#### CAMPBELL, CARR & BERGE, P.A.

LAWYERS

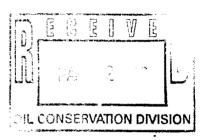
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OF COUNSEL

March 11, 1996

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### HAND-DELIVERED



William J. LeMay, Director Oil Conservation Division New Mexico Department of Energy, Minerals and Natural Resources 2040 South Pacheco Street Santa Fe. New Mexico 87505

> Amended Application of Amoco Production Company for fourteen Re: unorthodox infill carbon dioxide gas well locations, Union County, New Mexico Case 11497

Dear Mr. LeMay:

Enclosed in triplicate is an Amended Application of Amoco Production Company in the above-referenced case. As you will note, this application deletes two wells and adds two wells to the application filed on February 27, 1996. Since this change will not affect the notice or legal advertisement for this case, Amoco Production Company respectfully requests that this application, as amended, be heard as originally scheduled at the March 21, 1996 Examiner hearing.

Very truly yours,

WILLIAM F. CARR

WFC:mlh **Enclosures** 

Mr. Lynn Clay (w/enclosures) cc:

**Amoco Production Company** 

Highway 402 South

Clayton, New Mexico 88415

A. Andrew Gallo, Esq. (w/enclosures) **Amoco Corporation** Post Office Box 3092

Houston, TX 77253-3092

## BEFORE THE

### OIL CONSERVATION DIVISION

NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES

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

CASE NO. 1/497

# **AMENDED APPLICATION**

AMOCO PRODUCTION COMPANY, ("Amoco") by its undersigned attorneys, makes application to the Oil Conservation Division for an Order approving fourteen unorthodox infill carbon dioxide gas well locations, and in support thereof states:

- 1. Applicant is the operator of the Bravo Dome Carbon Dioxide Gas Unit ("BDCDGU") located in portions of Harding, Quay and Union Counties, New Mexico.
- 2. The BDCDGU is developed and operated in part pursuant to Special Rules and Regulations for the "Bravo Dome 640-acre Area" which were promulgated by Oil Conservation Division Order No. R-7556 dated June 19, 1984 ("the Special 640-acre Rules").
- 3. The Special 640-acre Rules provide for standard 640-acre spacing units consisting of a single governmental section (Rule 2), with wells located no nearer than 1650 feet to the outer boundary of the section and no nearer than 330 feet to any governmental quarter-quarter section line (Rule 4).
- 4. The Special 640-acre Rules permit the drilling of a well on each of the quarter sections in the unit (Rule 2) but provide that subsequent wells drilled on a 640-acre unit shall

be located no nearer than 1320 feet from any existing well drilling to or capable of producing from the Bravo Dome 640-acre Area (Rule 4).

- 5. Amoco seeks an exception to the provisions of Rule 4 of the Special Rules and Regulations for the Bravo Dome 640-acre Area for fourteen infill carbon dioxide gas wells which it proposes to drill to the Tubb formation in the Bravo Dome 640-acre Area in Union County, New Mexico as follows:
  - A. BDCDGU 2135 Well No. 182 4620' FSL and 660' FWL (Unit D) Section 18, Township 21 North, Range 35 East
  - B. BDCDGU 2234 Well No. 232 660' FS + WL (Unit M) Section 23, Township 22 North, Range 34 East
  - C. BDCDGU 1835 Well No. 082 660' FSL and 1980' FWL (Unit N) Section 8, Township 18 North, Range 35 East
  - D. BDCDGU 2234 Well No. 262660' FSL and 560' FWL (Unit M)Section 26, Township 22 North, Range 34 East
  - E. BDCDGU 2134 Well No. 243 660' FSL and 4620' FWL (Unit P) Section 24, Township 21 North, Range 34 East
  - F. BDCDGU 2234 Well No. 223 4620' FSL and 385' FWL (Unit D) Section 22, Township 22 North, Range 34 East
  - G. BDCDGU 2234 Well No. 212 660' FS + WL (Unit M) Section 21, Township 22 North, Range 34 East

- H. BDCDGU 2134 Well No. 132
   450' FS + EL (Unit P)
   Section 13, Township 21 North, Range 34 East
- I. BDCDGU 1835 Well No. 072
   1980' FS + WL (Unit K)
   Section 7, Township 18 North, Range 35 East
- J. BDCDGU 2135 Well No. 183
   660' FSL and 4620' FWL (Unit P)
   Section 18, Township 21 North, Range 35 East
- K. BDCDGU 1835 Well No. 162660' FSL and 4620' FWL (Unit P)Section 16, Township 18 North, Range 35 East
- L. BDCDGU 1835 Well No. 163 4620' FSL and 1980' FWL (Unit C) Section 16, Township 18 North, Range 35 East
- M. BDCDGU 2234 Well No. 213
  4720' FSL and 660' FWL (Unit D)
  Section 21, Township 22 North, Range 34 East
- N. BDCDGU 2234 Well No. 172
  660' FN + EL (Unit A)
  Section 17. Township 22 North, Range 34 East
- 6. Approval of this amended application will afford Amoco the opportunity to produce its just and equitable share of the carbon dioxide gas from the Tubb formation and will otherwise be in the best interest of conservation, the protection of correlative rights and the prevention of waste.

WHEREFORE, Amoco Production Company requests that this amended application be set for hearing before a duly appointed Examiner of the Oil Conservation Division of AMENDED APPLICATION, Page 3

March 21, 1996, and after notice and hearing as required by law, the Division enter its Order granting this application and providing such other relief as is proper.

Respectfully submitted,

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ATTORNEYS FOR AMOCO PRODUCTION COMPANY