

BEFORE THE  
OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

APPLICATION OF ENERGEN RESOURCES CORPORATION                      CASE NO. 12838  
FOR POOL EXTENSION, SPECIAL POOL RULES, AND  
AMENDMENT OF THE DEPTH-BRACKET ALLOWABLE  
FOR THE SAUNDERS-SAN ANDRES POOL, LEA COUNTY, NEW MEXICO

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Miller, Stratvert & Torgerson, P.A. (J. Scott Hall) on behalf of Energen Resources Corporation, as required by the Oil Conservation Division.

**APPEARANCES**

APPLICANT'S ATTORNEY

**J. Scott Hall, Esq.**  
Miller, Stratvert & Torgerson, P.A.  
Post Office Box 1986  
Santa Fe, New Mexico 87504  
(505) 989-9614

APPLICANT

**Energen Resources Corporation**  
605 Richard Arrington Jr. Blvd. North  
Birmingham, Alabama 35203-2707  
(205) 326-8129

OPPONENT'S ATTORNEY

OPPONENT

None

OTHER PARTY'S ATTORNEY

OTHER PARTY

**STATEMENT OF THE CASE**

APPLICANT

Applicant seeks an order increasing the depth bracket allowable from its current level of 80 barrels of oil per day and 2,000 cubic feet of gas per barrel of oil to 160 barrels of oil per day and 2,000 cubic feet of gas per barrel of oil for production from the Saunders-San Andres Pool. Applicant further seeks to have the amended depth bracket allowable made effective retroactively to December 1, 2000. The horizontal limits of said pool currently consists of the SW/4 of Section 4, Township 15 South, Range 33 East, N.M.P.M. Applicant seeks the extension of the pool to include the S/2 NE/4 and the SE/4 of Section 5, T-15-S, R-33-E. The pool is located approximately eighteen miles northwest of Lovington, New Mexico, near State Highway 457.

OPPOSITION OR OTHER PARTY

Unknown.

**PROPOSED EVIDENCE**

APPLICANT

<b>WITNESSES:</b>	<b>Est. Time</b>	<b>No. of Exhibits</b>
Dave Cromwell (Geologist)	20 Minutes	4
Barney Kahn (Petroleum Engineer)	20 Minutes	5

OPPOSITION

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
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**PROCEDURAL MATTERS**

MILLER, STRATVERT & TORGERSON, P.A.

By: J. Scott Hall

J. Scott Hall, Esq.  
Post Office Box 1986  
Santa Fe, New Mexico 87504  
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Attorneys for Energen Resources Corporation

**Certificate of Mailing**

I hereby certify that a true and correct copy of the foregoing was delivered to counsel of record on the 21 day of March, 2002, as follows:

J. Scott Hall

J. Scott Hall