

**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
PRE-HEARING STATEMENT**

Targa Northern Delaware LLC ("Targa") submits its Pre-Hearing Statement in accordance with Rule 19.15.4.13(B) NMAC.

APPEARANCES

APPLICANT

Targa Northern Delaware LLC

APPLICANT'S ATTORNEYS

Dana S. Hardy
Jaclyn M. McLean
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com

INTERESTED PARTIES

New Mexico Oil Conservation Division

ATTORNEYS

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@emnrd.nm.gov

EOG Resources Inc.,
Matador Production Company, and
ConocoPhillips Company

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

STATEMENT OF THE CASE

Targa seeks authorization to inject treated acid gas comprised of 80% CO₂, 20% H₂S, and traces of light hydrocarbons (“TAG”) from its Red Hills Gas Processing Plant (“Plant”) into the proposed Red Hills AGI #003 well (“Well”). The Well is an Underground Injection Control Class II well subject to the requirements of 19.15.26 NMAC. The Well is vertical with an approximate surface and bottom hole location at 3,116 feet from the north line and 1,159 feet from the east line of Section 13, Township 24 South, Range 33 East in Lea County. The Well’s proposed maximum daily injection rate is thirteen (13) million standard cubic feet per day, and the proposed maximum surface injection pressure is approximately 1,767 pounds per square inch gauge. The target injection zone is within the Bell Canyon and Cherry Canyon Formations of the Delaware Mountain Group at a depth of approximately 5,700 feet to 7,600 feet.

The New Mexico Oil Conservation Commission held a hearing on this matter on July 13, 2023 and approved Targa’s application, subject to permit conditions to be addressed by the parties. The parties are working toward an agreement on proposed permit conditions, which Targa expects will be presented at the hearing.

PROPOSED EVIDENCE**A. Witnesses**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Matthew Eales (Vice President of Regulatory Affairs, Targa Northern Delaware, LLC)	10 minutes	0

Targa reserves the right to call a rebuttal witness(es) if appropriate.

B. Exhibits

Targa's hearing exhibits were admitted into evidence at the July 13, 2023 hearing. Targa may provide additional exhibits if necessary to address NMOCD's proposed permit conditions.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

Counsel for Targa Northern Delaware LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2023, I served a copy of the foregoing document on the following counsel of record via electronic mail:

Jesse Tremaine
Chris Moander
Assistant General Counsel
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@emnrd.nm.gov
chris.moander@emnrd.nm.gov
Attorneys 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.,
Matador Production Company, and ConocoPhillips*

/s/ Dana S. Hardy
Dana S. Hardy

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 250760

QUESTIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 250760
	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.