

**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  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**Case Nos. 21513-21518**

**PRE-HEARING STATEMENT**

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

**APPEARANCES**

APPLICANT  
Manzano LLC

APPLICANT'S ATTORNEY  
Holland & Hart LLP

OPPONENT  
Texas Standard Oil LLC and  
Texas Standard Operating NM 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  
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Attention: Timothy M. Roberson  
(432) 219-6710

**STATEMENT OF THE CASE**

APPLICANT

In these cases Manzano LLC ("Manzano") seeks the compulsory pooling of the Canyon formation in well units in Sections 15, 22, and 27, Township 17 South, Range 36 East, N.M.P.M., Lea County, New Mexico.

OPPONENT

Texas Standard is a working interest owner in certain tracts in the proposed well units. In addition, Texas Standard has proposed competing wells in the subject lands, and will be filing pooling applications within the next several days. Thus, it opposes Manzano's applications.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OPPONENT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

Matt Roberson  
(landman)

20 min.

Approx. 8

David Entzminger  
(geology)

20 min.

Approx. 6

Craig Young  
(Operations V.P.)

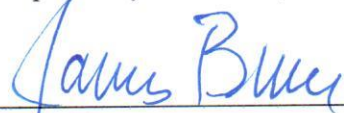
25 min.

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**

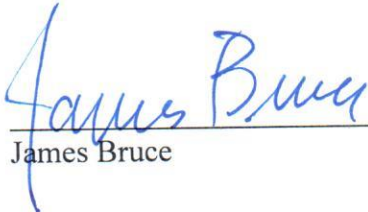
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 29<sup>th</sup> day of October, 2020 via e-mail:

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