

**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. 20475 (WHITT 32)

Table of Contents

Tab 1: Application and Application Packet

Tab 2: Affidavit of Scott Wilson*

Tab 3: Dr. Kate Ziegler Exhibits**

Tab 4: Affidavit of Dr. Steven Taylor

Tab 5: Notice Affidavit

*Supplemented as per Hearing Examiner Request

** Revised as per Hearing Examiner Request

Application and Application Packet

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

**APPLICATION OF NGL WATER
SOLUTIONS PERMIAN, LLC
TO APPROVE SALT WATER
DISPOSAL WELL IN EDDY
COUNTY, NEW MEXICO.**

CASE NO. _____

APPLICATION

NGL Water Solutions Permian, LLC ("NGL"), OGRID No. 372338, through its undersigned attorneys, hereby makes this application to the Oil Conservation Division pursuant to the provisions of N.M. Stat. Ann. § 70-2-12, for an order approving drilling of a salt water disposal well in Eddy County, New Mexico. In support of this application, NGL states as follows:

- (1) NGL proposes to drill the Whitt 32 SWD #1 well at a surface location 219 feet from the South line and 2,395 feet from the West line of Section 32, Township 26 South, Range 29 East, NMPM, Eddy County, New Mexico for the purpose of operating a salt water disposal well.
- (2) NGL seeks authority to inject salt water into the Silurian-Devonian formation at a depth of 15,170' to 16,312'.
- (3) 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.
- (4) NGL anticipates using an average pressure of 2,276 psi for this well, and it requests that a maximum pressure of 3,034 psi be approved for the well.
- (5) A proposed C-108 for the subject well is attached hereto in Attachment A.



(6) The granting of this application will avoid the drilling of unnecessary wells, will prevent waste, and will protect correlative rights.

WHEREFORE, NGL requests that this application be set for hearing before an Examiner of the Oil Conservation Division on May 2, 2019; and that after notice and hearing, the Division enter its order approving this application.

Respectfully submitted,

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

By: Deana M. Bennett

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

CASE NO. _____: Application of NGL Water Solutions Permian, LLC for approval of salt water disposal well in Eddy County, New Mexico. Applicant seeks an order approving disposal into the Silurian-Devonian formation through the Whitt 32 SWD #1 well at a surface location 219 feet from the South line and 2,395 feet from the West line of Section 32, 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 15,170' to 16,312'. 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. Said location is 15.8 miles South of Malaga, New Mexico.

RECEIVED:	REVIEWER:	TYPE:	APP NO:
-----------	-----------	-------	---------

ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

NEW MEXICO OIL CONSERVATION DIVISION
 - Geological & Engineering Bureau -
 1220 South St. Francis Drive, Santa Fe, NM 87505

**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND
 REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

Applicant: NGL WATER SOLUTIONS PERMIAN LLC	OGRID Number: 372338
Well Name: WHITT 32 SWD #1	API: TBD
Pool: SWD; DEVONIAN-SILURIAN	Pool Code: 97869

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION
 INDICATED BELOW**

1) TYPE OF APPLICATION: Check those which apply for [A]

A. Location - Spacing Unit - Simultaneous Dedication

☐ NSL ☐ NSP (PROJECT AREA) ☐ NSP (PROPORTION UNIT) ☐ SD

B. Check one only for [I] or [II]

[I] Commingling - Storage - Measurement

☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[II] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX ☐ PMX ☒ SWD ☐ IPI ☐ EOR ☐ PPR
2) NOTIFICATION REQUIRED TO: Check those which apply.

- A. ☒ Offset operators or lease holders
 B. ☐ Royalty, overriding royalty owners, revenue owners
 C. ☒ Application requires published notice
 D. ☐ Notification and/or concurrent approval by SLO
 E. ☒ Notification and/or concurrent approval by BLM
 F. ☒ Surface owner
 G. ☐ For all of the above, proof of notification or publication is attached, and/or.
 H. ☐ No notice required

FOR OCD ONLY

- ☐ Notice Complete
☐ Application
 Content
 Complete

- 3) CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

CHRIS WEYAND

Print or Type Name

Signature

03-18-2019

Date

512-600-1764


Phone Number

CHRIS@LONQUIST.COM

Email Address

EXHIBIT**A**

APPLICATION FOR AUTHORIZATION TO INJECT

- I. PURPOSE: _____ Secondary Recovery _____ Pressure Maintenance X Disposal _____ Storage
Application qualifies for administrative approval? X Yes _____ No
- II. OPERATOR: NGL WATER SOLUTIONS PERMIAN, LLC
ADDRESS: 1509 W WALL ST // STE 306 // MIDLAND, TX 79701
CONTACT PARTY: SARAH JORDAN PHONE: (432) 685-0005 x1989
- III. WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection.
Additional sheets may be attached if necessary.
- IV. Is this an expansion of an existing project? _____ Yes X No
If yes, give the Division order number authorizing the project: _____
- V. Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
- VI. Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
- VII. Attach data on the proposed operation, including:
1. Proposed average and maximum daily rate and volume of fluids to be injected;
 2. Whether the system is open or closed;
 3. Proposed average and maximum injection pressure;
 4. Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water; and,
 5. If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.).
- *VIII. Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
- LX. Describe the proposed stimulation program, if any.
- *X. Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
- *XI. Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
- XII. Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
- XIII. Applicants must complete the "Proof of Notice" section on the reverse side of this form.
- XIV. Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
- NAME: Christopher B. Weyand TITLE: Consulting Engineer
SIGNATURE:  DATE: 3/10/2019
E-MAIL ADDRESS: chris@lonquist.com
- * If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted. Please show the date and circumstances of the earlier submittal: _____

