

February 21, 2005

RECEIVED

FEB 25 2005

OIL CONSERVATION
DIVISION

New Mexico Oil Conservation Division
Attn: Michael E. Stogner
1220 South St. Francis Dr.
Santa Fe, New Mexico 87505

RE: Administrative approval of Unorthodox Location
Federal 28-9-9 #1S
160' FSL & 1935' FEL
Section 9, T28N, R9W
San Juan County, New Mexico

Dear Mr. Stogner:

Energen Resources Corporation (Energen) hereby requests Administrative Approval for an Unorthodox Location of its proposed Federal 28-9-9 #1S Fruitland Coal well under the provisions of New Mexico Oil Conservation Division (NMOCD) order R-8768.

This well is located 160' fsl & 1935' fel of Section 9-T28N-R9W, San Juan County, New Mexico and dedicated to a spacing unit consisting of all of irregular section 9, in the Basin Fruitland Coal gas pool.

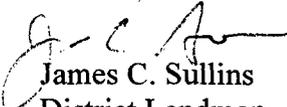
This well is closer than 660 feet to the Southern boundary of the proration unit, causing an unorthodox location. This location was moved to its current unorthodox location due to the fact that it is a small spacing unit (272.08 acres) with rough terrain allowing no standard location options.

A copy of this application is being sent to all affected owners by certified mail-return receipt request with a request that they furnish your office in Santa Fe a Waiver of Objection within twenty (20) days of receipt of this application.

Attached is a well location plat showing dedicated acreage (C-102), a plat showing the offsetting spacing units and Fruitland Coal wells, if any, and a topographic map.

Your favorable consideration of this request would be appreciated.

Sincerely,


James C. Sullins
District Landman

FEDERAL 28-9-9 #1S
BASIN FRUITLAND COAL
 160' FSL & 1935' FEL, Section 9, T-28-N, R-9-W
 San Juan County, New Mexico
 Affected Owners and Offset Spacing Unit Plat

State Com 32 #1 West Largo Corp. W/2 32	Aggie State 32 #1 Aggie State 32 #1A Koch Exploration E/2 32	No Fruitland Coal Wells Burlington Res. 100% WI W/2 33	Fed. 29-9-33 #1 Fed. 29-9-33 #2 Energen Res. E/2 33	T 29 N
Reid Com #706 Burlington Resources Irreg. Sec. 8 (273.92)		Federal 28-9-9 #2 Federal 28-9-9 #2S Energen Resources Irreg. Sec. 9 (272.08)		Jackson #3 ConocoPhillips Irreg. Sec. 10 (338.40)
Federal 17 #1 West Largo Corp. E/2 17	Sanchez A Com #2 Burlington Res. W/2 16	Sanchez A Com #1 Burlington Res. E/2 16	Federal 15 #2 West Largo Corp. W/2 15	T 28 N

R 9 W

District I
PO Box 1980, Hobbs, NM 88241-1980

District II
PO Drawer DD, Artesia, NM 88211-0719

District III
1000 Rio Brazos Rd., Aztec, NM 87410

District IV
PO Box 2088, Santa Fe, NM 87504-2088

State of New Mexico
Energy, Minerals & Natural Resources Department

OIL CONSERVATION DIVISION
PO Box 2088
Santa Fe, NM 87504-2088

Form C-102
Revised February 21, 1994

Instructions on back
Submit to Appropriate District Office
State Lease - 4 Copies
Fee Lease - 3 Copies

AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

*API Number		*Pool Code 71629	*Pool Name BASIN FRUITLAND COAL
*Property Code	*Property Name FEDERAL 28-9-9		*Well Number 1S
*OGRID No. 162928	*Operator Name ENERGEN RESOURCES CORPORATION		*Elevation 6623'

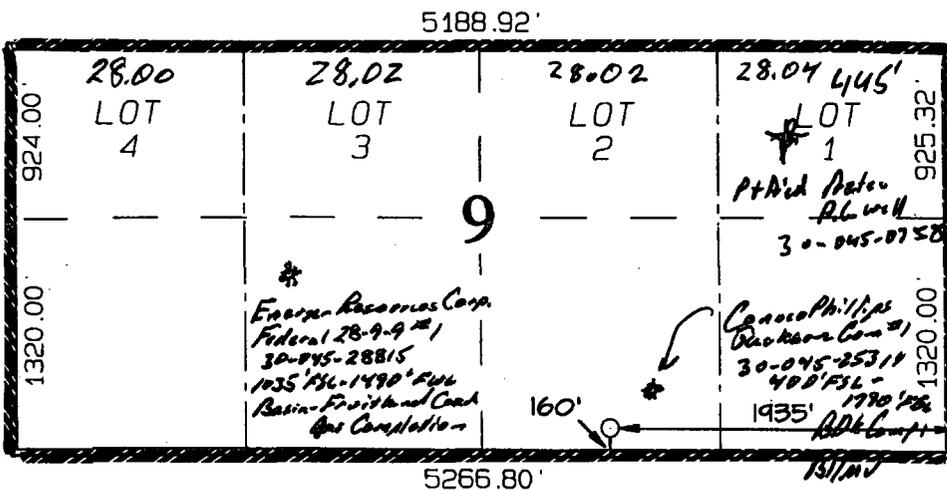
¹⁰ Surface Location

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
0	9	28N	9W		160	SOUTH	1935	EAST	SAN JUAN

¹¹ Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Dedicated Acres 272.08 Acres - (Entire Section)					¹³ Joint or Infill	¹⁴ Consolidation Code	¹⁵ Order No.		

NO ALLOWABLE WILL BE ASSIGNED TO THIS COMPLETION UNTIL ALL INTERESTS HAVE BEEN CONSOLIDATED OR A NON-STANDARD UNIT HAS BEEN APPROVED BY THE DIVISION



¹⁷ OPERATOR CERTIFICATION

I hereby certify that the information contained herein is true and complete to the best of my knowledge and belief

Signature

Doug Thomas

Printed Name

Drilling Superintendent

Title

Date

1/11/05

¹⁸ SURVEYOR CERTIFICATION

I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief.

Survey Date: SEPTEMBER 14, 2004

Signature and Seal of Professional Surveyor



JASON C. EDWARDS
Certificate Number 15269

MAR 07 2004

CERTIFIED MAIL
7004 1350 0002 0326 7822

February 21, 2005

Burlington Resources Oil & Gas Company
3535 E. 30th St.
Farmington, NM 87402
Attn: Linda Dean

RECEIVED

MAR 11 2005

RE: Administrative Approval of Unorthodox Location
Federal 28-9-9 #1S
160' FSL & 1935' FEL
Section 9, T28N, R9W
San Juan County, New Mexico

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

Dear Interest Owner:

Energen Resources Corporation has filed with the New Mexico Oil Conservation Division (NMOCD), an application for the Administrative Approval of an Unorthodox location for its Federal 28-9-9 #1S well. A copy of the application has been attached for your review.

If you have no objection to this unorthodox location, please sign the three copies of the attached waiver and within twenty (20) days of the receipt of this letter, return one (1) executed copy to the NMOCD at 1220 South Francis Drive, Santa Fe, New Mexico 87505, one (1) copy to our office and retain one (1) copy for your files.

Your cooperation in this matter is appreciated.

Sincerely,


James C. Sullins
District Landman

WAIVER

cc
~~Oil Exploration Division~~ hereby waives objection to the above referenced Application for Unorthodox Location for Energen Resources Corporation's Federal 28-9-9 #1S well.

Date: 3/8/05 By: 
cc: OCD-Aztec office, BLM-Farmington office, Offset operators

Lance F. Harmon
Vice President - Land