

**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. 23649

**TARGA NORTHERN DELAWARE, LLC'S
UNOPPOSED MOTION TO CONVERT STATUS CONFERENCE
TO EVIDENTIARY HEARING**

Targa Northern Delaware LLC (“Targa”) requests that the New Mexico Oil Conservation Commission (“Commission”) convert the July 13, 2023 status conference in this matter to an evidentiary hearing. In support of this motion, Targa states the following.

1. On February 20, 2023, Targa filed its initial Application for Authorization to Inject treated acid gas (“TAG”) into the Red Hills AGI #3 well (“AGI 3”) in Case No. 23463. The application sought authorization to inject TAG into the Devonian and Upper Silurian Wristen and Fusselman Formations at a depth of approximately 16,000 to 17,000 feet at Targa’s natural gas processing facility (“Facility”) in Lea County, New Mexico. On June 1, 2023, Targa withdrew the application to address concerns raised by certain operators in the area.

2. On June 12, 2023, Targa submitted its above-referenced Application for Authorization to Inject into AGI 3, seeking authorization to inject TAG into the Bell Canyon and Cherry Canyon Formations of the Delaware Mountain Group at a depth of approximately 5,700 to 7,600 feet.

3. Due to the circumstances discussed below involving Targa’s other AGI wells, Targa has an imminent need to commence injection into AGI 3.

4. Targa operates its Red Hill AGI #1 well (“AGI 1”) at the Facility under Order No. R-21679-G, but the injection capacity of AGI 1 is currently limited.

5. Additionally, Targa began drilling the Red Hill AGI #2 Well (“AGI 2”) under Order No. R-20916-H, but completion of the well has been postponed due to technical complications. As a result, Targa has filed a C-103 to temporarily abandon the well and has submitted to the Commission an administrative request to extend the deadline to commence injection into AGI 2 from October 2023 to October 2024.

6. Because AGI 1 has limited injection capacity and Targa’s ability to complete AGI 2 has been delayed, Targa requires the injection capacity of AGI 3 to serve the Facility. Otherwise, customers who rely on Targa’s AGI wells will be required to shut-in wells or, alternatively, to vent or flare natural gas, resulting in waste and violating correlative rights. Because Targa has an urgent need to commence injection into AGI 3, it requests that the Commission hold a hearing on Targa’s application and issue a decision on an expedited basis.

7. Targa has provided notice of its application to all affected parties and has not received any objections.

8. Targa is prepared to present its application at hearing on July 13, 2023 and has consulted with counsel for the New Mexico Oil Conservation Division, EOG Resources Inc., ConocoPhillips Company, and Matador Production Company regarding its request for a hearing on that date. No party opposes Targa’s request.

For the foregoing reasons, Targa respectfully requests that the Commission convert the July 13, 2023 status conference in this matter to an evidentiary hearing.

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

jmclean@hinklelawfirm.com

ypena@hinklelawfirm.com

Counsel for Targa Northern Delaware LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2023, I served a copy of the foregoing document on the following counsel of record via electronic mail:

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
Attorney for New Mexico Oil Conservation Division

Michael H. Feldewert
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
agrarkin@hollandhart.com
jbroggi@hollandhart.com
pmvance@hollandhart.com
*Attorneys for EOG Resources Inc.,
ConocoPhillips, and Matador Production Company*

/s/ Dana S. Hardy

Dana S. Hardy