

J. SCOTT HALL Office: (505) 986-2646 RECEIVED OCD Email: shall@montand.com Reply To: Santa Fe Office www.montand.com 2011 MAY 19 P 4: 05

May 19, 2011

Ms. Florene Davidson New Mexico Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

Re: NMOCD Case No. 14654: In The Matter of The Application of Energen Resources Corp. for Exception to The Well Density Provisions of The Special Rules and Regulations for The Basin-Fruitland Coal Gas Pool to Authorize The Recompletion of Wells as Horizontal Lateral or Sidetrack Wells and for Simultaneous Dedication, Rio Arriba County, New Mexico

Dear Ms. Davidson:

On behalf of Energen Resources Corporation, enclosed for filing is an original and one copy of Energen's Pre-Hearing Statement in the above case.

Very truly yours,

Kau William

Karen Williams Assistant to J. Scott Hall

:kw Enclosure

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STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

2011 MAY 19 P 4: 06

IN THE MATTER OF THE APPLICATION OF ENERGEN RESOURCES CORPORATION FOR EXCEPTION TO THE WELL DENSITY PROVISIONS OF THE SPECIAL RULES AND REGULATIONS FOR THE BASIN-FRUITLAND COAL GAS POOL TO AUTHORIZE THE RECOMPLE-TION OF WELLS AS HORIZONTAL LATERAL OR SIDETRACK WELLS AND FOR SIMULTANEOUS DEDICATION, RIO ARRIBA COUNTY, NEW MEXICO

Case No. 14654

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Energen Resources Corporation as required

by the Oil Conservation Division.

APPEARANCES

APPLICANTS

Energen Resources Corporation 2010 Afton Place Farmington, NM 87401

APPLICANT'S ATTORNEY

J. Scott Hall Montgomery & Andrews P.O. Box 2307 Santa Fe, New Mexico 87504-2307 (505) 986-2646

OPPONENT

OPPONENT'S ATTORNEY

None.

STATEMENT OF THE CASE

APPLICANT

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Energen Resources seeks an order authorizing the re-entry of a vertical well for the drilling of additional horizontal lateral or sidetrack wells in the Fruitland Coal formation within three existing standard spacing and proration units as follows:

Township 32 North, Range 5 West Section 32: N/2 State Bancos No. 100-S (API No. 3003927273) 720' FSL & 1180' FWL (surface location) 760' FNL & 760' FEL (bottom-hole location)

<u>Section 29: W/2</u> Elkhorn No. 100 (API No. 3003927337) 725' FSL & 800' FWL (surface location) 760' FNL & 1880' FWL (bottom-hole location)

<u>Township 32 North, Range 6 West</u> <u>Section 25: E/2</u> San Juan 32-5 No. 105-S (API No. 3003927265) 1670' FNL & 1340' FEL (surface location) 600' FNL & 100' FEL (bottom-hole location)

Energen also seeks to simultaneously dedicate each of these units to the proposed horizontal sidetrack lateral well and to the existing initial well and infill well currently producing from the Fruitland Coal formation.

OPPONENT

None.

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PROPOSED EVIDENCE

APPLICANT

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WITNESSES	EST. TIME	<u>EXHIBITS</u>
Dave Poage, Landman	10 Minutes	4
Rounack Collier, Petroleum Engineer	15 Minutes	4
Andrew Benson	15 Minutes	4
<u>OPPONENT</u>	EST. TIME	EXHIBITS

PROCEDURAL MATTERS

None.

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MONTGOMERY & ANDREWS, P.A.

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By: J. Scott Hall, Esq. Post Office Box 2307 Santa Fe, New Mexico 87504 (505) 982-3873 Attorneys for Energen Resources Corporation