lake; Glorieta-Yeso Pool in the SW/4 SE/4 (Unit O) of Section 30, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico. The Allman 2930 CDX Fed Com 007H and Allman 2930 CDX Fed Com 008H wells are orthodox in their locations as defined by 19.15.16.15(C) NMAC, and the take points and laterals comply with applicable setbacks under 19.15.16.15 NMAC. The remaining wells are unorthodox in their locations as defined by 19.15.16.15(C) NMAC. For these wells, Longfellow will submit Non-Standard Well Location Applications to the Division for administrative approval. The wells and lands are located approximately 6.85 miles northwest of Maljamar, New Mexico.

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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO ENFORCE THE REQUIREMENTS OF ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26288

APPLICATION OF LONGFELLOW ENERGY LP TO EXTEND THE DRILLING DEADLINE UNDER ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26328

SELF-AFFIRMED STATEMENT OF MATTHEW VAN WIE

1. My name is Matthew Van Wie, and I work for Spur Energy Partners LLC, ("Spur") as the Senior Vice President of Geosciences. I am familiar with the above-captioned matter and have personal knowledge of the geological and technical information set forth in this statement.

2. I have previously testified before the New Mexico Oil Conservation Division ("Division") as an expert witness in petroleum geology matters, including through my Self-Affirmed Statement dated May 22nd, 2026, filed in this docket in support of Spur's Motion for Reconsideration of the Division's Order Denying Spur's Emergency Motion for Stay. My credentials as a petroleum geologist have been accepted by the Division and made a matter of record.

3. My testimony in this proceeding addresses technical and geoscience concerns raised by Longfellow's unilateral change to its drilling plan and timing that will degrade ultimate recovery from the unit, especially with respect to the proposed 008H (Lower Paddock) well, which is now a fully bounded infill well with existing production in the adjacent spacing unit immediately

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

to the south (Cedar Lake Federal Unit) and from the offsetting producing 006H well within the Unit. Any further delays in drilling and completing the 008H and 002H (Lower Paddock) wells or additional changes to the plan of development and timing, could result in further degradation to production and ultimate recovery from the Unit, causing waste and impairing Spur's correlative rights.

4. With a nearly 40% working interest in the Unit, Spur wants to be sure the Unit is developed in a manner that minimizes waste and protects its correlative rights, especially where Spur's interests are being utilized by another operator to demonstrate the productivity of the Yeso in this step-out acreage.

I. FACTUAL AND PROCEDURAL BACKGROUND

5. Following notice and a hearing on September 16, 2025, the Division entered Order No. R-24036 in Case No. 25572, creating a standard, 320-acre, more or less, horizontal spacing unit in the Yeso formation comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the "Unit"), pooling the uncommitted interests in the Unit, and designating Longfellow (OGRID 372210) as operator. Spur owns a 37.511173% working interest in the Unit.

6. Order No. R-24036 dedicated the Unit to nine initial horizontal wells, the Petty Federal Com 31CD 001H through 009H wells (**Exhibit B-1**), each targeting the Yeso formation, with surface and bottomhole locations and a completion target (formation, true vertical depth, and measured depth) specified for each well in the Division's compulsory-pooling record for Case No. 25572.

7. Paragraph 20 of Order No. R-24036 requires the Operator to commence drilling the wells approved under the order within one year of the Order and to complete each well no later

than one year after commencement of drilling that well; it does not itself specify a drilling sequence.

8. Paragraph 22 permits the Operator to propose reasonable deviations from the development plan on notice to OCD and to parties entitled to notice of the original application, with the deviation deemed granted if unprotested for twenty days, and requiring a hearing if a protest is received. Paragraph 26 establishes a post-completion procedure for reconciling actual well costs against estimated well costs.

9. Longfellow's own initial well proposal for the Unit, submitted in connection with Case No. 25572, represented that Longfellow would drill and complete the nine dedicated wells "back to back." I understand this representation to be part of the record the Division relied upon in making its original findings, in Order No. R-24036, that the pooled, nine-well development (**Exhibit B-1**) would prevent waste and protect correlative rights.

10. On March 30, 2026, Longfellow issued a well proposal and election letter to Spur for the 006H well only. That proposal reflected a revised completion target — relocating the landing zone from the Blinebry bench of the Yeso formation (the bench associated with the 006H well's approved target as reflected in the Division's compulsory-pooling record for Case No. 25572) to the Lower Paddock bench of the Yeso formation — and an authorization-for-expenditure ("AFE") that had increased by approximately $1,000,000 over the AFE presented at the September 16, 2025 hearing.

11. Because Longfellow's proposal, if declined, exposed Spur's substantial working interest to a 200% non-consent risk charge under the terms of Order No. R-24036, Spur elected to participate in the 006H well, but did so "under protest," expressly reserving its position that the well proposed after the pooling order did not conform to the plan approved in Order No. R-24036.

12. On May 1, 2026, Longfellow met with Spur and provided Spur a notice of "minor deviation" together with a revised gunbarrel diagram (See **Exhibit B-2**). That diagram depicted changed landings not only for the 006H well but for the proposed landing of several of the other wells dedicated to the Unit, reflecting what I understood to be a broader revision to the Unit's nine-well development plan (See **Exhibit B-3**).

13. On May 5, 2026, Spur timely objected in writing to Longfellow's deviation notice.

14. Notwithstanding Spur's unresolved objection, Longfellow proceeded to drill the 006H well.

15. Spur filed its Emergency Motion for Stay on May 12, 2026; the Division denied that motion on May 19, 2026; Spur moved for reconsideration on May 22, 2026, supported by my prior Self-Affirmed Statement; Longfellow represented that drilling of the 006H well was completed on May 24, 2026, with pre-frac operations underway; and the Division denied reconsideration on May 29, 2026

16. On June 9, 2026, Spur filed its Application to Re-Open Order No. R-24036, Case No. 26288, requesting that the Division require Longfellow to comply with the terms of Order No. R-24036 or file an application to amend it, rule that Longfellow's March 30, 2026 well proposal is invalid, suspend the effect of Order No. R-24036 pending Longfellow's compliance, and stay the effect of the approved APD for the 006H well.

17. On July 2, 2026, Longfellow moved to dismiss that Application, which was denied.

II. DISPUTE OF LONGFELLOW'S CLAIM THAT THE LATERAL PLACEMENT REVISION IS NOT A DEVIATION

18. Longfellow claims that the revision of the Petty 31 CD 006H well's landing placement from the Blinebry bench to the Lower Paddock bench of the Yeso formation does not

constitute a deviation from Order No. R-24036 because "both Blinebry and Lower Paddock are within the Yeso formation." This characterization is technically misleading and materially incorrect.

