



Amoco Production Company

501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

September 23, 1994

TO: ALL INTEREST OWNERS IN THE BRAVO DOME CARBON DIOXIDE GAS UNIT
LOCATED IN HARDING, QUAY AND UNION COUNTIES, NEW MEXICO

Dear Owner:

Amoco Production Company, operator of the Bravo Dome Carbon Dioxide Gas Unit, hereby notifies you that the Unit Working Interest Owners have determined the productive limits of the Unitized Formation in the Unit Area. A plat showing the current Unit boundary and the line designating the productive limits of the Unitized Formation is printed on the back side of this letter. The plat shows: (i) the outline of the current Unit boundary; (ii) the Townships and Ranges; (iii) the section numbering method (shown by way of example in the center of the plat); and (iv) the productive limits of the Unitized Formation. The shaded area lies within the productive limits of the Unitized Formation. Pursuant to Section 5.2 of the Bravo Dome Carbon Dioxide Gas Unit Agreement, any tract outside the productive limits (i.e. outside the shaded area) is automatically eliminated from the Unit Area and the Tract Participation of each tract must be redetermined.

A hearing on this matter has been set before the New Mexico Oil Conservation Commission at 9:00 a.m. on October 20, 1994 in Morgan Hall, New Mexico State Land Office Building, 310 Old Santa Fe Trail, Santa Fe, New Mexico. The hearing will be limited to the determination of the limits of the Unitized Formation (zero net pay isopachous line) in the Unit Area.

You are not required to attend this hearing, but as the owner of an interest which may be affected by contraction of the Unit Area, you may appear at the hearing and present evidence. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

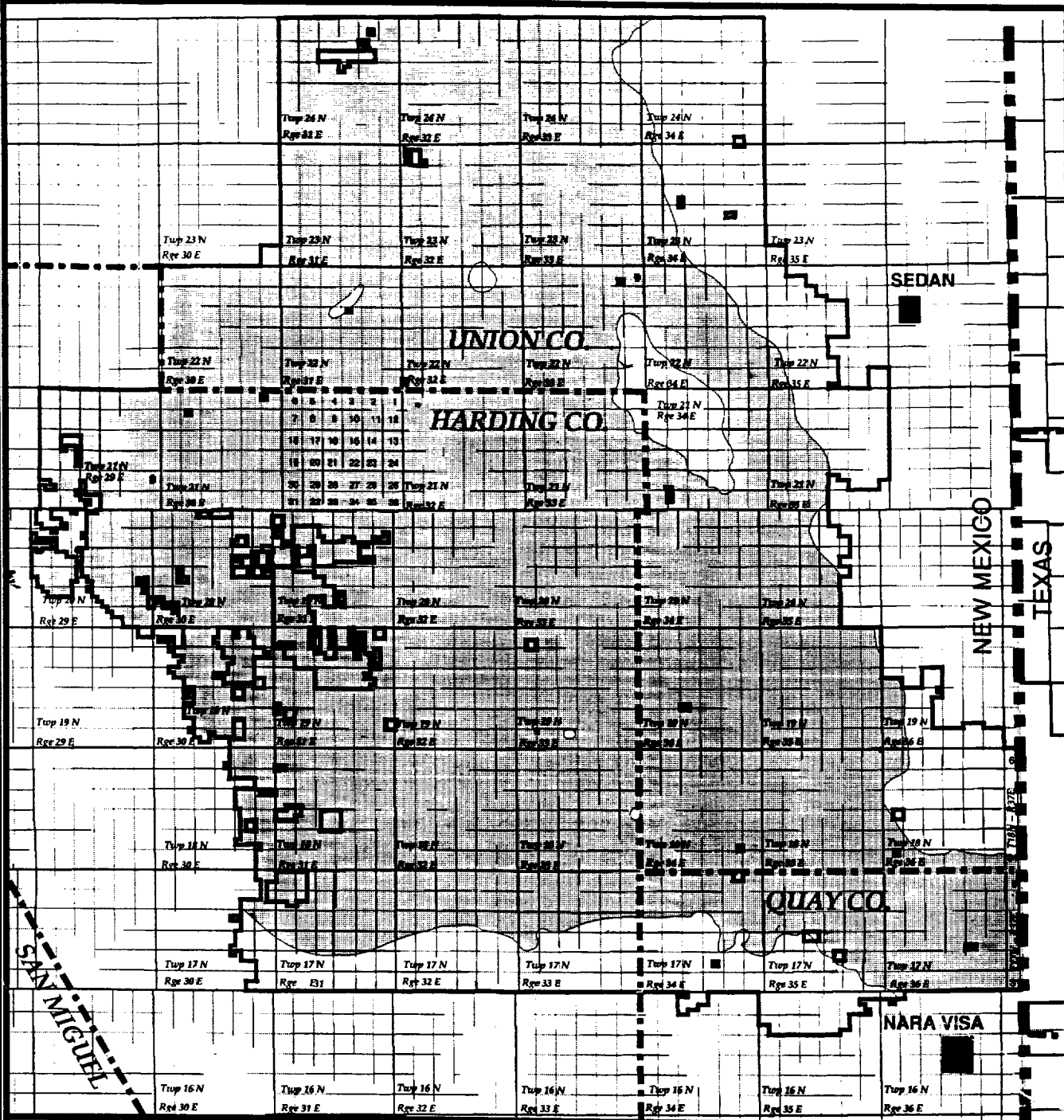
Parties appearing in cases before the Commission have been requested to file a Prehearing Statement substantially in the form prescribed by the Oil Conservation Division (Memorandum 2-90). Prehearing statements should be filed by 4:00 p.m. on the Friday before a scheduled hearing.

