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:

IN THE MATTER OF THE APPLICATION OF ENDURANCE RESOURCES, LLC FOR APPROVAL OF A SALT WATER DISPOSAL WELL, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP as required by the rules of the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Endurance Resources, inc. Attn: Mr. Don Ritter Post Office Box 1466 Artesia, New Mexico 88211 (575) 308-0722 William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

STATEMENT OF CASE

<u>APPLICANT</u>

Applicant seeks authorization to utilize its Marshall Well No. 2 (API No. 30-025-08359) located 1900 feet from the South line and 1910 feet from the West line of Section 19, Township 23 South, Range 33 East, NMPM to inject up to 3000 barrels of water per day, at a maximum pressure of 600 psi, into the Ramsey sand of the Delaware formation in the Cruz-Delaware Pool, at an approximate depth of 5105 feet to 5180 feet.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

ESTIMATED TIME

EXHIBITS

(Name and Expertise)

Don Ritter, Petroleum

Engineer

15 Minutes

Approx. 2

PROCEDURAL MATTERS

Endurance Resources, LLC has none at this time.

William F. **¢**arr

Attorney for Endurance Resources, LLC

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