19. The Yeso Formation on the Northwest Shelf of the Permian Basin is a mixed carbonate-evaporite-clastic sequence of Permian age, deposited in a complex shelf-margin environment. Within the Yeso, the Blinebry and Lower Paddock intervals are recognized across the basin as separate, named members or benches, each with its own stratigraphic identity, lithologic character, and productive limits. Their separation is not merely a matter of depth; it reflects materially different porosity profiles, permeability distributions, and fluid saturations. Treating them as a single interchangeable reservoir target ignores well-established stratigraphic and petrophysical distinctions that operators, geologists, and the Division itself treat as distinct completion targets.

20. This distinction is reflected in the Division's own compulsory-pooling practice. The Division's compulsory pooling application checklist requires an applicant to identify the specific completion target, TVD, and MD for each well, not merely the formation name. That requirement exists because the Division recognizes that intra-formation landing decisions are substantive geologic and engineering determinations that materially affect a well's productive characteristics — not incidental details that can be varied without consequence. This makes sense because in contested pooling cases the Division considers the "geologic factor", which evaluates each party's plan of development, including its targeted intervals, to be the most important factor. *See, e.g.,* Order No. R-10731 at ¶ 23(f) ("the most important consideration in awarding operations to competing interest owners is geologic evidence as it relates to well location and recovery of oil and gas and associated risk.").

21. Longfellow's deviation notice and revised gun-barrel diagram along with its own internal documents, including a drilling schedule and its application to amend Order No. R-24036, confirm that a substantive change to the approved well placement and Unit development plan and timing was initiated by Longfellow without proper Division authorization.

III. DISPUTE OF LONGFELLOW'S CLAIM THAT THE REVISION WILL NOT ALTER ULTIMATE DRAINAGE

22. Longfellow asserts that the "slight revision to the lateral placement of the Petty 31 CD 006H well in the Yeso formation would not, in reasonable probability, alter the ultimate drainage of the Unit." This assertion is not supported by engineering analysis and contradicts accepted principles of multi-bench horizontal co-development.

23. The revision of the Petty 31 CD 006H well's landing zone from the Blinebry bench to the Lower Paddock bench raises substantial concern. Relocating the 006H well's completion target from the Blinebry bench to the Lower Paddock bench compresses the effective same-zone spacing between the 006H well and 008H well — that were approved for the Lower Paddock interval (See **Exhibit B-2**). Under generally accepted principles of multi-bench reservoir development, when a well is completed and placed on production independently and substantially ahead of the offset wells that share its drainage area, it will begin depleting reservoir pressure across that shared area. Pressure depletion of this kind in a tight carbonate-evaporite reservoir is not a reversible condition: once an early producer draws down reservoir energy, the offset wells that follow it encounter a pressure-depleted parent zone, with reduced initial rates and recoverable reserves relative to what they would have achieved under the originally approved co-development. This is the parent-child interference effect, and it is materially worsened here because (a) the separation between the 006H well's originally approved target and its offset 008H well has been

reduced by the bench relocation, and (b) the 006H well was drilled and completed alone, well ahead of the remaining eight wells, rather than "back to back" as Longfellow itself proposed and as the Division's original correlative-rights findings in Order No. R-24036 were expressly premised.

24. Longfellow's sworn evidence in this docket asserts that the landing-zone adjustment is "intra-formational" and that parent-child interference concerns are "theoretical and unsupported by analytics." Longfellow has presented no comparative depletion analysis, interference simulation, or offset-well production comparison — nothing beyond its own conclusory assertion — to affirmatively demonstrate that the relocation and early, isolated completion of the 006H well will not, in reasonable probability, alter drainage within the Unit. It is Longfellow's position, not Spur's, that rests on unsupported assertion rather than analysis.

25. Spur has directly observed and quantified this effect in its own operated development. Attached as **Exhibit B-4** is a performance comparison from the Panhead/Flathead Paddock developments, a unit developed in multiple discrete phases: the parent wells were placed on initial production in 2014-2015, and the corresponding child wells were not brought on production until 2016-2017, a delay of approximately two years. Using actual production history normalized to a common time basis, the five-year cumulative oil recovery from the parent wells averaged ~115 MBO, compared to ~87 MBO for the child wells – a ~30% reduction in five-year cumulative recovery attributable to the child wells having been drilled into a reservoir already depleted by parent well production. This is not a modeled or theoretical result; it is measured performance from wells within Spur's own operated inventory, developed under comparable spacing and completion design, differing principally in the timing of child well development relative to the parent.

26. The Panhead / Flathead example (**Exhibit B-4)** is offered as a directly relevant analog because it isolates the variable at issue in this proceeding; the potential incremental reservoir impairment caused by delayed infill development. The Panhead / Flathead develop is depositionaly along trend approximately 10 miles to the east, southeast in Section 11, T17S, R32E, Lea County. The magnitude of the effect observed at Panhead / Flathead – a reduction of nearly one-third in five-year recovery for a development delay on the order of two years – demonstrates that this is not a marginal or speculative concern.

27. The burden of demonstrating that a proposed deviation will not impair correlative rights or cause waste rests, and should rest, with the operator proposing to depart from an approved, hearing-tested development plan — not with the non-operator working-interest owner objecting to it. Longfellow has not carried that burden here. The existing record — a bare assertion that the change is "intra-formational" and "theoretical" — does not permit the Division to find that it has.

IV. DISPUTE OF LONGFELLOW'S CLAIM REGARDING AFE COST INCREASES AND PROPER REMEDY

28. Longfellow contends that the Order provides a post-completion cost reconciliation mechanism under Paragraph 26 that should be used to address Spur's cost concerns.

29. Spur does not dispute the post-completion cost reconciliation process. However, the AFE presented to Spur for the Petty 31 CD 006H well in the March 30, 2026 election letter reflects a material increase of approximately $1,000,000 over the AFE that was presented at the September 16, 2025 hearing and upon which Spur's participation election was premised. This increase—attributable in large part to drilling only a single well—was imposed on Spur without prior notice or consent. Because Spur owns nearly 38% interest in the Unit, Spur will be responsible for approximately $380,000 of that additional cost for that single well.

30. The post-completion reconciliation process in Paragraph 26 of the Order is designed to address variations between estimated and actual costs for a well drilled as approved. It is not a mechanism that permits an operator to unilaterally redesign a well, increase costs, and then compel a working interest owner to either participate at the new cost or forfeit its interest. Requiring Spur to elect participation and fund a materially different development plan than the one approved, with no opportunity to contest the change in advance, impairs Spur's rights under the Order.

V. DIVISION REVIEW REMAINS TECHNICALLY NECESSARY NOTWITHSTANDING COMPLETION OF THE 006H WELL

31. I understand that the 006H well has been drilled and completed, and that Longfellow accordingly contends that Spur's requested relief concerning that well is moot. Spur's Application does not ask the Division to unwind or plug the 006H well. From a reservoir-engineering standpoint, however, the technical concerns I describe above are not extinguished by the fact that drilling and completion are complete; they are, in significant part, prospective and ongoing, for three reasons.

