

**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**

Matador Production Company

**ATTORNEYS**

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

MRC Permian Company

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<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub> (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 W<sup>1</sup>/<sub>2</sub>E<sup>1</sup>/<sub>2</sub> of Section 14 and the W<sup>1</sup>/<sub>2</sub>E<sup>1</sup>/<sub>2</sub> 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 NW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub> (Lot B) of Section 14, to a bottom hole location in the SW<sup>1</sup>/<sub>4</sub>SE<sup>1</sup>/<sub>4</sub> (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 E<sup>1</sup>/<sub>2</sub>E<sup>1</sup>/<sub>2</sub> of Section 14 and the E<sup>1</sup>/<sub>2</sub>E<sup>1</sup>/<sub>2</sub> 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 NW<sup>1</sup>/<sub>4</sub>NE<sup>1</sup>/<sub>4</sub> (Lot B) of Section 14, to a bottom hole location in the SE<sup>1</sup>/<sub>4</sub>SW<sup>1</sup>/<sub>4</sub> (Lot P) of Section 23. The completed interval of the Well will be orthodox.

#### **APPLICANT’S PROPOSED EVIDENCE**

The parties have not agreed on any material facts that are not in dispute. All of the facts to be presented by Legacy, which are summarized in the checklist and exhibits, should be considered as disputed facts.

The witnesses are as follows:

<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 10th day of June, 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@bwenergy.com](mailto:jparrot@bwenergy.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 115889

**QUESTIONS**

Operator: LEGACY RESERVES OPERATING, LP 15 Smith Road Midland, TX 79705	OGRID: 240974
	Action Number: 115889
	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	2
Testimony time (in minutes)	30