

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

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**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. 15109

PRE-HEARING STATEMENT

This 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, New Mexico 87504
Attorney for Endurance Resources, LLC
(505) 988-7577

OPPOSITION OR OTHER PARTY:

STATEMENT OF CASE

APPLICANT:

Applicant seeks an order pooling all mineral interests from the surface of the earth to the base of the Bone Spring Formation to test the Second Bone Springs formation underlying the E/2E/2 of Section 19, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico. Applicant proposes to drill its Nocaster 19 Federal 4H well to be located at a standard well location having a surface location 330 FSL and 660 FEL of Section 19 and a bottom hole location of 330 FNL and 660 FEL of said Section 19. Applicant seeks to dedicate the E/2E/2 of Section 19 to the well to form a non-standard 160 acre spacing and proration unit for any formations and/or pools developed on 160 acres or less within the vertical extent, including the Second Bone Spring formation. The subject lands are located approximately 18 miles northwest of Jal, New Mexico.

OPPOSITION OR OTHER PARTY:

PROPOSED EVIDENCE

APPLICANT

WITNESSES	EST. TIME	EXHIBITS
Don Ritter (Engineer)	45 min.	Engineering related exhibits Geo-mechanical studies
Manny Sirgo (Engineer)	45 min.	Engineering related exhibits Geo-mechanical studies
Randall Harris (Geologist)	30 min.	Geologist Structure maps Isopach
Brad Jones (Chief Geophysics)	30 min.	Seismic data
Jason South (Land man)	30 min.	Land maps Land ownership Joinder information Notice requirements
Ernest L. Padilla		Affidavit of Service

OPPOSITION

WITNESSES	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

PADILLA LAW FIRM, P.A.



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