DISTRIBUTION: Original and one copy to Santa Fe with one copy to the appropriate District Office

III. WELL DATA

- A. The following well data must be submitted for each injection well covered by this application. The data must be both in tabular and schematic form and shall include:

- (1) Lease name; Well No.; Location by Section, Township and Range; and footage location within the section.
- (2) Each casing string used with its size, setting depth, sacks of cement used, hole size, top of cement, and how such top was determined.
- (3) A description of the tubing to be used including its size, lining material, and setting depth.
- (4) The name, model, and setting depth of the packer used or a description of any other seal system or assembly used.

Division District Offices have supplies of Well Data Sheets which may be used or which may be used as models for this purpose. Applicants for several identical wells may submit a "typical data sheet" rather than submitting the data for each well.

- B. The following must be submitted for each injection well covered by this application. All items must be addressed for the initial well. Responses for additional wells need be shown only when different. Information shown on schematics need not be repeated.

- (1) The name of the injection formation and, if applicable, the field or pool name.
- (2) The injection interval and whether it is perforated or open-hole.
- (3) State if the well was drilled for injection or, if not, the original purpose of the well.
- (4) Give the depths of any other perforated intervals and detail on the sacks of cement or bridge plugs used to seal off such perforations.
- (5) Give the depth to and the name of the next higher and next lower oil or gas zone in the area of the well, if any.

XIV. PROOF OF NOTICE

All applicants must furnish proof that a copy of the application has been furnished, by certified or registered mail, to the owner of the surface of the land on which the well is to be located and to each leasehold operator within one-half mile of the well location.

Where an application is subject to administrative approval, a proof of publication must be submitted. Such proof shall consist of a copy of the legal advertisement which was published in the county in which the well is located. The contents of such advertisement must include:

- (1) The name, address, phone number, and contact party for the applicant;
- (2) The intended purpose of the injection well; with the exact location of single wells or the Section, Township, and Range location of multiple wells;
- (3) The formation name and depth with expected maximum injection rates and pressures; and,
- (4) A notation that interested parties must file objections or requests for hearing with the Oil Conservation Division, 1220 South St. Francis Dr., Santa Fe, New Mexico 87505, within 15 days.

NO ACTION WILL BE TAKEN ON THE APPLICATION UNTIL PROPER PROOF OF NOTICE HAS BEEN SUBMITTED.

NOTICE: Surface owners or offset operators must file any objections or requests for hearing of administrative applications within 15 days from the date this application was mailed to them.

Side 1

INJECTION WELL DATA SHEET

OPERATOR: NGL WATER SOLUTIONS PERMIAN, LLC

WELL NAME & NUMBER: WHITT 32 SWD #1

WELL LOCATION: 219' FSL & 2395' FWL L2 32 26S 29E
FOOTAGE LOCATION UNIT LETTER SECTION TOWNSHIP RANGE

WELLBORE SCHEMATIC

WELL CONSTRUCTION DATA

Surface Casing

Hole Size: 24.000"

Casing Size: 20.000"

Cemented with: 757 sx.

or _____ ft³

Top of Cement: Surface

Method Determined: Circulation

1st Intermediate Casing

Hole Size: 17.500"

Casing Size: 13.375"

Cemented with: 1,667 sx.

or _____ ft³

Top of Cement: Surface

Method Determined: Circulation

2nd Intermediate Casing

Hole Size: 12.250"

Casing Size: 9.625"

Cemented with: 2,848 sx.

or _____ ft³

Top of Cement: Surface

Method Determined: Circulation

Production Liner

Hole Size: 8,500"

Casing Size: 7,625"

Cemented with: 972 sx.

or _____ ft³

Top of Cement: 9,200'

Method Determined: Calculation

Total Depth: 16,312'

Injection Interval

15,170 feet to 16,312 feet

(Open Hole)

INJECTION WELL DATA SHEET

Tubing Size: 7", 26 lb/ft, P-110, TCPC from 0' - 9,100' and 5.500", 17 lb/ft, P-110 TCPC from 9,100' - 15,135'

Lining Material: Duoline

Type of Packer: 7-5/8" x 5-1/2" TCPC Permanent Packer with High Temp Elastomer and Full Inconel 925 trim

Packer Setting Depth: 15,135'

Other Type of Tubing/Casing Seal (if applicable): _____

Additional Data

1. Is this a new well drilled for injection? X Yes No

If no, for what purpose was the well originally drilled? N/A

2. Name of the Injection Formation: Devonian, Silurian, Fusselman and Montoya (Top 100')

3. Name of Field or Pool (if applicable): SWD; Devonian-Silurian

4. Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail, i.e. sacks of cement or plug(s) used. No, new drill.

