L A W Y E R S

August 21, 2018

Florene Davidson NM Oil Conservation Division 1220 S. St. Francis Drive Santa Fe, NM 87505

Case 16426

Jennifer L. Bradfute 505.848.1845 Fax: 505.848.1882 jlb@modrall.com

Re:

APPLICATION OF NGL WATER SOLUTIONS PERMIAN, LLC TO AMEND ADMINISTRATIVE ORDERS SWD-1724 AND SWD-1711 FOR SALT WATER DISPOSAL WELLS IN EDDY COUNTY, NEW MEXICO.

Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. NGL Water Solutions Permian, LLC's - Application

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

Zina Crum

Legal Assistant to Jennifer L. Bradfute

JLB/zc Enclosure

> Modrall Sperling Roehl Harris & Sisk P.A.

Bank of America Centre 500 Fourth Street NW Suite 1000 Albuquerque, New Mexico 87102

PO Box 2168 Albuquerque, New Mexico 87103-2168 STATE OF NEW MEXICO
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES
OIL CONSERVATION DIVISION

APPLICATION OF NGL WATER SOLUTIONS PERMIAN, LLC TO AMEND ADMINISTRATIVE ORDERS SWD-1724 AND SWD-1711 FOR SALT WATER DISPOSAL WELLS IN EDDY COUNTY, NEW MEXICO.

CASE NO. 16426

APPLICATION

NGL Water Solutions Permian, LLC ("NGL"), OGRID No. 372338, through its undersigned attorneys, hereby makes this application to the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-12, for an order amending the size of tubing approved by the Division in administrative orders SWD-1724 and SWD-1711. An amendment is being requested to increase the diameter of the approved injection tubing to allow for the use of 7 inch tubing inside the surface and intermediate casings and 5 ½ inch tubing inside the liner. In addition, NGL seeks approval of a maximum injection rate and an amendment to the approved surface pressures. In support of this application, NGL states as follows:

1. NGL is the operator of the Striker 1 SWD No. 1 Salt Water Disposal Well (API 30-015-44406). The Oil Conservation Division is expected authorized NGL through Administrative Order SWD-1724 to use the Striker 1 SWD No. 1 for disposal of oil filed produced water through an open-hole interval within the Devonian and Silurian formations from 13,750 feet to 15100 feet. The order expected to be issued by the Division approving the drilling of the well will state that injection will occur through either an internally-coated, 5-1/2-inch or

smaller tubing inside the surface and intermediate casings, and a 4-1/2-inch or smaller tubing inside the liner.

- 2. NGL is the operator of the Alpha SWD Well No. 2 (API 30-015-44530). The Oil Conservation Division has authorized NGL (and its predecessor in interest) through Administrative Order SWD-1711 to use the Alpha SWD NO. 2 well for disposal of oil filed produced water through an open-hole interval within the Devonian and Silurian formations from 13,275 feet to 14,465 feet. The order issued by the Division approving the drilling of the well states that injection will occur through either an internally-coated, 5-1/2-inch or smaller tubing inside the surface and intermediate casings, and a 5-inch or smaller tubing inside the liner.
- 3. NGL seeks an amendment to these orders or an initial order for the Striker 1 SWD No. 1 well, allowing it to use 7 inch tubing inside the surface and intermediate casings and 5 ½ inch tubing inside the liner.
- 4. The Striker 1 SWD No. 1 well is located 1016 feet from the North line and 1395 feet from the East line of Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico.
- 5. The Alpha SWD Well No. 2 is located 236 feet from the North line and 2433 feet from the West line of Section 18, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico.
- 6. NGL further requests that the Division approve a maximum daily injection rate for the wells of 50,000 bbls per day.
- 7. Finally, NGL requests that the maximum surface pressure approved under the order be 2,750 psi for the Striker 1 SWD No. 1 well, and that the maximum surface pressure approved for the Alpha SWD Well No. 2 be set at 2,655 psi.

8. The granting of this application will avoid the drilling of unnecessary wells, will

prevent waste, and will protect correlative rights.

WHEREFORE, NGL requests that this application be set for hearing before an Examiner

of the Oil Conservation Division on September 20, 2018; and that after notice and hearing, the

Division enter its order approving this application to amend Administrative Orders SWD-1724

and SWD-1711, or otherwise issuing order to approve the above-mentioned wells, which to

increase the diameter of the injection tubing in the wells to allow for the use of 7 inch tubing

inside the surface and intermediate casings and 5 ½ inch tubing inside the liner. And, that the

Division approve a maximum daily injection rate for the wells of 50,000 bbls per day, and set the

that the maximum surface pressure approved under the order at 2,750 psi for the Striker 1 SWD

No. 1 well, and 2,655 psi for the Alpha SWD Well No. 2 well.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS

& SISK, P.A.

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