



## Notice of Service of Process

Transmittal Number: 23103187  
Date Processed: 04/23/2021

**Primary Contact:** Joseph Grady  
Contango Oil & Gas Company  
717 Texas St  
Ste 2900  
Houston, TX 77002-2836

**Electronic copy provided to:** Julie Condon

---

**Entity:** Contango Resources, Inc.  
Entity ID Number 3990914

**Entity Served:** Contango Resources, Inc.

**Title of Action:** Re: Application of Longfellow Energy, LP for Compulsory Pooling, Eddy County, New Mexico

**Document(s) Type:** Notice

**Nature of Action:** Property

**Case/Reference No:** 21860

**Jurisdiction Served:** Texas

**Date Served on CSC:** 04/22/2021

**Answer or Appearance Due:** 04/28/2021

**Originally Served On:** CSC

**How Served:** Certified Mail

**Sender Information:** Sharon T. Shaheen  
505-986-2678

---

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

**To avoid potential delay, please do not send your response to CSC**

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | [sop@cscglobal.com](mailto:sop@cscglobal.com)



**MONTGOMERY  
& ANDREWS**  
LAW FIRM

SHARON T. SHAHEEN  
Direct: (505) 986-2678  
Email: [sshaheen@montand.com](mailto:sshaheen@montand.com)  
[www.montand.com](http://www.montand.com)

---

April 16, 2021

*Via U.S. Certified Mail, return receipt requested*

**TO: ALL INTEREST OWNERS ON ATTACHED LIST**

**Re: Case No. 21860** – Application of Longfellow Energy, LP for Compulsory Pooling, Eddy County, New Mexico – **Marley State Com 31 AB 001H, 002H, 003H, 004H and 005H**

Dear Interest Owner:

This will advise that pursuant to NMSA 1978, § 70-2-17, Longfellow Energy, LP ("Longfellow") has filed an Application with the New Mexico Oil Conservation Division for orders regarding the proposed wells described below. You are receiving this notice because you may have an interest in one or more of these wells.

**Case No. 21860. Application of Longfellow Energy, LP for Compulsory Pooling, Eddy County, New Mexico.** Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso, Northeast [96836]) in a standard 320-acre, more or less, horizontal spacing and proration unit ("HSU") comprised of the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. Applicant proposes to drill the following wells: (1) **Marley State Com 31 AB 001H** well, to be horizontally drilled from an approximate surface hole location 1578' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 361' FNL and 100' FWL of Section 31, T17S-R28E; (2) **Marley State Com 31 AB 002H** well, to be horizontally drilled from an approximate surface hole location 1603' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 843' FNL and 100' FWL of Section 31, T17S-R28E; (3) **Marley State Com 31 AB 003H** well, to be horizontally drilled from an approximate surface hole location 1628' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1325' FNL and 100' FWL of Section 31, T17S-R28E; (4) **Marley State Com 31 AB 004H** well, to be horizontally drilled from an approximate surface hole location 1653' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1807' FNL and 100' FWL of

---

All Interest Owners  
April 16, 2021  
Page 2

Section 31, T17S-R28E; and (5) **Marley State Com 31 AB 005H** well, to be horizontally drilled from an approximate surface hole location 1678' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 2288' FNL and 100' FWL of Section 31, T17S-R28E. The completed intervals and first and last take points for all wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells. A depth severance exists in the NW/4 NW4 of Section 31. Also to be considered will be the cost of drilling and completing the wells and the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells. The wells and lands are located approximately 15 miles west of Loco Hills, New Mexico.

The attached application will be set for hearing before a Division Examiner at the New Mexico Oil Conservation Division. During the COVID-19 Public Health Emergency, state buildings are closed to the public and hearings will be conducted remotely. The hearing will be conducted on **May 6, 2021** beginning at 8:15 a.m. To participate in the electronic hearing, see the instructions posted on the docket for the hearing date: <http://www.emnrd.state.nm.us/OCD/hearings.html>. You are not required to attend this hearing, but as an owner of an interest that may be affected, you may appear and present testimony.

Failure to appear at that time and become a party of record will preclude you from challenging this application at a later time. If you intend to present testimony or evidence at the hearing, you must enter your appearance by **April 28, 2021**, and serve the Division, counsel for the Applicant, and other parties with a pre-hearing statement by **April 29, 2021**, in accordance with Division Rule 19.15.4.13 NMAC.