Very truly yours,

AMOCO PRODUCTION COMPANY

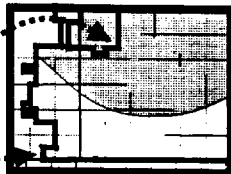
EXHIBIT "B"

BRAVO DOME CARBON DIOXIDE GAS UNIT

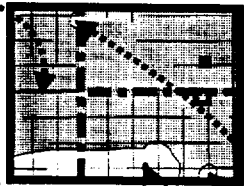


EXPLANATION OF MAP SYMBOLS

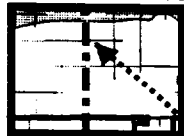
CURRENT "BRAVO DOME CARBON DIOXIDE GAS UNIT" BOUNDARY



SHADED AREA REPRESENTS PRODUCTIVE AREA OF THE UNITIZED FORMATION.



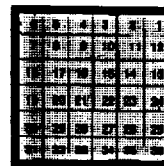
UNSHADED AREA INSIDE THE UNIT BOUNDARY REPRESENTS UNPRODUCTIVE AREAS OF THE UNITIZED FORMATION



COUNTY LINE



STATE LINE



LOCATION OF SECTIONS WITHIN EACH TOWNSHIP

**Santa Fe National Little League
Team Roster 1998
Senior Girls**

Team Name: Team 4

| Name | Birthdate-Age | Phone # |
|----------------------|---------------|----------|
| 1 Kimberly Gonzales | 12/03/84-13 | 471-8963 |
| 2 Carley Johnson | 04/04/85-13 | 471-1068 |
| 3 Klarissa Vigil | 03/08/85-13 | 471-4674 |
| 4 Jennifer Martinez | 01/04/85-13 | 471-0112 |
| 5 Christina Mitchell | 06/25/85-13 | 473-3197 |
| 6 Kristine Bostos | 08/22/84-13 | 471-6554 |
| 7 Natalie Peterson | 11/03/84-13 | 471-1498 |
| 8 Jessica Romero | 09/20/84-13 | 474-6129 |
| 9 Annale Trujillo | 06/12/85-13 | 473-9346 |
| 10 Amanda Bays | 09/28/83-14 | 471-3559 |
| 11 Valerie Romero | 09/12/83-14 | 471-6185 |
| 12 Elizabeth Shepard | 10/03/83-14 | 473-4460 |

Manager: Larry Bays 471-3559 (h) 667-5712 (w) 669-1691 (cellular)

Coach: Roy Johnson 471-1068 (h) 827-8198 (w)

Assistant Coach: Carlos Bostos 471-6554 (h)

Team Mom: ???

