

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

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

**CASE NO. 23686**

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**MEWBOURNE OIL COMPANY'S PRE-HEARING STATEMENT**

Mewbourne Oil Company ("Mewbourne" or "Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Commission ("Commission").

**APPEARANCES**

**APPLICANT**

Chevron U.S.A., Inc.

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### **STATEMENT OF THE CASE**

In Case No. 23686, Chevron U.S.A. Inc. ("Chevron") seeks an order approving the Papa Squirrel State SWD#1 well at a surface location 1,928' from the South line and 870' from the West line, Unit L, Section 13, Township 26 South, Range 32 East, NMPM, Lea County, New Mexico for the purpose of operating a saltwater disposal well. Injection formations will be the Bell Canyon, Cherry Canyon, and Brushy Canyon at a depth of 4,625' to 8,939'. The tubing packer will be set at 4,525' and production casing and cement will be set at 8,500'. The maximum anticipated injection rate will be 20,000 BWPD and maximum surface injection pressure will be 925 p.s.i.

In Case No. 23687, Chevron seeks an order approving the Severitas 2 State SWD#1 well at a surface location 185' from the North line and 1,082' from the East line, Unit A, 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, and Brushy Canyon at a depth of 2,343' to 6,012'. The tubing packer will be set at 2,243' and production casing and cement will be set at 5,500'. The maximum anticipated injection rate will be 15,000 BWPD and maximum surface injection pressure will be 468 p.s.i.

Mewbourne supports Chevron's Applications for Authorization to Inject, for the proposed Severitas 2 State SWD #1 and Papa Squirrel State SWD #1 wells, to be completed as Delaware Mountain Group ("DMG") saltwater disposal ("SWD") wells. Because saltwater production in Southeast New Mexico has more than doubled since 2019, additional disposal options are necessary to accommodate current production levels and predicted increases in saltwater production. The technical information gathered during the Severitas and Papa Squirrel injection pilot will additionally help the industry better understand the causes of the historical interference between DMG disposal and underlying producing horizons and determine if there are less risky areas for the operation of DMG SWD wells in southeast New Mexico. This pilot is scheduled to collect frac gradient data on individual layers within the DMG, which will help determine the maximum bottom-hole injection pressure allowed to reduce the risk of interference between DMG disposal and deeper producing horizons.

Mewbourne operates Avalon producers and has undeveloped locations near Chevron's proposed SWDs. As a result, Mewbourne recommends that these permits and all new DMG SWD permits include a special stipulation that requires operators to perform a step-rate-injection test ("SRT") prior to first disposal. The SRT shall be performed according to Oil Conservation Division ("OCD") guidelines, and the SRT results should be submitted to the OCD for interpretation and permit modification if appropriate.

Mewbourne notes that Rule 19.15.26.10B NMAC, which addresses the Operation and Maintenance of Injection, states:

The operation of an injection project shall operate and maintain at all times the injection project, including injection wells, producing wells and related surface facilities, **in such a manner as will confine the injected fluids to the interval or intervals approved** and prevent surface damage or pollution resulting from leaks, breaks or spills.

Thus, it is critical that any injection wells must be operated in a manner that ensures injection fluids are confined to the approved intervals.

Mewbourne requests that if all parties agree that the pilot is successful, that the OCD take a cautious and measured approach to additional DMG SWD approvals as industry continues to learn and gather information regarding the impacts of injection into the DMG.

#### **PROPOSED EVIDENCE**

Mewbourne does not intend to present testimony in this matter but reserves the right to examine witnesses and participate in the hearing.

#### **PROCEDURAL MATTERS**

None at this time.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 2, 2023, I caused a true and correct copy of the foregoing Prehearing Statement to be electronically served on the following counsel of record:

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QUESTIONS  
  
Action 282115

QUESTIONS

Operator: MEWBOURNE OIL CO P.O. Box 5270 Hobbs, NM 88241	OGRID: 14744
	Action Number: 282115
	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.