5. Give the name and depths of any oil or gas zones underlying or overlying the proposed injection zone in this area:

Delaware: 2,690'

Cherry Canyon: 3,594'

Bone Spring: 6,382'

Wolfcamp: 9,530'



Whitt 32 SWD Eddy County NM

APP

TD

16,312

Directions to Site: SSW of Sec 32 T26S R29E From Loving travel South on Hwy 285 19.8 miles and Turn East (left) on Catfish Rd. Travel 1.4 miles and location will be on the left
Lat/Long - 32.00091667, -104.0075

Vertical Injection: Devonian, Silurian, Fusselman, Montoya

Drill and Complete Cost

\$9.2MM

GL/KR

2880/

Geologic Tops (MD Ft)	Section	Problems	Bit/BHA	Fluid	Casing	Logging	Cement (HOLD)	Injection String
Rustler 319'	Surface Drill 24" 0' - 520' Set and Cement 20" Casing	Loss Circulation Hole Cleaning Wellbore stability in the Red Beds	24" Mill Tooth Bit + Bit sub w/ float 17 + 17" NBS + 1X8" DC + 17" IBS + 1X8" DC + SS + 4X8" DC's + X/O + 5" HWDP	Spud Mud MWc 9.0	500' of 20" 94# J55 BTC Centralizers - bottom 2 joints and every 3rd jt thereafter. Cement basket 5th jt from surface	Mud loggers on site by Drillout of Surf.	757sx of Halcem 3hr TT 50% Excess 1000psi CSD after 10hrs	9100' of 7" P110 26# TCPC
Surface TD 500'								
Castile 852'								
Delaware 2,690'	1st Intermediate Drill 1900' of 17-1/2" Hole 800' - 2700' Set and Cement 13-3/8" Casing	Seepage Losses Possible H2S Anhydrite Salt	17-1/2" Varel PDC Bit + 9-5/8" X 8" 7/8 4.0 Combo MM w/ 17" Steel NBS + 17" IBS + 2X8" DC's + SS + 4X8" DC's + 18X6" DC's + X/O + HWDP	Brine	SM A Section Casing Bowl 2700' of 13-3/8" 68# HCL80 BTC Centralizers - bottom jt, every 3rd joint in open hole and 2 jt inside the surface casing.	Gyro Survey	Halcem, 1667sx, 13.7ppg 30% Excess 1000psi CSD after 10 hrs Cement to Surface	6035' of 5-1/2" P110 17# TCPC
1st Int TD - 2,700'								
9-5/8" DV/ECP 2,800'								
Bell Canyon 2721'	2nd Intermediate Drill 6000' of 12-1/4" Hole 2700' - 9700' Set 9-5/8" Intermediate Casing and Cement in 3 Stages	Seepage to Complete Loss Water Flows Some Anhydrite H2S possible Production in the Lower Wolfcamp	12-1/4" Smith XS 7165 AxeBlade PDC Bit, sub, 8" 7/8 4.0 0.16 MM w/ 12" NBS, ALS Roller Reamer DeMag, UBHO sub, ALS 12" RR/UBHO/NMDC, SS, 6 jts: 8" DC, X/O sub, 18 jts: 6" DC, X/O sub, 8" Drilling Jars HWDP + 5" DP to Surface	Cut Brine	10M B Section 9700' of 9-5/8" 53.5# HCL80 BTC Special Drift to 8,535"	12.25" Open Hole: MWD GR Triple combo, Caliper, CBL of 13-3/8" Casing to surface Cased Hole: CBL/Pressure Pass to 1000 psi of 9-5/8" Casing before drillout	Stage 3: 10% Excess 596sx Halcem 13.7ppg 1000psi CSD after 10 hrs Cement to Surface	
Cherry Canyon 3,594'					Externally Coat 3850' Between DV Tools		Stage 2: 50% Excess 974 sx Halcem 13.7ppg 1000psi CSD after 10 hrs	
Brushy Canyon 4,589'					-DV/ECP tool at 2800' (DV Tool 100' Below Previous Casing shoe)		Stage 1: 1278sx Halcem 1.37ppg, 50% XS. 1000psi CSD after 10hrs	
9-5/8" DV 6,350'					-DV Tool w/ no ECP placed nominally above the Bone Springs top			
Bone Springs 6,382'					Centralizers - bottom jt, 100' aside of DV tool, every 3rd joint in open hole and 5 within the surface casing. ensure centralizers are 9-3/4" to fit Coated Pipe.			
TOC - Stage 1 Tail - 8,700'								
7-5/8" Liner Top 9,200'								
Wolfcamp 9,530'								
2nd Int TD - 9,700'								
Strawn 12,121'	3rd Intermediate Liner Drill 5470' of 8-1/2" Hole 9700' - 15170'	Pressure in the Atoka Morrow Hard Drilling in the Atoka & Morrow	8-1/2" Smith XS 7165 AxeBlade PDC Bit, sub, 6-3/4" 7/8 5.7 MM w/ 8" NBS, UBHO sub, 8" NMIBS/UBHO/NMDC, SS, 18 jts: 6" DC 6" Drilling Jars HWDP + 5" DP to Surface	Weighted WBM 11.0 ppg- 13.5 ppg (MAX)	5970' of 7-5/8" 39# HCP110 EZGO F13 (Gas Tight) VersaFlex Packer Hanger Centralizers on and 1 jt above shoe jt and then every 2nd jt.	8.5" Open Hole: MWD GR Triple combo, Caliper of 8.5" Open Hole Cased Hole: SCBL/Pressure Pass to 1000 psi of 7-5/8" Casing before drillout	972sx of Neocem 13.2 ppg 50% Excess 1000psi CSD after 12hrs	7-5/8" x 5-1/2" TCPC Permanent Packer with High Temp Elastomer and full Inconel 925 trim
Atoka 12,343'								
Morrow 13,008'								
Miss Lime 14,757'								
Woodford 14,997'								
Injection Packer 15,135'								
Devonian 15,155'								
3rd Int TD 15,170'								
Fusselman - 15,589'	Injection Interval Drill 1142 of 6-1/2" hole 15170' - 16312'	Chert is possible Loss of Circulation and or Flows are expected BHT estimated at 280F	6-1/2" Smith U611S PDC Bit, sub, 5" 7/8 2.6 0.26 1.5FBH MM w/ 6" NBS, 6" NMIBS, UBHO/NMDC, SS, X/O sub, 24 jts: 4-3/4" HWDP + 4" DP to Surface	Brine Water - flows possible	Openhole completion	MWD GR Triple Combo with FMI and CMR Tool	Displace with clean heavy brine	
Montoya - 16,212'								
TD - 16,312'								

