

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

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

**CASE NO. 22854**

**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**

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**OTHER PARTIES**

**ATTORNEY**

**APPLICANT'S STATEMENT OF CASE**

Enduring Resources, LLC seeks an order approving the proposed Haynes Canyon Unit. The proposed Unit Area consists of approximately 4,201.98-acres of the following Federal, State Trust, and Patented lands situated in Rio Arriba County, New Mexico:

**Township 23 North, Range 6 West, N.M.P.M.**

Section 2: NW/4  
Section 3: ALL  
Section 4: ALL  
Section 9: E/2, S/2 NW/4, S/2 SW/4, NE/4 SW/4  
Section 10: ALL  
Section 11: ALL  
Section 12: W/2 W/2  
Section 15: ALL  
Section 16: NE/4

Enduring is the designated operator under the proposed Unit Agreement and the unitized interval is defined as the stratigraphic equivalent of the top of the Mancos formation at a measured depth of 4,538 feet beneath the surface to the base of the Gallup formation at a measured depth of 5,620 feet beneath the surface as seen on the log in the WPX Enchilada 002X Well (API# 3003931194), which is located in Section 16, Township 23 North, Range 6 West, Rio Arriba County, New Mexico.

The proposed Haynes Canyon Unit Agreement (“Unit Agreement”) applies to horizontal and multi-lateral wells only, and all existing vertical wells within the Unit Area producing from the Mancos-Gallup formation are excluded from the terms of the Unit Agreement, which was attached as Exhibit A with the application. Enduring has met with the Bureau of Land Management and received a letter recognizing the proposed 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**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Anita Ashland – Landman	Affidavit	Approx. 5
Raffaello Sarcedoti – Geologist	Affidavit	Approx. 4

**PROCEDURAL MATTERS**

Enduring intends to present this case by affidavit if there is no opposition at the time of hearing.

Respectfully submitted,

**HOLLAND & HART LLP**

By:   
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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
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QUESTIONS  
  
Action 111224

QUESTIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way, Suite 525 Centennial, CO 80111	OGRID: 372286
	Action Number: 111224
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	2
Testimony time (in minutes)	9