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

APPLICATION OF ENDURING RESOURCES, LLC FOR APPROVAL OF THE RIDGE UNIT, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 20272

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 1050 17th Street, Suite 2500 Denver, Colorado 80265

ATTORNEY

Michael H. Feldewert, Esq. Adam G. Rankin Julia Broggi Holland & Hart, LLP Post Office Box 2208 Santa Fe, New Mexico 87504-2208 (505) 988-4421 (505) 983-6043 Facsimile mfeldewert@hollandhart.com agrankin@hollandhart.com

APPLICANT'S STATEMENT OF CASE

Applicant seeks approval of the Ridge Unit consisting of approximately 2,560 acres of Federal and Allotted Indian lands situated in all or parts of the Sections 22-27, Township 24 North, Range 8 West, San Juan County, New Mexico. The unitized interval is defined as the stratigraphic equivalent of the top of the Mancos Formation at a depth of 4,351 feet MD down to the stratigraphic equivalent of the base of the Mancos Formation at a depth of 6,203 feet MD as

encountered in the Elm Ridge Exploration Co. Federal 34 #43 well in Section 34, Township 24 North, Range 8 West, N.M.P.M. Enduring owns over 86 percent of the working interest in the Unit Area and has received preliminary approval of the Unit Agreement from the Bureau of Land Management and the Federal Indian Minerals Office. Notice of this application has been provided by mail and by publication in a local newspaper of general circulation in San Juan County, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

| WITNESS Name and Expertise | ESTIMATED TIME | EXHIBITS |
|-------------------------------|----------------|-----------|
| Paul Brooke – Landman | Approx. 10 | Approx. 5 |
| Robert German – Geologist | Approx. 10 | Approx. 4 |

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART LLP

Bv

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ATTORNEYS FOR ENDURING RESOURCES, LLC