

CAMPBELL, CARR, BERGE
& SHERIDAN, P.A.
LAWYERS

MICHAEL B. CAMPBELL
WILLIAM F. CARR
BRADFORD C. BERGE
MARK F. SHERIDAN

MICHAEL H. FELDEWERT
TANYA M. TRUJILLO
PAUL R. OWEN

JACK M. CAMPBELL
OF COUNSEL

JEFFERSON PLACE
SUITE 1 - 110 NORTH GUADALUPE
POST OFFICE BOX 2208
SANTA FE, NEW MEXICO 87504-2208
TELEPHONE: (505) 988-4421
TELECOPIER: (505) 983-6043

July 16, 1996

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

RECEIVED

JUL 16 1996

Oil Conservation Division

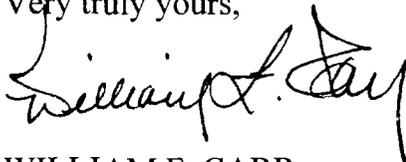
Case 11586

Re: Application of Amoco Production Company for simultaneous dedication, San
Juan County, New Mexico

Dear Mr. LeMay:

Enclosed in triplicate is the Application of Amoco Production Company in the above-referenced case as well as a copy of a legal advertisement. Amoco Production Company respectfully requests that this matter be placed on the docket for the August 8, 1996 Examiner hearings.

Very truly yours,



WILLIAM F. CARR

WFC:mlh

Enclosures

cc: Bill Hawkins (w/enclosures)

BEFORE THE
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

RECEIVED

JUL 16 1996

Oil Conservation Division
CASE NO. 11586

APPLICATION OF AMOCO PRODUCTION
COMPANY FOR SIMULTANEOUS DEDICATION,
SAN JUAN COUNTY, NEW MEXICO

APPLICATION

AMOCO PRODUCTION COMPANY ("Amoco"), through its undersigned attorneys, hereby makes application for authorization for simultaneous dedication, and in support of its application states:

1. Amoco is the operator of the Ute Indian A-17 Well which is completed as a producing gas well in the Dakota formation, Ute Dome-Dakota Gas Pool, at a standard location in the NW/4 of Section 2, Township 31 North, Range 14 West, N.M.P.M., San Juan County, New Mexico.

2. The Amoco Ute Indian A-17 Well is unable to effectively drain the reserves under the NW/4 of said Section 2 due to faults in the Dakota formation which transverse this spacing unit.

3. Amoco seeks an exception to Oil Conservation Division General Rule 104 C 3 to permit it to drill its proposed Ute Indian A-22 Well at a standard location as a second well in the NW/4 of said Section 2 and simultaneously dedicate the NW/4 of Section 2 to the Ute Indian A-17 and A-22 Wells.

4. Approval of this application and the drilling of the Ute Indian A-22 Well will enable Amoco to produce its just and fair share of the reserves under the NW/4 of Section 2 and will otherwise be in the best interest of conservation and the protection of correlative rights.

WHEREFORE, Amoco Production Company requests that this application be set for hearing before an Examiner of the Oil Conservation Division on August 8, 1996, and, after notice and hearing as required by law, the Division enter its order granting this application and authorizing the simultaneous dedication of the NW/4 of Section 2, Township 31 North, Range 14 West, N.M.P.M. to the Amoco Ute Indian A-17 and A-22 Wells.

Respectfully submitted,

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

By: 
WILLIAM F. CARR
Post Office Box 2208
Santa Fe, New Mexico 87504
Telephone: (505) 988-4421

ATTORNEYS FOR AMOCO PRODUCTION
COMPANY

CASE 11586

Application of Amoco Production Company for simultaneous dedication, San Juan County, New Mexico. Applicant in the above-styled cause seeks authority to simultaneously dedicate the NW/4 of Section 2, Township 31 North, Range 14 West in the Ute Dome-Dakota Gas Pool to the Ute Indian A-17 and A-22 Wells located at standard locations in the NW/4 of said Section 2. Said wells are located approximately __ miles __ of _____, New Mexico.

RECEIVED

JUL 16 1996

Oil Conservation Division