32. First, pressure depletion from an early, isolated producer continues to accrue over the life of that well's production, and its effect on offset wells not yet drilled will not be known — and cannot be remedied after the fact — until those offset wells are drilled. By then, whatever share of the shared pore volume the 006H well has already captured will be irretrievably lost to the offset wells; there is no mechanism, in Paragraph 26 or elsewhere in Order No. R-24036, that restores depleted reservoir pressure after the fact.

33. Second, the May 1, 2026 gun-barrel diagram indicates that Longfellow may apply the same "not really a deviation" characterization to changes affecting the remaining eight wells in the Unit. Absent Division review now of the technical merits of the 006H relocation, there is a substantial and immediate risk that the same rationale will be used to justify additional, unreviewed changes to the balance of the development plan, without the notice-and-hearing protections Paragraph 22 of Order No. R-24036 was designed to provide to non-operator working-interest owners such as Spur. Every well left unreviewed under this rationale compounds the correlative-rights exposure described in Section IV above.

34. Third, resolving the technical questions presented by the 006H relocation — whether it was a substantive deviation, and what its correlative-rights and waste implications are — provides the necessary factual predicate for evaluating the remaining wells' development and any future amendment of Order No. R-24036 that may be required to accurately reflect Longfellow's actual, as-built development plan.

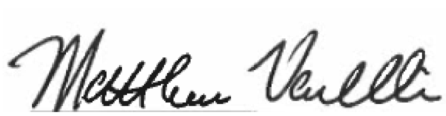
VII. CONCLUSION

35. Based on the foregoing, Spur asks the Division, following this hearing, to amend Order No. R-24036 to:

(a) declare that Longfellow's March 30, 2026 well proposal for the 006H well — which relocated the completion target from the Blinebry bench to the Lower Paddock bench and carried an approximately $1,000,000 AFE increase — was a substantive deviation from the development plan approved in Order No. R-24036, not a "minor deviation," and that Longfellow implemented it without the notice-and-hearing process Paragraph 22 requires once a deviation is protested;

(b) require Longfellow to confirm current plan of development and timing for the remaining initial wells so we have a clear understanding on the record of what their plans are, why they changed, and what, if anything, might alter or change their plans going forward

36. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.



September 8th, 2026

Matthew Van Wie | Date

39401541.v1

Matthew C. Van Wie

Spur Energy Partners LLC

713.204.3587

mvanwie@msn.com

SUMMARY

Petroleum geoscientist with strong geologic and geophysical background with 26 years of industry experience. Expertise in interpreting and integrating diverse data sets at the regional and field scales. Skills include stratigraphic correlation, seismic interpretation, and structural analysis. Experienced across all business stages, ranging from lead identification through field re-development, including lease permitting and commercial analysis.

EXPERIENCE

Spur Energy Partners LLC – Houston, Texas

Senior Vice President Geology – March 2019 to Present

- Assisted in the formation, fundraising, and strategy development for Spur Energy Partners LLC, leading to over $1 billion of capital deployed in the Yeso trend in southeast New Mexico
- Leading high-performing team responsible for subsurface geology and engineering
- Develop short- and long-term development plans aligned with corporate strategy, balancing risk across the portfolio

WildHorse Resource Development – Houston, Texas

Director Geology – December 2016 to February 2019

- Lead geoscientist and science advisor for ETX Eagleford asset acquisition and field development.
- Built short and long term strategic business plans by balancing internal and external opportunities and risks
- Steered subsurface understanding enhancement through continuous geologic and engineering analysis, development program influence, data acquisition and pilot testing.
- Served as a key player in $4B merger with Chesapeake Energy through both robust internal analysis and direct engagement with external advisors and Chesapeake business development

WildHorse Resources I & II – Houston, Texas

Manager Geology – March 2013 to December 2016

- WildHorse II – Principal geoscientist for asset evaluation, exploration, growth and development. Lead geologist on data acquisition, QC, interpretation and evaluation leading to recommendation to purchase, lease, and license 30,000 mineral acres, 200+ sq. miles of 3D seismic, and 3000+ miles of 2D seismic.
- WildHorse I – Lead geoscientist supporting 8 rig development of Terryville field (North Louisiana). Assisted in organizing and presenting portfolio for WildHorse I asset monetization through Memorial Resource Development acquisition and subsequent IPO.

Anadarko Petroleum Corporation – The Woodlands, Texas

Geology Team Lead (Haynesville) – March 2012 – March 2013

- Led Integrated subsurface team and provided geologic evaluation and support for the full field development of the Haynesville Shale asset (TX / LA).

Anadarko Petroleum Corporation – The Woodlands, Texas

Senior Geologist (Marcellus Shale) – April 2009 to March 2012

- Lead Development Geologist for Appalachian Basin asset. Provide geological input into generation of appraisal and development plans for resource assessment and development optimization.
- Work closely with drilling, production and reservoir engineering teams and champion operational activities from planning to execution.

Anadarko Petroleum Corporation – The Woodlands, Texas
Geologist (Deepwater GOM and International Operations) – July 2005 to April 2009
- Business unit lead responsible for planning operated asset resource appraisal programs, drill well permitting, and surveillance of well operations
- Mapped regional geologic framework utilizing stratigraphic models and fluid pressure analysis for resource assessment and reserve booking

Anadarko Petroleum Corporation – The Woodlands, Texas
Geologist (Onshore Lower 48) – August 2000 to July 2005
- Conducted regional exploration studies and evaluations of the petroleum system elements, and integrated available geological and geophysical data to create Gulf Coast US regional maps.
- Developed gross depositional environment maps, effectiveness maps, common risk segment maps of all petroleum system elements (source, reservoir, seal), and composite risk segment maps of different plays, to develop new play concepts and exploration opportunities.

EDUCATION

University of Texas at Austin
Bachelor of Science, Geological Sciences
Graduation: August 2000

Exhibit B-1: Petty CD Gun Barrel Diagram (Case No. 25572)

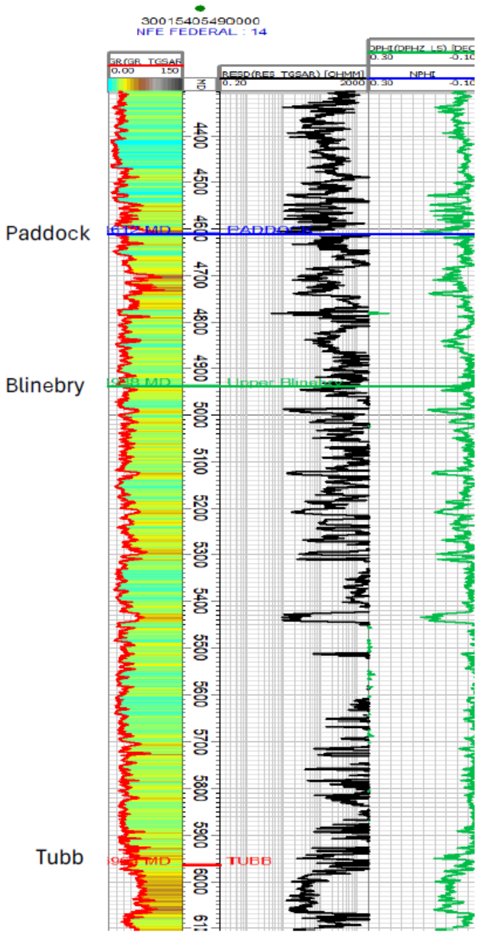
Received by OCD: 9/4/2025 5:15:46 PM

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-1
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

Page 77 of 133

Petty CD Gun Barrell Diagram

Petty CD Unit CPO
Exhibit B-4



Petty CD Unit. Wells will be drilled East to West, Toe Up.

