

STATEMENT OF THOMAS A. ST. OURS

STATE OF COLORADO)
) ss.
COUNTY OF LA PLATA)

I, Thomas A. St. Ours, being more than eighteen years of age and competent to provide testimony in the State of Colorado, being first duly sworn, upon oath, depose and say:

1. I am the owner of real property with the situs address of 611 CR 234, Durango, Colorado 81301 and with the following legal description as set forth in the records of the La Plata County Assessor: "Tract: A Section: 1 Township: 34 Range 9." I will refer to my real property as the "Subject Property."

2. I purchased the Subject Property effective May 14, 1997.

3. When I purchased the Subject Property, it was subject to an oil and gas lease. Currently, Enduring Resources LLC Operates a well (St. Ours #1-3) on a portion of the Subject Property. The well was drilled and completed during 2001 by a predecessor to Enduring Resources (Hallwood). I have not granted possession of the area in question to Enduring Resources or any lessee under the oil and gas lease. There certainly has been no exclusive possession granted by me or my predecessors. When the pad for oil and gas operations was being built by a contractor for Hallwood, I asked the contractor and Hallwood to extend the flattened area so that I could place my equipment on it. It was extended beyond what was

needed for the well pad, *i.e.*, the extended area for me was outside the rig tie down anchors. My part was not graveled, further delineating where the well pad ended and where the area I would use began. When Chevron electrified the pump, Chevron provided to me at my area a 110v power outlet. This was further evidence of the understanding about my "area" and the use of it.

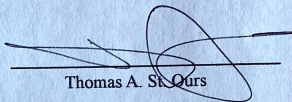
4. It is my understanding that the Colorado Oil and Gas Conservation Commission ("COGCC") conducted an inspection of the oil and gas operation on the Subject Property on or about December 23, 2019. As a result of the inspection, the COGCC requested Enduring Resources to "remove equipment and debris from the project area," which is reflected in Inspection Photographs 3 and 4 and located in the northern project area.

5. The property referred to as "equipment and debris" is owned by me and located on the surface of the Subject Property. I do not consider any of it debris. It consists of tool sheds, a trailer and a truck. I have regularly stored my personal property in this area without interfering in any way with any of the successive operators (Hallwood, Pure Resources, Unocal, Chevron and Enduring). I have stored property in this area since 2001. I have regularly paid the real property taxes on the portion of the Subject Property where my equipment is located. In sum, I own both the personal property and the real property involved.

6. Because of the December 2019 inspection, a representative of Enduring Resources requested that I remove the property reflected in Inspection Photographs 3 and 4. I informed the representative that I did not intend to remove the "equipment and debris" from the Subject Property.

7. A representative of Enduring Resources recently has repeated the request from the COGCC that I remove the "equipment and debris" and I repeated my refusal to remove my property on the basis that it fails to encroach on the designated well pad, interfere with lessee's operations, or create any sort of safety issue.

FURTHER, AFFIANT SAYETH NAUGHT.


Thomas A. St. Qurs

Date: 10/23/20