

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

**APPLICATION OF KEY ENERGY RESOURCES, LLC FOR APPROVAL OF A SALT
WATER DISPOSAL WELL, EDDY COUNTY, NEW MEXICO.**

CASE NO. 15322

OBJECTING PARTIES PRE-HEARING STATEMENT

This pre-hearing statement is submitted by BC Operating, Inc. and Crown Oil Partners V,
objecting parties to this application.

APPEARANCES

APPLICANT

Key Energy Services

ATTORNEY

Gary W. Larson
Hinkle Shanor LLP
Post Office Box 2068
Santa Fe, New Mexico 87504
(505) 982-4554
(505) 982-8623 Facsimile
glarson@hinklelawfirm.com

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OBJECTING PARTIES

BC Operating, Inc.
Crown Oil Partners V, LP.
4000 N. Big Spring, Suite 310
Midland, Texas 79705

ATTORNEY

Michael H. Feldewert
Jordan L. Kessler
Holland & Hart, LLP
Post Office Box 2208
Santa Fe, New Mexico 87504-2208
(505) 988-4421
(505) 983-6043 Facsimile
mfeldewert@hollandhart.com
jlkessler@hollandhart.com

OBJECTORS' STATEMENT OF THE CASE

Key Energy seeks authority to utilize the Grace Carlsbad Well No. 1 (API No. 30-015-
20573) located in the NE/4 SE/4 (Unit I) of Section 36, T-22-S, R-26-E, to inject "produced

water from various oil and gas producing formations” into the Brushy Canyon member of the Delaware formation at perforated intervals from 4,082 feet to 5,200 feet. The Objecting Parties are the owners of a State oil and gas lease (VO-9614) that covers all of Section 36. Key Energy does not own any of the oil and gas rights underlying Section 36 and only purports to have ownership rights to the Grace Carlsbad Well No. 1 wellbore by virtue of a lease with the surface owner.

The Cherry Canyon, Brushy Canyon, and deeper horizons underlying Section 36 are potentially productive of hydrocarbons. The Objecting Parties have plans to develop these productive zones, beginning with the deeper Wolfcamp and Upper Pennsylvanian formations. The proposed injection operations will impair the ability of the Objecting Parties to recover the state minerals underlying Section 36.

APPLICANT'S PROPOSED EVIDENCE

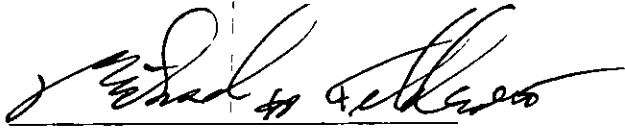
WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Caleb Hopson Landman	Approx. 10 minutes	Approx. 5
Mike Moylett Geologist	Approx. 15 minutes	Approx. 6

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

HOLLAND & HART, LLP




Michael H. Feldewert
Jordan L. Kessler
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Santa Fe, New Mexico 87504-2208
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(505) 983-6043 Facsimile
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jlkessler@hollandhart.com

ATTORNEYS FOR WPX ENERGY PRODUCTION, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2015, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

Gary W. Larson
Hinkle Shanor LLP
Post Office Box 2068
Santa Fe, New Mexico 87504
(505) 982-4554
(505) 982-8623
glarson@hinklelawfirm.com



Michael H. Feldewert
Jordan L. Kessler