

**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 LEA COUNTY,  
NEW MEXICO**

**CASE NO. 16509**

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

New Mexico State Land Office

Andrea Antillon  
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310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 16509, Applicant seeks an order approving disposal into the Silurian and Devonian formations through the Raptor SWD #1 well. NGL proposes to drill this well at a surface location 295 feet from the North line and 1,580 feet from West line of

Section 27, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian and Devonian formations at a depth of 18,529' – 19,874'. 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
Dr. Steven Taylor- Seismologist	Approx. 15	Approx. 7
Stephen Nave – Fishing Expert	Approx. 15	Approx. 5

### **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.**

By: Deana M. Bennett  
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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 May 9, 2019:

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