NGL Water Solutions Permian, LLC

Whitt 32 SWD No. 1

FORM C-108 Supplemental Information

III. Well Data

A. Wellbore Information

1.

Well information	
Lease Name	Whitt 32 SWD
Well No.	1
Location	S-32 T-26S R-29E
Footage Location	219' FSL & 2395' FWL

2.

a. Wellbore Description

Casing Information				
Type	Surface	Intermediate	Production	Liner
OD	20"	13.375"	9.625"	7.625"
WT	0.635"	0.480"	0.545"	0.500"
ID	19.124"	12.415"	8.535"	6.625"
Drift ID	18.936"	12.259"	8.535"	6.500"
COD	21.00"	14.375"	10.625"	7.625"
Weight	94 lb/ft	68 lb/ft	53.5 lb/ft	39 lb/ft
Grade	J-55	HCL-80	HCL-80	HC-P110
Hole Size	24"	17.5"	12.25"	8.5"
Depth Set	500'	2,700'	9,700'	9,200' – 15,170'

b. Cementing Program

Cement Information				
Casing String	Surface	Intermediate	Production	Liner
Lead Cement	Extenda Cem	Halcem	Halcem	Neocem
Lead Cement Volume	161	1,667	Stage 1: 1,278 sx Stage 2: 974 sx Stage 3: 596 sx	972
Tail Cement	Halcem			
Tail Cement Volume	596			
Cement Excess	50%	30%	10%,50%,50%	50%
TOC	Surface	Surface	Surface	9,200'
Method	Circulate to Surface	Circulate to Surface	Circulate to Surface	Logged

3. Tubing Description

Tubing Information		
OD	7"	5.5"
WT	0.362"	0.304"
ID	6.276"	4.892"
Drift ID	7.875"	6.050"
COD	6.151"	4.653"
Weight	26 lb/ft	17 lb/ft
Grade	P-110 TCPC	P-110 TCPC
Depth Set	0'-9,100'	9,100'-15,135'

Tubing will be lined with Duoline.

4. Packer Description

7-5/8" x 5-1/2" TCPC Permanent Packer with High Temp Elastomer and Full Inconel 925 trim

B. Completion Information

1. Injection Formation: Devonian, Fusselman, Montoya (Top 100')
2. Gross Injection Interval: 15,170' – 16,312'

Completion Type: Open Hole

3. Drilled for injection.
4. See the attached wellbore schematic.
5. Oil and Gas Bearing Zones within area of well:

Formation	Depth
Delaware	2,690'
Cherry Canyon	3,594'
Bone Spring	6,382'
Wolfcamp	9,530'

VI. Area of Review

No wells within the area of review penetrate the proposed injection zone.

VII. Proposed Operation Data

1. Proposed Daily Rate of Fluids to be Injection:

Average Volume: 40,000 BPD

Maximum Volume: 50,000 BPD

2. Closed System

3. Anticipated Injection Pressure:

Average Injection Pressure: 2,276 PSI (surface pressure)

Maximum Injection Pressure: 3,034 PSI (surface pressure)

4. The injection fluid is to be locally produced water. It is expected that the source water will predominantly be from the Bone Spring, Delaware, Avalon, and Wolfcamp formations. Attached are produced water sample analyses taken from the closest wells that feature samples from the above mentioned formations.

5. The disposal interval is non-productive. No water samples are available from the surrounding area.

VIII. Geological Data

The Devonian formation is a dolomitic ramp carbonate that occurs below the Woodford shale and above the Fusselman formation. Strata found in the Devonian formation include two major groups, the Wristen Buildups and the Thirtyone Deepwater Chert, with the Wristen being more abundant. The Wristen Groups is composed of mixed limestone and dolomites with mudstone to grainstone and boundstone textures. Porosity in the Wristen group is a result of both primary and secondary development. Present are moldic, vugular, karstic (including collapse breccia) features that allow for higher porosities and permeabilities. The Thirtyone Formation contains two end-member reservoir facies, skeletal packstones/grainstones and spiculitic chert, with most of the porosity and permeability found in the coarsely crystalline cherty dolomite. These particular characteristics allow for this formation to be a tremendous Salt Water Disposal horizon.

A. Injection Zone: Devonian-Silurian Formation

Formation	Depth
Rustler Anhydrite	319
Delaware	2,690
Bone Spring	6,382
Wolfcamp	9,530
Strawn	12,121
Atoka	12,343
Morrow	13,008
Mississippian	14,757
Woodford	14,997
Devonian	15,155
Fusselman	15,589
Montoya	16,212

B. Underground Sources of Drinking Water

There are no water wells within 1-mile of the proposed Whitt 32 SWD #1 location. Water wells in the surrounding area have an average depth of 206 ft and an average water depth of 115 ft generally producing from tertiary and quaternary alluvium and the upper Rustler. All will be protected. Active Texas oil and gas wells that were within 2 miles of the proposed Whitt 32 SWD #1 location had an average groundwater protection requirement depth of 515 ft.

