



**MONTGOMERY
& ANDREWS**
LAW FIRM

SHARON T. SHAHEEN
Direct: (505) 986-2678
Email: sshaheen@montand.com
www.montand.com

May 26, 2021

Submitted via OCD's electronic filing system

Leonard Lowe
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

**RE: Longfellow Energy, L.P.
Request for Administrative Approval of Non-Standard Location**

Ozzy Fed Com 18C 003H
N/2 S/2 Section 18, T17S, R29E
Eddy County, New Mexico
Empire; Glorieta-Yeso Pool (Pool Code 96210)
API# 30-015-48330

Dear Mr. Lowe,

Pursuant to Division Rules 19.15.16.15(C)(6) and 19.15.15.13(C)-(D) NMAC, Longfellow Energy, L.P. ("Longfellow") requests administrative approval of a non-standard location for the above-referenced oil well in an approximately 147-acre spacing unit, more or less, within an irregular section, as described more fully below.

The standard setback in the horizontal plane from any point in the completed interval to any outer boundary of the horizontal spacing unit is 330 feet for an oil well. 19.15.16.15(C)(1)(a) NMAC. The completed interval of the above-referenced well, however, will be 205 feet at its closest point from the southern boundary of the spacing unit. Longfellow is requesting approval to decrease the setback for the completed interval of the above-referenced well.

The proposed surface and bottom hole locations and first and last take points are as follows:

1. SHL: 1565' FSL and 675' FEL of Section 13-T17S-R28E
2. FTP: 1525' FSL and 100' FWL of Section 18-T17S-R29E
3. LTP: 1540' FSL and 100' FEL of Section 18-T17S-R29E

REPLY TO:

325 Paseo de Peralta
Santa Fe, New Mexico 87501
Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307
Santa Fe, New Mexico 87504-2307

Mr. Lowe
May 26, 2021
Page 2

4. BHL: 1540' FSL and 20' FEL of Section 18-T17S-R29E

It is Longfellow's responsibility as a prudent operator to maximize the recovery of oil and gas reserves left in the ground. Approval of the unorthodox completed interval will allow Longfellow to use its preferred well spacing plan for horizontal wells in this area and thereby maximize recovery and prevent waste.

Attached is the C-102 form and map indicating the offset tracts to assist the Division in its review of Longfellow's request. Longfellow has sent notice to all affected persons on the enclosed spreadsheet by certified mail, return receipt requested, with a copy of this request, the plat, and the C-102. The notice also informs the affected persons that, if they object to the aforementioned requests, they must file the objection in writing with the Division within 20 days from the date the Division receives this administrative approval request. I attach a sample of the notice letter and a spreadsheet with the types of interests and names of the affected parties, the location of each parties' interest, the date the letter was sent, and the mail tracking number for the mailings that went out today.

Please let me know if you have any questions or concerns. Thank you for your assistance in this matter.

Very truly yours,

/s/Sharon T. Shaheen

Sharon T. Shaheen

Enclosures

ec: Ryan Reynolds, *via email*
Longfellow Energy, LP

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone: (575) 748-1283 Fax: (575) 748-9720
District III
1000 Rio Brazos Road, Aztec, NM 87410
Phone: (505) 334-6178 Fax: (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico
Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-102
Revised August 1, 2011
Submit one copy to appropriate
District Office

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number 30-015-48330		² Pool Code 96210	³ Pool Name EMPIRE; GLORIETA-YESO
⁴ Property Code 330802	⁵ Property Name OZZY FEDERAL COM 18C		⁶ Well Number 003H
⁷ OGRID No. 372210	⁸ Operator Name LONGFELLOW ENERGY, LP		⁹ Elevation 3697.7

