NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION THE ARING CALLED THOR

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

CASE NO. 14332

APPLICATION OF ENSTOR GRAMA RIDGE STORAGE AND TRANSPORTATION, LLC FOR APPROVAL OF A GAS STORAGE WELL, GRAMA RIDGE MORROW STORAGE UNIT, LEA COUNTY, NEW MEXICO.

PRE-HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

ATTORNEY

Enstor Grama Ridge Storage and Transportation, L.L.C. Attn: Daryl Gee 20329 State Highway 249, Suite 400 Houston, Texas 77070 (281) 379-7499

OTHER PARTY

Apache Corporation

William F. Carr, Esq. Holland & Hart LLP Post Office Box 2208 Santa Fe, New Mexico 87504 (505) 988-4421

ATTORNEY

James Bruce, Esq. Post Office Box 1056 Santa Fe, New Mexico 87404 (505) 982-2043

STATEMENT OF CASE

In Case No. 14332 Enstor Grama Ridge Storage and Transportation, LLC seeks approval to utilize its Grama Ridge Federal, 8817-P Well No. 1 located 660 feet from the North line and 1980 feet from the East line of Section 9, Township 22 South, Range 34 East, N.M.P.M., for the purpose of injection, storage and withdrawal of natural gas, at a maximum pressure of 5000 psi, in the Morrow Formation sands in its Grama Ridge Morrow Storage Unit.

PROPOSED EVIDENCE

<u>WITNESSES</u> (Name and Expertise) **ESTIMATED TIME**

EXHIBITS

Vicki Devine (Geologist)

Approximately 15 Minutes

3 Exhibits

John Wells (Reservoir Engineer)

Approximately 20 Minutes

4 Exhibits

Thomas F. Barron (Drilling Engineer) (May Call)

PROCEDURAL MATTERS

Enstor Grama Ridge Storage and Transportation, L.L.C. will move that this case be consolidated for purposes of hearing with companion Case No. 14333.

William F. Carr

Attorney for Enstor Grama Ridge Storage and Transportation, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of June, 2009, I have caused to be delivered by Facsimile a copy of the **Pre-Hearing Statement** in the above mentioned case to the following counsel of record:

James Bruce, Esq. Post Office Box 1056

Santa Fe, New Mexico 87404 Telephone: (505) 982-2043

Facsimile: (505) 982-2151

William F. Carr, Esq.