IX. Proposed Stimulation Program

Stimulate with up to 50,000 gallons of acid.

X. Logging and Test Data on the Well

There are no logs or test data on the well. During the process of drilling and completion resistivity, gamma ray, and density logs will be run.

XI. Chemical Analysis of Fresh Water Wells

There are no water wells that exist within one mile of the well location.

XII. Affirmative Statement of Examination of Geologic and Engineering Data

Based on the available engineering and geologic data we find no evidence of open faults or any other hydrologic connection between the disposal zone (in the proposed Whitt 32 SWD #1) and any underground sources of drinking water.

NAME: John C. Webb

TITLE: Sr. Geologist

SIGNATURE: _____

John C. Webb

DATE: 7/23/2019

District I
1625 N. French Dr., Hobbs, NM 88240
Phone (575) 393-6161 Fax (575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone (575) 748-1283 Fax (575) 748-9720
District III
1000 Rio Brazos Road, Aztec, NM 87410
Phone (505) 334-6178 Fax (505) 334-6170
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505
Phone (505) 476-3460 Fax (505) 476-3462

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-101
Revised July 18, 2013

☐ AMENDED REPORT

APPLICATION FOR PERMIT TO DRILL, RE-ENTER, DEEPEN, PLUGBACK, OR ADD A ZONE

¹ Operator Name and Address NGI WATER SOLUTIONS PERMIAN, LLC 1509 W WALL ST. STE 306 MIDLAND, TX 79701		⁵ OGRID Number 372338
		⁶ API Number TBD
² Property Code	³ Property Name WHITT 32 SWD	⁴ Well No 1

⁷ Surface Location

UL - Lot	Section	Township	Range	Lot Idn	Feet from	N/S Line	Feet From	E/W Line	County
2	32	26S	29E	N/A	219'	SOUTH	2,395'	WEST	EDDY

⁸ Proposed Bottom Hole Location

UL - Lot	Section	Township	Range	Lot Idn	Feet from	N/S Line	Feet From	E/W Line	County

⁹ Pool Information

⁹ Pool Name SWD, Devonian-Silurian	¹⁰ Pool Code 97869
--	----------------------------------

Additional Well Information

¹¹ Work Type N	¹² Well Type SWD	¹³ Cable/Rotary R	¹⁴ Lease Type Private	¹⁵ Ground Level Elevation 2,880'
¹⁶ Multiple N	¹⁷ Proposed Depth 16,312'	¹⁸ Formation Siluro-Devonian	¹⁹ Contractor TBD	²⁰ Spud Date ASAP
Depth to Ground water 115'		Distance from nearest fresh water well > 1 mile		Distance to nearest surface water 4,697', Pecos River

☐ We will be using a closed-loop system in lieu of lined pits

²¹ Proposed Casing and Cement Program

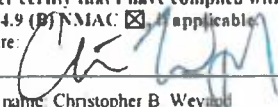
Type	Hole Size	Casing Size	Casing Weight/ft	Setting Depth	Sacks of Cement	Estimated TOC
Surface	24"	20"	94 lb/ft	500'	757	Surface
Intermediate	17.5"	13.375"	68 lb/ft	2,700'	1,667	Surface
Production	12.25"	9.625"	53.5 lb/ft	9,700'	2,848	Surface
Prod. Liner	8.5"	7.625"	39 lb/ft	15,170'	972	9,200'
Tubing	N/A	7"	26 lb/ft	0' - 9,100'	N/A	N/A
Tubing	N/A	5.5"	17 lb/ft	9,100' - 15,135'	N/A	N/A

Casing/Cement Program: Additional Comments

See attached schematic

²² Proposed Blowout Prevention Program

Type	Working Pressure	Test Pressure	Manufacturer
Double Hydraulic Blinds, Pipe	10,000 psi	8,000 psi	TBD - Schaffer Cameron

²³ I hereby certify that the information given above is true and complete to the best of my knowledge and belief. I further certify that I have complied with 19.15.14.9 (A) NMAC <input type="checkbox"/> and/or 19.15.14.9 (B) NMAC <input checked="" type="checkbox"/> if applicable. Signature: 		OIL CONSERVATION DIVISION	
Printed name: Christopher B. Weyand			
Title: Consulting Engineer		Title	
E-mail Address: chris@longquist.com		Approved Date	Expiration Date
Date: 03/08/2019	Phone: (512) 690-1764	Conditions of Approval Attached	

District
 1625 N. French Dr., Hobbs, NM 88240
 Phone (575) 393-6161 Fax (575) 393-0720
 District II
 811 S. First St., Artesia, NM 88210
 Phone (575) 748-1283 Fax (575) 748-0720
 District III
 1000 Rio Brazos Road, Artesia, NM 87410
 Phone (505) 334-6178 Fax (505) 334-6170
 District IV
 1220 S. St. Francis Dr., Santa Fe, NM 87505
 Phone (505) 476-3460 Fax (505) 476-3462

State of New Mexico
 Energy, Minerals & Natural Resources Department
OIL CONSERVATION DIVISION
 1220 South St. Francis Dr.
 Santa Fe, NM 87505