Tentative April Practice Schedule:

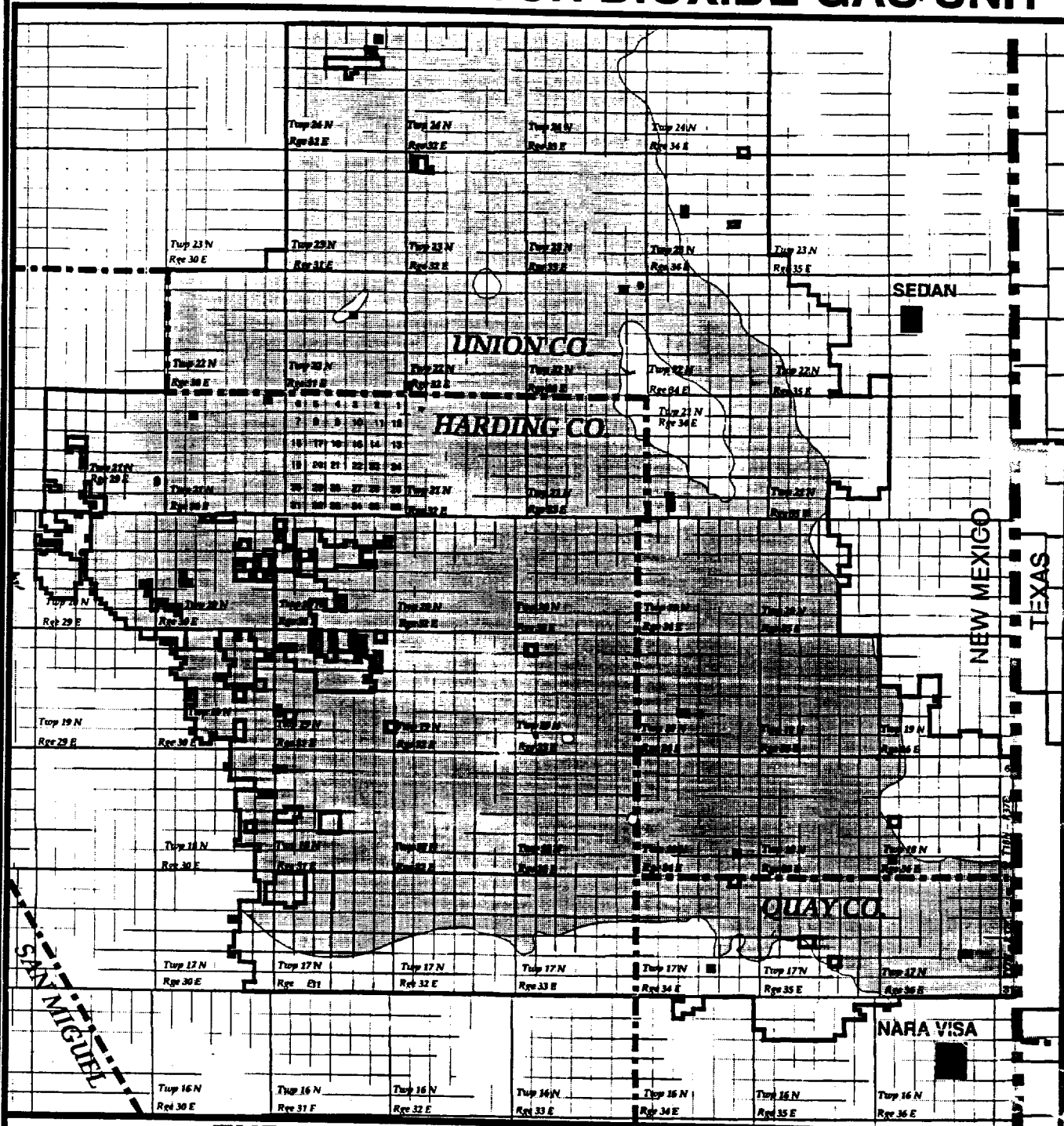
Tuesday: 6pm-8pm

Friday: 6pm - 8pm (No Practice April 10 (Good Friday))

