

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

**APPLICATION OF AGAVE ENERGY COMPANY  
FOR AUTHORIZATION TO INJECT,  
LEA COUNTY, NEW MEXICO**

**CASE NO. 14720  
ORDER NO. R-13507-D**

**TARGA NORTHERN DELAWARE, LLC'S  
PRE-HEARING STATEMENT**

Targa Northern Delaware, LLC<sup>1</sup> ("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  
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

**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@state.nm.us

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<sup>1</sup> Targa Northern Delaware, LLC, is the successor in interest to Lucid Energy and is the current operator of the Red Hills AGI #1.

**STATEMENT OF THE CASE**

Order No. R-13507-D (“Order”) requires Targa to provide the Commission with (1) injection data covering the first four years of operation of the Red Hills AGI #1 Well (API No. 30-025-40448) (“Well”); and (2) an updated model of the projected scope of the injection plume after 30 years of injection, which shall be based on the injection data and any other relevant data concerning the reservoir. The Order further provides that after submitting the injection data and updated model, Targa may renew its request that the Commission eliminate the Order’s requirement that it plug the Government L Com #001 Well (API 30-025-25604).

In accordance with the Order, Targa will present injection data for the first four years of operation of the Well and will provide the Commission with an updated model of the projected scope of the injection plume after 30 years of injection. Based on this data, as permitted by the Order, Targa renews its request that the Commission remove the Order’s requirement that it plug the Government L Com #1H Well.

**PROPOSED EVIDENCE**

**A. Witnesses**

| <u>WITNESS</u>  | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|---|-----------------------|-----------------|
| David Tu, Ph.D<br>(Petroleum Engineer, New Mexico Institute of Mining and Technology) | 40 minutes            | 1               |

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 have been filed contemporaneously with this Pre-Hearing Statement.

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](mailto:dhardy@hinklelawfirm.com)

[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)

[ypena@hinklelawfirm.com](mailto:ypena@hinklelawfirm.com)

*Counsel for Targa Northern Delaware, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2023, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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*

/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 213664

**QUESTIONS**

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| Operator:<br>Targa Northern Delaware, LLC.<br>110 W. 7th Street, Suite 2300<br>Tulsa, OK 74119 | OGRID:<br>331548   |
|  | Action Number:<br>213664                                 |
|  | Action Type:<br>[HEAR] Prehearing Statement (PREHEARING) |

**QUESTIONS**

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