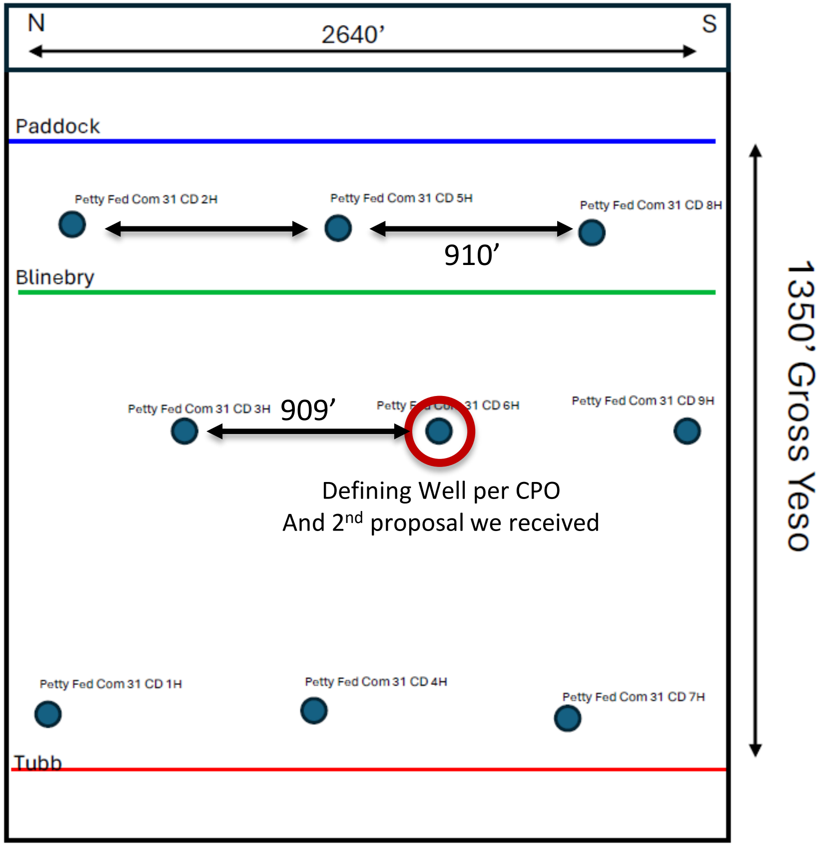
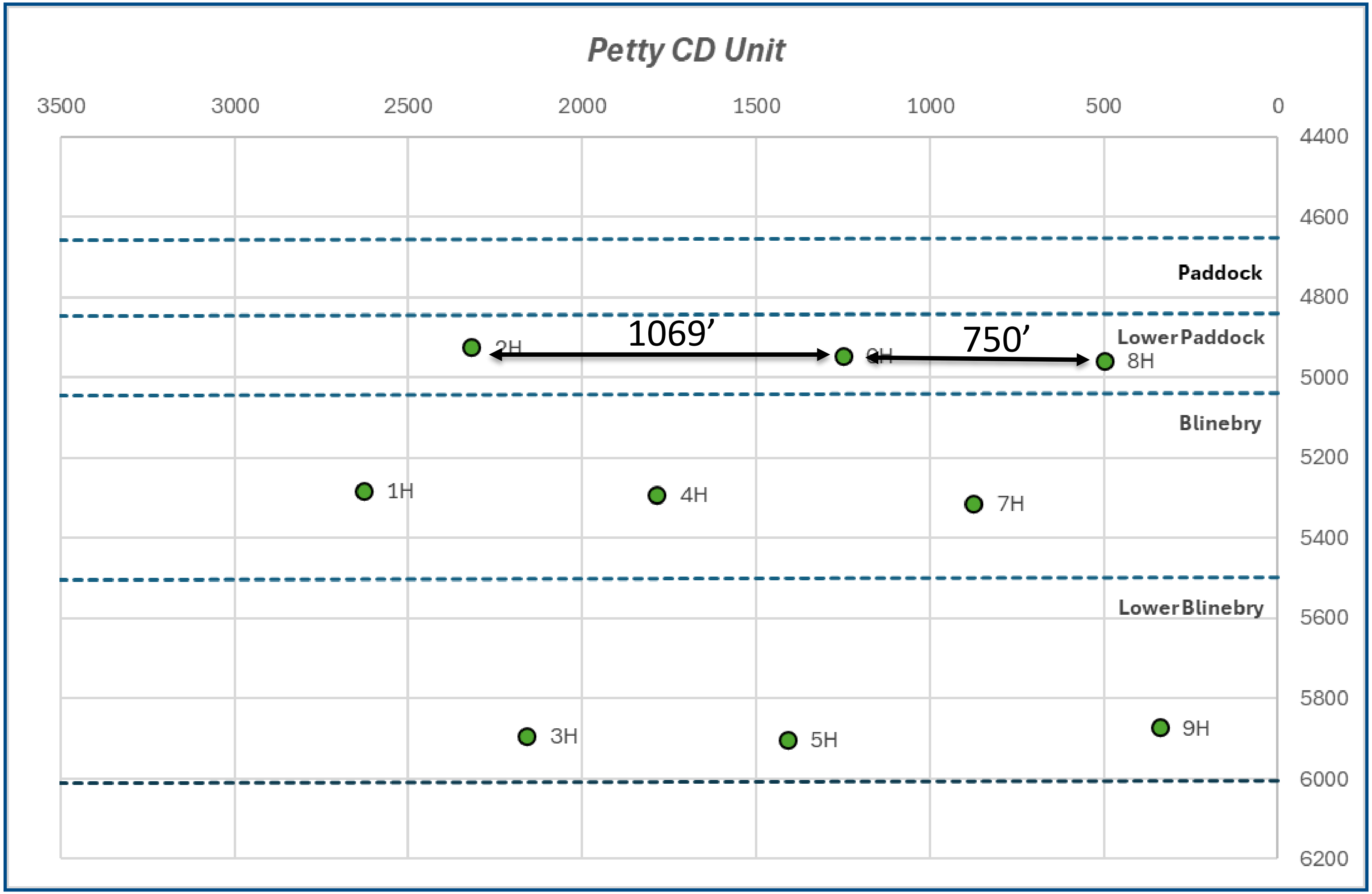


