



**Amoco Production Company**

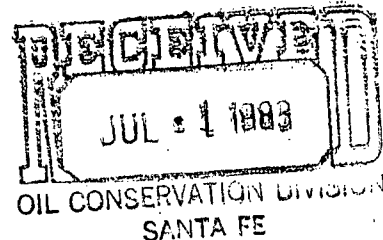
Denver Region  
Amoco Building  
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Stephen D. Ring  
Attorney

BEFORE EXAMINER STOGNER  
OIL CONSERVATION DIVISION  
*Amoco* EXHIBIT NO. *1-B*  
CASE NO. *2987 2948 7898*

December 13, 1982

Department of Energy and Minerals  
Oil Conservation Division  
P. O. Box 2088  
Santa Fe, New Mexico 87501



Re: NGPA Section 107 ("Coal Seam Gas");  
State Gas Com "BW" No. 1  
—> Schneider Gas Com "B" No. 1S  
Cahn Gas Com No. 1

Confidential Information Enclosed

Gentlemen:

Amoco Production Company ("Amoco") submits herewith applications for determinations that gas from the captioned wells qualifies as "occluded natural gas from coal seams" under Section 107 of the NGPA and Part 272 of the FERC's regulations. The stratigraphic cross-section map submitted with each of the applications shows the location of a coal seam and indicates that the captioned wells have been completed, by means of an open hole completion, in that coal seam.

Please note that the drilling of one of the captioned wells, namely, the Cahn Gas Com No. 1, was commenced on February 8, 1977, a date prior to the February 19, 1977 cut-off date which is an element in the definition of certain NGPA pricing categories, such as the Section 103 category. However, because neither Section 107 of the NGPA nor the pertinent part of the FERC's regulations, i.e., Part 272 of 18 C.F.R., makes spud date an element in the definition of the category known as "occluded natural gas from coal seams", Amoco believes that gas from the Cahn Gas Com No. 1 Well can qualify as belonging to that category, notwithstanding the spud date of that well.

Amoco requests that the information contained in the submitted applications be afforded confidential treatment. The grounds on which Amoco requests confidentiality is that the submitted information is "geological and geophysical information and data, including maps, concerning wells." (That particular class of information is defined as one to which the ordinary rules regarding public disclosure of infor-

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mation by Federal agencies are inapplicable. See 5 United States Code Annotated, Section 552(b)(9).) Additionally, Amoco asks that, in transmitting any of the submitted information to the FERC, you would request confidential treatment from the FERC in some such language as the following:

Please afford confidential treatment to the submitted information, pursuant to Section 275.206 of the FERC's regulations. The information is of the sort described at 5 U.S.C.A. Section 552(b)(9). At the applicant's request, the information was afforded confidential treatment before the Oil Conservation Division of New Mexico's Department of Energy and Minerals.

Thank you very much for your assistance in this regard.

Please acknowledge receipt of this letter by time-stamping the enclosed copy and returning it to Amoco in the self-addressed, stamped envelope provided. Thank you.

Very truly yours,

ORIGINAL SIGNED BY  
STEPHEN D. RING

Stephen D. Ring

SDR:mds

cc: El Paso Natural Gas Company  
Department of Energy and Minerals - District Office

bcc w/att: Messrs. H. A. Kincaid  
A. P. Payne