

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

**APPLICATION OF SALT CREEK MIDSTREAM, LLC
TO AMEND ORDER NO. R-20913-C**

CASE NO. 21476

**OIL CONSERVATION DIVISION'S
PRE-HEARING STATEMENT**

The New Mexico Oil Conservation Division (“OCD”) submits this Pre-Hearing Statement pursuant to 19.15.4.13(B) NMAC.

I. IDENTIFICATION OF PARTY AND COUNSEL

OCD has intervened in this matter and is represented by undersigned counsel.

II. STATEMENT OF THE CASE

Salt Creek Midstream, LLC (“Applicant”) filed an application to issue an order amending Order No. R-20913-C to reinstate and extend Applicant’s authorization to commence injection of treated acid gas (“TAG”) and adjust the deadline to submit an application for the redundant well. OCD does not oppose the application provided that the order conforms substantially to the proposed form of order in Exhibit A attached to the application.

III. PROPOSED EVIDENCE

OCD intends to call Phillip Goetze, the OCD’s UIC Program Coordinator, as an expert in petroleum geology and underground injection. Mr. Goetze manages the UIC Program, including the review of applications for compliance with the OCD’s rules and the prevention of waste and protection of correlative rights, public health, and environment. He also serves as a hearing examiner for these applications. Mr. Goetze has more than forty (40) years of experience in the fields of geology, hydrology, and environmental protection.

Mr. Goetze will testify that the requirements in the proposed form of order will provide adequate assurance that the proposed well will not cause waste or harm correlative rights, public health, or the environment, including underground sources of drinking water. In support of his testimony, Mr. Goetze intends to present the following exhibits:

Exhibit 1 Curriculum Vitae of Phillip Goetze

Mr. Goetze's testimony is expected to be ten (10) minutes.

IV. PROCEDURAL MATTERS

The OCD has not identified any procedural matters to be resolved prior to the hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on November 30, 2020, I served this pleading by electronic mail on:

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