

# CAVIN & INGRAM, P.A.

SEALY H. CAVIN, JR.†\*\*\*  
STEPHEN D. INGRAM†

ATTORNEYS & COUNSELORS AT LAW  
40 FIRST PLAZA  
SUITE 610  
ALBUQUERQUE, NEW MEXICO 87102

TELEPHONE  
(505) 243-5400

FACSIMILE  
(505) 243-1700

MAILING ADDRESS  
P.O. BOX 1216  
ALBUQUERQUE, NM 87103-1216  
OILAWFIRM@AOL.COM

† Also Admitted in Texas  
\*\*\* Also Admitted in Colorado  
• New Mexico Board of Legal  
Specialization Recognized Specialist in  
the Area of Natural Resources - Oil and  
Gas Law

April 2, 2014

Via Facsimile to (505) 476-3462 and U.S. Mail

Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

Re: *In the Matter of the Application of Energen Resources Corporation to Amend  
Compulsory Pooling Order No. R-10154, San Juan County, New Mexico;  
NMOCD Case No. 15072*

Gentlemen:

Enclosed is a Supplemental Pre-Hearing Statement we are submitting on behalf of Frank A. King and Paula S. Elmore f/k/a Paula S. King in connection with the hearing set for April 3, 2014. Thank you for your attention to this matter.

Sincerely,

CAVIN & INGRAM, P.A.

By: 

Stephen D. Ingram

Enclosure

cc w/enc: Joseph Scott Hall  
J. Edward Hollington  
Richard T. Tully

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

RECEIVED  
2014 APR -2 P 1:54

**IN THE MATTER OF THE APPLICATION  
OF ENERGEN RESOURCES CORPORATION  
TO AMEND COMPULSORY POOLING  
ORDER NO. R-10154, SAN JUAN COUNTY,  
NEW MEXICO**

**Case No. 15072**

**SUPPLEMENTAL PRE-HEARING STATEMENT**

Frank A. King and Paula S. Elmore f/k/a Paula S. King (the "Kings"), submit their Supplemental Pre-Hearing Statement as follows:

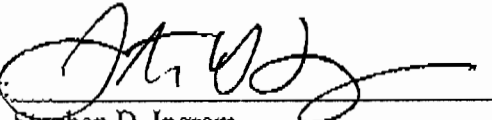
The April 3, 2014 hearing in this matter was previously noticed as only concerning the Kings' pending Motion to Dismiss Application. This week, the Kings were notified that in the event their Motion to Dismiss is denied, the Hearing Examiner will proceed to hear Applicant's Application to Amend Compulsory Pooling Order No. R-10154 on the same date. Accordingly, the Kings supplement their Pre-Hearing Statement so that they may present evidence as necessary as follows:

<u>Witness</u>	<u>Estimated Time</u>	<u>Exhibits</u>
Frank A. King	20 minutes	6

WHEREFORE, Frank A. King and Paula S. Elmore f/k/a Paula S. King, subject to and without waiving their pending Motion to Dismiss, request that the Division deny Energen Resources Corporation's Application to Amend Compulsory Pooling Order No. R-10154, and that the Kings receive all other and further relief to which they are entitled.

RESPECTFULLY SUBMITTED,

CAVIN & INGRAM, P.A.

By:   
Stephen D. Ingram  
P. O. Box 1216  
Albuquerque, NM 87103  
(505) 243-5400  
[sding1216@aol.com](mailto:sding1216@aol.com)

ATTORNEYS FOR FRANK A. KING and  
PAULA S. ELMORE f/k/a PAULA S. KING

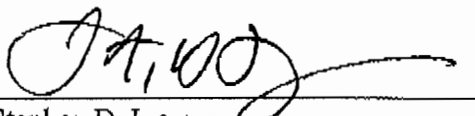
I hereby certify that a true and correct copy  
of the foregoing was served via e-mail and  
U.S. mail on April 2, 2014 to the following:

Joseph Scott Hall  
Montgomery & Andrews PA  
P.O. Box 2307  
Santa Fe, NM 87504-2307

J. Edward Hollington  
J. Edward Hollington & Associates  
708 Marquette Avenue NW  
Albuquerque, NM 87102-2035

Richard T. Tully  
Tully Law Firm PA  
P.O. Box 268  
Farmington, NM 87499-0268

CAVIN & INGRAM, P.A.

By:   
Stephen D. Ingram