Saturday: 9am-11am

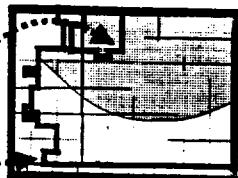
| | | |
|--|----------------------|----------------|
| Post-It™ brand fax transmittal memo 7671 | | # of pages > 1 |
| To: <i>Roy Johnson</i> | From: <i>L. Bays</i> | |
| Co. | Co. | |
| Dept. | Phone # | |
| Fax # <i>827-8177</i> | Fax # | |

BRAVO DOME CARBON DIOXIDE GAS UNIT

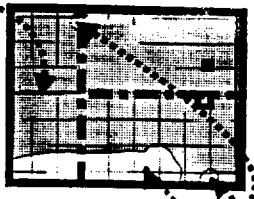


EXPLANATION OF MAP SYMBOLS

CURRENT "BRAVO DOME
CARBON DIOXIDE GAS
UNIT" BOUNDARY



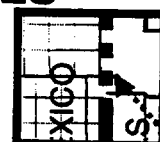
SHADED AREA REPRESENTS
PRODUCTIVE AREA OF THE
UNITIZED FORMATION.



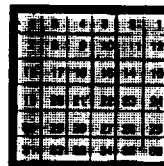
UNSHADED AREA
INSIDE THE UNIT BOUNDARY
REPRESENTS UNPRODUCTIVE
AREAS OF THE UNITIZED FORMATION



