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	KEU	ABOVE THIS LINE FOR DIVISION USE ONLY NEW MEXICO OIL CONSERVATION DIVISION 50-039 30-039 30-039 30-039 30-039
on alternation	2000-228	- Engineering Bureau - si AM 11 05 - Engineering Bureau - Energen 162920
San J	uan 32-5 #112	ADMINISTRATIVE APPLICATION COVERSHEET
·	THIS COVERSH	Let is mandatory for all administrative applications for exceptions to division rules and regulations 20.000
		30-200903
Applic	[PC-Po	[NSP-Non-Standard Proration Unit] [NSL-Non-Standard Location] [DD-Directional Drilling] [SD-Simultaneous Dedication] hole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] ol Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] lified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF A	PPLICATION - Check Those Which Apply for [A]
	[A]	Location - Spacing Unit - Directional Drilling [X] NSL [] NSP [] DD [] SD
	Check [B]	One Only for [B] and [C] Commingling - Storage - Measurement []DHC []CTB []PLC []PC []OLS []OLM
	[C]	Injection - Disposal - Pressure Increase - Enhanced Oil Recovery []WFX []PMX []SWD []IPI []EOR []PPR
[2]	NOTIFICAT [A]	TON REQUIRED TO: - Check Those Which Apply, or Does Not Apply [] Working, Royalty or Overriding Royalty Interest Owners
	[B]	[X] Offset Operators, Leaseholders or Surface Owner
	[C]	[] Application is One Which Requires Published Legal Notice
	[D]	[] Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E]	[] For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F]	[] Waivers are Attached

[3] INFORMATION / DATA SUBMITTED IS COMPLETE - Statement of Understanding

I hereby certify that I, or personnel under my supervision, have read and complied with all applicable Rules and Regulations of the Oil Conservation Division. Further, I assert that the attached application for administrative approval is accurate and complete to the best of my knowledge and where applicable, verify that all interest (WI, RI, ORRI) is common. I understand that any omission of data, information or notification is cause to have the application package returned with no action taken.

Note: Statement must be completed by an individual with supervisory capacity.

Darow	Roan
Signature	

District La	ndman	
Title		

4/16/09 Date

David M. Poage Print or Type Name



April 15, 2009

Certified Mail 7007 2680 0002 5579 6952

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, NM 87505

RE: Administrative Approval of Unorthodox Location Basin Fruitland Coal Gas Pool San Juan 32-5 #112S Well 760' FSL and 760' FEL – Bottom hole location Section 18, T32N, R5W Rio Arriba County, New Mexico

Gentlemen:

Energen Resources Corporation (Energen) hereby requests Administrative Approval for an Unorthodox Location of its San Juan 32-5 # 112S Fruitland Coal formation well under the provisions of New Mexico Oil Conservation Division, Basin Fruitland Coal Pool Rules.

This well is located in a previously approved non-standard gas spacing unit (R-2319-A) consisting of Sections 18 and 19, T32N-R5W, Rio Arriba County, New Mexico. This spacing unit is very narrow and ranges in width from 1468' to 1473'. This would only allow for 145' to drill the lateral and remain within 660' setbacks. For this reason Energen is requesting that the setbacks be reduced from 660' to 500' from both the east and west boundaries of the spacing unit.

The available space (width) and the terrain in this area requires this well to be surface located in Section 24-T32N, R6W. This well is completely located within the Fruitland Coal Participating Area of the San Juan 32-5 Unit. The surface location requires a lengthy horizontal lateral to access the reserves in the northern portion of Section 19-T32N-R5W. This will require the bottom of the intermediate shoe to be at 1100' FEL and 1600' FNL of Section 19-T32N-R5W. A portion of the well bore will be open to production in Section 19 and the remaining lateral will be in Section 19. In order to justify the expense of drilling the 32-5 #112S, production from this well bore in Sections 19 and 18 will be required, in addition to the continued production from the San Juan 32-5 #112. This location is being drilled as a horizontal well bore and is situated so that the longest lateral can be obtained. This additional length is required to provide for the production of the most reserves and the best possible economics for this well. An explanation of this reasoning is attached.