Exhibit B-2: Petty CD Gun Barrel Diagram (via LFE email)



BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-2
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

Exhibit B-3: Petty CD Gun Barrel Diagram (REVISIONS)

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-3
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

Petty CD Gun Barrell Diagram

Petty CD Unit CPO
Exhibit B-4

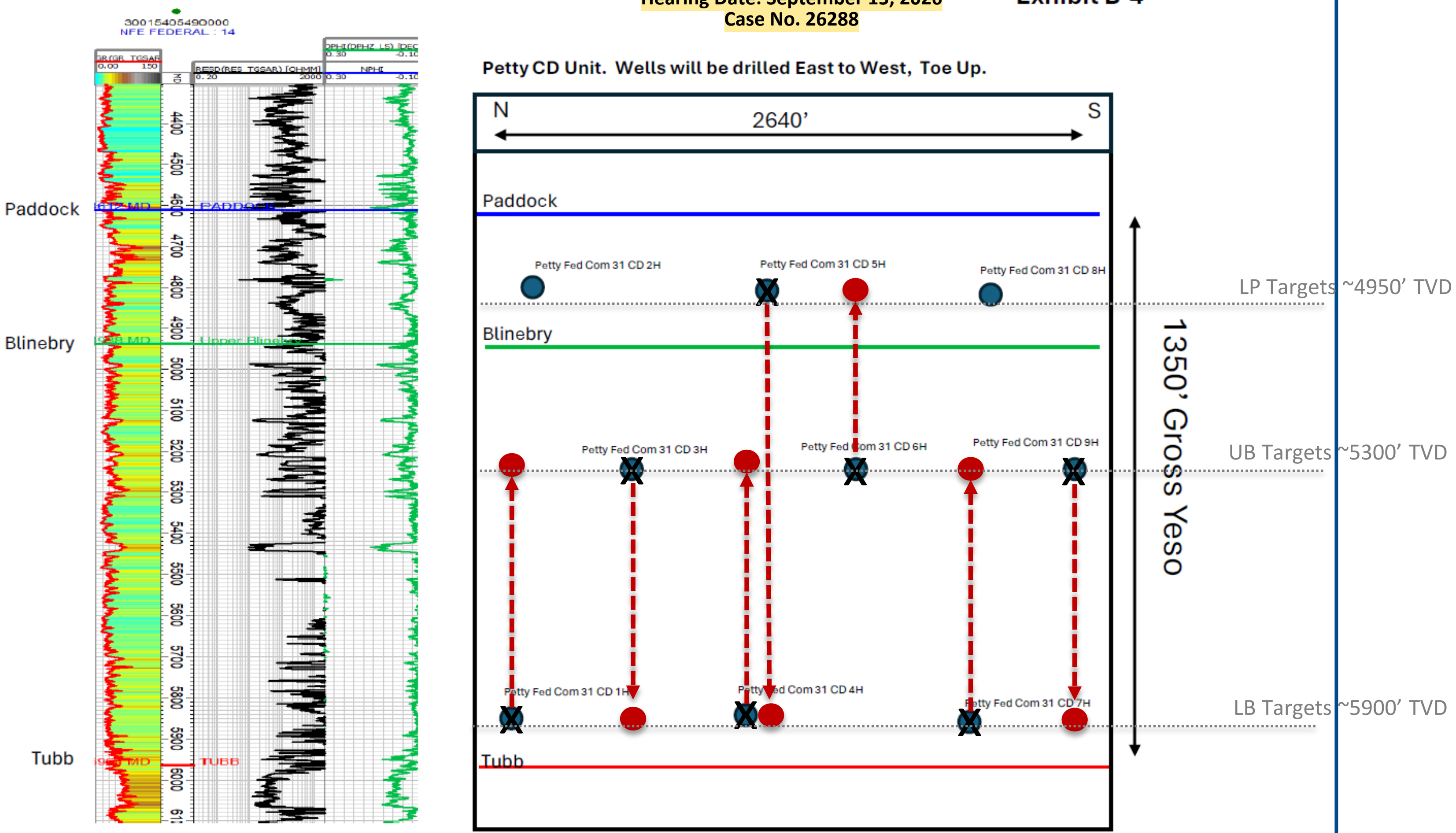
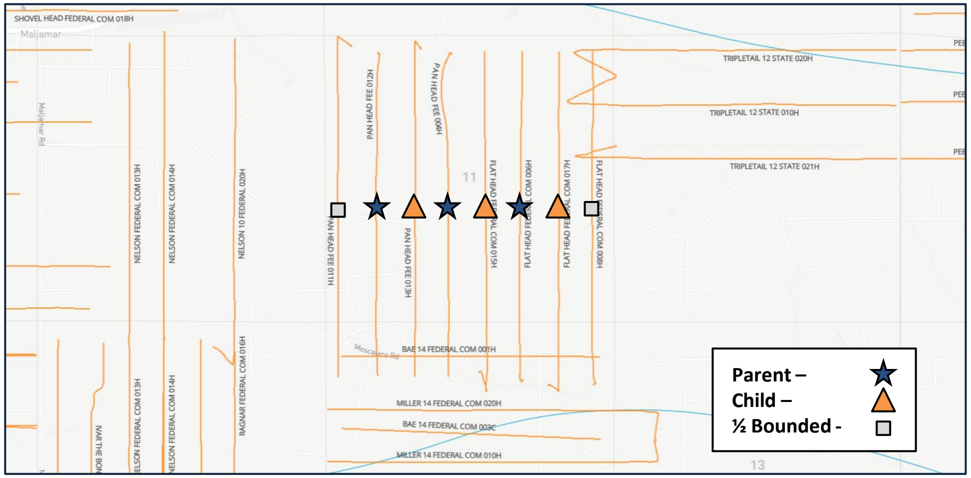


