

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

**APPLICATION OF MANZANO LLC
FOR COMPULSORY POOLING,
LEA COUNTY, NEW MEXICO.**

CASE NOS. 21513-21518

MANZANO LLC'S CONSOLIDATED PRE-HEARING STATEMENT

Manzano LLC ("Manzano") submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Manzano LLC

ATTORNEY

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APPLICANT'S STATEMENT OF CASE

In **Case No. 21513**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 W/2 of Section 15, and the W/2 NW/4 of Section 22, Township 17 South, Range 36 East, NMPM, Lea County, New Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 15-22 DELC 4H Well** to be horizontally drilled from a surface hole location in the SW/4 SW/4 (Unit M) of Section 10 to a bottom hole location in the SW/4 NW/4 (Unit E) of Section 22. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

In **Case No. 21514**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 E/2 of Section 15, and the W/2 NE/4 of Section 22, Township 17 South, Range 36 East, NMPM, Lea County, New Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 22-15 GBLC 2H Well** to be horizontally drilled from a surface hole location in the NW/4 SE/4 (Unit J) of Section 22 to a bottom hole location in the NW/4 NE/4 (Unit B) of Section 15. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

In **Case No. 21515**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 E/2 of Section 15, and the E/2 E/2 of Section 22, Township 17 South, Range 36 East, NMPM, Lea County, New

Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 22-15 PALC 1H Well** to be horizontally drilled from a surface hole location in the NE/4 NE/4 (Unit A) of Section 27 to a bottom hole location in the NE/4 NE/4 (Unit A) of Section 15. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

In **Case No. 21516**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 320-acre, more or less, horizontal spacing unit comprised of the E/2 W/2 of Section 22, and the E/2 W/2 of Section 27, Township 17 South, Range 36 East, NMPM, Lea County, New Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 22-27 CNLC 3H Well** to be horizontally drilled from a surface hole location in the SE/4 SW/4 (Unit N) of Section 15 to a bottom hole location in the SE/4 SW/4 (Unit N) of Section 27. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

In **Case No. 21517**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SE/4 of Section 22, and the W/2 E/2 of Section 27, Township 17 South, Range 36 East, NMPM, Lea County, New Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 22-27 JOLC 2H Well** to be horizontally drilled from a surface hole location in the SW/4 NE/4 (Unit G) of Section 22 to a bottom hole location in the SW/4 SE/4 (Unit O) of Section 27. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

In **Case No. 21518**, Manzano seeks an order from the Division pooling all uncommitted interests in the Canyon formation (WC-025 G-09 S173615C; Upper Penn [98333]) underlying a standard 240-acre, more or less, horizontal spacing unit comprised of the W/2 SW/4 of Section 22, and the W/2 W/2 of Section 27, Township 17 South, Range 36 East, NMPM, Lea County, New Mexico. Manzano seeks to dedicate the above-referenced horizontal spacing unit to the proposed initial **Vindicator Canyon State Unit 22-27 LMLC 4H Well** to be horizontally drilled from a surface hole location in the SW/4 NW/4 (Unit E) of Section 22 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 27. The completed interval for the proposed well will comply with statewide setbacks for oil wells.

APPLICANT'S PROPOSED EVIDENCE

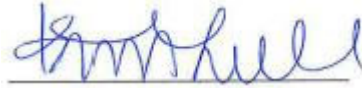
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Nick McClelland, Landman	Affidavit	Approx. 6
John Worrall, Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Manzano does not expect any opposition to presenting these uncontested cases by affidavit at the hearing.

Respectfully submitted,

HOLLAND & HART LLP



By: _____

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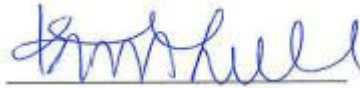
ATTORNEYS FOR MANZANO LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2020, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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