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

APPLICATION OF BLACKBUCK RESOURCES LLC FOR APPROVAL SALT WATER DISPOSAL WELL, EDDY COUNTY, NEW MEXICO.

Case No. 20460

# CHEVRON'S PRE-HEARING STATEMENT

This pre-hearing statement is submitted by Chevron U.S.A. Inc. as required by the rules of the Oil Conservation Division.

#### **APPEARANCES**

#### **APPLICANT**

## APPLICANT'S ATTORNEY

Blackbuck Resources, LLC

Ernest Padilla P.O. Box 2523 Santa Fe, NM 87504 (505) 988-7592 padillalaw@questoffice.net

## **OPPONENT**

#### OPPONENT'S ATTORNEY

Chevron U.S.A. Inc.

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#### STATEMENT OF THE CASE

Blackbuck proposes to drill the Camille SWD Fed #1, located 2596' FSL and 1471' FEL of Section 17, Township 24 South, Range 31 East, NMPM, Eddy County, New Mexico. Blackbuck seeks authority to inject salt water into the Devonian and Silurian-Fusselman formations at a depth of 16,225 to 17,300 feet.

Chevron opposes Blackbuck's application to protect its correlative rights and to present evidence and argument demonstrating that the granting of this application is not in the interests of conservation or the prevention of waste.

#### PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Fred Verner, Geologist	15	3
Chris Cooper, Landman	15	3

#### PROCEDURAL MATTERS

Chevron understands that other parties may have entered an appearance and requested that the case be continues. Chevron concurs in any such request.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

& SISK, PA

By:

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# **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this Pre-Hearing Statement was emailed on April 25, 2019 to:

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MODRALL, SPERLING, ROEHL, HARRIS

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