

**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 SE¹/₄SW¹/₄ (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 W¹/₂E¹/₂ of Section 14 and the W¹/₂E¹/₂ 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 503H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW¹/₄NE¹/₄ (Lot B) of Section 14, to a bottom hole location in the SW¹/₄SE¹/₄ (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 E¹/₂E¹/₂ of Section 14 and the E¹/₂E¹/₂ 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 504H Well** (API No. Pending), to be horizontally drilled from a surface location in the NW¹/₄NE¹/₄ (Lot B) of Section 14, to a bottom hole location in the SE¹/₄SW¹/₄ (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:

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
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

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 115890

QUESTIONS

Operator: LEGACY RESERVES OPERATING, LP 15 Smith Road Midland, TX 79705	OGRID: 240974
	Action Number: 115890
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	2
Testimony time (in minutes)	30