

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

**APPLICATION OF AGAVE ENERGY COMPANY  
FOR AUTHORIZATION TO INJECT,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 14720  
ORDER NO. R-13507-D**

**TARGA NORTHERN DELAWARE, LLC'S  
PRE-HEARING STATEMENT**

Targa Northern Delaware, LLC<sup>1</sup> ("Targa") submits its Pre-Hearing Statement in accordance with Rule 19.15.4.13(B) NMAC.

**APPEARANCES**

**APPLICANT**

Targa Northern Delaware, LLC

**APPLICANT'S ATTORNEYS**

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**INTERESTED PARTIES**

New Mexico Oil Conservation Division

**ATTORNEYS**

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<sup>1</sup> Targa Northern Delaware, LLC, is the successor in interest to Lucid Energy and is the current operator of the Red Hills AGI #1.

**STATEMENT OF THE CASE**

Order No. R-13507-D (“Order”) requires Targa to provide the Commission with (1) injection data covering the first four years of operation of the Red Hills AGI #1 Well (API No. 30-025-40448) (“Well”); and (2) an updated model of the projected scope of the injection plume after 30 years of injection, which shall be based on the injection data and any other relevant data concerning the reservoir. The Order further provides that after submitting the injection data and updated model, Targa may renew its request that the Commission eliminate the Order’s requirement that it plug the Government L Com #001 Well (API 30-025-25604).

In accordance with the Order, Targa will present injection data for the first four years of operation of the Well and will provide the Commission with an updated model of the projected scope of the injection plume after 30 years of injection. Based on this data, as permitted by the Order, Targa renews its request that the Commission remove the Order’s requirement that it plug the Government L Com #1H Well.

**PROPOSED EVIDENCE****A. Witnesses**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
David Tu, Ph.D (Petroleum Engineer, New Mexico Institute of Mining and Technology)	40 minutes	1

Targa reserves the right to call a rebuttal witness(es) if appropriate.

**B. Exhibits**

In accordance with Rule 19.15.4.13(B)(2) NMAC, copies of Targa's hearing exhibits have been filed contemporaneously with this Pre-Hearing Statement.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

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*Counsel for Targa Northern Delaware, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
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QUESTIONS  
  
Action 213664

QUESTIONS

Operator:  Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID:  331548
	Action Number:  213664
	Action Type:  [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.