Please feel free to contact me if you have any questions about these Applications.

Very truly yours,

/s/ Sharon T. Shaheen  
Sharon T. Shaheen

STS/lt  
Enclosures  
cc: Titus Oil & Gas Production, LLC, *via email*

## EXHIBIT A

### INTEREST OWNERS

#### Working Interest Party(ies):

Contango Resources, Inc.  
211 E. 7<sup>th</sup> St.  
Suite 620  
Austin, TX 78702

EOG Resources, Inc.  
5509 Champions Dr.  
Midland, TX 79702

ZPZ Delaware I, LLC  
2000 Post Oak Blvd.  
Suite 100  
Houston, TX 77056

Apache Corporation  
2000 Post Oak Blvd.  
Suite 100  
Houston, TX 77056

SEP Permian, LLC  
9655 Katy Freeway  
Suite 500  
Houston, TX 77024

Read & Stevens, Inc.  
400 N. Pennsylvania Ave.  
Roswell, NM 88201

Joan Hudson Moore  
660 Camino De Los Mares 334  
San Clemente, CA 92673-1800

Jonel Susan Grasso Howard  
11 Ocean Ridge  
Laguna Niguel, CA 92677-9231

Jane Ann Hudson Davis  
6770 Wolf Creek Ct. NE  
Rio Rancho, NM 87144-5708

Chisos, Ltd.  
1331 Lamar St.  
Suite 1077  
Houston, TX 77010

Mel Riggs  
2513 Regency Oaks Ct.  
Midland, TX 79705

Mark Tisdale  
6951 Sunrise Cr.  
Midland, TX 79707

Mark Heinen  
122 Mountain Spring Dr.  
Borne, TX 78006

Debra Latham  
954 River Forest Dr.  
New Braunfels, TX 78132

Debra Latham  
Trustee of the Latham Family Trust  
954 River Forest Dr.  
New Braunfels, TX 78132

Greg Benton  
P.O. Box 51034  
Midland, TX 79710

WPX Energy Permian, LLC  
3500 One Williams Center  
Tulsa, OK 74172

Devon Energy, Inc.  
333 West Sheridan Ave.  
Oklahoma City, OK 73102-5015

V-F Petroleum, Inc.  
500 W. Texas Ave.  
Suite 350  
Midland, TX 79710

Occidental Permian Limited  
Partnership  
5 Greenway Plaza, Suite 110  
Houston, TX 77046

OXY USA WTP, LP  
5 Greenway Plaza  
Suite 110  
Houston, TX 77046

#### Overriding Royalty Interest Owners:

Apache Corporation  
2000 Post Oak Blvd.  
Suite 100  
Houston, TX 77056-4400

Black Shale Minerals, LLC  
5006 State Hwy 31 North  
Longview, TX 75603

Chisos, Ltd.  
1331 Lamar St.  
Suite 1077  
Houston, TX 77010

Manix Royalty, Ltd.  
3300 N. A Street, Bldg. 8  
Suite 106  
Midland, TX 79705

John & Theresa Hillman Family  
Properties, LP  
3300 N. A Street, Bldg. 8  
Suite 106  
Midland, TX 79705

Nestegg Energy Corporation  
2308 Sierra Vista Rd.  
Artesia, NM 88210

Platform Energy III  
810 Texas Ave.  
Lubbock, TX 79401

EnPlat III  
1200 Summit Ave.  
Suite 350  
Fort Worth, TX 76102

Occidental Permian, LP  
5 Greenway Plaza  
Suite 110  
Houston, TX 77046

**Additional Interested Party(ies):**

Bureau of Land Management  
620 E. Greene St.  
Carlsbad, NM 88220

State Land Office  
310 Old Santa Fe Trail  
Santa Fe, NM 87501

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

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

Case No. 21860

**APPLICATION**

Longfellow Energy, LP (“Longfellow”), through its undersigned counsel Montgomery & Andrews, P.A. (Sharon T. Shaheen and John F. McIntyre), hereby files this application with the Oil Conservation Division pursuant to the provisions of NMSA 1978, § 70-2-17, for an order pooling all mineral interests in the Yeso formation (Red Lake; Glorieta-Yeso, Northeast [96836]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. In support of its application, Longfellow states as follows:

