

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

2014 FEB 13 P 11:28

**IN THE MATTER OF THE  
APPLICATION OF CHEVRON USA INC.  
FOR A NON-STANDARD SPACING  
AND PRORATION UNIT AND  
COMPULSORY POOLING, LEA COUNTY,  
NEW MEXICO.**

**CASE NO. 15074**

**IN THE MATTER OF THE APPLICATION  
OF ENDURANCE RESOURCES, LLC  
FOR COMPULSORY POOLING AND  
NON-STANDARD SPACING AND  
PRORATION UNIT, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15084**

**AMENDED PRE-HEARING STATEMENT**

This Amended Pre-hearing Statement is submitted by Endurance Resources, LLC, by and through its undersigned counsel, Ernest L. Padilla, PADILLA LAW FIRM, P.A., as required by the Oil Conservation Division.

**APPEARANCES OF PARTIES**

**APPLICANT:**

Endurance Resources, LLC  
PO Box 1466  
Artesia, New Mexico 88211-1466

**ATTORNEY:**

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577

**OPPOSITION OR OTHER PARTY:**

Chevron U.S.A., Inc.

Michael H. Feldewert  
Holland & Hart LLP  
PO Box 2208  
Santa Fe, NM 87504-2208  
(505) 988-4421

Kaiser Francis Oil Co.

James Bruce  
PO Box 1056  
Santa Fe, NM 87504  
(505) 982-2043

### **STATEMENT OF CASE**

**APPLICANT:** Endurance Resource, LLC, seeks approval for an order pooling all mineral interests from the surface of the earth to a depth sufficient to test the Bone Springs Formation (Bell Lake Bone Spring, North Pool, No. 5150), non-standard spacing and proration unit underlying the E/2 of Section 18, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico. Applicant intends to drill its Starcaster 18 Federal 4H well to be located at a standard well location having as surface location 330 FNL and 660 FEL of Section 18 and a bottom hole location of 330 FSL and 660 FEL of said Section 18.

### **OPPOSITION OR OTHER PARTY:**

Chevron U.S.A. Inc., proposes to drill a well oriented east/west and dedicated to the S/2 N/2 of Section 18.

### **PROPOSED EVIDENCE**

#### **APPLICANT**

| WITNESSES                            | EST. TIME | EXHIBITS                                                                                 |
|--------------------------------------|-----------|------------------------------------------------------------------------------------------|
| Jason South<br>(Landman)             | 40 min.   | Land ownership map<br>time-line of well<br>proposal and proposal<br>documentation; APD   |
| Donald Ritter<br>(Drilling Engineer) | 40 min.   | AFE<br>Drilling and<br>completion program;<br>Geomechanical study                        |
| Randall Harris<br>(Geologist)        | 20 min.   | Isopach map<br>Cross-section<br>Structure map                                            |
| Manny Sirgo<br>(Reservoir Engineer)  | 30 min.   | Computations of<br>production recoveries<br>on north/south vs.<br>east/west orientation; |

Lyle Lehman  
(Completion Engineer)

30 min.

Fracture orientation  
fracture treatment  
design

Ernest L. Padilla

Affidavit of Service

**OPPOSITION**

WITNESSES

EST. TIME

EXHIBITS

(Unknown)

**PROCEDURAL MATTERS**

None.

PADILLA LAW FIRM, P.A.



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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 13<sup>th</sup> day of February, 2014 by electronic transmission:

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