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

2014 SEP 18 P 4: 37

IN THE MATTER OF THE HEARING CALLED BY THE OIL CONSERVATION COMMISSION FOR THE PURPOSE OF CONSIDERING:

APPLICATION OF FRONTIER FIELD SERVICES, LLC FOR AUTHORIZATION TO INJECT, EDDY COUNTY, NEW MEXICO

3 Case No. 15,19**≸**

PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Frontier Field Services, LLC as required by the Oil Conservation Commission.

APPEARANCES

APPLICANT

Frontier Field Services, LLC c/o Aka Energy Group, LLC 65 Mercado Street Durango, Colorado 81301 (970) 764-6664

APPLICANT'S ATTORNEY

James Bruce P.O. Box 1056 Santa Fe, New Mexico 87504

(505) 982-2043

Attention: Coy Bryant

OPPONENT

OPPONENT'S ATTORNEY

STATEMENT OF THE CASE

APPLICANT

Applicant Frontier Field Services, LLC seeks authorization to inject acid gas and carbon dioxide from its Maljamar Processing Plant into the proposed Maljamar AGI Well No. 2, to be drilled at a surface location 400 feet from the south line and 2100 feet from the east line of Section 21, Township 17 South, Range 32 East, NMPM, to a bottom hole location 350 feet from the south line and 650 feet from the west line of said Section 21. Applicant proposes to use the Maljamar AGI Well No. 2 to inject acid gas and carbon dioxide into the Wolfcamp formation at depths of approximately 9600-10200 feet subsurface at a maximum injection pressure of 3200 psi and a maximum daily injection rate of 2 MMSCFD. Applicant requests that the maximum daily injection rate apply to the proposed Maljamar AGI Well No. 2 and to the existing Maljamar AGI

Well No. 1 (for either well, or both wells combined). The Maljamar AGI Well No. 1 is located 130 from the south line and 1813 feet from the east line of Section 21, Township 17 South, Range 32 East, NMPM.

OPPONENT

PROPOSED EVIDENCE

APPLICANT

WITNESSES

EST. TIME

EXHIBITS

Coy Bryant (operations director)

Alberto A. Gutierrez (geologist)

EST. TIME (EXHIBITS

Approx. 3

Approx. 2

OPPONENT

<u>WITNESSES</u> <u>EST. TIME</u> <u>EXHIBITS</u>

PROCEDURAL MATTERS

Respectfully submitted,

James Bruce

Post Office Box 1056

Santa Fe, New Mexico 87504

(505) 982-2043

Attorney for Frontier Field Services, LLC