# 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 ORDER NOS. R-13443-A and R-13443-B

### **INTERVENOR'S PRE-HEARING STATEMENT**

INTERVENER Oil Conservation Division

### **INTERVENOR'S ATTORNEY**

Gabriel Wade Oil Conservation Division Energy, Minerals and Natural Resources Department 1220 S. St. Francis Drive Santa Fe, NM 87505 Telephone: (505) 476-345 Fax: (505) 476-3462

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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:

### 1. Phillip Goetze

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

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# ESTIMATED TIME:

n/a

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:

J. Scott Hall Montgomery & Andrews, P.A. P. O. Box 2307 Santa Fe, NM 87504-2307 <u>shall@montand.com</u> (505) 986-2646 Attorney for Applicant Frontier Field Services, LLC

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