

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

**APPLICATION OF AMEREDEV OPERATING, LLC
FOR AUTHORIZATION TO INJECT,
LEA COUNTY, NEW MEXICO**

CASE NO. 21381

**COMMISSIONER OF PUBLIC LANDS AND NEW MEXICO STATE LAND OFFICE'S
PRE-HEARING STATEMENT**

Ari Biernoff hereby enters his appearance on behalf of Stephanie Garcia Richard, Commissioner of Public Lands of the State of New Mexico, and the New Mexico State Land Office (collectively, "State Land Office") in the above-captioned case. The State Land Office submits this Pre-Hearing Statement pursuant to 19.15.4.13(B) NMAC.

IDENTIFICATION OF PARTY AND COUNSEL

Concurrently with the submission of this Pre-Hearing Statement, the State Land Office has entered its appearance in this matter and is represented by undersigned counsel.

STATEMENT OF THE CASE

Ameredev Operating, LLC ("Ameredev") filed an application for authorization to inject Treated Acid Gas ("TAG"), consisting of acid gas and residual carbon dioxide, from a proposed natural gas processing plant into the proposed Independence AGI Well No. 1. The proposed well will be located in Section 20, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. Ameredev proposes to inject a total cumulative amount of 12 million standard cubic feet per day of TAG at a maximum surface injection pressure of 4,779 pounds per square inch. The proposed well will inject through an open-hole completion into an interval comprising the Devonian and Silurian formations from approximately 16,230 to 17,900 feet below the surface.

PROPOSED EVIDENCE

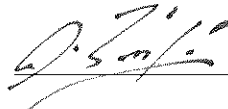
The State Land Office intends to call Allison Marks, Director of the agency's Oil, Gas and Minerals Division; and Paige Czoski, Petroleum Geologist Supervisor with the agency's Oil, Gas and Minerals Division. Ms. Marks and Ms. Czoski will testify regarding the agency's position on Ameredev's application, and the agency's concurrence in the conditions set forth in Exhibits 1 and 2 of the New Mexico Oil Conservation Division's Pre-Hearing Statement. Ms. Marks and Ms. Czoski may also testify regarding the potential effect of injection into the proposed well on state trust resources.

Ms. Marks' and Ms. Czoski's testimony will not exceed 20 minutes. There are no exhibits to be admitted through their testimony.

PROCEDURAL MATTERS

There are no procedural matters to be resolved prior to the hearing.

Respectfully submitted,




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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2020, I served a copy of the foregoing Pre-Hearing Statement by email on the following:

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