

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

**APPLICATION OF MANZANO, LLC
FOR APPROVAL OF THE MORRISON
SAN ANDRES STATE EXPLORATORY UNIT,
ROOSEVELT COUNTY, NEW MEXICO**

Case No. 16341

MANZANO, LLC'S PRE-HEARING STATEMENT

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

APPEARANCES

Manzano is the applicant in this case. Its business address is Post Office Box 1737, Roswell, New Mexico 88202-1737. Manzano is represented by the undersigned counsel.

STATEMENT OF THE CASE

Manzano's application requests an order approving its Morrison San Andres State Exploratory Unit ("the Unit"), which is comprised of 4,371.42 acres, more or less, of State of New Mexico lands situated in Roosevelt County, described as follows:

Township 6 South, Range 34 East, N.M.P.M.

Section 3: All
Section 4: All
Section 9: N/2 NW/4, SE/4 NW/4, NE/4, and S/2
Section 10: All
Section 11: S/2 N/2 and S/2
Section 14: All
Section 15: All
Section 16: All
Section 21: N/2

The unitized interval is the San Andres formation, defined as the stratigraphic equivalent of the interval between 3,181 feet and 4,523 feet as depicted on the Laterolog dated September 12, 2014 for the Armstrong Energy Touch of Grey State #1 well (API No. 30-041-20960) located

1,839 feet from the south line and 417 feet from the west line in Section 15, Township 6 South, Range 34 East, N.M.P.M., in Roosevelt County.

PROPOSED EVIDENCE

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Nick McClelland (Landman)	10 minutes	Approx. 4
John Worrall (Geologist)	10 minutes	Approx. 5

Manzano reserves the right to call a rebuttal witness(es) if appropriate.

PROCEDURAL MATTERS

Manzano is not aware of any procedural matters to be resolved prior to the hearing.

Respectfully submitted,

HINKLE SHANOR LLP



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