COUNTY LINE

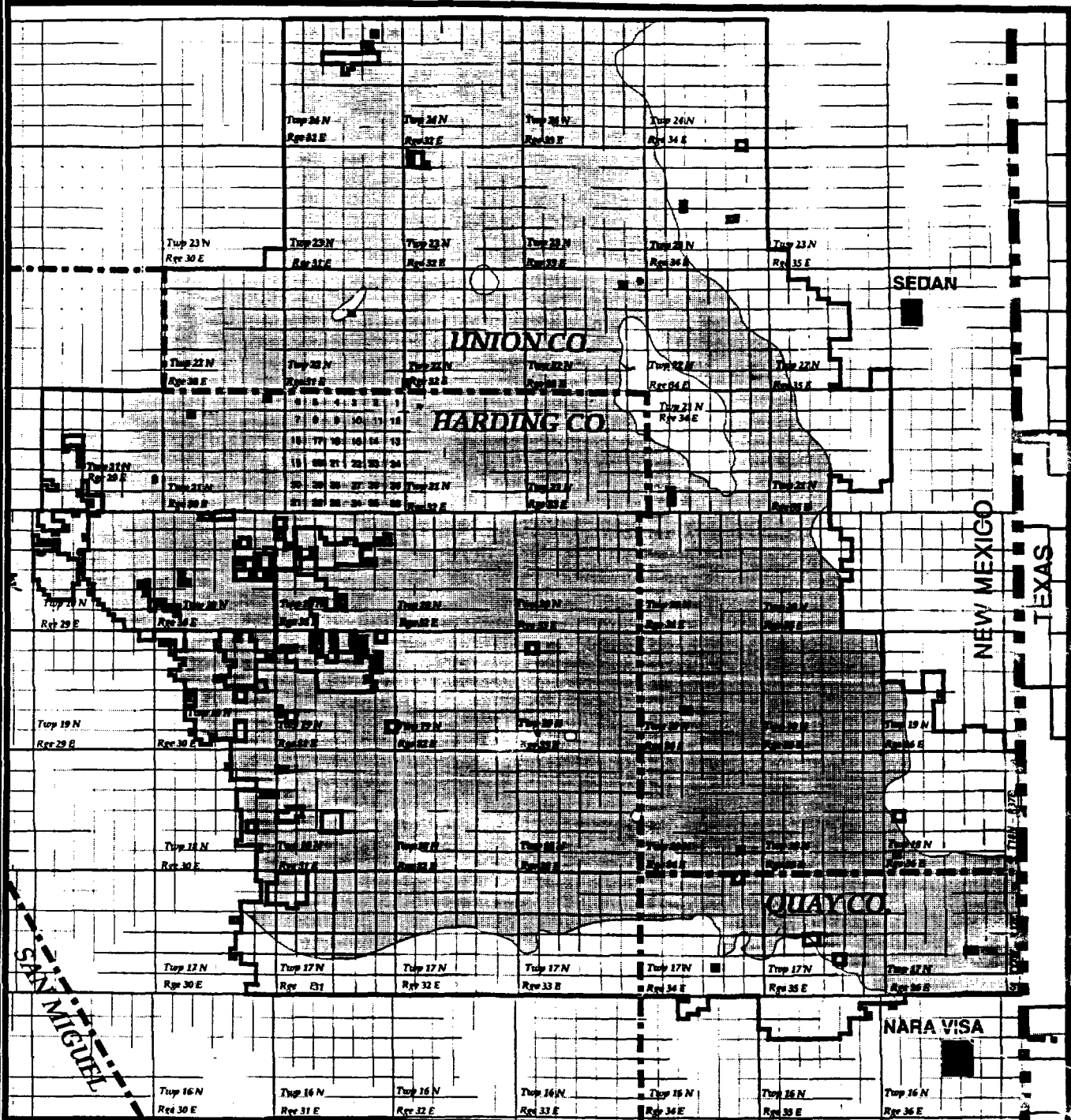


STATE LINE



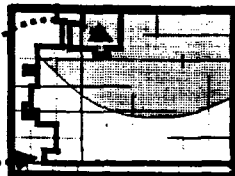
LOCATION OF SECTIONS
WITHIN EACH TOWNSHIP

BRAVO DOME CARBON DIOXIDE GAS UNIT

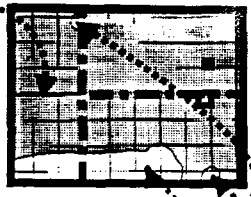


EXPLANATION OF MAP SYMBOLS

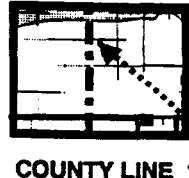
CURRENT "BRAVO DOME CARBON DIOXIDE GAS UNIT" BOUNDARY



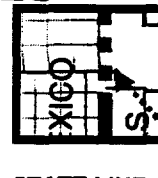
SHADED AREA REPRESENTS PRODUCTIVE AREA OF THE UNITIZED FORMATION.



UNSHADED AREA INSIDE THE UNIT BOUNDARY REPRESENTS UNPRODUCTIVE AREAS OF THE UNITIZED FORMATION



COUNTY LINE



STATE LINE

| | | | | | | | | | | | |
|----|----|----|----|----|----|----|----|----|----|----|----|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 |
| 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 |
| 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 |

LOCATION OF SECTIONS WITHIN EACH TOWNSHIP

**Amoco Production Company**

501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

September 23, 1994

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LOCATED IN HARDING, QUAY AND UNION COUNTIES, NEW MEXICO

Dear Owner:

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A hearing on this matter has been set before the New Mexico Oil Conservation Commission at 9:00 a.m. on October 20, 1994 in Morgan Hall, New Mexico State Land Office Building, 310 Old Santa Fe Trail, Santa Fe, New Mexico. The hearing will be limited to the determination of the limits of the Unitized Formation (zero net pay ~~baseline~~ ^{threshold} line) in the Unit Area.