¹⁰ Surface Location

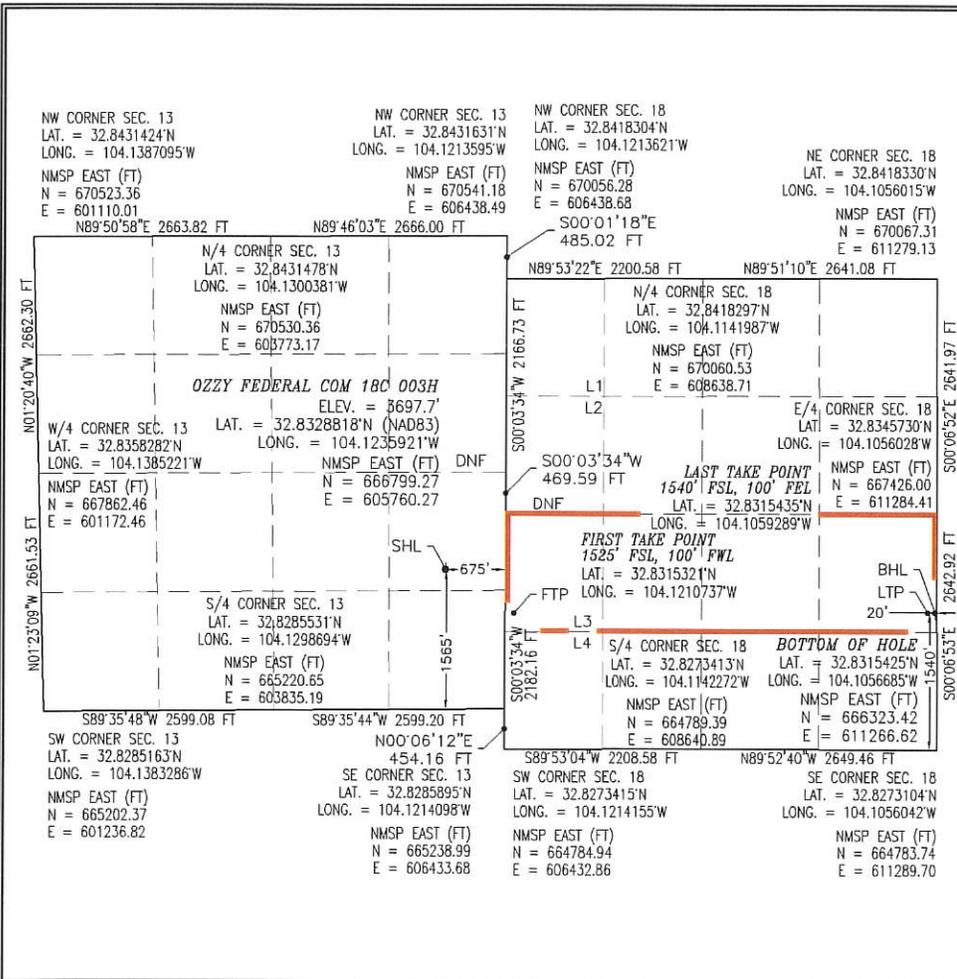
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
I	13	17 S	28 E		1565	SOUTH	675	EAST	EDDY

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
I	18	17 S	29 E		1540	SOUTH	20	EAST	EDDY

¹² Dedicated Acres 146.92	¹³ Joint or Infill	¹⁴ Consolidation Code C	¹⁵ Order No.
--	-------------------------------	--	-------------------------

No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.



17 OPERATOR CERTIFICATION
I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief, and that this organization either owns a working interest or unleased mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling order heretofore entered by the division.

[Signature] **9-15-20**
Signature Date
BRIAN WOOD
Printed Name
brian@permitswest.com
E-mail Address
505 466-8120
E-mail Address

18 SURVEYOR CERTIFICATION
I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

AUGUST 11, 2020
Date of Survey

[Signature]
Signature and Seal of Professional Surveyor
Certificate Number: **12797**
MON F. JARAMILA
PROFESSIONAL SURVEYOR
NO. 8391

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Submit Original
to Appropriate
District Office

GAS CAPTURE PLAN

Date: 9-13-20

X Original

Operator & OGRID No.: Longfellow Energy, LP (372210)

Amended - Reason for Amendment: _____

This Gas Capture Plan outlines actions to be taken by the Operator to reduce well/production facility flaring/venting for new completion (new drill, recomple to new zone, re-frac) activity.

