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

# APPLICATION OF ENDURING RESOURCES, LLC TO AMEND ORDER NO. R-14347 TO EXPAND THE SOUTH ESCAVADA UNIT AREA, SANDOVAL COUNTY, NEW MEXICO.

#### CASE NO. 22952

#### 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

# <u>ATTORNEY</u>

Michael H. Feldewert Adam G. Rankin Julia Broggi Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

# **OTHER PARTIES**

# ATTORNEY

None

# **APPLICANT'S STATEMENT OF CASE**

Enduring Resources, LLC seeks an order amending Order No. R-14347 to expand the geographic area of the South Escavada Unit Area. On May 15, 2017, the Division issued Order No. R-14347 in Case No. 15645 approving formation of the South Escavada Unit comprising

4,723.82 acres, more or less, of Federal and Allotted Indian lands in Sandoval County, New Mexico. As approved, the South Escavada Unit comprises the following-described acreage:

#### TOWNSHIP 22 NORTH, RANGE 7 WEST, NMPM

Section 13:	SE/4
Section 14:	SW/4
Section 15:	S/2
Section 22:	S/2
Section 23	N/2, SW/4, W/2SE/4
Section 24:	N/2
Section 26:	NW/4
Section 27:	All
Section 28:	SE/4

#### TOWNSHIP 22 NORTH, RANGE 6 WEST, NMPM

Section 17:	S/2
Section 18:	Lots 3, 4, E/2 SW/4, SE/4
Section 19:	Lots 1, 4 E/2 W/2, E/2
Section 20:	All

The Unitized Interval is defined as being from the top of the Mancos formation at a measured depth of 3,715 feet down to the stratigraphic equivalent of the depth of 5,575 feet as encountered in the Sandoval #1 23 well (API 30-043-05150) located in Section 23, Township 22 North, Range 7 West NMPM.

The Unit was created and approved as a single Participating Area with all tracts participating in all wells from inception. The Bureau of Land Management, Federal Indian Minerals Office, and Enduring agreed in 2018 that, when possible, the Unit will be expanded to include additional acreage in the N/2 of Section 22, Township 22 North, Range 7 West. Pursuant to that agreement, Enduring now seeks to expand the Unit Area to include the following 160-acre tract of Allotted Indian lands under the terms of the Unit Agreement recently leased to Enduring:

#### TOWNSHIP 22 NORTH, RANGE 7 WEST, NMPM

2

Section 22:

NE/4

The Unitized Interval for the expanded South Escavada Unit will remain the same as identified in Order No. R-14347. The entire expanded South Escavada Unit Area will be developed and operated as a single Participating Area. Enduring will remain the designated operator under the Unit Agreement. The effective date of the expanded South Escavada Unit is proposed to be August 1, 2022. All other provisions of Order No. R-14051 are proposed to remain unchanged. Enduring owns 100% of the working interest in the expanded Unit Area, ensuring that there will be effective control of unit operations following expansion. Enduring has received preliminary approval of the expansion of the South Escavada Unit from the Bureau of Land Management and the Federal Indian Minerals Office. Approval of this Application will be 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
Anita Ashland – Landman	Affidavit	Approx. 6
Raffaello Sacerdoti – 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. Santa Fe, NM 87505

QUESTIONS

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Action 138162

QUESTIONS

Operator:	OGRID:
ENDURING RESOURCES, LLC	372286
6300 S Syracuse Way, Suite 525	Action Number:
Centennial, CO 80111	138162
	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.	