

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

**APPLICATION OF LEGACY RESERVES OPERATING LP  
FOR COMPULSORY POOLING,  
LEA COUNTY, NEW MEXICO.**

**CASE NOS. 22226, 22227, 22228, 22229**

**LEGACY RESERVES OPERATING LP'S CONSOLIDATED PRE-HEARING  
STATEMENT**

Legacy Reserves Operating LP ("Legacy") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Legacy Reserves Operating LP

**ATTORNEY**

James Parrot  
Beatty & Wozniak, P.C.  
500 Don Gaspar Ave.,  
Santa Fe, NM 87505  
(303) 407-4458  
Fax: 800-886-6566  
jparrot@bwenergylaw.com

**INTERESTED PARTIES**

MRC Permian Company

**ATTORNEYS**

James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043  
jamesbruc@aol.com

COG Operating LLC

Ocean Munds-Dry  
Elizabeth Ryan  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, NM 87501  
(505) 780-8000  
Ocean.munds-dry@conocophillips.com  
Beth.ryan@conocophillips.com

Jalapeno Corporation

J.E. Gallegos  
Michael J. Condon  
460 St. Michael's Drive, Bldg. 300  
Santa Fe, New Mexico 87505  
(505) 983-6686  
jeg@gallegoslawfirm.net  
mjc@gallegoslawfirm.net

**APPLICANT'S STATEMENT OF CASE**

In **Case No. 22226**, Legacy applies for an order to create a standard spacing and proration unit and pool all uncommitted mineral interest owners within the Bone Spring Formation (GEM; BONE SPRING, EAST 27230) underlying a standard approximate 320-acre horizontal unit comprised of the W $\frac{1}{2}$ W $\frac{1}{2}$  of Section 14 and the W $\frac{1}{2}$ W $\frac{1}{2}$  of Section 23, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico ("Unit"). The Unit will be dedicated to the **Sapphire Fed Com 501H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW $\frac{1}{4}$ NW $\frac{1}{4}$  (Lot D) of Section 14, to a bottom hole location in the SW $\frac{1}{4}$ SW $\frac{1}{4}$  (Lot M) of Section 23. The completed interval of the Well will be orthodox.

In **Case No. 22227**, Legacy applies for an order to create a standard spacing and proration unit and pool all uncommitted mineral interest owners within the Bone Spring Formation underlying a standard approximate 320-acre horizontal unit comprised of the E $\frac{1}{2}$ W $\frac{1}{2}$  of Section 14 and the E $\frac{1}{2}$ W $\frac{1}{2}$  of Section 23, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico ("Unit"). The Unit will be dedicated to the **Sapphire Fed Com 502H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW $\frac{1}{4}$ NW $\frac{1}{4}$  (Lot D) of Section 14, to a bottom hole location in the SE $\frac{1}{4}$ SW $\frac{1}{4}$  (Lot N) of Section 23. The completed interval of the Well will be orthodox.

In **Case No. 22228**, Legacy applies for an order to create a standard spacing and proration unit and pool all uncommitted mineral interest owners within the Bone Spring Formation

underlying a standard approximate 320-acre horizontal unit comprised of the W½E½ of Section 14 and the W½E½ of Section 23, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico (“Unit”). The Unit will be dedicated to the **Sapphire Fed Com 503H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW¼NE¼ (Lot B) of Section 14, to a bottom hole location in the SW¼SE¼ (Lot O) of Section 23. The completed interval of the Well will be orthodox.

In **Case No. 22229**, Legacy applies for an order to create a standard spacing and proration unit and pool all uncommitted mineral interest owners within the Bone Spring Formation underlying a standard approximate 320-acre horizontal unit comprised of the E½E½ of Section 14 and the E½E½ of Section 23, Township 19 South, Range 33 East, N.M.P.M., Lea County, New Mexico (“Unit”). The Unit will be dedicated to the **Sapphire Fed Com 504H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW¼NE¼ (Lot B) of Section 14, to a bottom hole location in the SE¼SW¼ (Lot P) of Section 23. The completed interval of the Well will be orthodox.

**APPLICANT’S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Brett Willis, Landman	15 minutes	Approx. 5
John Stewart, Geologist	15 minutes	Approx. 5

**PROCEDURAL MATTERS**

The Division has consolidated for hearings Case Nos. 22226 through 22229.

Dated this 14th day of April, 2022.

Respectfully submitted

BEATTY & WOZNIAK, P.C.

By: \_\_\_\_\_



James Parrot  
Beatty & Wozniak, P.C.  
500 Don Gaspar Ave.,  
Santa Fe, NM 87505  
(303) 407-4458  
Fax: 800-886-6566  
[jparrot@bwenergylaw.com](mailto:jparrot@bwenergylaw.com)

Legacy Reserves Operating LP

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 98829

**QUESTIONS**

Operator: LEGACY RESERVES OPERATING, LP 15 Smith Road Midland, TX 79705	OGRID: 240974
	Action Number: 98829
	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.