Energen is the owner and operator of the offsetting spacing units in Sections 13 and 24-T32N-R6W. The Bureau of Land Management is the owner of unleased lands offsetting in Section 17 and 20-T32N-R5W, therefore an affected owner letter is being sent out and waivers are required. These lands are unleased because of the current BLM Resource Management Plan.

Attached is a well location plat showing dedicated acreage (C102), a plat showing the offsetting spacing units and a topographic map.

Your favorable consideration of this request would be appreciated.

Sincerely,

Dane M. Boag

David M. Poage District Landman



April 15, 2009

- To: NMOCD
- From: Andrew Benson Area Geologist Western Region
- RE: Energen Resources San Juan 32-5 #112S Horizontal Basin Fruitland Coal Well Sec 18 T32N-R5W (Bottom hole location) Rio Arriba County, NM Reduced set-backs and Non-standard location exception

Energen Resources (ERC) currently has plans to drill the subject horizontal Basin Fruitland Coal well within the Fruitland Coal Participating Area of the San Juan 32-5 Unit. As planned, intermediate casing will be set in Section 19, T32N-R5W, and the Fruitland Coal will be produced from a horizontal wellbore in Sections 18 and 19, T32N-R5W. At this time, the 32-5 #112ST is currently producing in the extreme southwest portion of Section 19. ERC requests both reduced setbacks and an Administrative Approval for an Unorthodox Location (AAUL) in order to drill the subject well as planned for the following reasons:

- 1. Current 660' setbacks allow for a legal window of only 145' wide. ERC requests that setbacks be reduced from 660' to 500' from the east and west boundaries of the spacing unit to allow more room to drill the lateral portion of the subject well and still remain within the legal setbacks.
- 2. The BLM has indicated that the subject well must be drilled from an existing well pad in Section 24, T32N-R6W due to space and terrain limitations.
- 3. Drilling the subject well from this existing surface location to the legal window in Section 18 would require a build length of approximately 3600'.
 - a. At this time, such extreme build lengths are not feasible for ERC, primarily due to the associated mechanical drilling risk, i.e. the risk of losing the well.
 - b. Therefore, given the aforementioned mechanical drilling limitations, surface location restrictions and prohibitively long build length required to reach the window in Section 18, ERC would not be able to access and/or adequately drain the reserves in Section 18.
- 4. If granted, an AAUL would allow ERC to minimize build length, set casing, stabilize the build portion of the well, and enter the Fruitland Coal reservoir in Section 19.
- 5. The expense of drilling the subject well cannot be justified if continued production of the existing San Juan 32-5 #112ST, located in Section 19, is not allowed.
- 6. The current well plan will allow the subject well to more efficiently drain the Basin Fruitland Coal reservoir in both Sections 18 and 19, minimizing waste and reducing the need to drill future wells in order to adequately drain existing reserves.
- 7. Correlative Rights will be protected.

This non-standard location exception is being requested where there is common ownership at the beginning and ending points of the horizontal leg. The entire length of the wellbore will be within the Fruitland Coal Participating Area of the San Juan 32-5 Unit.

Please do not hesitate to contact me with any questions.

