

**STATE OF NEW MEXICO  
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT  
OIL CONSERVATION COMMISSION**

IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
COMMISSION FOR THE PURPOSE OF  
CONSIDERING:

14 1994

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.

CASE NO. 11122

**PRE-HEARING STATEMENT**

This Prehearing Statement is submitted by Campbell, Carr, Berge & Sheridan, P.A., as required by the Oil Conservation Commission.

**APPEARANCES OF PARTIES**

PARTY	ATTORNEY
Amoco Production Company_____	William F. Carr, Esq._____
c/o A. Andrew Gallo_____	Campbell, Carr, Berge & Sheridan, P.A.
Post Office Box 3092_____	Post Office Box 2208_____
Houston, TX 77253_____	Santa Fe, New Mexico 87504_____
(713) 366-3709_____	(505) 988-4421_____

name, address, phone and  
contact person

**STATEMENT OF CASE**

Section 5 of the Bravo Dome Carbon Dioxide Unit Agreement requires the Working Interest Owners to redetermine the tract participation in the Unit within fifteen years after the first sales of carbon dioxide. First sales occurred in April, 1984. Section 5 also provides that the redetermination shall be made by establishing a zero net pay isopachous in this reservoir based on extrapolated net pay intervals in all wells in the Unit Area in accordance with industry-wide acceptable standards. The acreage outside the then known productive units is automatically eliminated from the Unit Area and tract participation are redetermined on an acreage basis.

This Unit Agreement was approved by the Oil Conservation Commission in 1980 and 1981 by Order Nos. R-6446 and R-6446-B. Order No. R-6446-B provides that "contractions of the unit area shall be submitted to the Commission for approval."

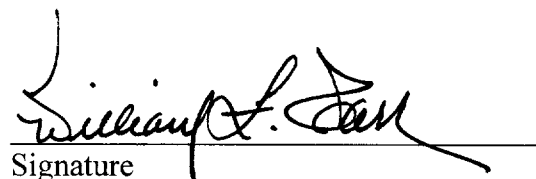
The Bravo Dome Working Interest Owners have established the zero net pay isopachous line which defines the productive limits of the reservoir in the Unit Area. Amoco Production Company, Unit Operator, will call witnesses who will present data on this reservoir and review the technology and procedures which have enabled them to define the productive limits of the reservoir in the Bravo Dome Unit Area.

#### **PROPOSED EVIDENCE**

<b>WITNESSES</b> (Name and expertise)	<b>EST. TIME</b>	<b>EXHIBITS</b>
Herb Wacker, Geologist	45 Min.	Approximately 10
Terence J. Cosban, Geophysicist	30 Min.	Approximately 3
Jim Collier, Petroleum Engineer	30 Min.	Approximately 12
Woody Allison, Landman	15 Min.	Approximately 4

#### **PROCEDURAL MATTERS**

None.

  
Signature

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 COMPANY

PRE-HEARING STATEMENT

This prehearing statement is submitted by THE DAVE ROMERO JR.  
as required by the Oil Conservation Division. LAW FIRM P.A.

APPEARANCES OF PARTIES

OPPOSITION TO  
APPLICANT

ATTORNEY

HERBERT GARCIA ESTATE

BENNIE GARCIA

G.D. CATTLE CO.

\_\_\_\_\_

name, address, phone and  
contact person

OPPOSITION OR OTHER PARTY

See above

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

name, address, phone and  
contact person

DAVE ROMERO JR.

" "

" "

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ATTORNEY

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STATEMENT OF CASE

OPPOSITION  
APPLICANT

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

1. APPLICANT HAS FAILED TO Carry his BURDEN OF DEMONSTRATING a Payline.
2. APPLICANT HAS FAILED PROCEDURALLY TO GIVE THOSE AFFECTED, SUFFICIENT NOTICE AND DUE PROCESS.
3. THE HEARING BODY HAS INAPPROPRIATELY LIMITED THE ISSUES AND PRESENTATION OF EVIDENCE AND TESTIMONY.

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.)

4. THE STATE LAND OFFICE HAS FAILED TO PROTECT ITS CITIZENS by failing to have its staff prepare an INDEPENDENT EVALUATION OF AMOCO'S PRESENTATION.
5. THE DETERMINATION BY THE HEARING BOARD IS AN UNCONSTITUTIONAL DELEGATION OF RESPONSIBILITY BY THE STATE LAND COMMISSIONER.

PROPOSED EVIDENCE

APPLICANT

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

OPPOSITION

WITNESSES  
(Name and expertise)

EST. TIME

EXHIBITS

NONE AT THIS TIME

PROCEDURAL MATTERS

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

DAVE ROMERO  
Signature