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

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

**CASE NO. 16509** 

# NGL WATER SOLUTIONS PERMIAN, LLC'S PRE-HEARING STATEMENT

NGL Water Solutions Permian, LLC's ("NGL") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

#### **APPEARANCES**

#### **APPLICANT**

#### **ATTORNEY**

NGL

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### STATEMENT OF CASE

### **APPLICANT**:

In Case No. 16509, Applicant seeks an order approving disposal into the Silurian and Devonian formations through the Raptor SWD #1 well. NGL proposes to drill this well at a surface location 295 feet from the North line and 1,580 feet from West line of Section 27, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian and Devonian formations at a depth of 18,529' – 19,874'. NGL further seeks approval of the use of 7-inch tubing inside the surface and intermediate casings and 5 ½-inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day.

### PROPOSED EVIDENCE

# **APPLICANT:**

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Neel Duncan- Operations	Approx. 15	Approx. 5
Kate Zeigler - Geologist	Approx. 15	Approx. 4
Scott Wilson - Engineer	Approx. 20	Approx. 11
Steve Taylor- Seismologist	Approx. 15	Approx. 7
Stephen Nave – Fishing Expert	Approx. 15	Approx. 5

# PROCEDURAL MATTERS

NGL intends to present evidence via affidavit in these matters and would like to consolidate this case with its other pending cases at hearing, if possible.

Respectfully submitted,

MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A.

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