Form C-102
 Revised August 1, 2011
 Submit one copy to appropriate
 District Office

☐ AMENDED REPORT

WELL LOCATION AND ACREAGE DEDICATION PLAT

¹ API Number	² Pool Code 97869	³ Pool Name SWD, Devonian-Silurian
⁴ Property Code	⁵ Property Name Whitt 32 SWD	⁶ Well Number 1
⁷ OGRID No. 372338	⁸ Operator Name NGL Water Solutions	⁹ Elevation 2880.00±

" Surface Location

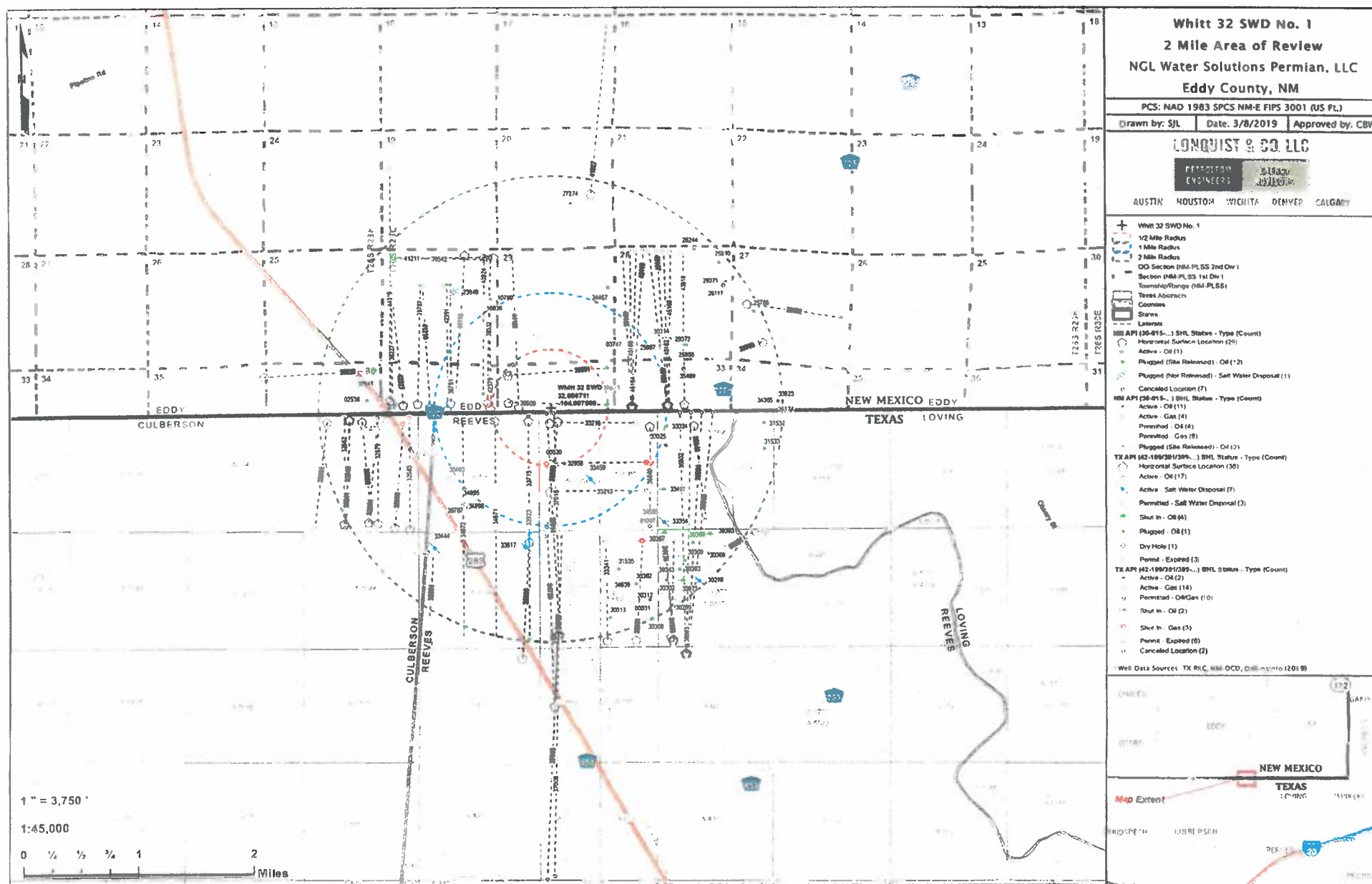
U.I. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
2	32	26S	29E	N/A	219'	South	2395'	West	Eddy

" Bottom Hole Location If Different From Surface

U.I. or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
¹² Dedicated Acres ¹³ Joint or Infill ¹⁴ Consolidation Code ¹⁵ Order No.									