1. Longfellow is a working interest owner in the proposed HSU and has the right to drill thereon.
2. Longfellow proposes to drill the following 1-mile wells in the proposed HSU:
  - **Marley State Com 31 AB 001H** well, to be horizontally drilled from an approximate surface hole location 1578’ FNL and 490’ FWL of Section 32, T17S-R28E, to an approximate bottom hole location 361’ FNL and 100’ FWL of Section 31, T17S-R28E;
  - **Marley State Com 31 AB 002H** well, to be horizontally drilled from an approximate surface hole location 1603’ FNL and 490’ FWL of Section 32, T17S-

R28E, to an approximate bottom hole location 843' FNL and 100' FWL of Section 31, T17S-R28E;

- **Marley State Com 31 AB 003H** well, to be horizontally drilled from an approximate surface hole location 1628' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1325' FNL and 100' FWL of Section 31, T17S-R28E;
- **Marley State Com 31 AB 004H** well, to be horizontally drilled from an approximate surface hole location 1653' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 1807' FNL and 100' FWL of Section 31, T17S-R28E; and
- **Marley State Com 31 AB 005H** well, to be horizontally drilled from an approximate surface hole location 1678' FNL and 490' FWL of Section 32, T17S-R28E, to an approximate bottom hole location 2288' FNL and 100' FWL of Section 31, T17S-R28E.

3. The completed intervals and first and last take points for all wells will meet the setback requirements set forth in the statewide rules for horizontal oil wells.

4. Total vertical depths will range from 3,625'-4,025'. A depth severance exists in the NW/4 NW4 of Section 31, T17S-R28E where Contango Resources owns 87.5% of the 40 acre tract above 3,560' and EOG owns 87.5% below 3,560'. The other 12.5% in this tract is owned by Read & Stevens, which owns all depths within the Yeso.

5. Longfellow has in good faith sought and been unable to obtain voluntary agreement for the development of these lands from all of the mineral interest owners in the HSU.

6. Approval of the HSU and the pooling of all mineral interest owners in the Yeso formation underlying the HSU will avoid the drilling of unnecessary wells, prevent waste, and protect correlative rights.

7. In order to permit Longfellow to obtain its just and fair share of the oil and gas underlying the subject lands, all uncommitted interests in this HSU should be pooled and Longfellow should be designated the operator of the HSU.

WHEREFORE, Longfellow requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 6, 2021, and that, after notice and hearing as required by law, the Division enter an order:

A. Creating a standard 320-acre, more or less, HSU comprised of the N/2 of Section 31, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico;

B. Pooling all mineral interests in the Yeso formation underlying the HSU;

C. Allowing the drilling of the following 1-mile wells in the HSU: (1) Marley State Com 31AB 001H, (2) Marley State Com 31AB 002H, (3) Marley State Com 31AB 003H, (4) Marley State Com 31AB 004H, and (5) Marley State Com 31AB 005H.

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

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

F. Approving the operating charges and costs of supervision while drilling of \$8,000/month and, after completion, \$800/month, together with a provision adjusting the rates pursuant to the COPAS accounting procedures; and



G. Imposing a 200% penalty for the risk assumed by Longfellow in drilling and completing the wells against any interest owner who does not voluntarily participate in the drilling of the wells.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

/s/ Sharon T. Shaheen

Sharon T. Shaheen

John F. McIntyre

Post Office Box 2307

Santa Fe, NM 87504-2307

(505) 986-2678

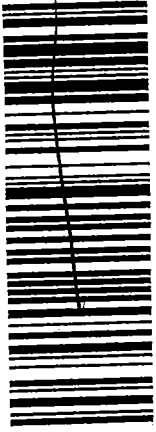
[sshaheen@montand.com](mailto:sshaheen@montand.com)

[jmcintyre@montand.com](mailto:jmcintyre@montand.com)

*Attorneys for Longfellow Energy, LP*

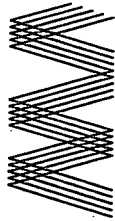
---

GERMANY MAIL



7015 1730 0000 9774 3660

U  
F  
0629  
B15268.14  
Schubert



MONTGOMERY  
& ANDREWS  
LAW FIRM

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

Contango Resources, Inc.  
211 E. 7th St.  
Suite 620  
Austin, TX 78702

Partial address visible on the right edge of the page.