

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

**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

**SOLARIS WATER MIDSTREAM, LLC
PRE-HEARING STATEMENT**

Solaris Water Midstream, LLC (Solaris), by and through undersigned counsel of record, hereby submits its Pre-Hearing Statement for the above referenced case, scheduled for hearing on August 22, 2019.

APPEARANCE

ATTORNEY FOR SOLARIS

Pete Domenici
Lorraine Hollingsworth
320 Gold Ave. SW, Suite 1000
Albuquerque, New Mexico 87102
505-883-6250

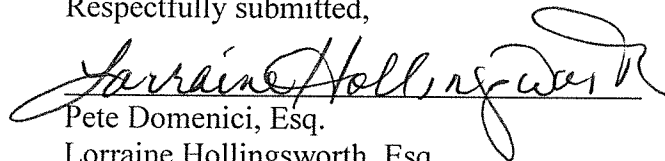
SOLARIS PRE-HEARING STATEMENT

Key Energy Services seeks an order approving the disposal of salt water into the Devonian formation through the well identified as the Queen Lake Federal 19 No. 1 at a surface location of 1950 feet from the north line and 1980 feet from the east line Section 19, Township 24 South, Range 29 East, Eddy County, New Mexico. Key Energy submitted a Form C-108 to the OCD on March 29, 2019 and submitted additional documents on May 16, 2019. Key Energy filed its Application for an order approving the salt water disposal well on May 30, 2019. Solaris

notified the OCD of its objection to the application via email to Michael McMillan and Phillip Goetze on June 3, 2019.

The basis for Solaris' objection is the location of the Queen Lake Federal 19 No. 1, which is less than 0.5 miles from Solaris' Berry SWD Well No. 1 (the Berry Well) (API Number 30-015045367). The Berry Well is shown on the 0.5 mile radius map attached to the Key Energy Application and is located 690 feet from the north line and 220 feet from the west line, Section 20, Township 45S, Range 29E. The Berry Well, which was purchased from LilyStream Water Solutions by Solaris, has been approved and permitted by the OCD and drilling is expected to begin in 2019. The Application for Permit to Drill was approved by the OCD on November 5, 2018 and Administrative Order SWD-1876, approving the Berry Well, was issued on March 12, 2019. Solaris requests that, in reviewing the application filed by Key Energy Services, the Hearing Examiner consider potential impacts on the Berry Well due to the close proximity of the Queen Lake Federal 19 No. 1 to the approved and permitted Berry Well, including potential interference with the operation of the Berry SWD Well No. 1.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lorraine Hollingsworth", is written over a horizontal line.

Pete Domenici, Esq.

Lorraine Hollingsworth, Esq.

320 Gold Ave. SW, Suite 1000

Albuquerque, New Mexico 87102

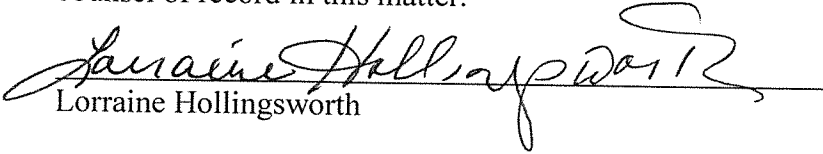
505-883-6250

pdomenici@domenicilaw.com

lhollingsworth@domenicilaw.com

Attorneys for Solaris Water Midstream, LLC

I hereby certify that, on August 15, 2019, a copy of the forgoing was served, via email, on counsel of record in this matter.


Lorraine Hollingsworth