

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

2014 FEB 13 10 14 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
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Kaiser Francis Oil Co.

James Bruce
PO Box 1056
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(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 (Landman)	40 min.	Land ownership map time-line of well proposal and proposal documentation; APD
Donald Ritter (Drilling Engineer)	40 min.	AFE Drilling and completion program; Geomechanical study
Randall Harris (Geologist)	20 min.	Isopach map Cross-section Structure map
Manny Sirgo (Reservoir Engineer)	30 min.	Computations of production recoveries on north/south vs. 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 13th day of February, 2014 by electronic transmission:

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