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

APPLICATION OF CHEVRON U.S.A. INC. FOR APPROVAL OF A SALT WATER DISPOSAL WELL, LEA COUNTY, NEW MEXICO.

CASE NO. 15972

PRE-HEARING STATEMENT

Chevron U.S.A. Inc., the applicant in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPEARANCES

APPLICANT

ATTORNEY

Chevron U.S.A. Inc. 6301 Deauville Blvd. Midland, TX 79706 Michael H. Feldewert, Esq.

Jordan L. Kessler, Esq.

Adam G. Rankin, Esq.

Holland & Hart, LLP

Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

(505) 983-6043 Facsimile

APPLICANT'S STATEMENT OF CASE

Chevron U.S.A. Inc. seeks an order authorizing injection for purposes of salt water disposal in the proposed **Maelstrom SWD No. 1** Well, at a surface location 2050 feet from the South line and 1793 feet from the East line (Unit J) of Section 15, Township 26 South, Range 32 East, N.M.P.M., Lea County, New Mexico. The target injection interval is the Salado Draw/Silurian Limestone formation at a depth of approximately 17,400 feet to 19,100 feet. The maximum injection rate will be 50,000 BWPD at a maximum injection pressure of 2500 psig.

APPLICANT'S PROPOSED EVIDENCE

WITNESS Name and Expertise	ESTIMATED TIME	EXHIBITS
Lynn Rouse, Water Management	Approx. 15 minutes	Approx. 4
Sean Heaster, Water Strategy Engineer	Approx. 15 minutes	Approx. 4
Keith Innes, Salt Water Disposal/Petroleum Engineer	Approx. 15 minutes	Approx. 4
Clayton Williams, Geology	Approx. 20 minutes	Approx. 6
Kenneth Hodges, Drilling and Completions Engineer	Approx. 15 minutes	Approx. 2

PROCEDURAL MATTERS

None at this time.

Respectfully submitted,

Michael H. Feldewert Jordan L. Kessler

Adam G. Rankin

HOLLAND & HART LLP Post Office Box 2208

Santa Fe, New Mexico 87504-2208

(505) 988-4421

mfeldewert@hollandhart.com

jlkessler@hollandhart.com

agrankin@hollandhart.com

ATTORNEYS FOR CHEVRON U.S.A. INC.

10643192_1