

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

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

**Case No. 21509**

**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**

Applicant in the above-styled cause seeks an order from the Division pooling all uncommitted interests in the Yeso formation (Empire; Glorieta-Yeso [96210]) in a standard 320-acre, more or less, horizontal spacing and proration unit (“HSU”) comprised of the S/2 of Section

13, Township 17 South, Range 28 East, NMPM, in Eddy County, New Mexico. Applicant proposes to drill the following one-mile wells:

- (1) Hendrix State Com 13CD 001H well, to be horizontally drilled from an approximate surface hole location 1387' FSL and 175' FEL of Section 14, T17S-R28E, to an approximate bottom hole location 2315' FSL and 20' FEL of Section 13, T17S-R28E;
- (2) Hendrix State Com 13CD 002H well, to be horizontally drilled from an approximate surface hole location 1362' FSL and 175' FEL of Section 14, T17S-R28E, to an approximate bottom hole location 1820' FSL and 20' FEL of Section 13, T17S-R28E;
- (3) Hendrix State Com 13CD 003H well, to be horizontally drilled from an approximate surface hole location 1337' FSL and 175' FEL of Section 14, T17S-R28E, to an approximate bottom hole location 1330' FSL and 20' FEL of Section 13, T17S-R28E;
- (4) Hendrix State Com 13CD 004H well, to be horizontally drilled from an approximate surface hole location 1312' FSL and 175' FEL of Section 14, T17S-R28E, to an approximate bottom hole location 835' FSL and 20' FEL of Section 13, T17S-R28E; and
- (5) Hendrix State Com 13CD 005H well, to be horizontally drilled from an approximate surface hole location 1287' FSL and 175' FEL of Section 14, T17S-R28E, to an approximate bottom hole location 390' FSL and 20' FEL of Section 13, T17S-R28E. The completed intervals and first and last take points for these wells will meet statewide setback requirements for horizontal wells.

Also to be considered will be the cost of drilling and completing the wells, the allocation of the costs, the designation of Applicant as Operator of the wells, and a 200% charge for the risk involved in drilling and completing the wells.

**PROPOSED EVIDENCE**

**APPLICANT:**

WITNESSES

Landman Ryan Culpepper

Geologist Harvin Broughton

EXHIBITS

A-1 through A-8

B-1 through B-7

**OTHER PARTY:**

None known at this time.

**PROCEDURAL MATTERS**

Interested party Jalapeno Corporation is hereby dismissed from this proceeding and therefore will not be force pooled by Applicant in this case. 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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*Attorneys for Longfellow Energy, LP*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on October 29, 2020:

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*Attorneys for Jalapeno Corporation*

*/s/Sharon T. Shaheen*

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