

STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

JUL 03 2019 PM04:16

APPLICATION OF KEY ENERGY SERVICES, LLC
FOR A SALT WATER DISPOSAL WELL,
KNOWN AS THE QUEEN LAKE FEDERAL
19 NO. 1, SECTION 19, T-24-S, R-29-E,
EDDY COUNTY, NEW MEXICO.

CASE NO. 20583

OXY's PRE-HEARING STATEMENT

OXY U.S.A. Inc. (OXY) submits this Pre-Hearing Statement pursuant to the Rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

Key Energy Services, LLC

ATTORNEY

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OPPONENTS

OXY U.S.A. Inc.

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OXY's STATEMENT OF CASE

Application seeks an order approving its proposed **Queen Lake Federal 19 No. 1 Well** (API No. 30-015-24292) at a surface location of 1,950 feet from the north line and 1,980 feet from the east line of Section 19, Township 24 South, Range 29 East, NMPM, Eddy County, New Mexico, for injection into the Devonian-Silurian formations. OXY is an affected person under Division rules, but did not receive notice of the application or of the hearing. It objects to this proposed commercial disposal well on the grounds that it will interfere with existing and proposed operations and plans of development.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Peter Van Liew, Senior Land Negotiator	Approx. 20 minutes	Approx. 3
R. Chan Tysor, Reservoir Engineer	Approx. 20 minutes	Approx. 5

PROCEDURAL MATTERS

OXY has filed a motion for a continuance of this matter.

Respectfully submitted,

HOLLAND & HART, LLP

By:  _____

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Attorneys for OXY U.S.A. Inc.

CERTIFICATE OF SERVICE

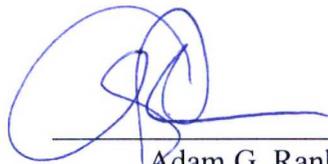
I hereby certify that on July 3, 2019, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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