

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

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**APPLICATION OF DCP OPERATING
COMPANY, LP TO RE-OPEN CASE NO.
15073 TO AMEND ORDER NO. R-13809 TO
REMOVE THE REQUEST TO REMEDIATE
THE WELLS IDENTIFIED IN PARAGRAPH
33, LEA COUNTY, NEW MEXICO.**

**CASE NO. 15073
ORDER NO. R-13809**

PRE-HEARING STATEMENT

This Pre-hearing Statement is submitted by Holland & Hart LLP as required by Rule
19.15.14.1211 NMAC.

APPEARANCES OF PARTIES

APPLICANT

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ATTORNEY

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STATEMENT OF CASE

Applicant DCP OPERATING COMPANY, LP (formerly DCP Midstream, LP) ("DCP") seeks an order from the New Mexico Oil Conservation Commission amending Order R-13809 for the sole and limited purpose of modifying Paragraph 33 of that Order regarding DCP's existing Zia AGI #1 acid gas injection well (API No. 30-025-42208), located in Section 19,

Township 19 south, Range 32 East, N.M.P.M., Lea County, New Mexico. Specifically, DCP seeks to amend Order R-13809 to remove the Division's request to conduct remedial work on four wells: (1) Delhi Federal-001 well (API No. 30-025-20025); (2) Lusk Deep Unit A-005 well (API No. 30-025-20122); (3) Gulf Federal-003 well (API No. 30-025-20876); and (4) Lusk Deep Unit-008 well (API No. 30-015-10382). The anticipated limited injection into the Zia AGI#1 well is not expected to affect the four identified offsetting wells, making the requested remedial work no longer necessary.

PROPOSED EVIDENCE

DCP may present the following witnesses and evidence:

<u>WITNESSES</u> (Name and Expertise)	<u>EST. TIME</u>	<u>EXHIBITS</u>
Alberto A. Gutiérrez, RG, Geolox, Inc.	Approx. 30 minutes	<p>3 Exhibits</p> <p><u>Exhibit 1:</u> Power Point slides summary application request and analysis; and</p> <p><u>Exhibit 2:</u> Administrative Application Filed with the OCD, attached to Commission Application as Exhibit A.</p> <p><u>Exhibit 3:</u> Attorney Affidavit, Notice Letter and Documentation of Notice Provided to Parties in the Area of Review.</p>

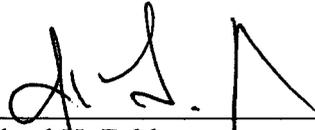
Mr. Gutiérrez will testify on the technical basis for DCP's request to modify Paragraph 33 of Order R-13809 by removing the Division's request to conduct remedial work on the four identified wells and deleting Order Paragraph 3. Mr. Gutiérrez will review the calculations and analysis in Exhibit A to the Application filed with the Commission which supports this request. Mr. Gutierrez also will testify that the proposed action will not result in waste, will not impair correlative rights, and will be protective of freshwater sources. Finally, Mr. Gutiérrez will testify that Holland & Hart LLP issued notice to the surface owner and affected parties identified within the area of review.

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

Holland & Hart LLP



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