

Protested
SWD
Application

By Chevron 8/20/21



MODRALL SPERLING

L A W Y E R S

August 20, 2021

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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 Anthem Water Solutions, LLC for
Authorization of Injection Well Dove 342635 Federal SWD 1
SW1/4 of the SW1/4 Section 34, Township 26S, Range 35E, Lea
County.

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 Anthem Water Solutions, LLC (“Anthem”). Anthem seeks to dispose of up to 30,00 BPD of fluids into the Devonian-Silurian formation at depths of between 18,703' and 19,649').

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, because Chevron was only provided with a cover letter concerning the application which lacked almost all of the information required by Division Rules, policies and form C-108, notice was improper and the application is incomplete.

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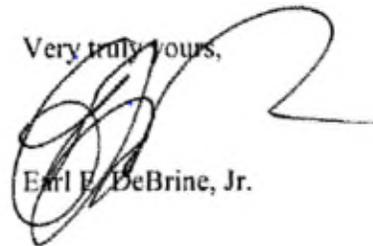
Engineering Bureau

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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,

Earl E. DeBrine, Jr.

EED/kta/L OCD protesting Anthem Water Solutions LLC's Application to Inject Dov..._docx

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Sara Clark (sjclark@chevron.com)

cc (via U.S. mail): Marshall Tippen
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