

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

**APPLICATION OF ENDURING RESOURCES, LLC
FOR APPROVAL OF THE BOBBY B UNIT,
RIO ARRIBA COUNTY, NEW MEXICO.**

CASE NO. 26181

ENDURING’S PREHEARING STATEMENT

Enduring Resources, LLC, (“Enduring” or “Applicant”) submits this Prehearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Enduring Resources, LLC
 (“Enduring”)

ATTORNEY

Adam G. Rankin
Paula M. Vance
A. Raylee Starnes
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile

APPLICANT’S STATEMENT OF CASE

In **Case No. 26181**, Enduring seeks an order approving the proposed Bobby B Unit. The proposed Unit Area consists of approximately 16,774.60-acres of the following Federal, State, Indian allotted, and fee lands, situated in Rio Arriba County, New Mexico:

Township 24 North, Range 6 West

- Section 7: Lots 1-4, E/2 W/2, E/2 (All)
- Section 18: Lots 1-4, E/2 W/2, E/2 (All)
- Section 19: Lots 1-4, E/2 W/2, E/2 (All)
- Section 29: SW/4, W/2 SE/4
- Section 30: Lots 1-4, E/2 W/2, E/2 (All)
- Section 31: Lots 1-4, E/2 W/2, E/2 (All)
- Section 32: All

Township 24 North, Range 7 West

| | |
|-------------|---------------------|
| Section 13: | S/2 |
| Section 14: | S/2 |
| Section 15: | All |
| Section 21: | NE/4, S/2 |
| Section 22: | All |
| Section 23: | All |
| Section 24: | All |
| Section 25: | All |
| Section 26: | All |
| Section 27: | All |
| Section 32: | W/2 NW/4, NE/4, S/2 |
| Section 34: | E/2 NW/4, NE/4, S/2 |
| Section 35: | All |
| Section 36: | All |

Township 23 North, Range 7 West

| | |
|-------------|--|
| Section 2: | Lots 1-4, S/2 N/2, S/2 (All) |
| Section 3: | Lots 1-12, S/2 N/2 (All) |
| Section 4: | Lots 5-20 (All) |
| Section 5: | Lots 5-9, SW/4 NE/4, S/2 NW/4, S/2 (All) |
| Section 8: | NE/4 |
| Section 9: | Lots 1-4, SE/4, W/2 (All) |
| Section 10: | Lots 1-10, SE/4 NE/4, NE/4 SE/4, S/2 S/2 (All) |
| Section 15: | NW/4 |
| Section 16: | All |

Enduring is the designated operator under the proposed Unit Agreement and the unitized interval shall be limited in depth from the stratigraphic equivalent of the top of the Mancos Formation, at a measured depth of 4,478 feet, down to the stratigraphic equivalent of the base of the Gallup Sandstone, at a measured depth of 5,660 feet as encountered in the Epic Energy LLC's Marcus A 014 well (API No. 30-039-24170) located in irregular Section 31, Township 24 North, Range 6 West, NMPM, Rio Arriba County, New Mexico.

The proposed Bobby B 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 obtained approval of the proposed Unit Agreement from all working interest owners, demonstrating

sufficient support to provide effective control of unit operations. Enduring is currently working with the BLM to obtain final approval of the Unit Agreement on an expedited basis and a letter recognizing the Unit Area as logically subject to exploration and development under the unitization provisions of the Mineral Leasing Act.

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. 2 |
| Matt Slowinski – 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: 
 Adam G. Rankin
 Paula M. Vance
 A. Raylee Starnes
 Post Office Box 2208
 Santa Fe, NM 87504
 505-988-4421
 Facsimile 505-983-6043
 agrankin@hollandhart.com
 pmvance@hollandhart.com
 arstarnes@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 589490

QUESTIONS

| | |
|---|--|
| Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way Centennial, CO 80111 | OGRID: 372286 |
| | Action Number: 589490 |
| | Action Type: [HEAR] Prehearing Statement (PREHEARING) |

QUESTIONS

| | |
|--|----------------------|
| Testimony | |
| <i>Please assist us by provide the following information about your testimony.</i> | |
| Number of witnesses | <i>Not answered.</i> |
| Testimony time (in minutes) | <i>Not answered.</i> |