

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

**APPLICATION OF CHEVRON USA INC.
TO APPROVE SALT WATER DISPOSAL
WELL IN LEA COUNTY, NEW MEXICO.**

CASE NO. 23686

**APPLICATION OF CHEVRON USA INC.
TO APPROVE SALT WATER DISPOSAL
WELL IN EDDY COUNTY, NEW MEXICO.**

CASE NO. 23687

CONSOLIDATED PRE-HEARING STATEMENT

Chevron USA Inc. ("Chevron") submits this Pre-Hearing Statement in accordance with Rule 19.15.4.13(B) NMAC.

APPEARANCES

APPLICANT

Chevron USA Inc.

ATTORNEY

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COG Operating LLC (in Case No. 23687 only)

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STATEMENT OF THE CASES

Case No. 23686

Chevron seeks an order approving the Papa Squirrel State SWD #1 well (“Well”) in Section 13, Township 26 South, Range 32 East, NMPM, Lea County, New Mexico for the purpose of operating a salt water disposal well. Injection formations will be the Bell Canyon/Cherry Canyon from 4,625 feet to 8,939 feet. The tubing packer will be set at 4,525 feet, and production casing and cement will be set at 8,500 feet. The maximum anticipated injection rate will be 20,000 BWPD and maximum surface injection pressure will be 925 psi. Said area is located approximately 26 miles west of Jal, New Mexico.

The Well, as proposed in the C-108, will not cause waste, impair correlative rights, or harm public health or the environment, including through the risk of induced seismicity. Accordingly, Chevron’s application for the Well is reasonable, comports with the requirements of the Oil and Gas Act, and should be approved.

Case No. 23687

Chevron seeks an order approving the Severitas 2 State SWD #1 well (“Well”) in Section 2, Township 26 South, Range 27 East, NMPM, Eddy County, New Mexico for the purpose of operating a saltwater disposal well. Injection formations will be the Bell Canyon/Cherry Canyon from 2,343 feet to 6,012 feet. The tubing packer will be set at 2,243 feet, and production casing and cement will be set at 5,500 feet. The maximum anticipated injection rate will be 15,000 BWPD and maximum surface injection pressure will be 468 psi. Said location is approximately 13 miles southwest of Malaga, New Mexico.

The Well, as proposed in the C-108, will not cause waste, impair correlative rights, or harm public health or the environment, including through the risk of induced seismicity. Accordingly, Chevron’s application for the Well is reasonable, comports with the requirements of the Oil and Gas Act, and should be approved.

PROPOSED EVIDENCE**A. Witnesses**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Tom Merrifield <i>DRP Earth Scientist</i>	Approx. 30 minutes	Approx. 15
Jason Parizek <i>Sr. Earth Scientist</i>	Approx. 45 minutes	Approx. 16
Cody Comisky <i>Earth Science Advisor</i>	Approx. 30 minutes	Approx. 15
Bryce Taylor <i>Senior PE Advisor</i>	Approx. 45 minutes	Approx. 15

Chevron reserves the right to call a rebuttal witness(es) if appropriate.

B. Exhibits

In accordance with Rule 19.15.4.13(B)(2) NMAC, Chevron's consolidated hearing exhibits have been filed contemporaneously with this Pre-Hearing Statement.

PROCEDURAL MATTERS

These cases are set for the November 9, 2023 Commission hearing. Chevron requests they be consolidated for hearing.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS
& SISK, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on November 2, 2023:

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QUESTIONS

Action 282312

QUESTIONS

Operator: CHEVRON U S A INC 6301 Deauville Blvd Midland, TX 79706	OGRID: 4323
	Action Number: 282312
	Action Type: [HEAR] Prehearing Statement (PREHEARING)

QUESTIONS

Testimony	
Please assist us by provide the following information about your testimony.	
Number of witnesses	Not answered.
Testimony time (in minutes)	Not answered.