

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

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IN THE MATTER OF THE HEARING CALLED
BY THE OIL CONSERVATION COMMISSION FOR
THE PURPOSE OF CONSIDERING:

Reopened
Case No. 14720

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

PRE-HEARING STATEMENT

This Pre-hearing statement is submitted by Lucid Energy Delaware, LLC, by and through its undersigned counsel, Ernest L. Padilla, Padilla Law Firm, P.A. as required by the Oil Conservation Commission.

APPEARANCES OF PARTIES

APPLICANT:

LUCID ENERGY DELAWARE, LLC

ATTORNEY:

Ernest L. Padilla
PADILLA LAW FIRM, P.A.
P.O. Box 2523
Santa Fe, NM 87504
(505) 988-7577

OPPOSITION OR OTHER PARTY:

None to date

STATEMENT OF CASE

APPLICANT:

1. Applicant, Lucid Energy Delaware, LLC, successor in interest to Agave Energy Company, seeks to conform Order R-13507 to more accurately carry out Applicant's present plan of development, the following should occur:

a. An extension of time to January 23, 2019 within which to complete the Red Hills AGI Well #1 and commence injection of treated acid gas should its current plan of development be delayed;

b. Modify the disposal interval to a depth of between 6,230 to 6,585 feet based on actual drilling and logging of the Red Hills AGI Well #1. Order R-13507 approved depths of injection in the Cherry Canyon Formation from 6,230 to 6,530 feet, which were based and calculated from logs from nearby wells. This change has been approved by the BLM in December of 2013, and informally approved by the Oil Conservation Division in August of 2017.

c. Change of the operator under the order from Agave Energy Company to Lucid Energy Delaware, LLC.

PROPOSED EVIDENCE

APPLICANT:

WITNESS

James C. Hunter
Registered Professional Geologist

EST. TIME

0.5/hr

EXHIBITS

-Red Hill AGI # 1 log and well schematics
-Zone of interest Area Map
-Sundry Notices

OPPOSITION:

WITNESS

EST. TIME

EXHIBITS

PROCEDURAL MATTERS

None.

PADILLA LAW FIRM, P.A.

/s/ ERNEST L. PADILLA

ERNEST L. PADILLA

Attorney for Lucid Energy Delaware LLC

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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of this Pre-Hearing Statement to be served upon William R. Brancard, Counsel for the Oil Conservation Commission, by electronic transmission, at bill.brancard@state.nm.us, this 27th day of September, 2017.

/s/ ERNEST L. PADILLA

ERNEST L. PADILLA