PKKVU 305 75 3751 NSL 3/20103

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(30-039-27312)

HAND DELIVERED

Ms. Lori Wrotenbery, Director Oil Conservation Division 1220 South Saint Francis Drive Santa Fe, New Mexico 87505 RECEIVED

Oil Conservation Division

Re: Administrative Application of Energen Resources Corporation for approval of a unorthodox gas well location for its Jicarilla "98" Well No. 12-A, Unit N, SW/4 dedication, Section 18

T26N, R3W, Rio Arriba County, New Mexico
NMOCD Case 12857 Order R-11848 dated 10/25/02

Dear Ms. Wrotenbery:

On behalf of Energen Resources Corporation, please find enclosed our referenced application that is being filed in accordance with Division Rule 104.D(2)(b)). This location is 478.44 feet from the east boundary of the 160-acre spacing unit.

CC: Energen Resources Corporation

W. Thomas Kellahin

Attn: Rick Corcoran

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

APPLICATION OF ENERGEN RESOURCES CORPORATION FOR APPROVAL OF AN UNORTHODOX GAS WELL LOCATION RIO ARRIBA COUNTY, NEW MEXICO

ADMINISTRATIVE APPLICATION

Comes now Energen Resources Corporation ("Energen") and by and through its attorneys, Kellahin & Kellahin, and in accordance with Division General Rule 104.F, applies to the New Mexico Oil Conservation Division ("Division") for approval of an unorthodox gas well location for its Jicarilla "98" Well No. 12-A, a proposed Pictured Cliffs gas well located 1160 feet FSL and 1920 feet FWL (Unit N) of Irregular Section 18, T26N, R3W, Rio Arriba County, New Mexico to be dedicated to a standard 160-acre gas spacing unit consisting of the SW/4 of this section.

In support, Energen states:

- 1. Energen is the proposed operator of the Jicarilla "98" Well No. 12-A to located 1160 feet FSL and 1920 feet FWL (Unit N) Section 18, T26N, R3W, at a standard gas well location for the Gavilan-Pictured Cliffs Gas Pool. See Form C-102, attached as Exhibit 1
- 2. This well is part of a thirty well pilot project for studying well density on the Pictured Cliffs Formation approved by Division Order R-11848, attached as Exhibit 2.
- 3. Paragraph (25) of Exhibit "A" for Order R-11848 identified this well with the correct footages but label it as "standard".

4. This well's spacing unit is an irregular sized quarter-section consisting of 145.07 acres that causes the well to be 468.44 feet from the eastern boundary of its spacing unit instead of the standard 660 feet.

TECHNICAL SUPPORT

5. The location of this well Energen requested the Division take administrative notice of the evidence submitted in Case 12857 in support of this and the other wells within this pilot project

NOTIFICATION

6. All of the interest owners in SW/4 of Section 18 are the same for a 160-acre spacing unit consisting of the SW/4 of Section 18.

CONCLUSION

7. Approval of this application will afford the owners and the applicant the opportunity to produce their just and equitable share of the gas in the Pictured Cliffs formation, will promote the orderly development in this area, will prevent the economic loss caused by the drilling of unnecessary wells, avoid the augmentation of risk arising from the drilling of an excessive number of wells and will otherwise prevent waste and protect correlative rights.

WHEREFORE, Applicant requests that this application be approve by the Division.

Respectfully Submitted:

W. Thomas Kellahin

District II! IOO Bio Bioros Bd., Aztec. NA 87410

District (V FO 80x 2003, Spoto Fr. NM 87504-2068

Energy, Himerals & Natural Proximes Constitute to Appropriate District Office State Lease - 4 Copies Fee Lease - 3 Copies Santa Fe, NM 87504-2088

MENDED REPORT

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