



**MONTGOMERY  
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DEC 3 PM 3 25

December 3, 2008

Florene Davidson  
New Mexico Oil Conservation Division  
1220 S. St. Francis Drive  
Santa Fe, NM 87505

**Re: In the Matter of the Application of Targa Midstream Services Limited  
Partnership for Approval of an Acid Gas Injection Well, Lea County,  
New Mexico, Case No. 14192**

Dear Ms. Davidson:

Enclosed are an original and two copies of a Motion for Continuance for filing with the Division in the above-captioned matter.

Also enclosed is an extra copy for file endorsement and return.

Thank you very much.

Very truly yours,

Karen Williams  
Assistant to J. Scott Hall

JSH:kw  
Enclosures

cc: Will Jones, NMOCD

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**REPLY TO:**

325 Paseo de Peralta  
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**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

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2008 DEC 3 PM 3 25

**IN THE MATTER OF THE APPLICATION OF  
TARGA MIDSTREAM SERVICES LIMITED PARTNERSHIP  
FOR APPROVAL OF AN ACID GAS INJECTION WELL,  
LEA COUNTY, NEW MEXICO**

**Case No. 14192**

**MOTION FOR CONTINUANCE**

Targa Midstream Services Limited Partnership, ("Targa"), through its undersigned attorneys, moves pursuant to Rule 1211 C that the New Mexico Oil Conservation Division enter its order continuing the hearing on the Application in this matter now scheduled for December 4, 2008 to the January 22, 2009 examiner hearing docket. As grounds for this motion, Targa states:

On October 10, 2008, the Division issued a Subpoena Duces Tecum at the request of Range Operating New Mexico, Inc. ("Range") seeking Targa's C-108 and other data. On October 15, 2008, Targa filed its Motion to Quash the Range subpoena. On October 16, 2008, the Division denied the Motion to Dismiss filed by Range. (See Order No. R-13012). Counsel for Range and Targa have discussed the Motion to Quash and compliance with Range Operating's subpoena and as a result, Targa agreed to provide its C-108 and supporting data by October 30, 2008.

Counsel for Targa has agreed that in the event there was any need to continue the hearing on the Application, the C-108 materials and supporting data would be supplied to the Division and to Range Operating at least fifteen days in advance of the hearing in any event.

In order to more fully and completely prepare its C-108 and supporting data and to resolve the matters precipitated by the Range Operating Subpoena Duces Tecum and Targa's Motion to Quash, as well as more fully prepare for hearing, Targa requests this matter be continued to the January 22, 2009 Examiner hearing docket.

Having previously continued this hearing at least twice before, Targa seeks a further continuance by this motion in accordance with the Division's practice.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: \_\_\_\_\_

*J. Scott Hall*  
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P. O. Box 2307  
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(505) 982-3873  
Attorneys for Targa Midstream  
Services Limited Partnership

**Certificate of Service**

I hereby certify that on this 3rd day of December, 2008 a copy of the foregoing was faxed to the following:

W. Thomas Kellahin, Esq.  
Attorney for Range Operating  
New Mexico, Inc.  
706 Gonzales Road  
Santa Fe, NM 87501  
982-2047 – fax

William. F. Carr, Esq.  
Chevron USA, Inc.  
Holland & Hart, LLP  
P. O. Box 2208  
Santa Fe, NM 87504  
983-6043 - fax

*J. Scott Hall*  
\_\_\_\_\_  
J. Scott Hall

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