

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

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

CASE NO. 26328

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

**CASE NO. 26288
ORDER NO. R-24036**

LONGFELLOW ENERGY, LP'S CONSOLIDATED PRE-HEARING STATEMENT

Longfellow Energy, LP ("Longfellow"), OGRID No. 372210, applicant in Case No. 26328 and the Division-designated operator and responding party in Case No. 26288, filed by Spur Energy Partners, LLC ("Spur"), through undersigned counsel, files this Consolidated Pre-Hearing Statement pursuant to 19.15.4.13(B) NMAC and the July 23, 2026, Pre-Hearing Order, as amended by the August 21, 2026, Amended Pre-Hearing Order.

APPEARANCES

APPLICANT

Longfellow Energy, LP

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PROTESTING PARTY

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LONGFELLOW'S STATEMENT OF THE CONSOLIDATED CASES

These consolidated cases concern the same nine-well Yeso development authorized by Order No. R-24036 ("Pooling Order") for the S/2 of Section 31, Township 16 South, Range 31 East, N.M.P.M., Eddy County, New Mexico ("Unit"). The Pooling Order designates Longfellow as operator and dedicates the Petty Federal Com 31CD 001H through 009H wells (collectively, the "Wells") to the Unit.

The wells dedicated to the Unit and the Pooling Order are the Petty Federal Com 31CD 001H (API No. Pending), Petty Federal Com 31CD 002H (API No. Pending), Petty Federal Com 31CD 003H (API No. 30-015-58413), Petty Federal Com 31CD 004H (API No. 30-015-58414), Petty Federal Com 31CD 005H (API No. 30-015-58420), Petty Federal Com 31CD 006H (API No. 30-015-58054), Petty Federal Com 31CD 007H (API No. 30-015-58421), Petty Federal Com 31CD 008H (API No. 30-015-58422), and the Petty Federal Com 31CD 009H (API No. Pending) wells.

Case No. 26328 has been consolidated for hearing with Case No. 26288, an Application filed by Spur, in which Spur seeks an order requiring Longfellow to comply with the terms and requirements of the Pooling Order or amend the Pooling Order to reflect its revised drilling and development plans following Spur's objection to its notice of deviation from the Pooling Order. Spur owns a 37.511173% working interest in the Unit.

On June 24, 2026, Spur issued a subpoena to Longfellow for the production of documents pertaining to the Wells and development issues raised in Case No. 26288. Longfellow produced its response and relevant documents to Spur on August 20, 2026. Further, on August 4, 2026, Spur filed an entry of appearance and objection to hearing by affidavit in Case No. 26328. Although Longfellow has communicated extensively with Spur concerning the Petty development, Spur asserts that its concerns have not been resolved and that Longfellow remains out of compliance with the Pooling Order.

In **Case No. 26328**, Longfellow seeks a one-year extension, through December 1, 2027, of the deadline to commence drilling the remaining eight Wells under Paragraphs 20 and 21 of the Pooling Order. Longfellow will present evidence that good cause exists because the 006H was accelerated in 2026 to preserve federal leasehold and establish production, while Longfellow continued constructing and permitting the gas, produced-water, and recycling infrastructure intended to support full development of the Petty/Cedar Lake area. Longfellow's current development schedule places the remaining Wells in a defined 2027 drilling program before the requested extended deadline.

In **Case No. 26288**, Spur seeks relief arising from Longfellow's May 1, 2026, notice of deviation and Spur's protest. The Division's July 17, 2026, Order set the matter for evidentiary hearing on: (1) whether the 006H landing-zone shift from the Blinebry bench to the Lower Paddock bench constitutes a reasonable deviation under Paragraph 22 of the Pooling Order; (2) whether Longfellow intends to drill, and will drill, the remaining eight Wells in accordance with the Pooling Order's terms and deadlines; and (3) other issues properly raised and remaining live before the Division. The July 17 Order dismissed as moot Spur's request to stay or suspend the 006H APD and dismissed without prejudice any AFE or actual-well-cost disputes outside Paragraph 26.

Longfellow's development plan evolved as engineering, permitting, and operational planning progressed. Longfellow does not contend that nothing changed. Individual well-to-target assignments and development timing were refined, including the 006H landing-zone change. Longfellow will show, however, that the development remains the same Unit, the same nine-well Yeso development framework, and the same overall plan to fully develop the Unit.

Through Jacob DeHamer, Longfellow will present testimony and geology and development evidence explaining the Yeso stratigraphy, the original and current development configurations, the reasonableness of the 006H deviation, the resulting well spacing, relevant Northwest Shelf spacing analogues, and why the current configuration does not, in reasonable probability, materially alter ultimate drainage, cause waste, or impair correlative rights.

Through David Mitchell, Longfellow will present testimony and engineering and operational evidence establishing why the 006H was accelerated, Longfellow's continued investment in development infrastructure, the current 2027 execution plan for the remaining eight Wells, and the factual basis supporting through December 1, 2027. Mr. Mitchell also will address engineering considerations associated with sequential development and parent-child/frac-hit effects to the extent relevant to Spur's claims.

Longfellow remains committed to drilling all nine Wells authorized under the Pooling Order. The 006H was the first accelerated well in the broader development—not the only well Longfellow intends to drill—and Longfellow seeks a reasonable, good cause extension to complete the remaining development in coordination with the infrastructure and permitting necessary for efficient operations.

The consolidated contested hearing is set for September 15, 2026, at 8:30 a.m. under the August 21, 2026, Amended Pre-Hearing Order. That Order consolidated Case Nos. 26288 and

26328 for hearing and left all other provisions of the July 23, 2026, Pre-Hearing Order unchanged and in full effect.

ISSUES FOR HEARING

1. Whether the 006H landing-zone shift identified in the July 17 Order constitutes a reasonable deviation from the development plan under Paragraph 22 of Order No. R-24036.
2. Whether the 006H landing-zone shift affects spacing considerations for the remaining eight Wells and whether the evidentiary record establishes any material change in ultimate drainage, waste, or impairment of correlative rights.
3. Whether Longfellow intends to drill, and will drill, the remaining eight Wells within the requested extended deadline.
4. Whether the drilling-commencement deadline should be extended through December 1, 2027, under Paragraph 21 of Order No. R-24036.

LONGFELLOW'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Jacob DeHamer, Geologist	30 Minutes	Approx. 6
David Mitchell, Engineer and Chief Operating Officer	30 Minutes	Approx. 6

Dated this 8th day of September, 2026.

Respectfully submitted,

BEATTY & WOZNIAK, P.C.

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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 8th day of September 2026, as follows:

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Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 622801

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 622801
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	60