

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

2014 MAR 28 10:03:33

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

**CASE NO. 15109**

**MOTION FOR CONTINUANCE**

Chevron U.S.A. Inc. ("Chevron") moves the Division to continue the above reference case, currently scheduled for hearing on April 3, 2014, to the May 1, 2014, Examiner docket. In support of this motion, Chevron states:

1. Under Case No. 15109, Endurance Resources, LLC ("Endurance") seeks to create a non-standard spacing unit comprised of the E/2 E/2 of Section 19, Township 23 South, Range 34 East, NMPM, in Lea County, New Mexico for a proposed horizontal well in the Bone Spring formation.

2. Chevron is an interest owner in Section 19 and has proposed to the working interest owners a competing horizontal well in the N/2 N/2 of Section 19. Chevron's competing development proposal for this acreage will be ready for consideration by the Division at the May 1, 2014 Examiner docket.

3. Chevron has sought concurrence from Endurance in this continuance motion, but as of filing has not received a final response.

4. Chevron notes that with respect to Section 18 to the north of this acreage, the parties agreed to have their respective development plans heard by the Division at a single hearing rather

than in a piecemeal fashion. *See* Attachment 1 hereto.<sup>1</sup>

5. No harm or prejudice will result if this matter is continued to the May 1, 2014, docket so that both cases can be heard at the same time.

WHEREFORE, Chevron requests that the Division continue the hearing on Case No. 15109 until the May 1, 2014, Examiner Docket.

Respectfully submitted,

HOLLAND & HART, LLP



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ATTORNEYS FOR CHEVRON U.S.A. INC.

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<sup>1</sup> Case Nos. 15074 and 15084 were jointly heard by the Division at the February 20, 2014, Examiner docket and proposed orders were submitted to the Division on March 24, 2014.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2014, I served a copy of the foregoing document to the following via electronic mail to:

Ernest L. Padilla  
Padilla Law Firm. P.A.  
Post Office Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577  
[epadilla@qwestoffice.net](mailto:epadilla@qwestoffice.net)

A handwritten signature in black ink, appearing to read "Michael H. Feldewert", written over a horizontal line.

Michael H. Feldewert

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

**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**

**AGREED MOTION FOR CONTINUANCE**

Endurance Resources, Inc., by and through its undersigned counsel of record, hereby requests continuance of the hearing in the above-captioned matter set for January 23, 2014, on the Division's docket and as grounds therefore states:

1. Endurance Resources, Inc., has asked for consolidation of this case with the application of OCD Case #15084 set for hearing on February 6, 2014, as stated in its Pre-Hearing Statement.
2. Endurance Resources, Inc.'s, principle witness Don Ritter, is unable to testify at the January 23, 2014, hearing.
3. Endurance Resources, Inc., is informed that one of Chevron USA Inc.'s witnesses is not available to testify at the February 6, 2014, hearing.
4. Undersigned counsel has contacted counsel for Chevron USA Inc., Michael Feldewert, and is informed that Chevron USA Inc. does not oppose this motion, and therefore concurs in this motion.



WHEREFORE, for the foregoing reasons Endurance Resources, Inc., requests a continuance of this case to the Division's February 20, 2014, hearing docket at which time both applications can be heard.

PADILLA LAW FIRM, P.A.

By:



Ernest L. Padilla  
P.O. Box 2523  
Santa Fe, New Mexico 87504  
(505) 988-7577

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of this Motion for Continuance to be served upon, Michael H. Feldewert, Holland & Hart, counsel for Chevron U.S.A., Inc., PO Box 2208, Santa Fe, NM 87504-2208, by electronic mail to [mfeldewert@hollandhart.com](mailto:mfeldewert@hollandhart.com) this 21<sup>st</sup> day of January, 2014.



ERNEST L. PADILLA