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827-5800

Very truly yours,

AMOCO PRODUCTION COMPANY

OCT-6-94 THU 10:36 OIL CONSERVATION DIV

P.02



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNORPOST OFFICE BOX 2000
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 227-1000

2-90

MEMORANDUM

TO: All Parties Appearing Before OCD Examiners or the Commission

FROM: William J. LeMay, Director *WJL*

SUBJECT: Prehearing Statement to be Filed Prior to Hearing

DATE: April 30, 1990

In order to improve the management of hearing dockets before Oil Conservation Division examiners and the Oil Conservation Commission, parties appearing in any cases are hereby requested to file a **PREHEARING STATEMENT** substantially in the form attached to this memorandum by 4:00 p.m. on the Friday before a scheduled hearing beginning with the Docket set for May 30, 1990. The statements should be filed by the attorney who will be representing the party at the hearing. Two copies should be provided for examiner hearings and four copies for Commission hearings with an additional copy provided to the reporter on the day of the hearing. The statement must be served on any party who has entered an appearance pursuant to Rule 1208.

There are several benefits to be derived from the statements. First the examiner or Commission will be able to anticipate the approximate length of a case in order to schedule the court reporter and plan their own schedules. Hopefully it will also enable parties to better determine when they can expect their case to be heard. By identifying the issues and evidence in advance, the examiners and the parties will be better prepared for the hearings. Changes in witnesses and exhibits will normally be allowed.

Parties subject to this memorandum include applicants and any other party planning to appear either in opposition or support of an application. Applicants should include in the notice required under Division Rules a statement that a prehearing statement is required by any person planning to appear and that anyone wishing to receive other parties' prehearing statements or pleadings must file an entry of appearance.

If any party in a case fails to file a prehearing statement the examiner or the Commission reserves the right to make such adjustments to the docket as are appropriate in a given circumstance, such as moving the case to the end of the docket after all cases in which parties have filed their statements. Because this procedure is intended to improve the hearing process, it is hoped that the high level of support and cooperation normally shown in OCD and OCC proceedings will continue.

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:

CASE NO.

APPLICATION OF Amoco Production Co
P.O. Box 3092
Houston, TX 77253-3092

PRE-HEARING STATEMENT

This prehearing statement is submitted by Opposition
as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Amoco Production Co

name, address, phone and
contact person

OPPOSITION OR OTHER PARTY

ATTORNEY

Donald Terrence Sewell #1

None to be present

Rufus Donald Sewell RA.#s

330565-00-3 # 330567-00-9.

1909 Chaudelle NE, Albuquerque,

N.M 8742 505-293-0724

name, address, phone and
contact person

Pre-hearing Statement
NMOCD Case No. _____
Page 2

STATEMENT OF CASE

APPLICANT

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

PLEASE SEE ATTACHED LETTER FROM Amoco Production Co. CONCERNING SECTION 5.2 OF THE BRAVO DOME CARBON DIOXIDE GAS UNIT AGREEMENT, DATED SEPTEMBER 29, 1994, AND THE MAP PICTURED ON THE OPPOSITE SIDE SHOWING AN IMAGINARY (ISOPACHOUS) LINE DECLARING ZERO NET PAY AREAS THAT HAD BEEN (POSITIVE) PAY AREAS FOR THE PAST SEVERAL YEARS.

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.)

THE ABOVE CORRESPONDENCE INDICATES THAT WE WHO ARE PARTIAL OWNERS OF BRAVO DOME CO₂ GAS UT TR 0213-A AND 0213-B. ARE BEING ELIMINATED FROM THE PAY ZONE OF THE UNITIZED FORMATION UNIT AREA AND ARE BEING PUT INTO THE "ZERO NET PAY ISOPACHOUS LINE" ZONE. WE, AS ROYALTY OWNERS, WISH TO ATTEND THIS HEARING IN ORDER TO UNDERSTAND AND OBJECT, IF NECESSARY, TO THIS IMAGINARY LINE THAT AMOCO HAS SUBJECTIVELY DRAWN POSSIBLY HARMING OUR INTERESTS IN A NEGATIVE FINANCIAL MANNER.

SINCE THIS IS AN ISOPACHOUS LINE AND NO REAL EXPLANATION OF ITS EXISTENCE IS EXPECTED. ESPECIALLY TO PROPERTY DESCRIPTIONS: T22N R35E SEC 8 SW 4 AS TO CO₂ RTS IN THE TUBBEE UNION CTY NM AND T-22N R-35E SEC 5, S2 AS TO CO₂ UNION CT NM.

