

**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**

Michael H. Feldewert  
Adam G. Rankin  
Julia Broggi  
Kaitlyn A. Luck  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
mfeldewert@hollandhart.com  
agrankin@hollandhart.com  
jbroggi@hollandhart.com  
kaluck@hollandhart.com

**OTHER PARTIES**

Marathon Oil Permian LLC

Deana M. Bennett  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
dmb@modrall.com

## 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**

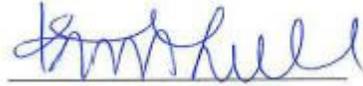
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Nick McClelland, Landman	Affidavit	Approx. 6
John Worrall, Geologist	Affidavit	Approx. 3

**PROCEDURAL MATTERS**

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

Respectfully submitted,

HOLLAND & HART LLP



By: \_\_\_\_\_

Michael H. Feldewert

Adam G. Rankin

Julia Broggi

Kaitlyn A. Luck

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)

[agrankin@hollandhart.com](mailto:agrankin@hollandhart.com)

[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

[kaluck@hollandhart.com](mailto:kaluck@hollandhart.com)

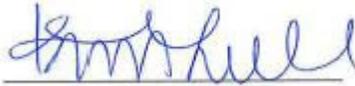
**ATTORNEYS FOR MANZANO LLC**

**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:

Deana M. Bennett.  
Modrall, Sperling, Roehl, Harris & Sisk, P.A.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800  
[dmb@modrall.com](mailto:dmb@modrall.com)

*Attorney for Marathon Oil Permian LLC*



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Kaitlyn A. Luck