Sincerely,

Andrew Benson Area Geologist Western Region

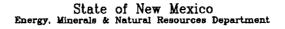
cc: David Poage

DISTRICT I 1625 N. French Dr., Hobbs, N.M. 86240

DISTRICT II 1301 W. Grand Avenue, Artesia, N.M. 85210

DISTRICT III 1000 Rio Brazos Rd., Arteo, N.M. 87410

DISTRICT IV 1220 S. St. Francis Dr., Santa Fe, NM 87605



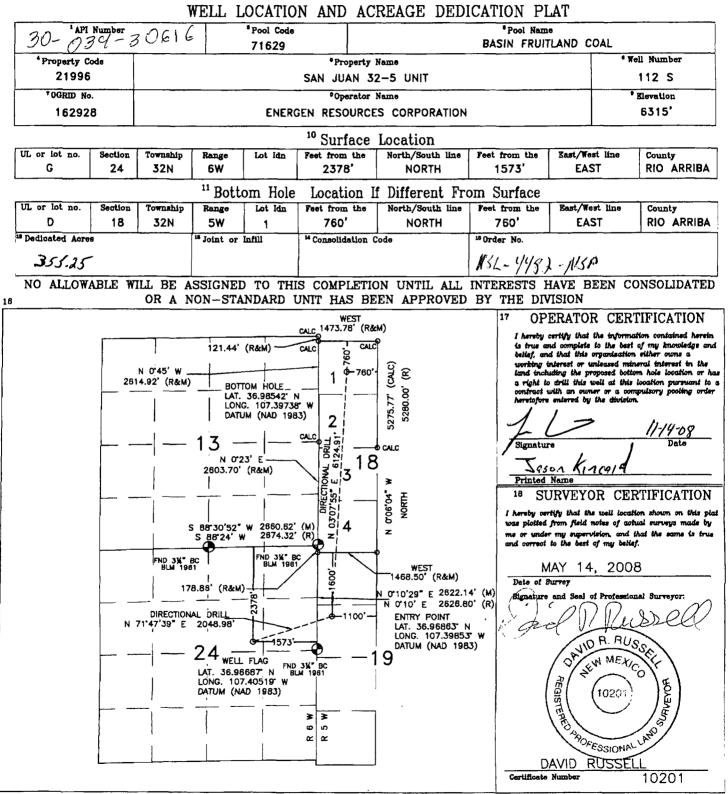
OIL CONSERVATION DIVISION

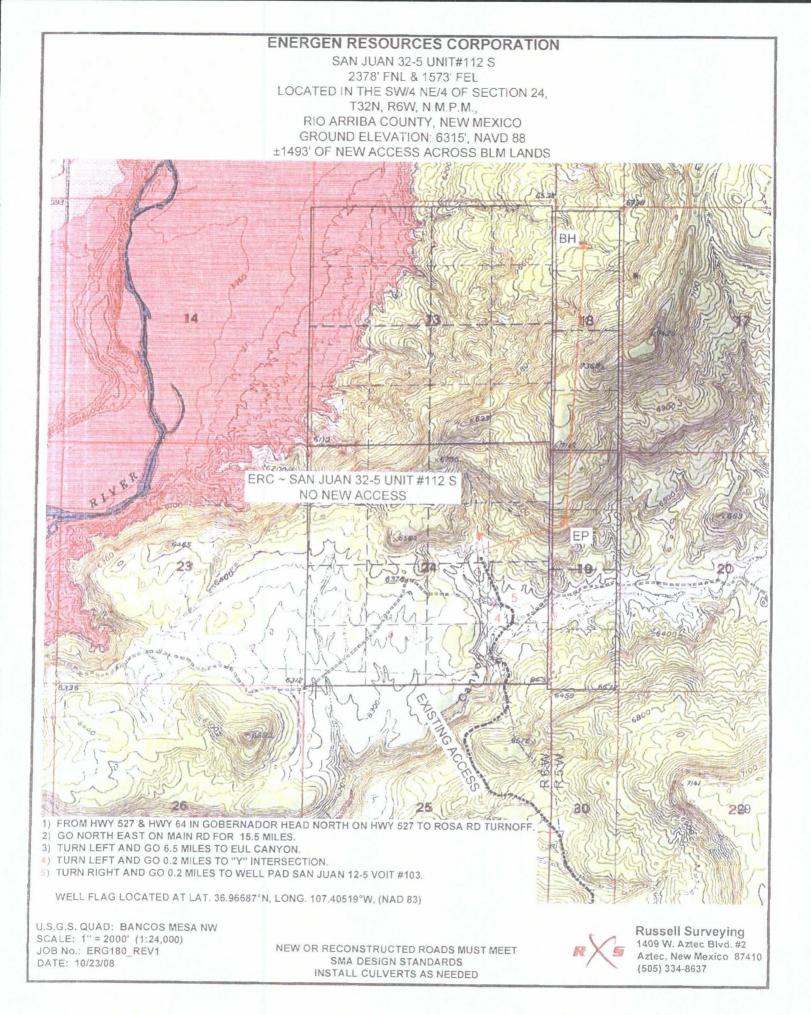
1220 South St. Francis Dr. Santa Fe, NM 87505

