

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

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

CASE NO. 21860

PRE-HEARING STATEMENT

Respondent Contango Oil & Gas Company (“Contango”) submits its Pre-Hearing Statement as follows:

STATEMENT OF THE CASE

Longfellow Energy, LP (“Longfellow”) has brought this action to compulsory pool non-participating working interest owners, regarding a 320-acre, more or less, spacing and proration unit, for its Waukee A 36 State Com 3H Well, comprised of the N/2 of Section 36, Township 17 South, Range 27 East, NMPM, Eddy County, New Mexico and all uncommitted interests in from the top of the Yeso formation to a depth of approximately 3,500 feet. Respondent, Contango, is an affected Yeso formation interest owner.

In at least one previous instance, Applicant drilled, hydraulically fractured and completed a horizontal well which caused damage to an existing vertical wellbore owned and operated by Respondent. Respondents have spent approximately \$150,000 repairing and securing said well. Additionally, the damage to Respondent’s well created a serious safety issue which requires additional examination. Finally, Respondent needs additional time to analyze the overall effects on production. It will take additional time together more data regarding subsequent production and related problems.

APPLICANT

LONGFELLOW ENERGY, LP

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OTHER INTERESTED PARTIES

SPUR ENERGY PARTNERS, LLC

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RESPONDENT

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RESPONDENT'S ATTORNEY

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RESPONDENT'S PROPOSED EVIDENCE

WITNESSES	ESTIMATED TIME	EXHIBITS
Jason Thomas, Land Director: Contango Oil & Gas Company	15 minutes	Approx. 5-10
Amanda Elliot, Senior Production Engineer: Contango Oil & Gas Company	15 minutes	Approx. 5-10
Neal Hageman, P.E.	15 minutes	Approx. 5-10

PROCEDURAL MATTERS

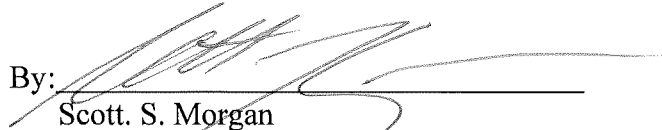
Respondent has filed a Motion for Continuance current herewith.

RESPONDENT'S POSITION ON RELIEF SOUGHT

Respondent opposes the issuance of the compulsory pooling relief sought by Longfellow until such time as it has had adequate opportunity to complete its current investigation and negotiations regarding the effects on its interests made subject to this action.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By: 

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I hereby certify that a true and correct copy
of the foregoing was served via email and
U.S. mail on 4/14/2021 to the
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