# Protested

SWD

Application



# Dalva L. Moellenberg

Attorney Direct: (505) 989-7278 Email: dlm@gknet.com

August 1, 2019

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re:

Application for Authorization to Inject (C-108) filed by COG Operating LLC for the Vamoose 6 Fee SWD #1; Unit C, Section 6, Township 24 South, Range 35 East, Lea County, New Mexico.

# Dear Sir or Madam:

This firm represents OXY USA Inc. which hereby protests and objects to the Application for Authority to Inject ("the Application") filed by COG Operating LLC, Paul Porter, General Manager of New Mexico, <a href="PPorter@concho.com">PPorter@concho.com</a>, (575) 748-6940, 2208 Main Street, Artesia, New Mexico 88210, for administrative approval for its salt water disposal well Vamoose 6 Fee SWD #1 ("Proposed Well"). The Proposed Well would be located within Section 6, Township 24 South, Range 35 East, Lea County, New Mexico. According to the public notice of the Application, disposal water will be injected into the Devonian formation from a depth of 15,400 feet to 17,200 feet, with a maximum injection rate of 40,000 BWPD and a maximum surface injection pressure of 3,080 psi.

OXY USA Inc. received individual notice of the application by letter dated July 11, 2019 based upon the applicant's identification of OXY as the surface owner or an affected person within a one mile radius area of review. OXY protests this application due to the proposed SWD's interference with surface plans for an upcoming development and requests that it be set for a hearing before the OCD Hearing Examiners.

Sincerely,

GALLAGHER & KENNEDY, P.A.

By:

Dalva L. Moellenberg

CC:

Matthew Cole, OXY USA Inc.

# McMillan, Michael, EMNRD

From: McMillan, Michael, EMNRD

**Sent:** Thursday, August 1, 2019 3:55 PM

To: 'Marissa Villa'

Cc: 'Moellenberg, Dalva L.'; Goetze, Phillip, EMNRD; Lowe, Leonard, EMNRD; Murphy, Kathleen A,

EMNRD; Goetze, Phillip, EMNRD; 'Willeto, Lisa'

**Subject:** FW: Notification of Protest for Application to Inject -: Vamoose 6 Fee SWD Well No.1 OXY

**Attachments:** COG Vamoose6FeeSWD#1 OXY Protest.pdf

RE: Vamoose 6 Fee SWD Well No.1 (API 30-025-Pending; Admin. Appl. No pMAM1919739720) Unit C-6-24S-35E, NMPM, Lea County

Ms. Villa:

OCD was notified by OXY USA Inc. it is protesting this application. This party is identified as an affected person for the location being considered for the application. You are being notified that if COG Operating, LLC wishes for this application to be considered, they must either go to hearing or may be reviewed administratively if the protest is withdrawn as a result of a negotiated resolution with this party. The application will be retained pending resolution of the protest. Please continue to provide OCD with information regarding the standing of this application. Please me call with any questions on this matter.

Contact for OXY USA Inc.

Dalva Moellenberg Attorney Office of General Counsel 1239 Paseo de Peralta Santa Fe, NM. 87501-2758 Phone: (505) 982-9253

E-mail: DLM@gknet.com

Michael McMillan 1220 South St. Francis Santa Fe, New Mexico 505-476-3448

Michael.mcmillan@state.nm.us

# McMillan, Michael, EMNRD

From: Willeto, Lisa sa.willeto@gknet.com>
Thursday, August 1, 2019 10:52 AM

To: Hearings, OCD, EMNRD

**Cc:** Moellenberg, Dalva L.; matthew\_cole@oxy.com

Subject: [EXT] Protest Letter to NM OCD dated August 1 2019 re Application to Inject C 108 Filed by COG

Operating for the Vamoose 6 fee SWD 1 Unit C Section 6 Township 24 South Range 35 East Lea

County New Mexico

**Attachments:** Letter to NM OCD dated August 1 2019 re Application to Inject C 108 Filed by COG Operating for

the Vamoose 6 fee SWD 1 Unit C Section 6 Township 24 South Range 35 East Lea County New

Mexico.pdf

# Good morning,

Please see the attached protest letter re: Application to Inject C 108 Filed by COG Operating for the Vamoose 6 fee SWD 1 Unit C Section 6 Township 24 South Range 35 East Lea County New Mexico.

Let me know if you have any questions.

Thank you, Lisa



1239 Paseo de Peralta Santa Fe, New Mexico 87501-2758 505-982-9523 | www.gknet.com Lisa Willeto
Assistant to
Dalva Moellenberg and Gene Creely
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505-989-7365

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