

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

**IN THE MATTER OF THE HEARING  
CALLED BY THE OIL CONSERVATION  
DIVISION FOR THE PURPOSE OF  
CONSIDERING:**

**CASE NO. 14593**

**SECOND AMENDED APPLICATION OF CHEVRON USA, INC. FOR  
APPROVAL OF A SALT WATER DISPOSAL WELL, EDDY COUNTY,  
NEW MEXICO.**

**PRE-HEARING STATEMENT**

This Pre-Hearing Statement is submitted by Holland & Hart, LLP on behalf of Chevron U.S.A., Inc. as required by Oil Conservation Rule 19.15.14.1204 B NMAC.

**APPEARANCES OF PARTIES**

**APPLICANT**

Chevron USA, Inc.

**ATTORNEY**

William F. Carr, Esq.  
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**STATEMENT OF CASE**

Chevron U.S.A., Inc. seeks approval to utilize its Skelly Unit No. 902 Well (API No. 30-015-29322), located 1650 feet from the North line and 990 feet from the West line (Unit E) of Section 15, Township 17 South, Range 31 East, NMPM, to inject up to 10,000 barrels of water per day, at a maximum pressure of 1684 psi, into the into the Wolfcamp and Cisco formations in a lateral open-hole interval from 8418 feet to 10534 feet MD, 8417 to 8552 TVD and the perforated interval from 8552 feet to 9766 feet.

**PROPOSED EVIDENCE**

| <b>WITNESSES</b><br>(Name and expertise)             | <b>EST. TIME</b> | <b>EXHIBITS</b> |
|--|------------------|-----------------|
| Daniel Pequeno<br>Landman<br>(Or other land witness) | Approx. 10 min.  | 1 Exhibit       |
| Edgar Acero<br>Production Engineer                   | Approx. 20 Min.  | 2 Exhibits      |

**PROCEDURAL MATTERS**

Chevron has none at this time

Respectfully Submitted,

HOLLAND & HART LLP



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ATTORNEYS FOR CHEVRON U.S.A.,  
INC.