

**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 EDDY COUNTY, NEW MEXICO.**

**CASE NO. 20404**

**CONOCOPhillips COMPANY  
PRE-HEARING STATEMENT**

ConocoPhillips Company (“ConocoPhillips”), the opponent in the above-referenced matter, submits this Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

NGL WATER SOLUTIONS  
PERMIAN, LLC

**ATTORNEY**

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**OPPONENT**

CONOCOPHILLIPS COMPANY

**ATTORNEY**

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## **CONOCOPHILLIPS' STATEMENT OF THE CASE**

In its amended application, NGL seeks an order for the Division approving disposal through the **Whitt 31 SWD No. 1 Well** at a surface location 1,191 feet from the North line and 2,335 feet from the West line of Section 31, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico for the purpose of operating a salt water disposal well. NGL seeks authority to inject salt water into the Silurian-Devonian formation at a depth of 14,990 feet to 16,137 feet. NGL further seeks approval of the use of 7-inch tubing inside the surface and intermediate casings and 5-inch tubing inside the liner and an injection rate for the well of 50,000 bbls per day.

ConocoPhillips is an offset operator to the proposed Whitt 31 SWD No. 1 Well. It objects to the proposed completion and operation of NGL's injection well at its current location due to its proximity to ConocoPhillips' offsetting leasehold interests and operations. In addition, ConocoPhillips has concerns about the proposed rate of injection and the potential for adverse geologic impacts at this specific location, which have the potential to significantly impair ConocoPhillips' offsetting lease operations.

### **OPPONENT'S PROPOSED EVIDENCE**

<b>WITNESS Name and Expertise</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
David Haddad, Geology	Approx. 20 minutes	Approx. 5
Hannah Wasserman, Geology	Approx. 20 minutes	Approx. 5

**PROCEDURAL MATTERS**

ConocoPhillips intends to file a motion for continuance to give the parties time to discuss a potential resolution to ConocoPhillips' objections. Counsel for ConocoPhillips has requested a continuance from counsel for NGL and is awaiting a response.

Respectfully submitted,

HOLLAND & HART LLP

By: 

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**ATTORNEYS FOR CONOCOPHILLIPS COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2019 I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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*Attorney for NGL Water Solutions Permian, LLC*



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