



MODRALL SPERLING
L A W Y E R S

October 11, 2018

Florene Davidson
NM Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

Jennifer L. Bradfute
505.848.1845
Fax: 505.848.1882
jlb@modrall.com

**Re: No. 16441 - APPLICATION OF NGL WATER
SOLUTIONS PERMIAN, LLC FOR APPROVAL OF
SALT WATER DISPOSAL WELLS IN LEA COUNTY,
NEW MEXICO.**

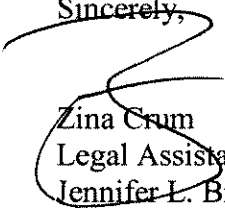
Dear Ms. Davidson:

Enclosed please find three copies of the following:

1. NGL Water Solutions Permian, LLC's – Application
No. 16441 – Minuteman.

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,


Zina Crum
Legal Assistant to
Jennifer L. Bradfute

JLB/zc
Enclosure

Y:\dox\client\87806\0003\DRAFTS\W3282921.DOC

Modrall Sperling
Roehl Harris & Sisk
P.A.

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500 Fourth Street
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**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 LEA COUNTY,
NEW MEXICO**

CASE NO. 16441

**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

NGL

ATTORNEY

Jennifer L. Bradfute
Deana Bennett
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
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INTERESTED PARTIES

Devon Energy Production Company, L.P.

ATTORNEY

Seth C. McMillan
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, New Mexico 87504-2307
(505) 982-3873

Oilfield Water Logistics, LLC

Dalva L. Moellenberg
Gallagher & Kennedy, P.A.
1239 Paseo de Peralta
Santa Fe, New Mexico 87501
(505) 982-9523

STATEMENT OF CASE

APPLICANT:

In Case No. 16441, Applicant seeks an order approving disposal into the Devonian and Silurian formations through the Minuteman SWD #1 well. NGL proposes to drill this well at a surface location 659 feet from the South line and 449 feet from West line of Section 14, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico. The target injection interval is the Devonian and Silurian formations at a depth of 16,691' – 18,326'. 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:

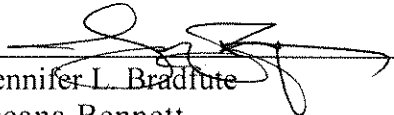
<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Neel Duncan– Operations	Approx. 15	Approx. 5
Kate Zeigler - Geologist	Approx. 15	Approx. 4
Scott Wilson - Engineer	Approx. 20	Approx. 11
Steve Taylor- Seismologist	Approx. 15	Approx. 7
Stephen Nave – Fishing Expert	Approx. 15	Approx. 5

PROCEDURAL MATTERS

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

Respectfully submitted,

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

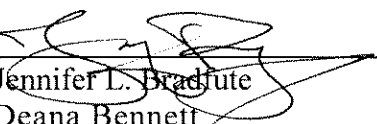
By: 
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on October 11, 2018:

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