

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

**APPLICATION OF SALT CREEK
MIDSTREAM, LLC FOR AUTHORIZATION
TO DRILL, COMPLETE AND OPERATE
AN ACID GAS INJECTION (AGI) WELL AT THE
AMEREDEV SOUTH GAS PROCESSING
FACILITY IN LEA COUNTY, NEW MEXICO**

CASE NO. 20780

MOTION FOR CONTINUANCE

The Commissioner of Public Lands and the New Mexico State Land Office (collectively, "SLO"), through undersigned counsel, respectfully move the Oil Conservation Commission (OCC), pursuant to New Mexico Administrative Code (NMAC) 19.15.4.13(C), for a continuance in this matter. This is the SLO's first request for a continuance in this matter.

On August 18, 2019, Salt Creek Midstream, LLC (the Applicant) filed an application with the OCC seeking authorization to drill, complete and operate an acid gas injection well at the Ameredev South gas processing facility in Section 21, Township 26 South, Range 36 East, Lea County, New Mexico. The SLO is the surface and mineral owner of the majority of surrounding sections, including Section 16, 15, 20, 22, and 28 in Township 26 South, Range 36 East.

Acid gas injection is a matter of great importance to the Commissioner of Public Lands and the State Land Office. The State Land Office has significant concerns with the proposed acid gas injection well and objects to this Application. SLO first received notice of the Application almost a month after it had been filed, on

September 18, 2019. On September 26, 2019, the State Land Office entered an appearance in this matter. However, due to the complexity of its case, its limited notice prior to the hearing, and the significant matters at issue, including health and safety concerns and potential for waste, the State Land Office requests additional time to prepare its case. Granting this Motion will allow the State Land Office time to properly inform the OCC regarding protection of waste, correlative rights, groundwater and public health and the environment. SLO seeks only a modest continuance of time – around two weeks – so there is no prejudice to the Applicant. [State position of other parties– i.e. whether or not they oppose this motion]

CONCLUSION

For the aforementioned reasons, the State Land Office respectfully requests that this Motion for Continuance be approved and the hearing be rescheduled for November 6, 2019 in order to enable the State Land Office to consult with the requisite experts and thoroughly and properly evaluate the potential impacts of this Application.

Respectfully submitted,



Andrea Antillon
Associate Counsel, New Mexico State Land Office
310 Old Santa Fe Trail, PO Box 1148
Santa Fe, NM 87504
(505) 827-5752
(505) 827-4262 fax
aaantillon@slo.state.nm.us
**ATTORNEY FOR THE COMMISSIONER OF
PUBLIC LANDS AND NEW MEXICO STATE
LAND OFFICE**

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2019, a copy of the foregoing Motion for Continuance was served via email upon the following:

HINKLE SHANOR LLP
218 Montezuma Avenue
Santa Fe, NM 87501
(505) 982-4554
Thomas M. Hnasko
thnasko@hinklelawfirm.com
Dana S. Hardy
dhardy@hinklelawfirm.com
Attorney for Salt Creek Midstream, LLC

Eric Ames, Assistant General Counsel
Energy, Minerals and Natural Resources Department
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
(505) 476-3463
eric.ames@state.nm.us
Attorneys for the Oil Conservation Division



Andrea Antillon