

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

**APPLICATION OF FRONTIER FIELD
SERVICES, LLC FOR AUTHORIZATION
TO INJECT, EDDY COUNTY, NEW MEXICO.**

CASE NO. 25480

PRE-HEARING STATEMENT

Frontier Field Services, LLC (“Frontier” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT

Frontier Field Services, LLC

ATTORNEYS

Dana S. Hardy
Jaclyn M. McLean
Hardy McLean LLC
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INTERESTED PARTY

None.

ATTORNEYS

STATEMENT OF THE CASE

Frontier seeks authorization to inject treated acid gas (“TAG”) from Frontier’s Kings Landing Gas Plant (“Plant”) into the proposed Kings Landing AGI No. 1 well and Kings Landing AGI No. 2 well (“Wells”), which will be located in Section 15, Township 19 South, Range 31 East, Eddy County, New Mexico. The Wells are Underground Injection Control (“UIC”) Class II wells subject to the requirements of 19.15.26 NMAC. The Wells will be drilled as vertical wells: the Kings Landing AGI No. 1 will have a surface location approximately 2,176’ from the north line (FNL) and 384’ from the west line (FWL) of Section 15, and the Kings Landing AGI No. 2 will have a surface location approximately 1,876’ FNL and 735’ FWL of Section 15. The Wells will inject TAG into the Siluro-Devonian formations, including the Thirtyone, Wristen, and Fusselman groups, plus the Montoya Formation, at depths of approximately 13,215’ to 14,415’ in the Kings Landing AGI No. 1 well, and 13,240’ to 14,440’ in the Kings Landing AGI No. 2 well. Although each well is designed to inject up to 20 million cubic feet per day (MMcf/D) of TAG, Frontier is requesting a combined allowable maximum daily injection rate of 20 MMcf/D to be shared between the two wells. The proposed maximum surface injection pressure will be approximately 3,991 pounds per square inch gauge.

The Wells, as proposed in the C-108, will not cause waste, impair correlative rights, or harm public health or the environment, including through the risk of induced seismicity. In addition, the Wells will facilitate the sequestration of CO₂ and TAG, which is in the public interest. Accordingly, Frontier’s application for the Wells comports with the requirements of the Oil and Gas Act and the Division’s regulations and should be approved.

PROPOSED EVIDENCE

Witness	Occupation	Estimated Time	Exhibits
Ramona Hovey	Engineer	Affidavit	Approx. 3
Mitchell Dan	Geologist	Affidavit	Approx. 3
Braxton Reese	Reservoir Engineer	Affidavit	Approx. 3

PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition to its application.

Respectfully submitted,

HARDY McLEAN LLC

/s/ Dana S. Hardy

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Energy, Minerals and Natural Resources
Oil Conservation Division
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QUESTIONS

Action 496665

QUESTIONS

Operator: FRONTIER FIELD SERVICES, LLC 303 Veterans Airpark Lane Midland, TX 79705	OGRID: 221115
	Action Number: 496665
	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.