

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

**AMENDED APPLICATION OF NGL WATER SOLUTIONS
PERMIAN, LLC FOR APPROVAL OF SALT WATER
DISPOSAL WELL IN LEA COUNTY, NEW MEXICO**

CASE NO. 16442

PRE-HEARING STATEMENT

Devon Energy Production Company, LP (“Devon”) provides this Pre-Hearing Statement as required by the rules of the Division.

APPEARANCES

APPLICANT

NGL Water Solutions Permian, LLC

APPLICANT’S ATTORNEYS

Jennifer Bradfute
Deana M. Bennett
Modrall Sperling
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, NM 87103-2168
jlb@modrall.com
dmb@modrall.com

OPPONENTS

Devon Energy Production Company, LP

OPPONENTS’ ATTORNEYS

Seth C. McMillan
Montgomery & Andrews, P.A.
P.O. Box 2307
Santa Fe, NM 87504-2307
(505) 982-3873
smcmillan@montand.com

Fulfer Oil & Cattle, LLC

Ernest L. Padilla
Padilla Law Firm PA
PO Box 2523
Santa Fe, NM 87504-2523
padillalaw@qwestoffice.com

STATEMENT OF THE CASE

Applicant has applied for an order approving drilling of the Red Road SWD #1 well at a surface location 510 feet from the South line and 1,167 feet from the East line of Section 26, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico.

Devon opposes the Application because the proposed surface location appears to be on one of Devon’s drill islands, thus reducing Devon’s well pad and limiting the number of wells Devon will be able to drill.

PROPOSED EVIDENCE

<u>OPPONENT’S WITNESSES</u>	<u>EST. TIME</u>	<u>EXHIBITS</u>
Ryan Cloer, Land	20 min.	4
James Cain, Reservoir Geologist	20 min	6

PROCEDURAL MATTERS

Devon requests a continuance of this matter so as to allow it to prepare its case and bring its witnesses to Santa Fe. If NGL will not agree, Devon will be filing an opposed motion for continuance.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

By: Seth C. McMillan

Seth C. McMillan

Post Office Box 2307

Santa Fe, New Mexico 87504-2307

(505) 982-3873

smcmillan@montand.com

Attorneys for Devon Energy Production Company, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the following counsel of record by electronic mail on October 11, 2018:

Jennifer Bradfute
Deana M. Bennett
Modrall Sperling
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, NM 87103-2168
jlb@modrall.com
dmb@modrall.com

Ernest L. Padilla
Padilla Law Firm PA
PO Box 2523
Santa Fe, NM 87504-2523
padillalaw@qwestoffice.com

/s/ Seth C. McMillan _____
Seth C. McMillan