

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

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

Case No. 21900

APPLICANT'S PRE-HEARING STATEMENT

LONGFELLOW ENERGY, LP ("Longfellow"), provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

LONGFELLOW ENERGY, LP

ATTORNEY:

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OTHER INTERESTED PARTIES

CONOCOPHILLIPS COMPANY

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STATEMENT OF THE CASE

In this case, Longfellow seeks approval of an unorthodox or non-standard location (“NSL”) for the **Ozzy Fed Com 18C 003H, API# 30-015-48330** (“Ozzy 3H”), to be drilled in a standard 147-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the N/2 S/2 of irregular Section 18, Township 17 South, Range 29 East, NMPM, in Eddy County, New Mexico, for development of the Yeso formation (Artesia; Glorieta-Yeso [96210]).

Longfellow seeks approval of a NSL because the completed interval of the Ozzy 3H will be closer than 330’ from the outer boundary of the HSU. Longfellow proposes to drill the Ozzy 3H horizontally from a surface hole located approximately 1565’ FSL and 675’ FEL of Section 13-T17S-R28E to a bottom hole located approximately 1540’ FSL and 20’ FEL of Section 18-T17S-R29E. . The first and last take points for the well will meet the setback requirements set forth in the statewide rules for horizontal oil wells. The well and lands are located approximately 9 miles southwest of Loco Hills, New Mexico.

An administrative application was filed on May 26, 2021. The administrative application was protested by ConocoPhillips Co. (“COP”), and no others. Since then, COP has agreed not to oppose the request for NSL. Consequently, Longfellow anticipates that it will seek dismissal of the instant application and request that the administrative application be processed accordingly.. Nonetheless, in an abundance of caution, Longfellow files this prehearing statement.

PROPOSED EVIDENCE

APPLICANT:

WITNESSES	EST. TIME	EXHIBITS
Landman Ryan Reynolds	Written Testimony	4-5
Geologist Jennifer Eker	Written Testimony	4-5

Engineer Moosa Madha

Written Testimony

4-5

OTHER INTERESTED PARTIES:

WITNESSES

EST. TIME

EXHIBITS

TBD

PROCEDURAL MATTERS

If there is no opposition by time of hearing, Applicant will present this matter by affidavit. If opposition remains at the time of hearing, Longfellow’s witnesses will appear at hearing on July 1, 2021 for cross-examination.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: /s/Sharon T. Shaheen

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Attorneys for Longfellow Energy, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on June 24, 2021:

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State of New Mexico
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QUESTIONS

Action 33667

QUESTIONS

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 33667
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witness	3
Testimony time (in minutes)	0