

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

**APPLICATION OF NGL WATER  
SOLUTIONS PERMIAN, LLC  
FOR APPROVAL OF SALT WATER  
DISPOSAL WELL IN EDDY COUNTY,  
NEW MEXICO**

**CASE NO. 20404**

**NGL WATER SOLUTIONS PERMIAN,  
LLC'S PRE-HEARING STATEMENT**

NGL Water Solutions Permian, LLC ("NGL") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

NGL

**ATTORNEY**

Deana M. Bennett  
Zoe E. Lees  
MODRALL, SPERLING, ROEHL,  
HARRIS & SISK, P.A.  
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**OPPONENT**

New Mexico State Land Office  
Andrea Antillon  
aantillon@slo.state.nm.is  
310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 20404: NGL seeks an order approving disposal into the Silurian-Devonian formation through the Whitt 31 SWD #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' to 16,137'. 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**

<b>APPLICANT: WITNESS</b>	<b>ESTIMATED TIME</b>	<b>EXHIBITS</b>
Neel Duncan– Operations	Approx. 30	Approx. 10

**PROCEDURAL ISSUES**

NGL intends to put this case on by affidavit and has conferred with counsel for the State Land Office who does not oppose NGL putting this case on by affidavit.

Respectfully submitted,

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

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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 March 28, 2018:

New Mexico State Land Office  
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