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. 20084

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

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

APPEARANCES

APPLICANT

NGL

<u>ATTORNEY</u>

Jennifer L. Bradfute Deana M.Bennett MODRALL, SPERLING, ROEHL, HARRIS & SISK, P.A. P. O. Box 2168 Albuquerque, New Mexico 87103-2168 (505) 848-1800

STATEMENT OF CASE

APPLICANT:

In Case No. 20084, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Hornet SWD #1 well at a surface location 351 feet from the South line and 333 feet from West line of Section 6, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 18,220' - 19,930'. 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	<u>EXHIBITS</u>
Neel Duncan– Operations	Approx. 15	Approx. 5
Kate Zeigler - Geologist	Approx. 15	Approx. 4
Scott Wilson - Engineer	Approx. 20	Approx. 11
Dr. Steven 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.

Bennet By:

Jennifer L. Bradfute Deana M. Bennett Post Office Box 2168 500 Fourth Street NW, Suite 1000 Albuquerque, New Mexico 87103-2168 Telephone: 505.848.1800