# 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 No. 21894

# PRE-HEARING STATEMENT

This pre-hearing statement is submitted by applicant as required by the Oil Conservation Division.

## **APPEARANCES**

APPLICANT

Manzano LLC

P.O. Box 1737

Roswell, New Mexico 88202

Attention:

Nick McClelland

(575) 623-1996

**OPPONENT** 

APPLICANT'S ATTORNEY

James Bruce

P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

**OPPONENT'S ATTORNEY** 

#### STATEMENT OF THE CASE

#### APPLICANT

Manzano LLC seeks an order of all mineral interests in the San Andres formation underlying a (proximity tract) horizontal spacing unit comprised of the W/2 of Section 23 and the W/2 of Section 14, Township 12 South, Range 38 East, NMPM. The unit will be dedicated to the Trinity State Com. Well No. 4H, to be drilled to a depth sufficient to test the San Andres formation, and to dedicate the W½ of Section 23 and the W½ of Section 14 to the well. The well is a horizontal well, with a first take point 100 feet from the south line and 1425 feet from the west line (in the SE¼SW¼) of Section 23, and a last take point 100 feet from the north line and 1204 feet from the west line (in the NW¼NW¼) of Section 14. Also to be considered will be the cost of drilling and completing the well and the allocation of the cost thereof, as well as actual operating costs

and charges for supervision, designation of applicant as operator of the well, and a cost plus 200% charge for the risk involved in drilling and completing the well.

# **OPPONENT**

# PROPOSED EVIDENCE

# **APPLICANT**

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

Nick McClelland 10 min. Approx. 6 (landman)

John Worrall 10 min. Approx. 4 (geologist)

**OPPONENTS** 

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

### **PROCEDURAL MATTERS**

If unopposed, applicant intends to present the case by affidavit.

James Bruce

Post Office Box 1056

Respectfully submitted

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Mewbourne Oil Company