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 QUALIFICATION OF A WELL WORKOVER PROJECT AND CERTIFICATION OF APPROVAL, SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 11557

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	ATTORNEY
Amoco Production Company c/o J. W. Hawkins Post Office Box 800 Denver, Colorado 80201 (303) 830-5072 name, address, phone and contact person	William F. Carr, EsqCampbell, Carr, Berge & Sheridan, P.A. Post Office Box 2208Santa Fe, New Mexico 87504(505) 988-4421
OPPOSITION OR OTHER PARTY	ATTORNEY

name, address, phone and contact person

Pre-hearing Statement NMOCD Case No. 11557 Page 2

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 order from the Division, pursuant to the "Rules and Procedures for Qualification of Well Workover Projects and Certification for the Well Workover Incentive Tax Rate," as promulgated by Division Order No. R-10505 for its Florence Well No. 67 (API No. 30-045-11822), located 1135 feet from the South line and 1850 feet from the East line (Unit O) of Section 19, Township 27 North, Range 8 West.

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.)

Pre-hearing Statement NMOCD Case No. 11557 Page 3

PROPOSED EVIDENCE

<u>APPLICANT</u>

WITNESSES EST. TIME EXHIBITS (Name and expertise)

Bill Hawkins, Petroleum Engineer 10 Min. Approximately 4

OPPOSITION

WITNESSES EST. TIME EXHIBITS (Name and expertise)

PROCEDURAL MATTERS

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

Amoco will request that Cases 11555, 11556, 11558, 11559, 11560 and 11557 be consolidated for the purpose of hearing.

Signature