

**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. 22021**

**SOC's PRE-HEARING STATEMENT**

SOC 1999 Partnership Limited and SOC GP, LLC ("SOC") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Longfellow Energy, LP

**ATTORNEY**

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**SOC's ANTICIPATED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Shari D. Dayhoff, CPL	30 minutes	Approx. 5

**SOC's OBJECTION TO THE CASE**

Applicant seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Red Lake; Glorieta-Yeso [96836]) underlying a standard 480-acre, more or less, horizontal spacing and proration unit comprised of the S/2 of Section 19, Township 17 South, Range 28 East, and the SE/4 of Section 24, Township 17 South, Range 27 East, NMPM, in Eddy County, New Mexico. Applicant proposes to initially dedicate six horizontal wells to this spacing unit and requests a 200% risk charge for each of these wells. SOC objects to the pooling of this acreage and the risk charge.

**PROCEDURAL MATTERS**

SOC objects to this matter proceeding by affidavit and requests that this matter be continued for additional discussions or set for a contested hearing date.

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

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**ATTORNEYS FOR SOC 1999 PARTNERSHIP  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2021, I served a copy of the foregoing document to all counsel of record via Electronic Mail to:

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