

**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**

Deana M. Bennett  
Earl E. DeBrine  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
P. O. Box 2168  
Albuquerque, New Mexico 87103-  
2168  
(505) 848-1800

**OTHER PARTIES**

New Mexico Oil Conservation Division

**ATTORNEY**

Jesse K. Tremaine  
Chris Moander  
New Mexico Energy, Minerals &  
Natural Resources Department  
1220 South St. Francis Dr. Santa Fe,  
NM 87505  
(505) 231-9312

Mewbourne Oil Company

Dana S. Hardy  
Jaclyn M. McLean  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504

Commissioner of Public Lands  
New Mexico State Land Office

Ari Biernoff  
General Counsel  
New Mexico State Land Office  
PO Box 1148  
Santa Fe NM 87504-1148  
(505) 827-5756

COG Operating LLC (in Case No. 23687 only)

Elizabeth Ryan  
Jobediah Rittenhouse  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, NM 87501  
(505) 780-8000

## 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.

By: Deana M. Bennett

Deana Bennett  
Earl E. DeBrine, Jr.  
Post Office Box 2168  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.1800  
[deana.bennett@modrall.com](mailto:deana.bennett@modrall.com)  
[edebrine@modrall.com](mailto:edebrine@modrall.com)  
*Attorneys for Chevron USA, Inc.*

**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:

Jesse K. Tremaine  
Chris Moander  
New Mexico Energy, Minerals & Natural Resources Department  
1220 South St. Francis Dr. Santa Fe, NM 87505  
(505) 231-9312  
[Jessek.tremaine@emnrd.nm.gov](mailto:Jessek.tremaine@emnrd.nm.gov)  
[Chris.moander@emnrd.nm.gov](mailto:Chris.moander@emnrd.nm.gov)  
*Attorneys for New Mexico Oil Conservation Division*

Ari Biernoff  
General Counsel  
New Mexico State Land Office  
PO Box 1148  
Santa Fe NM 87504-1148  
(505) 827-5756  
[abiernoff@slo.state.nm.us](mailto:abiernoff@slo.state.nm.us)  
*Counsel for New Mexico State Land Office*

Dana S. Hardy  
Jaclyn M. McLean  
Hinkle Shanor LLP  
P.O. Box 2068  
Santa Fe, NM 87504  
[dhardy@hinklelawfirm.com](mailto:dhardy@hinklelawfirm.com)  
[jmclean@hinklelawfirm.com](mailto:jmclean@hinklelawfirm.com)  
*Counsel for COG Operating LLC*

Elizabeth Ryan  
Jobediah Rittenhouse  
ConocoPhillips  
1048 Paseo de Peralta  
Santa Fe, NM 87501  
(505) 780-8000  
[Beth.ryan@conocophillips.com](mailto:Beth.ryan@conocophillips.com)  
[Joby.rittenhouse@conocophillips.com](mailto:Joby.rittenhouse@conocophillips.com)  
*Counsel for ConocoPhillips*

By: 

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

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**

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