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 NO. 22325

PRE-HEARING STATEMENT

Manzano LLC ("Applicant") submits its Pre-Hearing Statement pursuant to the rules of the

Oil Conservation Division.

APPEARANCES

APPLICANT Manzano LLC **ATTORNEYS**

ATTORNEYS

Dana S. Hardy Michael Rodriguez P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com

INTERESTED PARTIES

No other parties of record

STATEMENT OF THE CASE

Applicant seeks an order pooling all uncommitted mineral interests in the Upper Penn formation underlying a 280-acre, more or less, standard horizontal spacing unit ("Unit") comprised of the SE/4SE/4 of Section 9, E/2E/2 of Section 16, and E/2NE/4 of Section 21, Township 17 South, Range 36 East, Lea County, New Mexico. The Unit will be dedicated to the **Bodacious State Com #91H** well ("Well") to be horizontally drilled from a surface location in the NE/4SE/4 (Unit I) of Section 9 to a bottom hole location in the SE/4NE/4 (Unit H) of Section 21. The completed interval of the Well will be orthodox. Also, to be considered will be the cost of drilling and completing the Well and the allocation of the costs, the designation of Applicant as the operator of the Well, and a 200% charge for the risk involved in drilling and completing the Well. The Well is located approximately 6 miles south of Lovington, New Mexico.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Nick C. McClelland	Landman	Affidavit	Approx. 7
John Worrall	Geologist	Affidavit	Approx. 3

PROCEDURAL MATTERS

Applicant will present its case by affidavit if there is no opposition to its application.

Respectfully submitted,

HINKLE SHANOR, LLP

<u>/s/ Dana S. Hardy</u> Dana S. Hardy Michael Rodriguez P.O. Box 2068 Santa Fe, NM 87504-2068 Phone: (505) 982-4554 Facsimile: (505) 982-8623 dhardy@hinklelawfirm.com mrodriguez@hinklelawfirm.com *Counsel for Manzano LLC*

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QUESTIONS

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Action 62980

QUESTIONS

Operator:	OGRID:
MANZANO LLC	231429
P.O. Box 1737	Action Number:
Roswell, NM 88202	62980
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	