

# Protested SWD Application

By Chevron 8/20/21



MODRALL SPERLING

L A W Y E R S

August 20, 2021

**Via E-mail Only**

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Engineering Bureau  
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 Mewbourne Oil Company for proposed Jett 36 Fee SWD #1 Unit M in Section 36 of Township 23 South, Range 28 East, Eddy County, New Mexico.

Dear Sir or Madam:

Chevron U.S.A., Inc. (“Chevron”), by and through its counsel, hereby protests the above-referenced Administrative Application to Inject filed by Mewbourne Oil Company (“MOC”). MOC seeks to dispose of up to 25,000 BPD of fluids into the Devonian formation.

Chevron is an “affected person” under Rule 19.15.26.7(A) which was provided noticed of the 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 at least 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;
2. The application does not include any geologic data on the injection zone with appropriate lithological detail to assess the potential for the migration of fluids nor does it provide a sworn affirmation that

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Engineering Bureau

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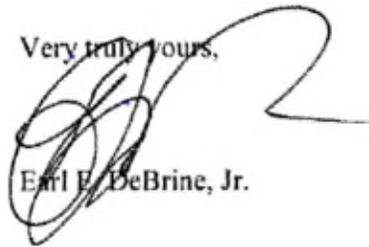
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the well be tested for mechanical integrity or monitoring conducted to determine if the well may be contributing to seismic activity.

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.

Very truly yours,

A handwritten signature in black ink, appearing to be "Earl E. BeBrine, Jr.", written over the typed name. The signature is stylized and somewhat cursive.

Earl E. BeBrine, Jr.

EED/kata/L OCD protesting MOC Jett (W4140118).docx

cc: Kelly Rau ([Kelly.Rau@chevron.com](mailto:Kelly.Rau@chevron.com))  
Kerry McEniry ([Kerry.McEniry@chevron.com](mailto:Kerry.McEniry@chevron.com))  
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