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June 28, 2013

Ms. Jami Bailey, Director
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87504

HAND DELIVERED

**Re: NMOCD Case No. 15017: Application of Energen Resources Corporation
for Determination of Cement Adequacy in Proximity to Proposed Well
Perforations, Sandoval County, New Mexico**

Dear Ms. Bailey:

On behalf of Energen Resources Corporation, enclosed for filing is an original
and one copy of Energen's Pre-Hearing Statement in the above-captioned case.

Thank you.

Very truly yours,

Karen Williams
Assistant to J. Scott Hall

Enclosures

481409

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
DETERMINATION OF CEMENT
ADEQUACY IN PROXIMITY TO
PROPOSED WELL PERFORATIONS
SANDOVAL COUNTY, NEW MEXICO**

Case No. 15017

PRE-HEARING STATEMENT

Energen Resources Corporation ("Energen") provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

Energen Resources Corporation

APPLICANT'S ATTORNEY

J. Scott Hall
Montgomery & Andrews
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873

OTHER PARTY

NM Oil Conservation Division

OTHER PARTY'S ATTORNEY

Gabrielle A. Gerholt
Gabriel Wade
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

STATEMENT OF THE CASE

APPLICANT

Applicant seeks an order pursuant to *inter alia* Rules 19.15.16.9 and 19.15.16.10 determining the adequacy of well cement for strata isolation and authorizing the

placement of new perforations in the Niobrara formation, West Lindrith Gallup-Dakota Pool (39189) within 500 feet of the top of existing cement in the Chacon Jicarilla D Well No. 7 located in the NE/4 NW/4 of Section 21, Township 23 North, Range 3 West, on Jicarilla Apache Nation lands in Sandoval County.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

Charles J. Donahue, Petroleum Engineer

EST. TIME

30 minutes

EXHIBITS

5

OPPONENT

WITNESSES

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

Montgomery and Andrews, P. A.

By:



J. Scott Hall
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Santa Fe, New Mexico 87504-2307
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shall@montand.com
Attorneys for Energen Resources Corporation

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served to counsel of record by electronic mail this 28 day of June, 2013.

Gabrielle A. Gerholt
Gabriel Wade
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505



J. Scott Hall

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