



MONTGOMERY  
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LAW FIRM

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2015 NOV 24 P 4:09

November 24, 2015

**HAND-DELIVERY**

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

**Re: Case No. 15410 : Application of Energen Resources Corporation for Approval of the Amarillo Canyon Unit, Creation of a New Pool for Horizontal Development, and Establishing 330 Foot Exterior Boundary Setbacks for Completed Intervals for Horizontal Wells Within the Unit, San Juan County, New Mexico**

Dear Ms. Davidson:

Enclosed please find for filing the original and one copy of the Pre-Hearing Statement on behalf of Energen Resources Corporation.

Thank you.

Very truly yours,

J. Scott Hall

Enclosure

cc: Dean Price, Energen Resources Corporation (w/enc.)

**REPLY TO:**

325 Paseo de Peralta  
Santa Fe, New Mexico 87501  
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**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERAL AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

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**IN THE MATTER OF THE APPLICATION OF ENERGEN RESOURCES  
CORPORATION FOR APPROVAL OF THE AMARILLO CANYON UNIT, CREATION  
OF A NEW POOL FOR HORIZONTAL DEVELOPMENT, AND ESTABLISHING 330  
FOOT EXTERIOR BOUNDARY SETBACKS FOR COMPLETED INTERVALS FOR  
HORIZONTAL WELLS WITHIN THE UNIT, SAN JUAN COUNTY, NEW MEXICO**

**CASE NO. 15410**

**PRE-HEARING STATEMENT**

ENERGEN RESOURCES CORPORATION, ("Energen"), provides this Pre-Hearing Statement as required by the rules of the Division.

**APPEARANCES**

ENERGEN RESOURCES  
CORPORATION

ENERGEN RESOURCES CORPORATION'S  
ATTORNEY

J. Scott Hall, Esq.  
Seth C. McMillan, Esq.  
MONTGOMERY & ANDREWS, P.A.  
P.O. Box 2307  
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**STATEMENT OF THE CASE**

Applicant seeks approval of its Amarillo Canyon Unit comprised of 3,838.08 acres of federal, state and Indian allotted lands located in Township 27 North, Range 13 West, NMPM in San Juan County. Applicant also seeks the creation of a new pool for horizontal development within the unit area with vertical limits coterminous with the unitized formation and providing for 330 foot exterior boundary setbacks for completed intervals of horizontal wells drilled within the unit. The unitized interval extends from the stratigraphic equivalent of the top of the Mancos Formation located at a depth of 4,270' to the base of the Greenhorn (i.e. Graneros) Formation at a depth of 5,797 feet as encountered in the Energen Resources Navajo-D No. 1-E Well (API No. 30-045-254040000) located in NW/4 SW/4 of Section 1, Township 27 North, Range 13 West, N.M.P.M. in San Juan County.

### **PROPOSED EVIDENCE**

<u>APPLICANT'S WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Dean Price, Landman	30 min.	7
Don Lehman, Geologist	30 min.	6

### **PROCEDURAL MATTERS**

None.

Respectfully submitted,

MONTGOMERY & ANDREWS, P. A.

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### **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 24<sup>th</sup> day of November, 2015:

*n/a*

*n/a*  
J. Scott Hall