

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

**APPLICATION OF ENDURING
RESOURCES, LLC FOR APPROVAL OF
THE ALAMOS CANYON UNIT,
SANDOVAL COUNTY, NEW MEXICO.**

CASE NO. 25282

APPLICANT'S PREHEARING STATEMENT

Enduring Resources, LLC, ("Enduring") (OGRID No. 372286) submits this Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Enduring Resources, LLC

ATTORNEY

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

OTHER PARTIES

NONE

ATTORNEY

APPLICANT'S STATEMENT OF CASE

Enduring Resources, LLC seeks an order approving the proposed Alamos Canyon Unit. The proposed Unit Area consists of approximately 5,927.62-acres of the following Federal and Indian allotted lands situated in Sandoval County, New Mexico:

Township 22 North, Range 6 West, N.M.P.M.

Section 3: S/2
Section 4: Lots 3, 4, S/2NW/4, S/2
Section 5: S/2
Section 6: Lots 6, 7, E/2SW/4, SE/4
Section 7: Lots 1, 2, 3, 4, E/2, E/2W/2 (All)
Section 8: All
Section 9: All
Section 10: NW/4
Section 17: N/2
Section 18: Lots 1, 2, E/2NW/4, NE/4

Township 22 North, Range 7 West, N.M.P.M.

Section 11: E/2
Section 12: All
Section 13: N/2, SW/4
Section 14: E/2

Enduring is the designated operator under the proposed Unit Agreement and the unitized interval shall be limited in depth from the stratigraphic equivalents of top of the Mancos Formation, which is the base of the Point Lookout Sandstone of the Mesa Verde Group, at a measured depth of 4,416 feet down to the stratigraphic equivalent of the top of the Graneros Shale Formation, which is the base of the Greenhorn Limestone, at a measured depth of 6,241 feet as encountered in the Enduring Resources Logos #003 (API # 30-043-21135) located in Section 5, Township 22 North, Range 6 West, NMPM, Sandoval County, New Mexico.

The proposed Alamos Canyon Unit Agreement ("Unit Agreement") applies to new horizontal and multi-lateral wells only, and all existing wells within the Unit Area producing from the Mancos-Gallup formation are excluded from the terms of the Unit Agreement. Enduring has met with the Bureau of Land Management and received preliminary approval of the Unit Agreement. Enduring has obtained approval of the proposed Unit Agreement from all working interest owners, demonstrating sufficient support to provide effective control of unit operations.

The Unit Agreement, and the unitized operation and management of the Unit Area, are in the best interests of conservation, the prevention of waste and the protection of correlative rights.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Travis Whitham – Landman	Self-Affirmed Statement	Approx. 3
Raffaello Sarcedoti – Geologist	Self-Affirmed Statement	Approx. 3

PROCEDURAL MATTERS

Enduring intends to present this case by self-affirmed statement if there is no opposition at the time of hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

Michael H. Feldewert
Adam G. Rankin
Paula M. Vance
Post Office Box 2208
Santa Fe, NM 87504
505-988-4421
Facsimile 505-983-6043
mfeldewert@hollandhart.com
agrarkin@hollandhart.com
pmvance@hollandhart.com

ATTORNEYS FOR ENDURING RESOURCES, LLC

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 448175

QUESTIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way Centennial, CO 80111	OGRID: 372286
	Action Number: 448175
	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.