

**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. 16442**

**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  
Albuquerque, New Mexico 87103-2168  
(505) 848-1800

**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

Fulfer Oil & Cattle, LLC

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 16442, Applicant seeks an order approving disposal into the Devonian and Silurian formations through the Red Road SWD #1 well. NGL proposes to drill this well at a surface location 510 feet from the South line and 1,167 feet from East line of Section 26, Township 23 South, Range 31 East, NMPM, Eddy County, New Mexico. The target injection interval is the Devonian formations at a depth of 16,450' – 17,458'. NGL further seeks approval of the use of 7 -nch 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: 

Jennifer L. Bradfute  
Deana Bennett  
Post Office Box 2168  
Bank of America Centre  
500 Fourth Street NW, Suite 1000  
Albuquerque, New Mexico 87103-2168  
Telephone: 505.848.180

**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:

Seth C. McMillan  
Montgomery & Andrews, P.A.  
Post Office Box 2307  
Santa Fe, New Mexico 87504-2307  
(505) 982-3873  
[smcmillan@montand.com](mailto:smcmillan@montand.com)

Ernest L. Padilla  
Padilla Law Firm, P.A.  
P.O. Box 2523  
Santa Fe, NM 87504  
(505) 988-7577  
[epadillapl@qwestoffice.net](mailto:epadillapl@qwestoffice.net)

By: 

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