

**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. 24594

**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
Dylan M. Villescascas
P.O. Box 2068
Santa Fe, NM 87504-2068
Phone: (505) 982-4554
Facsimile: (505) 982-8623
dhardy@hinklelawfirm.com
jmclean@hinklelawfirm.com
dvillescascas@hinklelawfirm.com

INTERESTED PARTY

New Mexico Oil Conservation Division

ATTORNEYS

Jesse Tremaine
Legal Director
Christopher Moander
Christy Treviño
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
chris.moander@emnrd.nm.gov
christy.trevino@emnrd.nm.gov

STATEMENT OF THE CASE

Targa seeks authorization to inject treated acid gas (“TAG”) from its Copperhead Gas Processing (“Plant”) into the proposed Copperhead AGI No. 1 Well (“Well”), to be located in Section 13, Township 24 South, Range 32 East, Lea County, New Mexico. The Well is an Underground Injection Control (“UIC”) Class II well subject to the requirements of 19.15.26 NMAC. The Well will be drilled as a vertical well with a surface location approximately 793 feet from the south line (FSL) and 429 feet from the east line (FEL) of Section 13. The Well will inject TAG into the Devonian Thirtyone, Upper Silurian Wristen, and Lower Silurian Fusselman Formations at a depth of approximately 17,299 feet to 18,689 feet. The Well’s proposed maximum daily injection rate is twenty-six (26) million standard cubic feet per day (“MMSCFD”), and the proposed maximum surface injection pressure will be approximately 3,460 pounds per square inch gauge (“psig”).

The Well, 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 Well will facilitate the sequestration of CO₂ and TAG, which is in the public interest. Accordingly, Targa’s application for the Well is reasonable, comports with the requirements of the Oil and Gas Act, and should be approved.

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	3
George El-Kaseeh, Ph.D (Research Engineer, New Mexico Institute of Mining and Technology)	60 minutes	Slides 7 to 37 of Exhibit B
Paul Ragsdale (Engineering Consultant)	15 minutes	Slides 38 to 47 of Exhibit B

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

B. Exhibits

In accordance with Rule 19.15.4.13(B)(2) NMAC, copies of Targa’s hearing exhibits are being filed contemporaneously with this Pre-Hearing Statement.

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HINKLE SHANOR LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn M. McLean

Dylan M. Villescas

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

dvillescascas@hinklelawfirm.com
Counsel for Targa Northern Delaware, LLC

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2024, I served a copy of the foregoing document on the following counsel of record via electronic mail:

Jesse Tremaine
Legal Director
Christopher Moander
Christy Treviño
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
Chris.moander@emnrd.nm.gov
Christy.trevino@emnrd.nm.gov

Attorneys for New Mexico Oil Conservation Division

/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 372067

QUESTIONS

Operator: Targa Northern Delaware, LLC. 110 W. 7th Street, Suite 2300 Tulsa, OK 74119	OGRID: 331548
	Action Number: 372067
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
<i>Please assist us by provide the following information about your testimony.</i>	
Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>