

**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

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

CASE NO. 21989

PRE-HEARING STATEMENT

ConocoPhillips Company (“COPC”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Longfellow Energy, LP

ATTORNEYS

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ConocoPhillips Company

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STATEMENT OF THE CASE

Longfellow Energy, LP's ("Longfellow") application in Case No. 21954 seeks compulsory pooling and 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. It is COPC's understanding that Longfellow intends to dismiss the compulsory pooling portion of Case No. 21954 at hearing and proceed with its request for approval of a non-standard location since it filed a separate compulsory pooling application (Case No. 21989) for its Elvis State Com 29A 001H, 002H, and 003H wells. Longfellow's application in Case No. 21989 is set for hearing on July 1, 2021.

On June 17, 2021, the Division held a status conference in Case No. 21954 and subsequently entered a scheduling order setting the case for hearing on July 1, 2021 so that Longfellow's application for approval of a non-standard location can be heard in conjunction with its compulsory pooling application in Case No. 21989.

COPC owns a 12.50% working interest in Longfellow's proposed Elvis spacing unit ("Elvis Unit"). COPC is an affected party to Longfellow's non-standard location application since it owns an 18.75% working interest in adjacent acreage to Longfellow's proposed Elvis spacing unit.

Since the status conference on June 17, 2021, COPC and Longfellow have not resolved their differences in these matters. Further, COPC has not had sufficient time to fully evaluate Longfellow’s well proposals and development plan for the Elvis Unit. COPC has also not had sufficient time to fully evaluate how the non-standard location of Longfellow’s Elvis State Com 29A 0001H well will impact COPC’s correlative rights within the acreage adjacent to the Elvis Unit. As such, COPC submitted a motion for continuance of the subject matters to the Oil Conservation Division’s August 19, 2021 hearing docket.

PROPOSED EVIDENCE

<u>Witness</u>	<u>Occupation</u>	<u>Est. Time</u>	<u>Exhibits</u>
Andrew Kendall	Landman	30 minutes	Approx. 4
Ephraim Schofield	Reservoir Engineer	30 minutes	Approx. 4

PROCEDURAL MATTERS

COPC objects to these matters being presented by affidavit on July 1, 2021. As such, COPC filed a motion to continue these matters to the August 19, 2021 hearing docket. COPC requests its motion for continuance be granted or a status conference on these matters be held on July 1, 2021.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 34018

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 34018
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>