

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

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF
CONSIDERING:

IN THE MATTER OF THE APPLICATION OF
AMOCO PRODUCTION COMPANY FOR
FOURTEEN UNORTHODOX INFILL CARBON
DIOXIDE GAS WELL LOCATIONS,
UNION COUNTY, NEW MEXICO.

CASE NO. 11497

PRE-HEARING STATEMENT

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A.,
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Amoco Production Company
Post Office Box 3092
Houston, TX 77253
(713) 366-3709

name, address, phone and
contact person

ATTORNEY

William F. Carr, Esq.
Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

A. Andrew Gallo
Amoco Production Company
Post Office Box 3092
Houston, TX 77253
(713) 366-3709

OPPOSITION OR OTHER PARTY

name, address, phone and
contact person

ATTORNEY

STATEMENT OF CASE

APPLICANT

(Please make a concise statement of what is being sought with this application and the reasons therefore.)

Amoco Production Company, applicant in the above-styled cause, seeks an exception to the provisions of Rule 4 of the "Special Rules and Regulations for the Bravo Dome 640-Acre Area" as promulgated by Division Order No. R-7556, dated June 19, 1984, for fourteen certain infill carbon dioxide gas well locations all located within its Bravo Dome Carbon Dioxide Gas Unit Area in Township 18 North, Range 35 East; Township 21 North, Ranges 34 and 35 East; and Township 22 North, Range 34 East.

OPPOSITION OR OTHER PARTY

(Please make a concise statement of the basis for opposing this application or otherwise state the position of the party filing this statement.)

PROPOSED EVIDENCE

APPLICANT

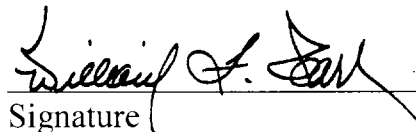
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Sam Culpepper, Landman	15 Min.	Approximately 5
Herbert J. Wacker, Geologist	30 Min.	Approximately 9
Bill Gibson, Engineer	45 Min.	Approximately 10

OPPOSITION

WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
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PROCEDURAL MATTERS

(Please identify any procedural matters which need to be resolved prior to hearing)


Signature