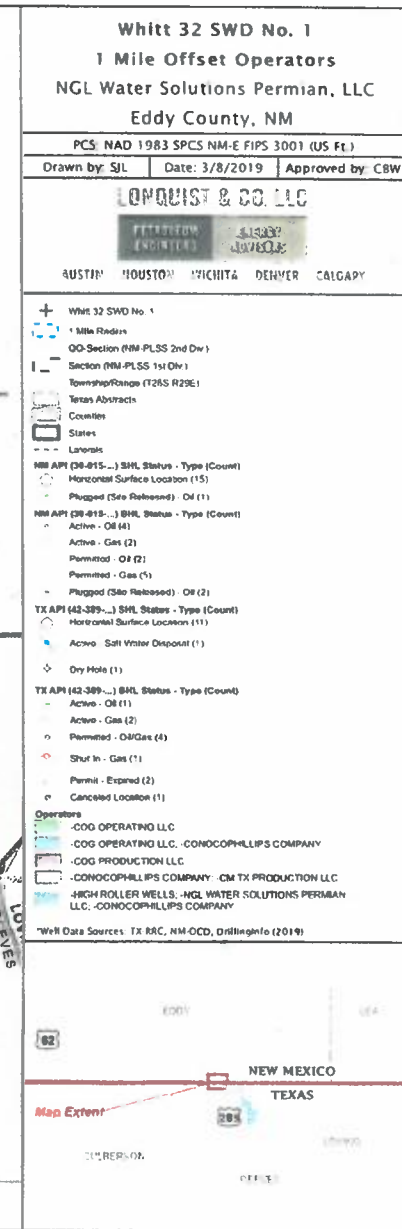
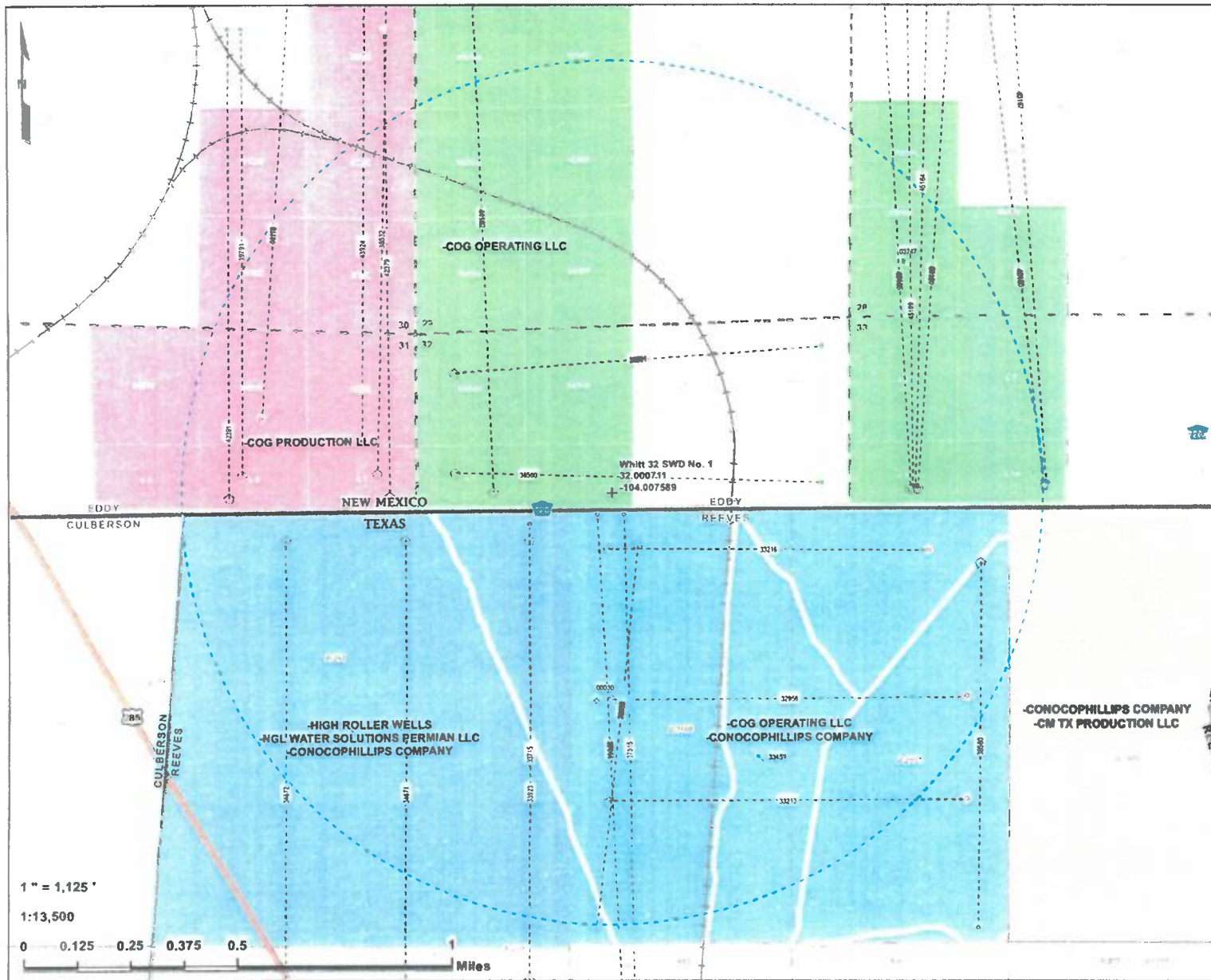
No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.