Pre-hearing Statement
NMOCD Case No. _____
Page 3

PROPOSED EVIDENCE

APPLICANT

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES
(Name and expertise)

EST. TIME

EXHIBITS

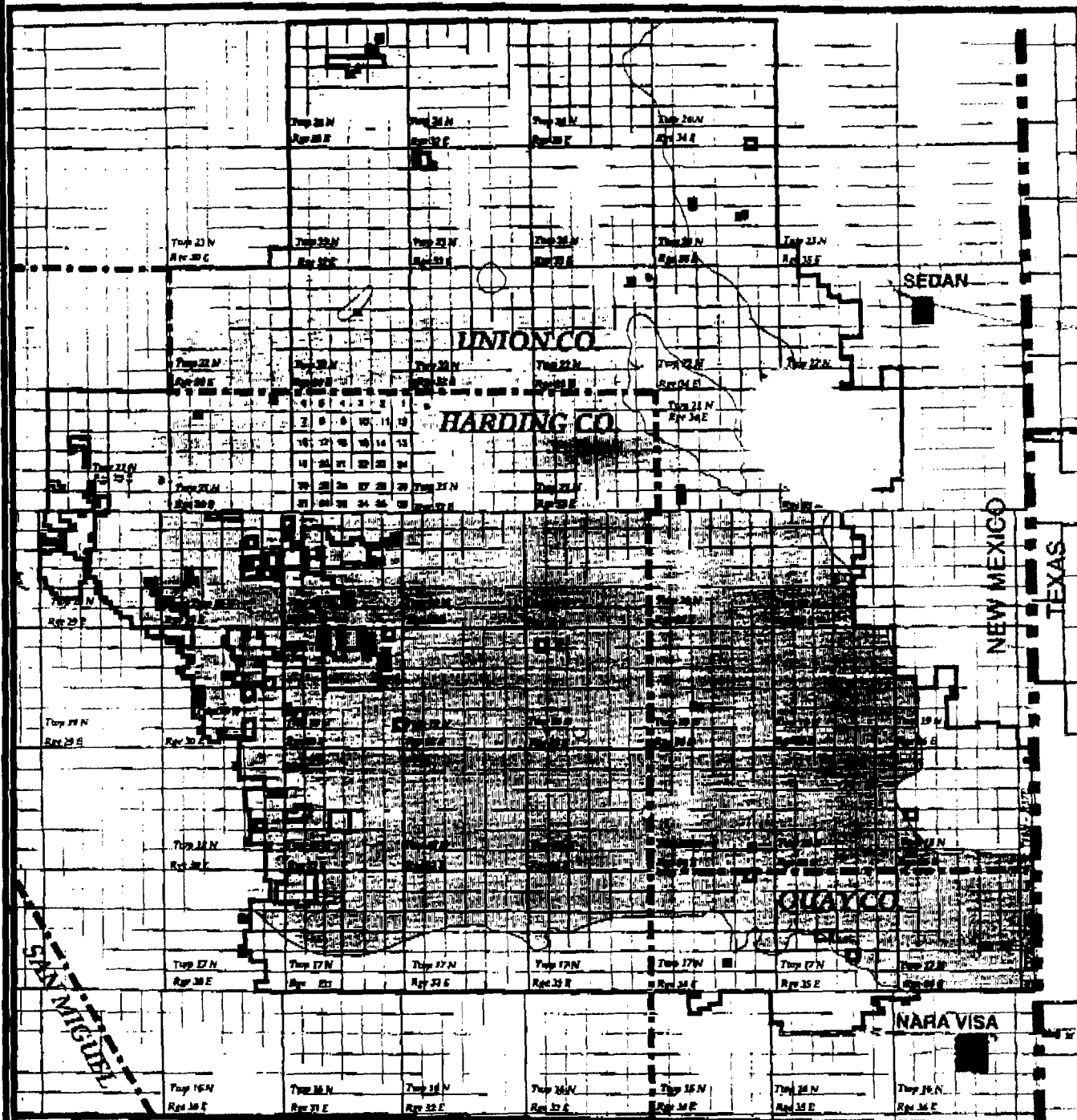
PROCEDURAL MATTERS

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

I, DONALD TERRENCE SEWELL, AND my mother HAZEL INEZ S.
REPRESENTING my father, Rufus Donald Sewell, represent ourselves
at present. We RESERVE the right to present original documents
and the fact of previous proof by Amoco that our product was
of proven value.

