

J. SCOTT HALL

Cell: (505) 670-7362

Email: shall@montand.com

Reply To: Santa Fe Office

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www.montand.com

March 12, 2009

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

Re: Application of Energen Resources Corporation for Creation of the Carracas Canyon Production Area and for Exception to the Well

Location Provisions, NMOCD Case No. 14287

Dear Ms. Davidson:

Attached for filing is an original and two copies of a Pre-Hearing Statement in the above-referenced matter. I have included an extra copy to be conformed.

Thank you.

Very truly yours,
Kalen Williams

Karen Williams

Assistant to J. Scott Hall

:kw Enclosure

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**REPLY TO:** 

325 Paseo de Peralta Santa Fe, New Mexico 87501 Telephone (505) 982-3873 • Fax (505) 982-4289

Post Office Box 2307 Santa Fe, New Mexico 87504-2307 6301 Indian School Road NE, Suite 400 Albuquerque, New Mexico 87110 Telephone (505) 884-4200 • Fax (505) 888-8929

Post Office Box 36210 Albuquerque, New Mexico 87176-6210

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

IN THE MATTER OF THE APPLICATION OF ENERGEN RESOURCES CORPORATION FOR CREATION OF THE CARRACAS CANYON PRODUCTION AREA AND FOR EXCEPTION TO THE WELL LOCATION PROVISIONS OF THE SPECIAL RULES AND REGULATIONS FOR THE BASIN-FRUITLAND COAL GAS POOL, RIO ARRIBA COUNTY, NEW MEXICO

**CASE NO. 14287** 

#### PRE-HEARING STATEMENT

This Pre-Hearing Statement is submitted by Energen Resources Corporation as required by the Oil Conservation Division.

## **APPEARANCES OF PARTIES**

APPLICANT

Energen Resources Corporation

Attn: Dave Poage 1210 Afton Place

Farmington, NM 87041

(505) 326-6112

ATTORNEY

J. Scott Hall, Esq.

Montgomery & Andrews, P.A.

P.O. Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

OPPOSITION OR OTHER PARTY

ATTORNEY

#### STATEMENT OF CASE

Applicant seeks an order creating the Carracas Canyon Production Area and providing for an exception to the well setback location provisions of the Rules and Regulations for the Basin-Fruitland Coal Gas Pool authorizing well locations within 10 feet of section, quarter-section, or interior quarter-quarter section lines or subdivision inner boundaries in conformance with Rule 7(a)(2) of the pool rules for the pool including wells to be drilled in and adjacent to participating areas within

the production area, but no closer than 660 feet from the outer boundaries of the production area.

The proposed production area is comprised of the following lands located in Rio Arriba County, New Mexico:

All or portions of the following sections in Township 32 North, Range 4 West: Sections 8 through 36; all or portions of the following sections in Township 32 North, Range 5 West: Sections 10 through 16, Sections 21 through 27, Sections 34 through 36; and all or portions of the following sections in Township 31 North, Range 5 West: Sections 1 and 2.

# **OPPOSITION OR OTHER PARTY**

There is no opposing party at this time.

#### PROPOSED EVIDENCE

## **APPLICANT**

WITNESSES	EST. TIME	EXHIBITS
David Poage (Landman)	20 min.	4
Andrew Benson (Geologist)	20 min.	4
Bryan Ward (Reservoir Engineer)	20 min.	4

### **OPPOSITION**

WITNESSES EST. TIME EXHIBITS

# **FROCEDURAL MATTERS**

(Please identify any procedural matters which need to be resolved prior to the hearing)

None.

Respectfully submitted,

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J. Scott Hall
Montgomery & Andrews, P. A.
325 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 982-3873
Attorneys for Energen Resources Corp.

# Certificate of Service

I hereby certify that on this 12th day of March, 2009 a copy of the foregoing was faxed to the following:

N/A

J. Scott Hall

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