

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

**APPLICATION OF LONGFELLOW ENERGY, LP  
TO AMEND ORDER NO. R-21654  
EDDY COUNTY, NEW MEXICO**

**Case No. 22402**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

**APPLICANT**

LONGFELLOW ENERGY, LP

APPLICANT’S ATTORNEY:

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**OTHER PARTY**

None at this time.

**STATEMENT OF THE CASE**

In this case, Applicant seeks to re-open Case No. 21792 for the limited purpose of amending Order No. R-21654 to extend by one year, through April 13, 2023, the time to commence drilling the (1) Santana State Com 20CD 001H well; (2) Santana State Com 20CD 002H well; (3) Santana State Com 20CD 003H well; (4) Santana State Com 20CD 004H well; (5) Santana State Com 20CD 005H well; and (6) Santana State Com 20CD 006H well, all of which are proposed to be drilled into the Yeso formation (Artesia; Glorieta-Yeso [96830])

underlying the S/2 of Section 20, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico.

As stated in the application, good cause exists to grant the extension. There have been changes in Longfellow’s drilling schedule due to current labor shortages and supply chain issues resulting from COVID-19 policies, as well as delays in obtaining the necessary rights-of-way relating to infrastructure that will be used for the Wells. For example, construction was delayed on a pipeline between Longfellow’s water retention/recycling facility and the drilling pad for the Wells due to unanticipated months of negotiation for the necessary right of way. As another example, prior to incurring the expense of drilling the six Wells, Longfellow plans to test the productivity in the Yeso from three other nearby wells, which have already been drilled but not completed because Longfellow cannot obtain a frac crew until February 2022. Peak flow rates for the previously drilled wells are not projected to occur until 90-120 days after flowback begins, i.e., sometime between May and June of 2022.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES	TIME	EXHIBITS
Landman Ryan Reynolds	By affidavit	4-5

**PROCEDURAL MATTERS**

Assuming no opposition by time of hearing, Applicant will present these matters by affidavit.

Respectfully submitted,

**MONTGOMERY & ANDREWS, P.A.**

By: /s/Sharon T. Shaheen

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS

Action 69423

**QUESTIONS**

Operator: LONGFELLOW ENERGY, LP 8115 Preston Road Dallas, TX 75225	OGRID: 372210
	Action Number: 69423
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS**

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