Note: Form C-129 must be submitted and approved prior to exceeding 60 days allowed by Rule (Subsection A of 19.15.18.12 NMAC).

Well(s)/Production Facility – Name of facility

The well(s) that will be located at the production facility are shown in the table below.

Well Name & Number	API	SHL (ULSTR)	SHL Footages	Expected MCF/D	Flare or Vent	Comments
Ozzy Federal Com 18C 1H	30-015-	I-13-17s-28e	1615' FSL & 675' FEL	225	<30 days	flare until well clean, then connect
Ozzy Federal Com 18C 2H	30-015-	I-13-17s-28e	1590' FSL & 675' FEL	225	<30 days	flare until well clean, then connect
Ozzy Federal Com 18C 3H	30-015-	I-13-17s-28e	1ea5' FSL & 675' FEL	225	<30 days	flare until well clean, then connect

Gathering System and Pipeline Notification

Well(s) will be connected to a production facility after flowback operations are complete, if gas transporter system is in place. The gas produced from production facility is not yet dedicated, but will be connected to a 3rd party gathering system located in Eddy County, New Mexico. Gas will most likely be piped 100 yards east to Longfellow's Phillips AID State 4 (I-13-17s-28e) which is connected with DCP Operating Company, LP (36785). Operator will provide (periodically) to Gas Transporter a drilling, completion and estimated first production date for wells that are scheduled to be drilled in the foreseeable future. In addition, Operator and Gas Transporter have periodic conference calls to discuss changes to drilling and completion schedules. Gas from these wells will be processed at an unknown Processing Plant located in Eddy County, New Mexico. The actual flow of the gas will be based on compression operating parameters and gathering system pressures.

Flowback Strategy

After the fracture treatment/completion operations, well(s) will be produced to temporary production tanks and gas will be flared or vented. During flowback, the fluids and sand content will be monitored. When the produced fluids contain minimal sand, the wells will be turned to production facilities. Gas sales should start as soon as the wells start flowing through the production facilities, unless there are operational issues on Gas Transporter system at that time. Based on current information, it is Operator's belief the system can take this gas upon completion of the well(s).

Safety requirements during cleanout operations from the use of underbalanced air cleanout systems may necessitate that sand and non-pipeline quality gas be vented and/or flared rather than sold on a temporary basis.

Alternatives to Reduce Flaring

Below are alternatives considered from a conceptual standpoint to reduce the amount of gas flared.

- Power Generation – On lease
 - Only a portion of gas is consumed operating the generator, remainder of gas will be flared
- Compressed Natural Gas – On lease
 - Gas flared would be minimal, but might be uneconomical to operate when gas volume declines
- NGL Removal – On lease
 - Plants are expensive, residue gas is still flared, and uneconomical to operate when gas volume declines

NSL AFFECTED PARTY LIST
OZZY FED COM 18C 003H

	A	B	C	D	E	F	G
1	Type	Affected Party	Address	City, State Zip	Location	Date Sent	Mail Tracking Number
2	WIO	Longfellow Energy (Applicant)	8115 Preston Road, Suite 800	Dallas, TX 75225	S/2 S/2 18 17S 29E	Applicant	
3	WIO	ConocoPhillips	600 W. Illinois Ave.	Midland, TX 79701	Lot 4; SE/4 SE/4 18 17S 29E	5/26/2021	7015 1730 0000 9774 5220
4	WIO	Viersen Oil & Gas	7130 S. Lewis Ave., Suite 200	Tulsa, OK 74136	SE/4 SW/4 18 17S 29E	5/26/2021	7015 1730 0000 9774 5237
5	Lessor	Bureau of Land Management	620 E Greene St.	Carlsbad, NM 88220	Lot 4; SE/4 SW/4; SW/4 SE/4 18 17S 29E	5/26/2021	7015 1730 0000 9774 5244
6	Lessor	NM State Land Office	310 Old Santa Fe Trail	Santa Fe, NM 87501	SE/4 SE/4 18 17S 29E	5/26/2021	7015 1730 0000 9774 5251



**MONTGOMERY
& ANDREWS**
LAW FIRM

SHARON T. SHAHEEN
Direct: (505) 986-2678
Email: sshaheen@montand.com
www.montand.com

May 26, 2021

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

TO: ALL INTERESTED PARTIES ON THE ATTACHED LIST

Re: Administrative Application for Non-Standard Location

Longfellow Energy, L.P.

