

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

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

**Case No. 22701**

**NOTICE OF INTERVENTION**

**AND**

**ONJECTION TO PRESENTATION OF CASE BY AFFIDAVIT**

This Notice of Intervention is submitted by Mewbourne Oil Company ("Mewbourne") pursuant to Division Rule 19.15.4.11. Mewbourne also objects to presentation of the case by affidavit, for reasons summarized below.

**INTERVENOR'S NAME**

Mewbourne Oil Company  
c/o James Bruce  
P.O. Box 1056  
Santa Fe, New Mexico 87504  
Phone: (505) 982-2043  
Fax: (505) 982-2151  
*jamesbruc@aol.com*

Attorney for Mewbourne Oil Company

**NATURE OF INTERVENOR'S INTEREST**

Legacy Reserves Operating LP ("Legacy") has filed the above pooling application covering standup Bone Spring well unit comprised of the E/2 of Section 33, Township 18 South, Range 31 East N.M.P.M, and the NE/4 of Section 4, Township 19 South, Range 31 East N.M.P.M, Eddy County, New Mexico.

Mewbourne does not own an interest in Legacy's proposed well unit, but does own working interests in Section 32, Township 18 South, Range 31 East N.M.P.M, Eddy County, New Mexico. These interests adjoin Legacy's well unit.

Mewbourne has proposed laydown well units covering all of Sections 32 and 33, in Township 18 South, Range 31 East, N.M.P.M., which conflict with Legacy's proposal. Mewbourne believes that in this area laydown units are preferable from a technical standpoint.

### **OBJECTION**

Mewbourne objects to presentation of Legacy's case by affidavit, due to the reasons stated above. Mewbourne requests that the matter be set as a status conference.

### **OTHER MATTERS**

Mewbourne recognizes that this notice is late-filed. The undersigned will discuss the reasons therefor at the hearing.

Mewbourne also points out that the hearing needs to be continued in any event. Although Legacy's application requests the above 480 acre unit in 18S-31E and 19S-31E, the legal notice filed with the Division requested a "480" acre well unit comprised of the W/2E/2 of Sections 15 and 22, Township 19 South, Range 33 East, N.M.P.M., Lea County. This needs to be corrected for the case record to be complete. And by the time this is corrected this Intervention will not be late-filed.

Respectfully submitted,



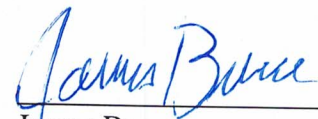
James Bruce  
Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Mewbourne Oil Company

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 15<sup>th</sup> day of January, 2023 by e-mail:

James Parrot - [iparrot@bwenergylaw.com](mailto:iparrot@bwenergylaw.com)  
Ocean Munds-Dry - [ocean@conocophillips.com](mailto:ocean@conocophillips.com)  
Elizabeth Ryan - [beth@conocophillips.com](mailto:beth@conocophillips.com)  
Joby.Rittenhouse - [joby.rittenhouse@conocophillips.com](mailto:joby.rittenhouse@conocophillips.com)

  
James Bruce