

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

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

**APPLICATION OF ANADARKO PETROLEUM
CORPORATION FOR APPROVAL OF AN ACID
GAS INJECTION WELL, SAN JUAN COUNTY,
NEW MEXICO.**

CASE NO. 14329

AMENDED PRE- HEARING STATEMENT

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

APPEARANCES OF PARTIES

APPLICANT

Linda Kuhn
Anadarko Petroleum Corporation
1201 Lake Robbins Drive
The Woodland, TX 77380
(832) 636-1000

ATTORNEY

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

STATEMENT OF CASE

APPLICANT

Applicant seeks approval to drill an acid gas injection well at its Kirtland, New Mexico site. The well will be drilled 1650 feet from the North line and 2310 feet from the West line in Unit F of Section 1, Township 29 North, Range 15 West NMPM, to inject up to 2000 barrels of acid gas per day at a maximum pressure of 1985 psi into the Entrada Formation, at an approximate depth of 6500 feet to 6700 feet. Said well is located on the Anadarko San Juan River Gas Plant near Kirtland in San Juan County, New Mexico.

PROPOSED EVIDENCE

<u>WITNESSES</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Alberto Gutierrez, ✓ Hydrogeologist	30 minutes	Approx. 10
Chuck Johnson, ✓ Corporate Representative	15 minutes	Approx. 5
Tony Marques, Petroleum Engineer (May Call)	20 minutes	Approx. 5
Kent McEvers, Plant Manager (May Call)	10 minutes	Approx. 5

PROCEDURAL MATTERS

Anardarko Petroleum Corporation has none at this time. However, the Division has indicated there may be a notice issue in this case. **Anadarko therefore requests a pre-hearing conference be scheduled as soon as possible in order to address this issue.**

Respectfully submitted,

HOLLAND & HART LLP

By: Ocean Munds-Dry
William F. Carr

Ocean Munds-Dry

Post Office Box 2208

Santa Fe, New Mexico 87504

(505) 988-4421

(505) 983-6043 Facsimile

ATTORNEYS FOR

ANADARKO PETROLEUM CORPORATION

CERTIFICATE OF SERVICE

I certify that on October 8, 2009 I served a copy of the foregoing document to the following by

- ☐ U.S. Mail, postage prepaid
- ☒ Hand Delivery
- ☐ Fax
- ☒ Email to Mikal.Altomare@state.nm.us

Mikal Altomare, Esq.
New Mexico Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505

Ocean Munds-Dry
Ocean Munds-Dry