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

APPLICATION OF MANZANO, LLC TO AMEND ORDER NO. R-21572 FOR APPROVAL OF THE EXPANSION OF THE VINDICATOR CANYON STATE EXPLORATORY UNIT, LEA COUNTY, NEW MEXICO.

CASE NO. 21713 (Order R-21572, issued in Case 21463)

MANZANO, LLC'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

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

ATTORNEY

APPLICANT'S STATEMENT OF THE CASE

Manzano seeks to amend Order No. R-21572 to expand the geographic area of the Vindicator Canyon State Exploratory Unit by approximately of 960 acres of State land. This Unit currently consists of approximately 6,000 acres. At the request of the New Mexico State Land Office, Manzano seeks to expand the Unit to include the E/2 of Section 20 and all of Section 22 in Township 17 South, Range 36 East, NMPM, in Lea County. The expanded Unit will now consist of approximately 6,960 acres comprised of the following state lands in Lea County:

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

Section 14: SW/4

Section 15: ALL

Section 20: 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

All other aspects of the Unit and the governing Unit Agreement approved by Order R-21572 remain the same.

PROPOSED EVIDENCE

EXHIBITS

Name and Expertise		
Nick C. McClelland, Landman	Affidavit	Approx. 4

WITNESSES

ESTIMATED TIME

PROCEDURAL MATTERS

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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