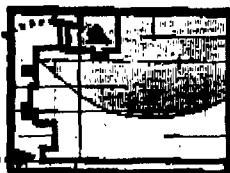
Donald J. Sewell

BRAVO DOME CARBON DIOXIDE GAS UNIT

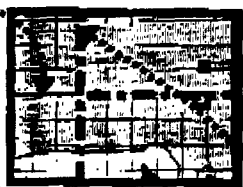


EXPLANATION OF MAP SYMBOLS

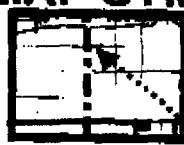
CURRENT "BRAVO DOME
CARBON DIOXIDE GAS
UNIT" BOUNDARY



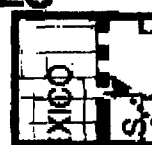
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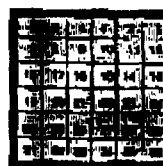
UNSHADED AREA
INSIDE THE UNIT BOUNDARY
REPRESENTS UNPRODUCTIVE
AREAS OF THE UNITIZED FORMATION



COUNTY LINE



STATE LINE



LOCATION OF SECTIONS
WITHIN EACH TOWNSHIP

[date]

TO ALL INTEREST OWNERS IN THE BRAVO DOME CARBON DIOXIDE GAS UNIT
LOCATED IN HARDING, QUAY AND UNION COUNTIES, NEW MEXICO

Gentlemen:

Amoco Production Company, operator of the Bravo Dome Carbon Dioxide Gas Unit, hereby notifies you that the Unit Working Interest Owners have determined the productive limits of the unitized formation in the Unit Area. A description of the new Unit Area is enclosed with this letter. Pursuant to Section 5.2 of the Bravo Dome Carbon Dioxide Gas Unit Agreement, any tract outside the productive limits is automatically eliminated from the Unit Area and the Tract Participation of each tract must be redetermined.

The New Mexico Oil Conservation Commission has set this matter for hearing at 9:00 a.m. on October 20, 1994 in Morgan Hall, New Mexico State Land Office Building, 310 Old Santa Fe Trail, Santa Fe, New Mexico. The hearing will be limited to the determination of the limits of the unitized formation in the Unit Area.

You are not required to attend this hearing, but as the owner of an interest which may be affected by contraction of the Unit Area, you may appear at the hearing and present evidence. Failure to appear at that time and become a party of record will preclude you from challenging the matter at a later date.

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Very truly yours,

CASE _____:

In the matter of the hearing called by the Oil Conservation Commission for the purpose of considering the contraction of the Bravo Dome Carbon Dioxide Gas Unit Area. This unit is located in portions of Townships 17 through 24 North, Ranges 29 through 37 East, N.M.P.M., Harding, Quay and Union Counties, New Mexico. This hearing will be limited to evidence concerning the productive limits of the Tubb formation in the Unit Area. *Plat of affected*

area

↑
(2000 net pay
150000 bbls)

CASE 11122:

In the matter of the hearing called to consider the recommendation of the Bravo Dome Carbon Dioxide Gas Unit Working Interest Owners to contract the Bravo Dome Carbon Dioxide Gas Unit Area. This unit is located in portions of Townships 17 through 24 North, Ranges 29 through 37 East, N.M.P.M., Harding, Quay and Union Counties, New Mexico. This hearing will be limited to evidence concerning the productive limits of the Tubb formation in the Unit Area. A copy of a plat showing the productive limits of the Tubb formation may be obtained by contacting Karen Crow, Amoco Production Company, Post Office Box 3092, Houston, TX 77253 or 501 WestLake Park Boulevard, Houston, TX 77079; (713 366-5977).

21 1991