

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

APPLICATION OF LONGFELLOW ENERGY, LP
FOR COMPULSORY POOLING AND FOR APPROVAL OF
A NON-STANDARD LOCATION,
EDDY COUNTY, NEW MEXICO

CASE NO. 21954

CONOCOPHILLIPS COMPANY'S MOTION FOR CONTINUANCE

ConocoPhillips Company ("Conoco") requests a continuance of this matter to the Oil Conservation Division's July 15, 2021 hearing docket. In support of this request, Conoco submits the following:

1. On May 20, 2021, Conoco received notice of Longfellow Energy, LP's ("Longfellow") administrative application for approval of a non-standard location for its Elvis State Com 29A 0001H well, to be horizontally drilled from an approximate surface hole location 790' FNL and 560' FWL of Section 28, T17S-R28E, to an approximate bottom hole location 181' FNL and 100' FWL of Section 29, T17S-R28E.
2. Conoco is an affected interest owner in adjacent acreage to Longfellow's development and would be negatively impacted by the location of Longfellow's proposed well.
3. Accordingly, on June 7, 2021, Conoco filed a timely protest of Longfellow's administrative application requesting the matter be set for hearing.
4. However, Longfellow had previously filed the above-referenced application for compulsory pooling and for approval of a non-standard location of its proposed Elvis State Com 29A 001H well, which is set for the June 17th hearing docket.
5. It is Conoco's understanding that Longfellow intends to dismiss the compulsory pooling portion of this application at hearing and proceed with its request for approval of a non-

standard location, as Longfellow has filed a new compulsory pooling application (Case No. 21989) for the proposed well that is set for the July 1st hearing docket.

6. Since Longfellow filed for administrative approval of its non-standard location concurrent with its application for hearing on the matter less than a month ago, Conoco has not had sufficient time to properly evaluate the impact Longfellow's non-standard well location will have on its acreage and has not had sufficient time to prepare for a hearing on the matter.

7. Further, it has been a longstanding practice that a party seeking approval of a non-standard location must file for administrative approval prior to seeking a hearing for approval of a non-standard location. However, Longfellow concurrently filed an application for administrative approval of a non-standard location and a hearing application for approval of non-standard location. Filing these applications concurrently circumvents this practice and allows the applicant to prematurely file an application for hearing and have the matter heard through one or both channels at the same time. In this case, the administrative deadline to protest Longfellow's administrative application was Wednesday, June 8th and its hearing on the matter is scheduled for June 17th, roughly a week after the administrative protest deadline.

8. Finally, Longfellow's revised compulsory pooling application is set for the July 1st docket. Therefore, Longfellow will not be prejudiced if Case No. 21954 is continued since it still must receive an order from the Division pooling the proposed spacing unit prior to producing its proposed Elvis State Com 29A 001H well.

9. Spur Energy Partners LLC concurs with this motion.

10. Longfellow opposes this motion.

For the foregoing reasons, Conoco requests the Division grant its motion to continue Case No. 21954 to the July 15, 2021 hearing docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2021, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

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