

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**APPLICATION OF ENTERPRISE DELAWARE  
BASIN TREATING LLC FOR AUTHORIZATION  
TO INJECT, LEA COUNTY, NEW MEXICO.**

**CASE NO. 25679**

**PRE-HEARING STATEMENT**

Enterprise Delaware Basin Treating, LLC (“Enterprise” or “Applicant”) submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPLICANT**

Enterprise Delaware Basin Treating, LLC

**ATTORNEYS**

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**INTERESTED PARTIES**

MRC Toro, LLC and  
Matador Production Company

**ATTORNEYS**

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**STATEMENT OF THE CASE**

Enterprise seeks authorization to drill, complete, and operate an additional redundant acid gas injection (“AGI”) well, the Independence AGI #3 well (“Well”), at its Dark Horse Treating Facility

located in Lea County, New Mexico. The Well will be a deviated injection well and will be directionally drilled from a surface location approximately 529' FNL and 1434' FWL (Unit C) in Section 20, Township 25 South, Range 36 East to a bottom hole location approximately 2064' FSL and 60' FWL (Unit L) in Section 17, Township 25 South, Range 36 East. The Well will inject treated acid gas into the Siluro-Devonian formations, including the Devonian, Wristen, and Fusselman formations, at depths of approximately 16,056 to 17,730 feet. Enterprise is requesting a combined allowable maximum daily injection rate of 45 million cubic feet per day (MMcf/D) to be shared between the proposed well and the existing Independence AGI #1 and #2 wells. The Well's maximum surface injection pressure will be approximately 4,929 pounds per square inch gauge.

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 CO<sub>2</sub> and TAG, which is in the public interest. Accordingly, Enterprise's application for the Well comports with the requirements of the Oil and Gas Act and the Division's regulations and should be approved.

#### **PROPOSED EVIDENCE**

<b>Witness</b>	<b>Occupation</b>	<b>Estimated Time</b>	<b>Exhibits</b>
David A. White	Vice President and Senior Geologist, Geolex	Affidavit	Approx. 2
Daryl Arredondo	Vice President, Permian Operations, Enterprise	Affidavit	Approx. 1

## **PROCEDURAL MATTERS**

Applicant will present this matter by affidavit if there is no opposition to its application.

Respectfully submitted,

HARDY MCLEAN LLC

/s/ Dana S. Hardy

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record via electronic mail on December   , 2025:

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

QUESTIONS

Action 539069

**QUESTIONS**

Operator:  Enterprise Delaware Basin Treating LLC PO Box 4324 Houston, TX 77210	OGRID: 330718
	Action Number: 539069
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

**QUESTIONS****Testimony**

*Please assist us by provide the following information about your testimony.*

Number of witnesses	<i>Not answered.</i>
Testimony time (in minutes)	<i>Not answered.</i>