

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

**APPLICATION OF ENDURANCE RESOURCES LLC  
FOR A SPECIAL DEPTH BRACKET ALLOWABLE  
FOR OIL WELLS WITHIN THE WC-025 G-05 S253523H;  
DELAWARE WILDCAT POOL, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15465**

**ENDURANCE'S PRE-HEARING STATEMENT**

Endurance Resources LLC ("Endurance"), the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

Endurance Resources LLC  
203 West Wall, Suite 1000  
Midland, TX 79701

**ATTORNEY**

Michael H. Feldewert, Esq.  
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**APPLICANT'S STATEMENT OF CASE**

Endurance seeks an order Applicant seeks to increase the depth bracket allowable for oil wells within the WC-025 G-05 S253523H; Delaware Pool (97779) from 230 to 350 barrels of oil per day for each 40-acre spacing unit. This pool is currently covers the following acreage in Lea County, New Mexico:

**Township 25 South, Range 35 East, N.M.P.M.**  
Section 15: S/2  
Section 16: W/2 and SE/4  
Section 22: NE/4  
Section 23: N/2

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**APPLICANT'S PROPOSED EVIDENCE**

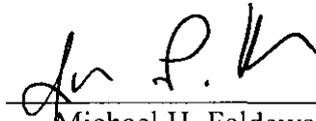
<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Jason South (Land Manager)	Approx. 10	Approx. 3
Randall Harris (VP of Exploration, Geologist)	Approx. 10	Approx. 3
Manny Sirgo (VP of Operations, Petroleum Engineer)	Approx. 10	Approx. 3

**PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

HOLLAND & HART LLP



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**ATTORNEYS FOR ENDURANCE RESOURCES LLC**