

RECEIVED
OCT 11 1998
P 3:48

**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:**

CASE NO. 14333

**APPLICATION OF ENSTOR GRAMA RIDGE STORAGE AND TRANSPORTATION,
LLC FOR EXPANSION OF THE GRAMA RIDGE MORROW STORAGE UNIT AND
AREA SUBJECT TO THE SPECIAL PROJECT RULES AND OPERATING
PROCEDURES FOR THIS 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

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

ATTORNEY

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

OTHER PARTY

Apache Corporation

ATTORNEY

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

STATEMENT OF CASE

In Case No. 14333 Enstor Grama Ridge Storage and Transportation, LLC seeks an order expanding the area subject to the Special Rules and Regulations for the Grama Ridge Morrow Storage Unit, which include certain notification, casing, cementing, completion and recompletion requirements for newly drilled and existing wells within the Unit Area, to include Section 9, Township 22 South, Range 34 East, N.M.P.M.. The Unit Area, also known as the Grama Ridge Morrow Gas Storage Agreement Area, following expansion, will include:

Township 21 South, Range 34 East, N.M.P.M.
Sections 33 and 34: All

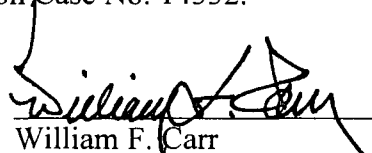
Township 22 South, Range 34 East, N.M.P.M.
Sections 3 and 4: All
Sections 9 and 10: All

PROPOSED EVIDENCE

<u>WITNESSES</u> (Name and Expertise)	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
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. 14332.

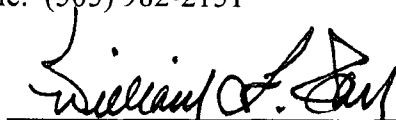


William F. Carr
Attorney for Enstor Grama Ridge Storage
and Transportation, L.L.C.

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.