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2011 MAY 19 P 4: 06

May 19, 2011

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

**Hand Delivered**

**Re: NMOCD Case No. 14653: Application of Energen Resources Corporation  
for Compulsory Pooling and an Unorthodox Surface Location, Rio Arriba  
County, New Mexico**

Dear Ms. Davidson:

On behalf of Energen Resources Corporation, enclosed is an original and one copy Energen's Pre-Hearing Statement.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

JSH:kw  
Enclosure

280864

**REPLY TO:**

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

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IN THE MATTER OF THE APPLICATION OF ENERGEN  
RESOURCES CORPORATION FOR COMPULSORY  
POOLING AND AN UNORTHODOX SURFACE  
LOCATION, RIO ARRIBA COUNTY, NEW MEXICO

Case No. 14653

**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

**STATEMENT OF THE CASE**

APPLICANT

Energen Resources Corporation seeks an order pooling all mineral interests in the Fruitland Coal formation, (Basin-Fruitland Coal Gas Pool) underlying lots 5, 6, 7, 8 and the S/2 S/2 of irregular Section 8, Township 32 North, Range 4 West, NMPM, Rio Arriba County, New Mexico, forming a 274.08 acre  $\pm$  spacing and proration unit to be dedicated to the Carracas 8 B

Well No. 16-H. Pursuant to the provisions of Order No. R-13119, the well will be directionally drilled from an unorthodox surface location 2095 feet from the South line and 119 feet from the West line in adjoining Section 9, penetrating the Fruitland Coal formation at a point 1,400 feet from the South line and 400 feet from the East line of Section 8, with a standard bottom hole location 1,400 feet from the South line and 760 feet from the West line of Section 8, Township 32 North, Range 4 West, NMPM, Rio Arriba County, New Mexico. Also to be considered will be the cost of drilling and completing said well and the allocation of the cost thereof as well as actual operating costs and charges for supervision, designation of Energen Resources Corporation as operator of the well and a charge for risk involved in drilling said well.

OPPONENT

**PROPOSED EVIDENCE**

APPLICANT

<u>WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Dave Poage, Landman	10 Minutes	4

<u>OPPONENT</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
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**PROCEDURAL MATTERS**

MONTGOMERY & ANDREWS, P.A.

By: J. Scott Hall

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

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was delivered to  
counsel of record on the \_\_\_\_\_ day of May, 2011, via electronic mail.

N/A

\_\_\_\_\_  
J. Scott Hall

280744