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

APPLICATION OF MANZANO LLC FOR APPROVAL OF THE VINDICATOR CANYON STATE EXPLORATORY UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 21463

APPLICANT'S PRE- HEARING STATEMENT

Manzano, LLC ("Manzano") (OGRID No. 231429) submits this pre-hearing statement as required by the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT ATTORNEY

Manzano, LLC 300 West 2nd Street Roswell, NM 88202-1737 Michael H. Feldewert Adam G. Rankin Kaitlyn A. Luck Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421 (505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF THE CASE

Manzano seeks an order approving the Vindicator Canyon State Exploratory Unit, a voluntary unit consisting of the following 7,600 acres of State lands situated in Lea County:

TOWNSHIP 17 SOUTH, RANGE 36 EAST, N.M.P.M.

Section 14: SW/4

Section 15: ALL

Section 20: ALL

Section 21: ALL

Section 22: ALL

Section 23: S/2, NW/4

Section 26: ALL

Section 27: ALL

Section 28: ALL

Section 29: ALL

Section 30: E/2

Section 31: E/2 NE/4

Section 32: N/2, SW/4

Section 33: NE/4

Section 34: E/2 E/2

Section 35: ALL

The unitized interval for the Vindicator Canyon State Exploratory Unit is the Canyon formation, at the stratigraphic equivalent interval between 11,678 feet and 12,202 feet as found on the sonic log for the Deep Sparkling Muddler 15 State #1 well (API No. 30-025-22194) in Section 15, Township 17 South, Range 36 East, N.M.P.M., Lea County, New Mexico. Manzano has met with the State Land Office and received preliminary approval of the Unit Agreement. Manzano has discussed this proposed voluntary unit with the other working interest owners in the unitized area and expects to receive approval from a sufficient percentage of the working interest owners to provide effective control of unit operations.

PROPOSED EVIDENCE

WITNESSES Name and Expertise	ESTIMATED TIME	EXHIBITS
Nick C. McClelland, Landman	Affidavit	Approx. 5
John Worrall, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Since this is a voluntary unit, Manzano does not expect opposition at hearing and therefore intends to present this case by affidavit.

Respectfully submitted,

HOLLAND & HART LLP

By:

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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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