

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

APPLICATION OF	§	
KEY ENERGY SERVICES, LLC	§	
FOR A SALTWATER 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

**KEY ENERGY SERVICES, LLC's
AMENDED PRE-HEARING STATEMENT**

The applicant, Key Energy Services, LLC ("Key Energy") submits this Amended Pre-Hearing Statement for the above-referenced case pursuant to the rules and regulations of the New Mexico Oil Conservation Division.

APPEARANCES

APPLICANT

KEY ENERGY SERVICES, LLC

ATTORNEY

Clayton D. Nance
Rash, Chapman, Schreiber, Leaverton &
Morrison, LLP
2112 Rio Grande Street
Austin, Texas 78705
(512) 477-7543
cnance@rashchapman.com

OBJECTING PARTIES

NGL WATER SOLUTIONS
PERMIAN, LLC

ATTORNEY

Deana M. Bennett
Law Firm of Modrall Sperling
P.O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
Deana.bennett@modrall.com

SOLARIS WATER MIDSTREAM, LLC

Pete Domenici
Domenici Law Firm, PC
320 Gold Ave. SW, Suite 1000
Albuquerque, New Mexico 87102
(505) 883-6250
pdomenici@domenicilaw.com

APPLICANT'S STATEMENT OF THE CASE

In Case No. 20583, Key Energy seeks an order approving disposal of saltwater into the Devonian Formation through the 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. Key Energy seeks the authority to sidetrack the well and convert it to a commercial saltwater disposal well, for disposal of saltwater into the Devonian at a depth of 14,500' to 16,000'. Key Energy further seeks approval of the use of 13-3/8" surface casing with cement circulated to surface, 9-5/8" intermediate casing with cement circulated to surface, 7" production casing with top of cement at 4,412 feet, 5" injection liner with top of cement at 10,700 feet, and 4-1/2 x 2-7/8" tubing, and requests that the Division approve a maximum daily injection rate for the well of 15,000 barrels per day. Said well is located approximately 19 miles southeast of Carlsbad, New Mexico.

APPLICANT'S PROPOSED EVIDENCE

WITNESSES

ESTIMATED TIME

EXHIBITS

Mr. Rene Aqueron
Project Manager
Fluid Management Services
Key Energy Services, LLC
Operations

Approx. 20 minutes

Estimated 5

Mr. Michael G. Eide
Managing Partner and Senior Geologist
Weegar-Edie & Associates, LLC
Geology

Approx. 30 minutes

Estimated 5 - 8

Mr. William M. Johnson
Founding Partner/Technical Manager
Strata Technologies, LLC
Engineering

Approx. 30 minutes

Estimated 5

PROCEDURAL MATTERS

Key Energy filed its Application for Hearing on May 30, 2019. The hearing was originally scheduled for July 11, 2019. The hearing was rescheduled for August 22, 2019, in response to a Motion for Continuance that was unopposed by Key Energy.

NGL Water Solutions Permian, LLC filed an Entry of Appearance dated July 3, 2019. NGL did not state the basis for the protest. Key Energy reserves the right to challenge the standing of an entity or person who files a timely appearance in the above-referenced case.

OXY USA Inc. filed an Entry of Appearance dated July 3, 2019. OXY filed a Withdrawal of Appearance dated August 14, 2019.

Solaris Water Midstream, LLC filed an Entry of Appearance and Pre-Hearing Statement dated August 15, 2019.

Respectfully submitted,

**RASH, CHAPMAN, SCHREIBER,
LEAVERTON & MORRISON, LLP**
2112 Rio Grande Street
Austin, Texas 78705
(512) 477-7543
(512) 474-0954 (fax)

By:



Clayton D Nance
New Mexico Bar No. 144017
cnance@rashchapman.com

**Attorneys for Applicant,
Key Energy Services, LLC**

CERTIFICATE OF SERVICE

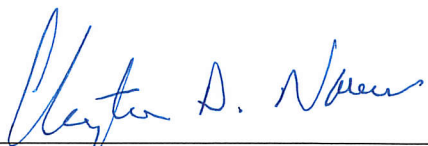
I hereby certify that a copy of the foregoing Amended Pre-Hearing Statement of Key Energy Services, LLC was served on counsel of record by electronic mail on August 15, 2019:

Deana M. Bennett
Law Firm of Modrall Sperling
P.O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800
Deana.bennett@modrall.com

*Counsel for NGL Water Solutions
Permian LLC*

Pete Domenici
Domenici Law Firm, PC
320 Gold Ave. SW, Suite 1000
Albuquerque, New Mexico 87102
(505) 883-6250
pdomenici@domenicilaw.com

Counsel for Solaris Water Midstream, LLC



Clayton D. Mance