OGRID Number: 372210

Pool: Empire; Glorieta-Yeso

Pool Code: 96210

Ozzy Fed Com 18C 003H

N/2 S/2 Section 18, T17S, R29E

Eddy County, New Mexico

API# 30-015-48330

Pursuant to Division Rules 19.15.16.15(C)(6) and 19.15.15.13(C)-(D) NMAC, Longfellow Energy, L.P. has on this date made application to the New Mexico Oil Conservation Division ("NMOCD") for administrative approval of a non-standard location regarding the above-referenced well. A copy of the application is enclosed.

As the owner of an interest that may be affected, you have the right to object to the application. To do so, you must file a written protest with the NMOCD within twenty days. Failure to do so will prevent you from challenging the matter at a later time. A letter of protest may be sent to the NMOCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, directed to the attention of Leonard Lowe.

Should you consent to the application and the proposed well location, you are requested to indicate your waiver of objection by signing where indicated below and then returning a copy of this letter with the executed signature page to me at your earliest convenience.

Very truly yours,

/s/ Sharon T. Shaheen
Sharon T. Shaheen

REPLY TO:

325 Paseo de Peralta

Santa Fe, New Mexico 87501

Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

Affected Parties
May 26, 2021
Page | 2

Enclosure

CONSENT:

By: _____ for _____
Signature Name of Interested Party

Printed Name, Authorized Representative

RECEIVED:	REVIEWER:	TYPE:	APP NO:
-----------	-----------	-------	---------

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Geological & Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505



ADMINISTRATIVE APPLICATION CHECKLIST

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Applicant: Longfellow Energy, L.P. **OGRID Number:** 372210
Well Name: Ozzy Fed Com 18C 003H **API:** 30-015-48330
Pool: Empire; Glorieta-Yeso **Pool Code:** 96210

SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW

- 1) **TYPE OF APPLICATION:** Check those which apply for [A]
 A. Location – Spacing Unit – Simultaneous Dedication
 NSL NSP (PROJECT AREA) NSP (PRORATION UNIT) SD
- B. Check one only for [I] or [II]
 [I] Commingling – Storage – Measurement
 DHC CTB PLC PC OLS OLM
 [II] Injection – Disposal – Pressure Increase – Enhanced Oil Recovery
 WFX PMX SWD IPI EOR PPR

- 2) **NOTIFICATION REQUIRED TO:** Check those which apply.
 A. Offset operators or lease holders
 B. Royalty, overriding royalty owners, revenue owners
 C. Application requires published notice
 D. Notification and/or concurrent approval by SLO
 E. Notification and/or concurrent approval by BLM
 F. Surface owner
 G. For all of the above, proof of notification or publication is attached, and/or,
 H. No notice required

FOR OCD ONLY	
<input type="checkbox"/>	Notice Complete
<input type="checkbox"/>	Application Content Complete

3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

Sharon T. Shaheen, Attorney, Montgomery & Andrews, P.A.

