

**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. 26365

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")

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APPLICANT'S STATEMENT OF CASE

In **Case No. 26365**, Enduring seeks an order approving the proposed Bobby B Unit, which is a federal unit that received final approval from the BLM on May 12, 2026, comprising approximately 16,774.60 acres (of which 15,716.52 acres, more or less, are committed acres). Enduring is seeking federal approval for an expansion under the terms of the Unit Agreement, adding approximately 1,520 additional acres to the Unit Area. The Unit Area with the proposed expansion consists of approximately 18,294.60-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:	All
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 12:	NE/4, S/2
Section 13:	All
Section 14:	All
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 awaiting final BLM approval for the proposed expansion and seeks approval from the Division for the Unit and the expanded Unit Area.

Enduring is the designated operator under the 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 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 Unit Agreement from the BLM, Federal Indian Mineral Office (FIMO), State Land Office and all committed working interest owners, demonstrating sufficient support to provide effective control of unit operations. Enduring is currently working with the BLM to obtain preliminary approval of the Unit expansion on an expedited basis.

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.

Epic Energy, LLC (“Epic”) filed an objection to Enduring’s application; however, Epic only owns overriding royalty interests within the Bobby B Unit associated with federal leases that have already been effectively committed to the Unit Agreement, approved by the Bureau of Land Management (“BLM”). Epic failed to timely file a State Director Review (“SDR”) with the BLM, challenging BLM’s approval of the Unit and Unit Agreement or the commitment of the underlying federal leases to the Unit. And, because it holds only an overriding royalty interest in the Unit, Epic is not an “owner” under the New Mexico Oil and Gas Act for purposes of protecting correlative rights. Correlative rights are afforded only to owners of a mineral interest with a right to produce. *See* 19.15.2.7.C(17) NMAC (defining “correlative rights”); *see also* 19.15.2.7.O(7) NMAC (defining “owner”). Owners of overriding royalty interests, including Epic, do not have a right to produce.

FILED EVIDENCE

Pursuant to the Prehearing Order entered in this matter, Enduring has file the following with this prehearing statement:

- Enduring Exhibit B: Self-Affirmed Statement of Travis Whitham, Senior Landman
 - Enduring Exhibit B-1 through B-3: Documents references by the testifying witness
- Enduring Exhibit C: Self-Affirmed Statement of Raffaello Sacerdoti, Geologist
 - Enduring Exhibit C-1 through C-2: Documents references by the testifying witness

The qualifications and direct testimony for each witness are contained in the self-affirmed statements filed with this prehearing statement.

PROCEDURAL MATTERS

Enduring reserves the right to call these or other witnesses, including rebuttal witnesses, to address issues that arise with the filing of additional information or at the hearing.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2026, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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QUESTIONS

Action 622814

QUESTIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way Centennial, CO 80111	OGRID: 372286
	Action Number: 622814
	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.