

# Protested SWD Application

By Chevron USA on 12/13/19

## Lamkin, Baylen, EMNRD

---

**From:** Lamkin, Baylen, EMNRD  
**Sent:** Monday, December 16, 2019 12:42 PM  
**To:** 'nallemann@all-llc.com'  
**Cc:** Goetze, Phillip, EMNRD; Rose-Coss, Dylan H, EMNRD  
**Subject:** Notification of Protest for Application to Inject: Jerrah 3 Fed SWD #2 \_ Chevron USA  
**Attachments:** Select Energy Services\_Jerrah 3 Federal SWD #2\_Chevron with new surface location.pdf

RE: Jerrah 3 Fed SWD #2 (API 30-25-Pending; Admin. Appl. No pBL1933035105) Unit K S10 T23S R32E, NMPM, Lea County

Mr. Alleman,

The OCD was notified by Chevron USA that they are protesting this application. This party has been identified as an affected person for the location being considered. Because of the protest, the application can no longer be reviewed administratively. You are being notified that for this application to be considered, Select Energy Services, LLC currently has two options; the first is to go to hearing, the second is to negotiate a resolution with the protesting party. If the protest is withdrawn, then the application can be reviewed administratively. In the meantime, the application will be retained pending a hearing or other resolution. Please continue to provide OCD with information regarding the standing of this application and feel free to call me with any questions.

Contact for Chevron USA:

Earl E. Debrine, Jr.

505.848.1810

Fax: 505.848.9710

[edebrine@modrall.com](mailto:edebrine@modrall.com)

Regards,

**Baylen Lamkin**

*Petroleum Specialist*

Oil Conservation Division

1220 South St. Francis Drive

Santa Fe, New Mexico 87505





MODRALL SPERLING

L A W Y E R S

December 13, 2019

**Via E-mail & U.S. Mail**

*Phillip.Goetze@state.nm.us*

Earl E. DeBrine, Jr.  
505.848.1800  
Fax: 505.848.1891  
edebrine@modrall.com

Phillip Goetze  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

Re: Administrative Application of Select Energy Services  
Jerrah 3 Fed SWD #2 Class 11D injection well  
T23S R32E, S10 Unit K, NMPM, Lea County, New Mexico.

Dear Mr. Goetze:

Chevron U.S.A., Inc. ("Chevron"), by and through its counsel, hereby protests the above-referenced Administration Application to Inject filed by Select Energy Services ("Select"). Select seeks to dispose of up to 40,000 BPD of fluids into the Devonian - Silurian formations at a depth of 16,602 feet to 17,935 feet.

Chevron is an "affected person" under Rule 19.15.26.7(A) which was provided noticed of the application. It appears from the application that Select published notice before it filed its application which misrepresents the timing for filing an objection to Select's application.

Chevron believes that the location of the proposed well will impair or impede the development of its oil and gas resources by limiting the location of Chevron's wells and surface facilities such that granting the Application will cause waste and impair its correlative rights.

Additionally, the Application is incomplete in that it lacks the following information required by Division Rules, policies and form C-108:

1. Although the Application implies that disposal will be into zones not productive of oil or gas, no analysis of present or future productivity is provided;

Modrall Sperling  
Roehl Harris & Sisk P.A.

Bank of America Centre  
500 Fourth Street NW  
Suite 1000  
Albuquerque,  
New Mexico 87102

PO Box 2168  
Albuquerque,  
New Mexico 87103-2168

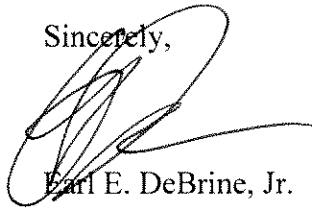
Tel: 505.848.1800  
www.modrall.com

2. The application does not include any geologic data on the injection zone with appropriate lithologic detail to assess the potential for the migration of fluids nor does it provide any affirmation that the well be tested for mechanical integrity or monitoring conducted to determine if the well may be contributing to seismic activity.

Chevron hereby requests that the application be set for hearing in accordance with Rule 19.15.26.8(D) and, after appropriate notice and hearing, be denied.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Earl E. DeBrine, Jr.", with a large, stylized flourish extending from the end of the signature.

Earl E. DeBrine, Jr.

EED/hta/Y:\dox\client\83420\0029\CORRES\W3591528.DOCX

cc: Dillon Rose-Coss ([DylanH.Rose-Coss@state.nm.us](mailto:DylanH.Rose-Coss@state.nm.us))  
Nate Alleman, ALL Consulting  
Cara Wright