

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

**APPLICATION OF ENDURING RESOURCES,
LLC TO CONTRACT THE BASIN MANCOS
POOL FROM THE PROPOSED HAYNES
CANYON UNIT AREA AND EXPAND THE
COUNSELORS GALLUP-DAKOTA POOL TO
THE INTERIOR BOUNDARY OF THE
PROPOSED HAYNES CANYON UNIT AREA,
RIO ARRIBA COUNTY, NEW MEXICO.**

CASE NO. 22899

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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APPLICANT’S STATEMENT OF CASE

Enduring Resources, LLC seeks an order to contract the Basin Mancos Pool (Pool Code 97232) from the proposed Haynes Canyon Unit and expand the Counselors Gallup-Dakota pool (Pool Code 13379) to the interior boundary of the proposed Haynes Canyon Unit. The proposed Haynes Canyon 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 (the “Unit Area”):

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. Enduring presented its application for approval of its proposed Haynes Canyon Unit at a hearing before a Division Examiner on June 2, 2022, in Case No. 22854. The case was taken under advisement and an order is pending Division approval.

There are two Division-designated pools for the Mancos-Gallup formation within the proposed Unit Area: The Counselors Gallup-Dakota pool (Pool Code 13379) and the Basin Mancos Pool (Pool Code 97232). The District Office instructed Enduring to file a subsequent

application to modify the pool boundaries to contract the Basin Mancos pool out of the Unit Area and to expand the Counselors Gallup-Dakota pool to the interior boundary of the Unit Area, so the only Division-designated pool within the Unit Area will be the Counselors Gallup-Dakota pool.

To foster administrative reporting and efficiency, and to comply with the District Office’s instructions, Enduring seeks to contract the Basin Mancos Pool (Pool Code 97232) outside the exterior boundary of the Unit Area and to expand the Counselors Gallup-Dakota pool (Pool Code 13379) to the interior boundary of the Unit Area. Approval of the contraction and expansion of pools as set forth herein will promote administrative and reporting efficiency.

APPLICANT’S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Anita Ashland – Landman	Affidavit	Approx. 2
Raffaello Sacerdoti – Geologist	Affidavit	Approx. 2

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 129552

QUESTIONS

Operator: ENDURING RESOURCES, LLC 6300 S Syracuse Way, Suite 525 Centennial, CO 80111	OGRID: 372286
	Action Number: 129552
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

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