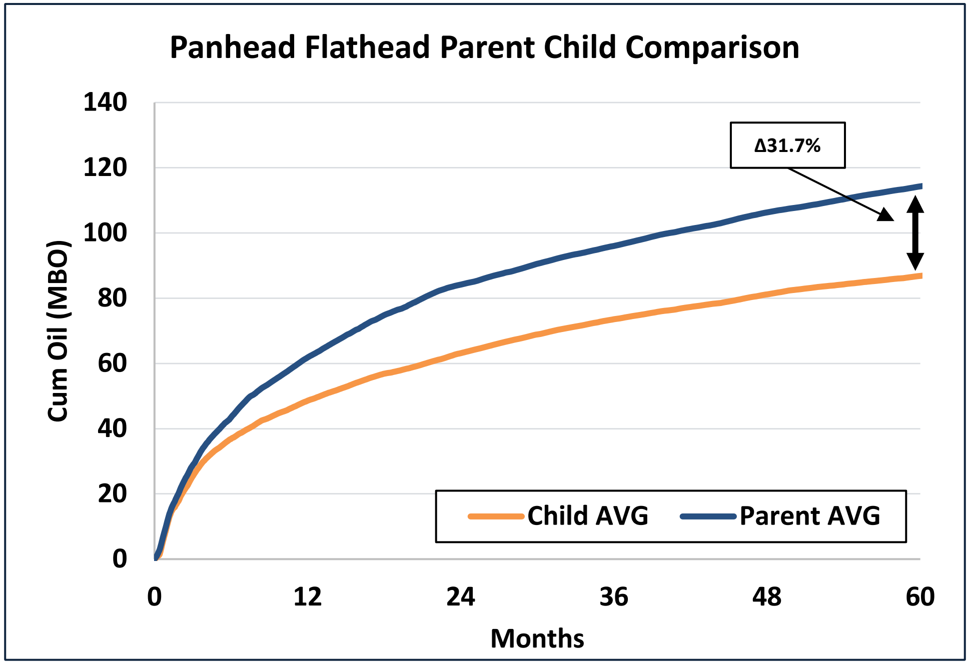
Exhibit B-4: Pan Head/Flat Head Parent Child Comparison

SPUR

- Panhead / Flathead Paddock was developed in multiple drilling phases
  - Panhead / Flathead Parent 1st Production: 2014/2015
  - Panhead / Flathead Child 1st Production: 2016/2017
- Significant reservoir depletion has reduced expected performance of the infill wells



EUR Impact – Post Infill	
Parent 5 Year AVG (MBO)	114.7
Child 5 Year AVG (MBO)	87.1
% Impact	**31.7%**



BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. B-4
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

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

APPLICATION OF SPUR ENERGY PARTNERS LLC TO RE-OPEN ORDER NO. R-24036, EDDY COUNTY, NEW MEXICO.

CASE NO. 26288
ORDER NO. R-24036

SELF-AFFIRMED STATEMENT OF ADAM G. RANKIN

1. I am attorney in fact and authorized representative of Spur Energy Partners LLC ("Spur"), the Applicant herein. I have personal knowledge of the matter addressed herein and am competent to provide this self-affirmed statement.

2. The above-referenced application and notice of the hearing on this application was sent by certified mail to the locatable affected parties on the date set forth in the letter attached hereto.

3. The spreadsheet attached hereto contains the names of the parties to whom notice was provided.

4. The spreadsheet attached hereto contains the information provided by the United States Postal Service on the status of the delivery of this notice as of September 8, 2026.

5. I caused a notice to be published to all parties subject to these proceedings. An affidavit of publication from the publication's legal clerk with a copy of the notice of publication is attached herein.

6. I affirm under penalty of perjury under the laws of the State of New Mexico that the foregoing statements are true and correct. I understand that this self-affirmed statement will be used as written testimony in this case. This statement is made on the date next to my signature below.

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. C
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288

Adam G. Rankin

09/08/26

Date

Holland & Hart

Adam G. Rankin
Phone (505) 988-4421
Email agrankin@hollandhart.com

June 18, 2026

VIA CERTIFIED MAIL
CERTIFIED RECEIPT REQUESTED

TO: ALL INTEREST OWNERS SUBJECT TO ORDER NO. R-24036

Re: Application of Spur Energy Partners LLC to Re-Open Order No. R-24036, Eddy County, New Mexico: *Petty Wells*

Ladies & Gentlemen:

This letter is to advise you that Spur Energy Partners LLC has filed the enclosed application with the New Mexico Oil Conservation Division. A hearing has been requested before a Division Examiner on July 9, 2026, and the status of the hearing can be monitored through the Division's website at https://www.emnrd.nm.gov/ocd/.

It is anticipated that hearings will be held in a hybrid format with both in-person and virtual participation options. The meeting will be held in the Pecos Hall Hearing Room at the Wendall Chino Building, 1st Floor, 1220 South St. Francis Dr., Santa Fe, New Mexico. To participate virtually in the hearing, see the instructions posted on the OCD Hearings website: https://www.emnrd.nm.gov/ocd/hearing-info/.

You are not required to attend this hearing, but as an owner of an interest that may be affected by this application, you may appear and present testimony. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date. Parties appearing in cases are required to file a Pre-hearing Statement four business days in advance of a scheduled hearing that complies with the provisions of NMAC 19.15.4.13.B.

If you have any questions about this matter, please contact Emma Whelton at (832) 930-8532 or by email at emma.whelton@spurenergy.com.