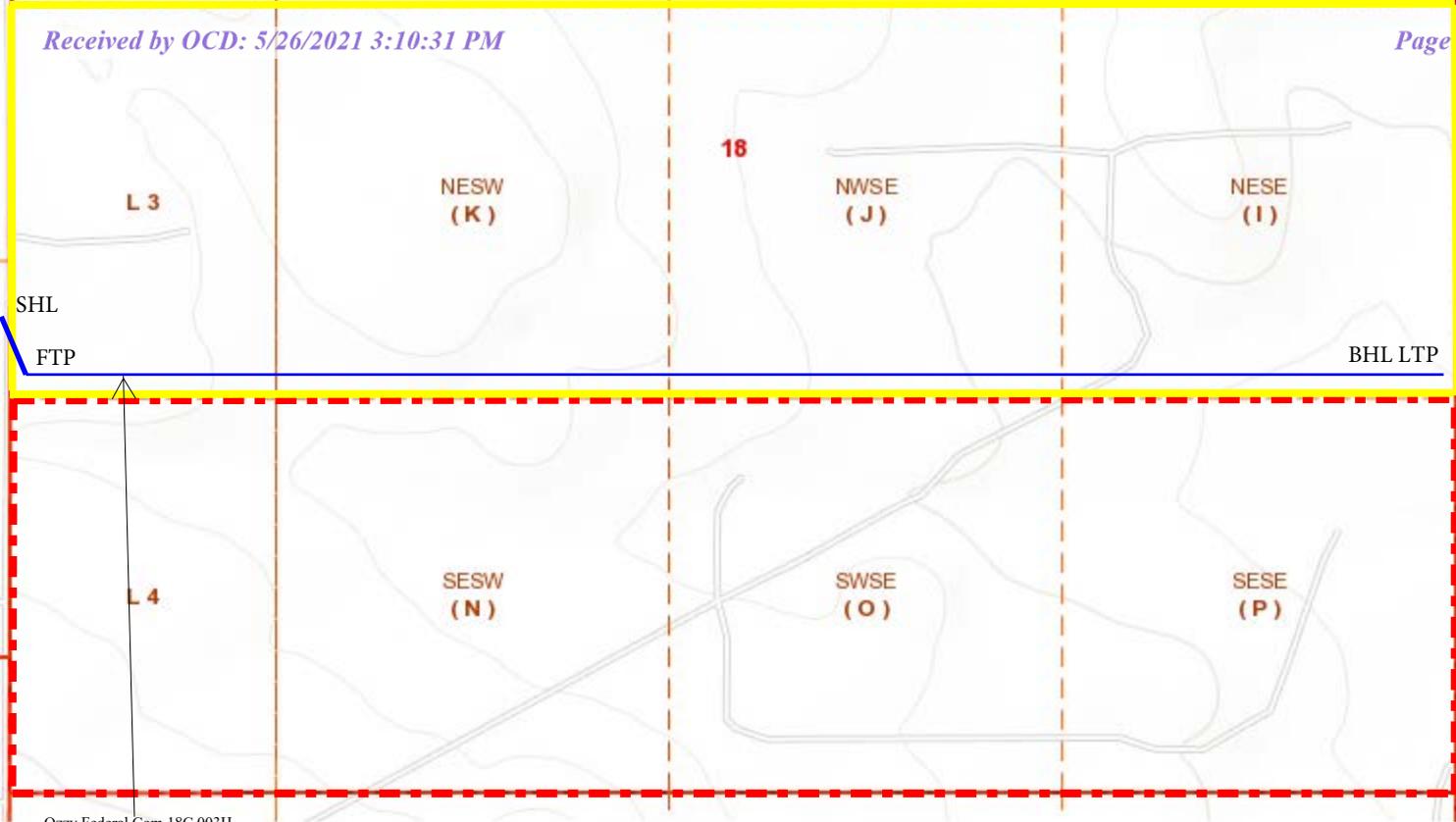
Print or Type Name

Sharon T Shaheen
 Signature

May 26, 2021
 Date

(505) 986-2678
 Phone Number

sshhaheen@montand.com
 e-mail Address



Ozzy Federal Com 18C 003H

Longfellow LH, LLC
 Ozzy Federal Com 18C 003H
 Sec. 18-17S-29E
 Eddy County, NM

- -Horizontal Spacing Unit
- - - -Affected Parties List

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS
 Action 29649

CONDITIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 29649
	Action Type: [UF-NSL] Non-Standard Location (NSL)

CONDITIONS

Created By	Condition	Condition Date
llowe	None	5/27/2021