

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

**IN THE MATTER OF THE HEARING CALLED  
BY THE OIL CONSERVATION DIVISION FOR  
THE PURPOSE OF CONSIDERING:**

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

**Case No. 20141**

**PRE-HEARING STATEMENT**

This pre-hearing statement is submitted by Kaiser-Francis Oil Company ("KFOC") as required by the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

NGL Water Solutions, LLC

**APPLICANT'S ATTORNEY**

Deanna Bennett

**OPPONENT**

Kaiser-Francis Oil Company

**OPPONENT'S ATTORNEY**

James Bruce

Invenergy, LLC

Holland & Hart, LLP

Commissioner of Public Lands

Andrea Antillon

**STATEMENT OF THE CASE**

**APPLICANT.**

NGL Water Solutions Permian, LLC ("NGL") seeks approval to inject produced water into the Siluro-Devonian formation through the Sparrow SWD Well No. 1, located in Section 11, Township 24 South, Range 33 East, NMPM.

**OPPONENT**

KFOC will present evidence of substantial faulting in the area of the proposed SWD well, which precludes safe injection into the well.

## PROPOSED EVIDENCE

### APPLICANT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

### OPPONENT

#### WITNESSES

#### EST. TIME

#### EXHIBITS

David Hamilton  
(landman)

10 min.

Approx. 4

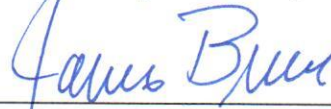
Chris Miller  
(geologist)

25 min.

Approx. 4

## PROCEDURAL MATTERS

Respectfully submitted,



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Post Office Box 1056  
Santa Fe, New Mexico 87504  
(505) 982-2043

Attorney for Kaiser-Francis Oil Company

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 18<sup>th</sup> day of July, 2019 by e-mail:

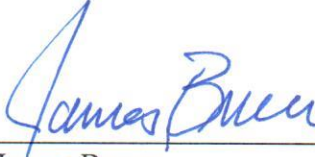
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James Bruce