Sincerely,

Adam G. Rankin
ATTORNEY FOR SPUR ENERGY PARTNERS LLC

9414811898765520454139	Abuelo, LLC	21 Crook Dr	Artesia	NM	88210-9227	Your item was delivered to an individual at the address at 12:02 pm on July 2, 2026 in ARTESIA, NM 88210.
9414811898765520454313	B&H Properties	2410 Auburn Pl	Midland	TX	79705-4906	Your item has been delivered to the original sender at 11:40 am on July 30, 2026 in SANTA FE, NM 87501.
9414811898765520454368	Becky Welch Kitto	7011 E Brooks Dr	Tucson	AZ	85730-1708	Your item has been delivered to the original sender at 11:15 am on July 9, 2026 in SANTA FE, NM 87501.
9414811898765520454306	Blue Star Oil and Gas, LLC	PO Box 100	Artesia	NM	88211-0100	Your item was picked up at the post office at 11:04 am on June 26, 2026 in ARTESIA, NM 88210.
9414811898765520454399	Bryan W. Welch	1764 S Paige Creek Pl	Tucson	AZ	85748-7763	Your item was delivered to an individual at the address at 12:43 pm on June 23, 2026 in TUCSON, AZ 85748.
9414811898765520454344	Bureau of Land Management	620 E Greene St	Carlsbad	NM	88220-6292	Your item was delivered to the front desk, reception area, or mail room at 11:23 am on July 2, 2026 in CARLSBAD, NM 88220.
9414811898765520454382	Bureau of Land Management	301 Dinosaur Trl	Santa Fe	NM	87508-1560	Your item was delivered to the front desk, reception area, or mail room at 10:28 am on June 23, 2026 in SANTA FE, NM 87508.
9414811898765520454337	Carl Brinninstool	201 Blackberry Cir	Midland	TX	79705-3039	Your item has been delivered to the original sender at 11:39 am on July 30, 2026 in SANTA FE, NM 87501.
9414811898765520454375	CBS Partners, Ltd.	PO Box 2236	Midland	TX	79702-2236	Your item was picked up at the post office at 8:32 am on July 15, 2026 in MIDLAND, TX 79701.
9414811898765520454016	Chevron U.S.A. Inc.	1400 Smith St	Houston	TX	77002-7311	Your item has been delivered to an agent. The item was picked up at USPS at 3:50 pm on June 29, 2026 in HOUSTON, TX 77002.
9414811898765520454054	Chevron U.S.A. Inc. Attn Land Dept.,	6301 Deauville	Midland	TX	79706-2964	Your item was delivered to an individual at the address at 11:22 am on June 29, 2026 in MIDLAND, TX 79706.
9414811898765520454023	EOG Resources, Inc.	5509 Champions Dr Midland Division	Midland	TX	79706-2843	Your item has been delivered to an agent. The item was picked up at USPS at 7:50 am on June 30, 2026 in MIDLAND, TX 79706.
9414811898765520454009	Ergodic, LLC	PO Box 2021	Roswell	NM	88202-2021	Your item has been delivered to the original sender at 11:42 am on July 20, 2026 in SANTA FE, NM 87501.
9414811898765520454047	James Gary Welch	9307 Sam Rayburn Ct	Cypress	TX	77433-3649	Your item was picked up at the post office at 10:44 am on June 26, 2026 in CYPRESS, TX 77429.
9414811898765520454030	Julia Terri Welch	11525 Lindsey Garden Dr	Tyler	TX	75709-5164	Your item was delivered to an individual at the address at 10:55 am on June 23, 2026 in TYLER, TX 75709.
9414811898765520454412	Karen Capps, d/b/a Dragon Royalties	5773 Woodway Dr PMB 106	Houston	TX	77057-1501	Your item was delivered to an individual at the address at 11:56 am on June 24, 2026 in HOUSTON, TX 77057.
9414811898765520454450	Loco Hills Production Company, LLC	PO Box 779	Artesia	NM	88211-0779	Your item was picked up at a postal facility at 9:27 am on June 27, 2026 in ARTESIA, NM 88211.
9414811898765520454429	Marian Welch Pendegrass	2705 Gaye Dr	Roswell	NM	88201-3428	Your item has been delivered to the original sender at 11:04 am on July 28, 2026 in SANTA FE, NM 87501.
9414811898765520454405	Marjorie Welch Weisner	43 Camino Arroyo Pl	Palm Desert	CA	92260-0326	Your item was delivered to an individual at the address at 11:18 am on June 24, 2026 in PALM DESERT, CA 92260.
9414811898765520454443	Mark L. Shidler, Inc.	1313 Campbell Rd Ste D	Houston	TX	77055-6429	Your item was delivered to an individual at the address at 5:49 pm on June 25, 2026 in HOUSTON, TX 77055.

Spur - (Longfellow) Petty Federal Reopen Order No. R-24036 - Case no. 26288
Postal Delivery Report

9414811898765520454436	Michael Irwin Welch	5317 County Road 7675	Lubbock	TX	79424-2153	Your item was delivered to an individual at the address at 10:40 am on July 2, 2026 in LUBBOCK, TX 79424.
9414811898765520454559	Oxy USA WTP LP	5 Greenway Plz Ste 110	Houston	TX	77046-0521	Your item was delivered to the front desk, reception area, or mail room at 10:10 am on June 24, 2026 in HOUSTON, TX 77046.
9414811898765520454566	Pamela J. Burke, Trustee of the Claire Ann Iverson Revocable Living Trust	PO Box 10508	Midland	TX	79702-7508	Your item was picked up at the post office at 1:21 pm on July 15, 2026 in MIDLAND, TX 79701.
9414811898765520454528	Pamela J. Burke, Trustee of the EGP Revocable Living Trust	PO Box 10508	Midland	TX	79702-7508	Your item was picked up at the post office at 8:55 am on July 7, 2026 in MIDLAND, TX 79701.
9414811898765520454504	Pamela J. Burke, Trustee of the KIP Revocable Living Trust	PO Box 10508	Midland	TX	79702-7508	Your item was picked up at the post office at 8:55 am on July 7, 2026 in MIDLAND, TX 79701.
9414811898765520454597	James Iverson III Revocable Living Trust	PO Box 10508	Midland	TX	79702-7508	Your item was picked up at the post office at 8:55 am on July 7, 2026 in MIDLAND, TX 79701.
9414811898765520454580	Phoebe Jane Welch, IV	PO Box 1305	Mesquite	NM	88048-1305	Your item has been delivered to the original sender at 12:02 pm on July 6, 2026 in SANTA FE, NM 87501.
9414811898765520454535	Pogar Petroleum, Ltd.	PO Box 10095	Midland	TX	79702-7095	Your item was picked up at the post office at 4:55 pm on July 8, 2026 in MIDLAND, TX 79701.
9414811898765520454573	Randall Capps	1801 W Texas Ave	Midland	TX	79701-6561	Your item was delivered to an individual at the address at 2:50 pm on July 2, 2026 in MIDLAND, TX 79701.
9414811898765520455211	Ray Westall	PO Box 4	Loco Hills	NM	88255-0004	Your item was picked up at a postal facility at 10:43 am on July 2, 2026 in LOCO HILLS, NM 88255.
9414811898765520455259	Robert Welch Gillespie	186 Sierra View Rd	Pasadena	CA	91105-1448	Your item was delivered to an individual at the address at 2:25 pm on July 2, 2026 in PASADENA, CA 91105.
9414811898765520455266	Rocky Mountain Resources	PO Box 7405	Midland	TX	79708-7405	Your item arrived at our USPS facility in ALBUQUERQUE, NM 87101 on August 15, 2026 at 11:42 am. The item is currently in transit to the destination.
9414811898765520455228	Sacramento Partners Limited Partnership	105 S 4th St	Artesia	NM	88210-2177	Your item has been delivered to the original sender at 11:18 am on July 13, 2026 in SANTA FE, NM 87501.
9414811898765520455297	SEP Permian Holding Corp.	9655 Katy Fwy Ste 500	Houston	TX	77024-1385	Your item was delivered to an individual at the address at 1:15 pm on June 24, 2026 in HOUSTON, TX 77024.
9414811898765520455280	Sharbro Oil LTD	PO Box 840	Artesia	NM	88211-0840	Your item was picked up at the post office at 10:37 am on July 2, 2026 in ARTESIA, NM 88210.
9414811898765520455235	Silverhair, LLC	1301 Lewis Rd	Artesia	NM	88210-9686	Your item was delivered to an individual at the address at 10:48 am on June 30, 2026 in ARTESIA, NM 88210.
9414811898765520455815	Square Lake Drilling, LLC	2704 Botticelli Dr	Henderson	NV	89052-3120	Your item arrived at our LAS VEGAS NV DISTRIBUTION CENTER destination facility on June 22, 2026 at 10:38 am. The item is currently in transit to the destination.
9414811898765520455860	Stacy Welch Green	4260 E Cooper St	Tucson	AZ	85711-3465	Your item was delivered to an individual at the address at 12:01 pm on June 23, 2026 in TUCSON, AZ 85711.
9414811898765520455822	Summit Overseas Exploration, Inc.	PO Box 271127	Littleton	CO	80127-0020	Your item was picked up at the post office at 3:07 pm on June 23, 2026 in LITTLETON, CO 80127.
9414811898765520455891	T.I.G. Properties, LP	PO Box 10508	Midland	TX	79702-7508	Your item was picked up at the post office at 8:55 am on July 7, 2026 in MIDLAND, TX 79701.
9414811898765520455846	Thomas A. Crow, Trustee of the Mark E. Boling Revocable Trust	8210 Louisiana Blvd NE Ste B	Albuquerque	NM	87113-1761	Your item was delivered to an individual at the address at 11:27 am on June 26, 2026 in ALBUQUERQUE, NM 87113.

