

**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. 11555

**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, 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 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 Canyon Well No. 5 (API No. 30-045-21315), located 800 feet from the South line and 1840 feet from the East line (Unit O) of Section 3, Township 25 North, Range 11 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
Bill Hawkins, Petroleum Engineer	10 Min.	Approximately 4

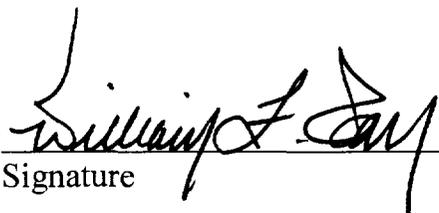
OPPOSITION

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)

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

  
\_\_\_\_\_  
Signature