

**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:

**NOV**

IN THE MATTER OF THE APPLICATION OF  
AMOCO PRODUCTION COMPANY FOR  
DOWNHOLE COMMINGLING,  
SAN JUAN COUNTY, NEW MEXICO.

CASE NO. 11645

**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 \_\_\_\_\_  
c/o Pam Staley \_\_\_\_\_  
Post Office Box \_\_\_\_\_  
Denver, CO 80202 \_\_\_\_\_  
(303) 830-5344 \_\_\_\_\_  
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 \_\_\_\_\_

**OPPOSITION OR OTHER PARTY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ATTORNEY**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

name, address, phone and  
contact person

**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 authority to downhole commingle production from the Basin Dakota Pool and the Blanco Mesaverde Pool within the wellbore of its Stewart LS 6M Well to be located 800 feet from the South line and 1165 feet from the East line (Lot 16) of Section 28, Township 30 North, Range 10 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.)

**PROPOSED EVIDENCE**

APPLICANT

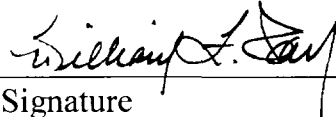
WITNESSES (Name and expertise)	EST. TIME	EXHIBITS
Pam Staley, Petroleum Engineer	25 Min.	Approximately 12

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