Spur - (Longfellow) Petty Federal Reopen Order No. R-24036 - Case no. 26288
Postal Delivery Report

9414811898765520455884	Unknown Heirs of James R. Evarts, Deceased c/o Brian David Arneson	4601 Sunnycrest Dr	Ukiah	CA	95482-8757	Your item was returned to the sender on August 3, 2026 at 1:56 pm in SANTA FE, NM 87501 because it could not be delivered as addressed.
9414811898765520455839	Van P. Welch, Jr.	22259-C Via Puerta	Laguna Woods	CA	92653	Your item has been delivered to the original sender at 11:19 am on July 13, 2026 in SANTA FE, NM 87501.
9414811898765520455877	Van S. Welch, II	2207 Fairway Dr	Duncan	OK	73533-3209	Your item was delivered to an individual at the address at 12:00 pm on June 29, 2026 in DUNCAN, OK 73533.
9414811898765520455716	Vladin, LLC	PO Box 100	Artesia	NM	88211-0100	Your item was picked up at the post office at 11:04 am on June 26, 2026 in ARTESIA, NM 88210.
9414811898765520455754	William J. Colby, Trustee of the Colby Revocable Living Trust U/A dated January 14, 1992	PO Box 25151	Albuquerque	NM	87125-0151	Your item was returned to the sender on July 23, 2026 at 11:54 am in SANTA FE, NM 87501 because it could not be delivered as addressed.

Affidavit of Publication

No. 111620

State of New Mexico

County of Eddy:

Adrian Hedden

being duly sworn, sayes that he is the **Publisher**

of the Artesia Daily Press, a weekly newspaper of General circulation, published in English at Artesia, said county and state, and that the hereto attached

Legal Ad

was published in a regular and entire issue of the said Artesia Daily Press, a weekly newspaper duly qualified for that purpose within the meaning of Chapter 167 of the 1937 Session Laws of the state of New Mexico for 1 Consecutive weeks/day on the same day as follows:

First Publication	June 24, 2026
Second Publication	
Third Publication	
Fourth Publication	
Fifth Publication	
Sixth Publication	
Seventh Publication	
Eighth Publication	

Subscribed and sworn before me this 24th day of June 2026

LATISHA ROMINE
Notary Public, State of New Mexico
Commission No. 1076338
My Commission Expires
05-12-2027

Latisha Romine

Latisha Romine

Notary Public, Eddy County, New Mexico

Copy of Publication:

Legal Notice (Publication)

Case No. 26288: Application of Spur Energy Partners LLC to Re-Open Order No. R-24036, Eddy County, New Mexico. Notice to all affected interest owners, including all heirs, devisees and successors of: Bureau of Land Management; Abuelo, LLC; B&H Properties; Becky Welch Kitto; Blue Star Oil and Gas, LLC; Bryan W. Welch; Carl Brinninstool; CBS Partners, Ltd.; Chevron U.S.A. Inc.; EOG Resources, Inc.; Ergodic, LLC; James Gary Welch; Julia Terri Welch; Karen Capps, d/b/a Dragon Royalties; Loco Hills Production Company, LLC; Marian Welch Pendegrass; Marjorie Welch Weisner Palm Desert, CA 92260; Mark L. Shidler, Inc.; Michael Irwin Welch; Oxy USA WTP LP; Pamela J. Burke, Trustee of the Claire Ann Iverson Revocable Living Trust; Pamela J. Burke, Trustee of the EGP Revocable Living Trust; Pamela J. Burke, Trustee of the KIP Revocable Living Trust; Pamela J. Burke, Trustee of the Siegfried James Iverson III Revocable Living Trust; Phoebe Jane Welch, IV; Pogar Petroleum, Ltd.; Randall Capps; Ray Westall; Robert Welch Gillespie; Rocky Mountain Resources; Sacramento Partners Limited Partnership; SEP Permian Holding Corp.; Sharbro Oil LTD; Silverhair, LLC; Square Lake Drilling, LLC; Stacy Welch Green; Summit Overseas Exploration, Inc.; T.I.G. Properties, LP; Thomas A. Crow, Trustee of the Mark E. Boling Revocable Trust; Unknown Heirs of James R. Evarts, Deceased c/o Brian David Arneson; Van P. Welch, Jr.; Van S. Welch, II; Vladin, LLC; and William J. Colby, Trustee of the Colby Revocable Living Trust U/A dated January 14, 1992. The State of New Mexico, Energy Minerals and Natural Resources Department, Oil Conservation Division (Division) hereby gives notice that the Division will hold public hearing 8:30 a.m. on July 9, 2026, to consider this application. The hearing will be conducted in a hybrid fashion, both in-person at the Energy, Minerals, Natural Resources Department, Wendell Chino Building, Pecos Hall, 1220 South St. Francis Drive, 1st Floor, Santa Fe, NM 87505 and via the WebEx virtual meeting platform. To participate in the hearings electronically, see the instructions posted on the docket for the hearing date: https://www.emnrd.nm.gov/ocd/hearing-info/ or contact Freya Tschantz, at Freya.Tschantz@emnrd.nm.gov. Applicant in the above-styled cause seeks to re-open Order No. R-24036 to require Longfellow Energy, LP (Longfellow) to comply with the terms and requirements of Order No. R-24036 (Order) or amend the Order to reflect its revised drilling and development plans following Spurs objection to its notice of deviation from the Order, as required by Division guidance. Division Order No. R-24036, entered on December 1, 2025, in Case No. 25572, created a standard 320-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 31, Township 16 South, Range 31 East, NMPM, Eddy County, New Mexico (the Unit), and designated Longfellow (OGRID 372210) operator of the Unit. Longfellow should be required to comply with the express provisions of Order No. R-24036 or follow the Divisions guidance on compulsory pooling orders and file an application to amend Order No. R-24036 to correctly reflect its updated drilling and development plan. Said area is located approximately 6 miles northeast of Loco Hills, New Mexico.
111620-Published in Artesia Daily Press June 24, 2026.

BEFORE THE OIL CONSERVATION DIVISION
Santa Fe, New Mexico
Exhibit No. D
Submitted by: Spur Energy Partners, LLC
Hearing Date: September 15, 2026
Case No. 26288