

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

**APPLICATION OF TARGA NORTHERN DELAWARE,  
LLC, FOR AUTHORIZATION TO INJECT,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 23463**

**TARGA NORTHERN DELAWARE, LLC'S  
RESPONSE TO EOG RESOURCES, INC.'S MOTION FOR CONTINUANCE**

Targa Northern Delaware, LLC ("Targa") submits the following response to EOG Resources, Inc.'s ("EOG") Motion for Continuance.

1. EOG received timely notice of the May 11, 2023 hearing in accordance with the New Mexico Oil Conservation Commission's ("Commission") requirements. Although Targa filed its application in this matter on February 20, 2023, the Commission selected a hearing date at its April 13, 2023 meeting and Targa sent its hearing notice letter by certified mail shortly thereafter. Targa also transmitted its application to EOG by electronic mail on April 14, 2023 and has been consistently communicating with EOG in an effort to resolve EOG's concerns. Regardless, Targa agrees to continue this matter to the June 8, 2023 Commission hearing docket to allow the parties additional time to resolve the outstanding issues.

2. Targa would oppose a continuance beyond the June 8, 2023 hearing docket due to its urgent need for the Red Hills AGI #3 well, both for itself and for upstream operators. The well is needed to treat acid gas and thereby prevent flaring and release of CO<sub>2</sub>, as well as prevent cessation of production. In this regard, an expeditious decision on Targa's application will prevent waste, protect correlative rights, and protect human health and the environment.

For the foregoing reasons, Targa requests that the Commission set this matter for hearing on the June 8, 2023 hearing docket.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Yarithza Peña

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)

[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

[ypena@hinklelawfirm.com](mailto:ypena@hinklelawfirm.com)

*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:

Jesse Tremaine

Assistant General Counsels

New Mexico Energy, Minerals, and

Natural Resources Department

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

(505) 741-1231

(505) 231-9312

[jessek.tremaine@state.nm.us](mailto:jessek.tremaine@state.nm.us)

*Attorney for New Mexico Oil Conservation Division*

Michael H. Felderwert

Adam G. Rankin

Julia Broggi

Paula M. Vance

Holland & Hart, LLP

Post Office Box 2208

Santa Fe, New Mexico 87504

Phone: (505) 988-4421

[mfelderwert@hollandhart.com](mailto:mfelderwert@hollandhart.com)

[agrarkin@hollandhart.com](mailto:agrarkin@hollandhart.com)

[jbroggi@hollandhart.com](mailto:jbroggi@hollandhart.com)

[pmvance@hollandhart.com](mailto:pmvance@hollandhart.com)

*Attorneys for EOG Resources Inc.  
and Matador Production Company*

/s/ Dana S. Hardy  
Dana S. Hardy