

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

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

CASE NO. 22020

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

CASE NO. 22021

CONOCOPHILLIPS COMPANY'S MOTION FOR CONTINUANCE

ConocoPhillips Company ("COPC") requests a continuance of these matters to the Oil Conservation Division's August 19, 2021 hearing docket. In support of this request, COPC states the following:

1. In Case No. 22020, Longfellow Energy, LP ("Longfellow") requests approval of a non-standard location for the Bonzo Federal Com 1924CDX 006H ("Bonzo"), to be drilled from a surface hole located approximately 1272' FSL and 415' FWL of Section 20, T-17S-R28E, to a bottom hole located approximately 142' FSL and 2615' FEL of Section 24, T-17S-R27E.

2. In companion Case No. 22021, Longfellow seeks an order pooling all mineral interests in the Yeso formation in a standard 480-acre, more or less, horizontal spacing unit comprised of the S/2 of Section 19, Township 17 South, Range 28 East, and the SE/4 of Section 24, Township 17 South, Range 27 East, in Eddy County, New Mexico, and seeks to dedicate the unit to six wells including the Bonzo well.

3. COPC owns a 14.40% working interest in Longfellow's proposed unit.

4. COPC has not had sufficient time to fully evaluate Longfellow's well proposals and development plan for its proposed unit.

5. Additionally, Longfellow's Bonzo well proposal (attached as **Exhibit A**) indicates the surface hole location is 1252 FSL and **397 FEL**. However, the surface hole location identified in Longfellow's compulsory pooling application is 1272 FSL and **415 FWL**. This is a material discrepancy since the variance between the locations is over 4000' and does not comply with notice requirements pursuant to 19.15.4.12 NMAC. Longfellow should rectify this material discrepancy by re-proposing the well prior to hearing so as not to impair due process rights afforded to all interested parties in these matters.

6. Therefore, COPC requests these matters be continued to allow the parties further time to continue evaluating Longfellow's development plans and continue good-faith negotiations and to allow Longfellow sufficient time to rectify the material discrepancy within its compulsory pooling application (Case No. 22021).

7. Although Longfellow opposes this motion, it did not provide COPC with a basis demonstrating it would be materially prejudiced if a continuance is granted for these matters. Further, neither matter has previously been continued.

8. Spur Energy Partners LLC concurs with this motion.

9. SOC 1999 Partnership Limited and SOC GP, LLC concur with this motion.

For the foregoing reasons, COPC requests the Division grant its motion to continue Case Nos. 22020 and 22021 to the August 19, 2021 hearing docket.

Respectfully submitted,

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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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