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:

APPLICATION OF TARGA MIDSTREAM SERVICES, LIMITED PARTNERSHIP TO AMEND ORDER NO. R-13052, LEA COUNTY, NEW MEXICO.

Case No. 14161

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Momentum Operating Co., Inc. as required by the Oil Conservation Division.

APPEARANCES

APPLICANT

Targa Midstream Services, L.P.

APPLICANT'S ATTORNEY

William C. Scott

Suite 1000

500 Fourth Street N.W.

Albuquerque, New Mexico 87102

Phone: (505) 848-1824

OPPONENT

Momentum Operating Co., Inc. P.O. Box 578

Albany, Texas 76430

OPPONENT'S ATTORNEY

James Bruce P.O. Box 1056

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Attention:

Mike Parsons

(325) 762-4018

STATEMENT OF THE CASE

APPLICANT

OPPONENTS

Targa Midstream Services, L.P. seeks to amend Order No. R-13052 so that it is not required to re-enter NMGSAU Well No. 285 and plug it back to the Grayburg-San Andres producing interval. Momentum Operating Co., Inc. opposes the application.

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

OPPONENT

WITNESSES

EST. TIME

<u>EXHIBITS</u>

Mike Parsons (President)

uncertain

Unknown at this time

PROCEDURAL MATTERS

Respectfully submitted,

James Bruce P.O. Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Momentum Operating, Co., Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this ______ day of August, 2011 by facsimile transmission and United States Mail:

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James Bruce