

**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. 20142

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 Permian, LLC

APPLICANT'S ATTORNEY

Lara Katz

OPPONENT

Kaiser-Francis Oil Company

OPPONENT'S ATTORNEY

James Bruce

Invenergy, LLC

Holland & Hart LLP

Marathon Oil Permian LLC

Holland & Hart LLP

STATEMENT OF THE CASE

APPLICANT.

NGL Water Solutions Permian, LLC seeks approval to inject produced water into the Siluro-Devonian formation through the proposed Trident SWD Well No. 1, located in Section 13, 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. 2

Chris Miller
(geologist)

25 min.

Approx. 4

PROCEDURAL MATTERS

Respectfully submitted,



James Bruce
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Attorney for Kaiser-Francis Oil
Company

CERTIFICATE OF SERVICE

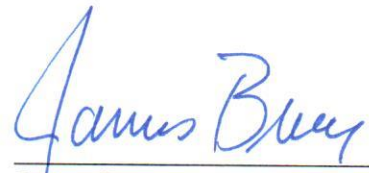
I hereby certify that a copy of the foregoing pleading was served upon the following counsel of record this 18th day of July, 2019 by e-mail:

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