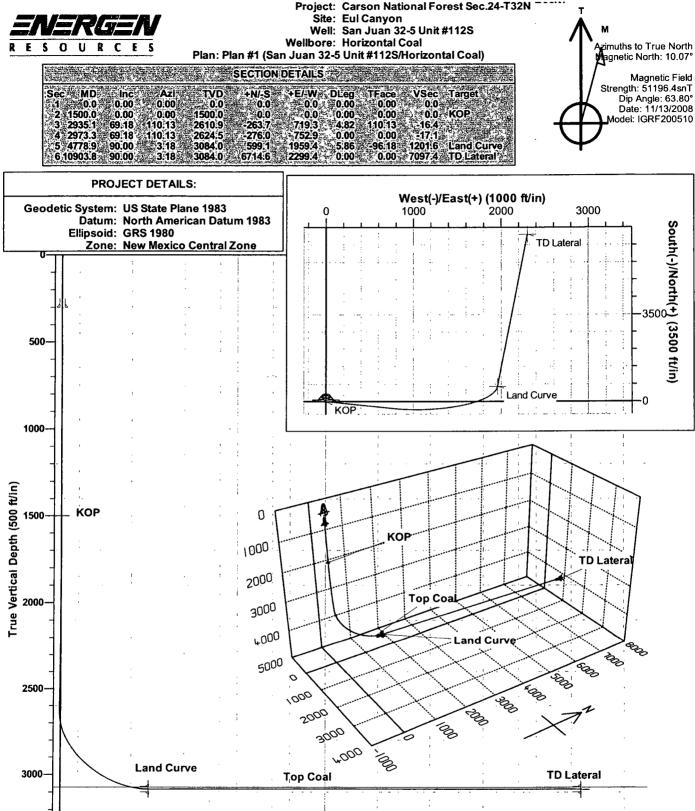
Form C-102 Revised October 12, 2005

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

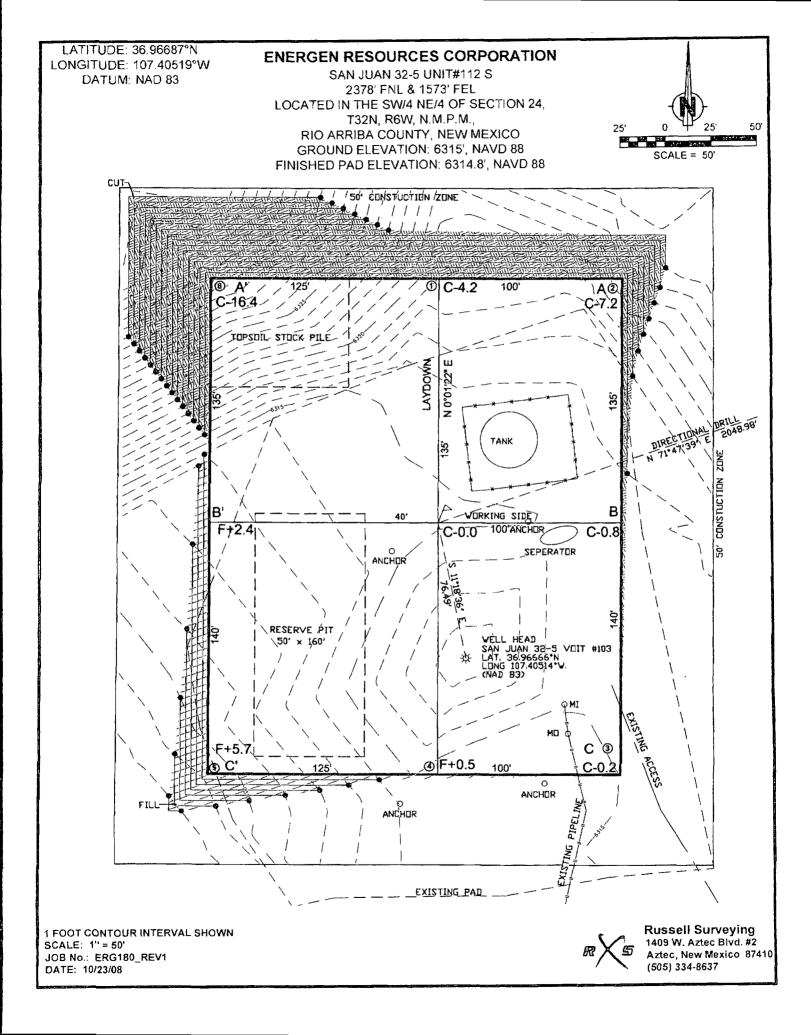
□ AMENDED REPORT





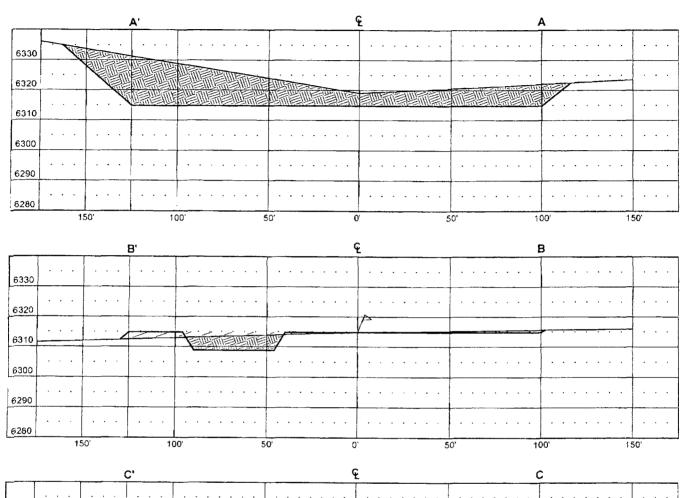


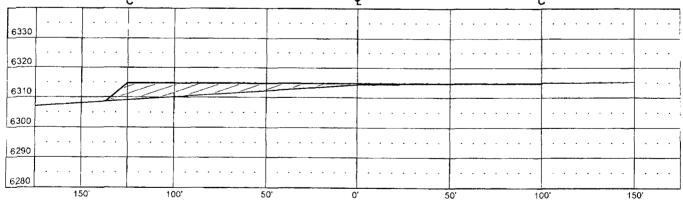
Vertical Section at 18.90° (1200 ft/in)



ENERGEN RESOURCES CORPORATION

SAN JUAN 32-5 UNIT#112 S 2378' FNL & 1573' FEL LOCATED IN THE SW/4 NE/4 OF SECTION 24, T32N, R6W, N.M.P.M., RIO ARRIBA COUNTY, NEW MEXICO GROUND ELEVATION: 6315', NAVD 88 FINISHED PAD ELEVATION: 6314.8', NAVD 88





VERT. SCALE: 1" = 30' HORZ. SCALE: 1" = 50' JOB No.: ERG180_REV1 DATE: 10/23/08





Russell Surveying 1409 W. Aztec Blvd. #2 Aztec, New Mexico 87410 (505) 334-8637

San Juan 32-5 #112S Sections 18 & 19-T32N-R5W Rio Arriba County, New Mexico Offset Operators Plat

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