

**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. 16504
(COBRA)**

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

NGL Water Solutions Permian, LLC ("NGL") submits this Amended 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.
P. O. Box 2168
Albuquerque, New Mexico
87103-2168
(505) 848-1800

OPPONENT

BC&D Operating

ATTORNEY

Gary W. Larson
Hinkle Shanor LLP
218 Montezuma
Santa Fe, NM 87501
(505) 982-4554
glarson@hinklelawfirm.com

INTERESTED PARTY

Lilis Energy, Inc.

ATTORNEY

Dalva Moellenberg
Gallagher & Kennedy, P.A.,

1329 Paseo de Peralta
Santa Fe, NM 87501
(505) 982-9523
d1m@gknet.com

Doyle Hartman
500 North Main
P.O. Box 10426
Midland, Texas, 79702

STATEMENT OF CASE

APPLICANT:

In Case No. 16504, Applicant seeks an order approving disposal into the Silurian-Devonian formation through the Cobra SWD #1 well. NGL proposes to drill this well at a surface location 325 feet from the North line and 268 feet from the East line of Section 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico for the purpose of operating a salt water disposal well. The target injection interval is the Silurian-Devonian formation at a depth of 15,600' – 17,261'. 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
Dr. Kate Zeigler - Geologist	Approx. 15	Approx. 4
Scott Wilson - Engineer	Approx. 20	Approx. 11
Todd Reynolds-Geologist/Geophysicist	Approx. 20	Approx. 11

PROCEDURAL ISSUES

NGL understands that BC&D intends to object to NGL's application at the May30 hearing. NGL will have live witnesses at the hearing on May 30 to testify on NGL's behalf.

Respectfully submitted,

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

By: Deana M. Bennett

Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800

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 23, 2019:

Gary W. Larson
Hinkle Shanor LLP
218 Montezuma
Santa Fe, NM 87501
(505) 982-4554
glarson@hinklelawfirm.com

Dalva Moellenberg
Gallagher & Kennedy, P.A.
1329 Paseo de Peralta
Santa Fe, NM 87501
(505) 982-9523
dln@gknet.com

and by FedEx to:

Doyle Hartman
500 North Main
P.O. Box 10426
Midland, Texas, 79702

By: Deana M. Bennett
Deana M. Bennett
Post Office Box 2168
500 Fourth Street NW, Suite 1000
Albuquerque, New Mexico 87103-2168
Telephone: 505.848.1800