

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

**IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION DIVISION FOR
THE PURPOSE OF CONSIDERING:**

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

Case No. 21463

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Texas Standard Oil LLC ("Texas Standard") as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Manzano LLC

APPLICANT'S ATTORNEY

Holland & Hart LLP

OPPONENT

Texas Standard Oil LLC
One Petroleum Center, Building One
3300 North A Street, Suite 105
Midland, Texas 79705

OPPONENT'S ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043
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Attention: Timothy M. Roberson
(432) 219-6710

STATEMENT OF THE CASE

APPLICANT

In this case Manzano LLC ("Manzano") seeks Division approval of the Vindicator Canyon State Exploratory Unit, comprising 7600 acres of State lands in Lea County. The interval sought to be unitized is the Canyon formation.

OPPONENT

Texas Standard is a working interest owner in certain tracts in the proposed unit area. Texas Standard objects to the application because unitization will interfere with its plans to develop the Canyon formation and Upper Penn Pool in the northern portions of the proposed unit area.

PROPOSED EVIDENCE

APPLICANT

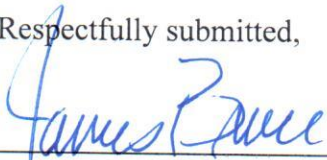
<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
<u>OPPONENT</u>		

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Matt Roberson (landman)	15 min.	Approx. 4
David Entzminger (geology)	15 min.	Approx. 6
Craig Young (Operations V.P.)	15 min.	Approx. 4

PROCEDURAL MATTERS

Texas Standard objects to this case being presented by affidavit, and requests that a status conference be set in this matter to determine a hearing date.

Respectfully submitted,



James Bruce
Post Office Box 1056
Santa Fe, New Mexico 87504
(505) 982-2043

Attorney for Texas Standard Oil LLC

CERTIFICATE OF SERVICE

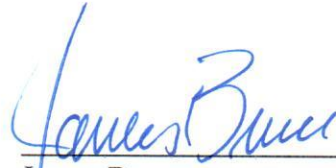
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 1st day of October, 2020 via e-mail:

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