

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

**RE-OPENED: APPLICATION OF FRONTIER FIELD SERVICES,
FOR AUTHORITY TO INJECT,
LEA COUNTY, NEW MEXICO**

**CASE NO. 15193
ORDER NOS. R-13443-A and R-13443-B**

INTERVENOR'S PRE-HEARING STATEMENT

INTERVENER

Oil Conservation Division

INTERVENOR'S ATTORNEY

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Energy, Minerals and Natural
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STATEMENT OF THE CASE

The Oil Conservation Division (OCD) does not oppose Frontier Field Services' (Applicant) request to 1) increase the rate of injection to the two wells to a maximum of 3.5 MMSCFD; and 2) to authorize the Division to review and approve further modifications to Applicant's injection authorization either administratively or by hearing for such matters as are presently provided for injection operations under 19.15.16.1 NMAC, *et seq.* and by the Division's current procedures.

The OCD will make available to the Commission Phillip Goetze, as necessary, to testify regarding Case No. 15193.

INTERVENOR'S PROPOSED EVIDENCE

WITNESS:

ESTIMATED TIME:

1. Phillip Goetze

n/a

Mr. Goetze holds a Bachelor of Science degree in geology and is a registered geologist in the states of Arizona and Texas. He has been employed by OCD for over a year and has been qualified as a hearing examiner. His experience with OCD includes the review of C-108 applications submitted to the division under Rule 19.15.26 NMAC. Prior to employment with OCD, he has 30 years of experience including oil and gas resource

evaluation and regulatory oversight with the United States Geological Survey and the Bureau of Land Management.

The OCD will offer Mr. Goetze as an expert in petroleum geology and underground injection.

2. Any rebuttal witness needed due to evidence presented at the hearing.

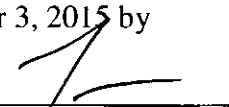
EXHIBITS

None.

PROCEDURAL MATTERS

None.

Respectfully submitted
September 3, 2015 by

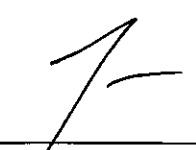


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was electronically mailed on the following parties on September 3, 2015:

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