

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

**APPLICATION OF ENDURANCE RESOURCES TO REOPEN CASE NO. 15465 FOR THE PURPOSE OF CREATING A DEFINED DELAWARE OIL POOL SUBJECT TO THE SPECIAL RULES ENACTED UNDER DIVISION ORDER R-14153, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15465 (re-opened)**

**ENDURANCE'S PRE-HEARING STATEMENT**

Endurance Resources LLC ("Endurance"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Endurance Resources LLC  
203 West Wall, Suite 1000  
Midland, TX 79701

**ATTORNEY**

Michael H. Feldewert, Esq.  
Jordan L. Kessler, Esq.  
Holland & Hart, LLP  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile

2016 JUL 14 P 2:04  
RECEIVED OCD

**APPLICANT'S STATEMENT OF CASE**

Endurance seeks an order pursuant to Order R-14153 creating a new Delaware Oil Pool subject to the Special Pool Rules enacted under Order R-14153. Division Order R-14153 enacted Special Pool Rules for the Delaware WC-025-G-05 S253523H; Delaware Pool (97779), a wildcat pool located in Lea County. The subject pool is currently comprised of the following acreage:

**Township 25 South, Range 35 East, NMPM**

Section 15: S/2  
Section 16: W/2 and SE/4  
Section 22: NE/4  
Section 23: N/2 and SW/4  
Section 26: W/2

Ordering paragraph (3) of R-14153 required applicant to re-open Case. No. 15465 for the purpose of creating “a defined Delaware Oil Pool and requesting that the Special Pool Rules enacted herein be applied to the new pool.” In connection with Order R-14153, Endurance now seeks the creation of the White Falcon Pool to correspond with the current boundaries of the WC-025 G-05 S253523H; Delaware Pool and to subject this new pool to the Special Pool Rules set forth in Order-14153 providing for a depth bracket allowable of 350 barrels of oil per day per 40-acre oil spacing and proration unit. All other rules for this pool shall remain in conformance with statewide rules.

**APPLICANT’S PROPOSED EVIDENCE**

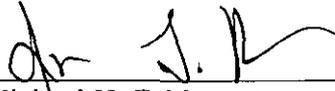
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jason South (Land Manager)	Approx. 10	Approx. 3

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



---

Michael H. Feldewert  
Jordan L. Kessler  
Post Office Box 2208  
Santa Fe, New Mexico 87504-2208  
(505) 988-4421  
(505) 983-6043 Facsimile  
[mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com)  
[jlkessler@hollandhart.com](mailto:jlkessler@hollandhart.com)

**ATTORNEYS FOR ENDURANCE RESOURCES LLC**