

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

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

**APPLICATION OF SOUTHERN UNION
GAS SERVICES FOR APPROVAL OF AN
ACID GAS AND WASTEWATER INJECTION
WELL, LEA COUNTY, NEW MEXICO**

CASE NO.: 14080

**RECEIVED
2000 JUN 31 PM 3 36**

PRE- HEARING STATEMENT

This Pre-Hearing Statement is submitted by Holland & Hart LLP, as required by the Oil Conservation Division.

APPEARANCES OF PARTIES

APPLICANT

Southern Union Gas Services, Ltd.
301 Commerce Street #700
Fort Worth, TX 76102
(817) 692-9374

ATTORNEY

Ocean Munds-Dry
Holland & Hart LLP
Post Office Box 2208
Santa Fe, New Mexico 87504
(505) 988-4421

STATEMENT OF CASE

APPLICANT

Application of Southern Union Gas Services, Ltd. for approval of an acid gas injection well, Lea County, New Mexico. Applicant seeks approval to utilize its proposed Jal Plant AGI Well No. 1, to be drilled 1570 feet from the North line and 1050 feet from the West line in Unit E of Section 33, Township 24 South, Range 37 East, NMPM, to inject up to 7390 barrels of acid gas and produced water per day, at a maximum pressure of 1130 psi, into the San Andres Formation, at an approximate depth of 4350 feet to 5200

feet. SUGS may be contacted through its representative, Mr. Alberto Gutierrez, 500 Marquette Ave NW, Suite 1350, Albuquerque, New Mexico 87102 or (505) 842-8000. Said well is located approximately 3 ½ miles north of Jal, New Mexico.

PROPOSED EVIDENCE

<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
ALBERTO GUTIERREZ HYDRO GEOLOGIST	<u>25</u>	<u>10</u>
BOB MILAND OPERATIONS VICE-PRESIDENT	<u>30</u>	<u>10</u>
ROSS BOYD ENGINEER	<u>25</u>	<u>10</u>

PROCEDURAL MATTERS

Southern Union Gas Services, Ltd. has none at this time.

Respectfully submitted,

HOLLAND & HART LLP

By: Ocean Munds-Dry
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ATTORNEY FOR
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