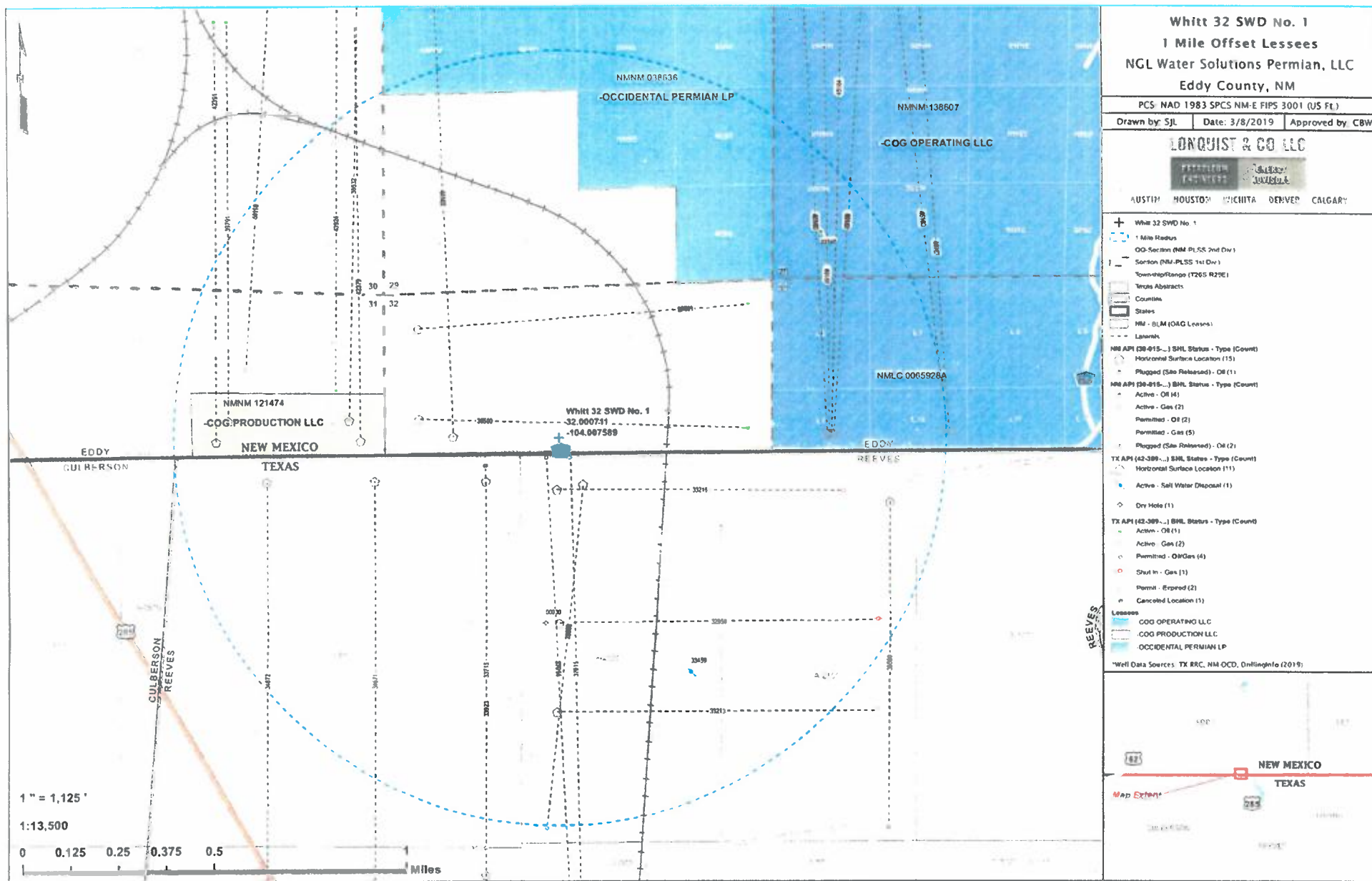
<p>PROPOSED WHITT 32 SWD #1</p> <p>NMSP-E (NAD27) N=364,093.26 E=601,128.13</p> <p>NMSP-E (NAD83) N=364,150.55 E=642,313.91 LAT=32°00'02.56" LONG=104°00'27.32"</p>		<p>" OPERATOR CERTIFICATION</p> <p>I hereby certify that the information contained herein is true and complete to the best of my knowledge, and belief, and that this organization either owns a working interest or undivided mineral interest in the land including the proposed bottom hole location or has a right to drill this well at this location pursuant to a contract with an owner of such a mineral or working interest, or to a voluntary pooling agreement or a compulsory pooling interest.</p> <p>Signature: <i>[Signature]</i> Date: 3/18/2019</p> <p>Chris Weyand</p> <p>Printed Name</p> <p>chris@longquist.com</p> <p>E-mail Address</p>	
<p>"SURVEYOR CERTIFICATION</p> <p>I hereby certify that the well location shown on this plat was plotted from field notes of actual surveys made by me or under my supervision, and that the same is true and correct to the best of my belief</p> <p>03/07/2019</p> <p>Date of Survey</p> <p>Signature and Seal of Professional Surveyor</p> <p>25114</p> <p>Certificate Number</p>			



Whitt 32 SWD No. 1
1 Mile Area of Review List

API	WELL NAME	WELL TYPE	STATUS	OPERATOR	TVD (FT.)	LATITUDE (NAD83 DD)	LONGITUDE (NAD83 DD)	DATE DRILLED
3001503747	PRE-ONGARD WELL #001	O	P	PRE-ONGARD WELL OPERATOR	2960	32.0084267000	-103.995971700	1/1/1900
3001538500	SIDEWINDER #001H	O	P	COG PRODUCTION, LLC	9	32.0014343000	-104.013748200	6/18/2011
3001538501	SIDEWINDER #002H	O	P	COG PRODUCTION, LLC	7028	32.0052414000	-103.999687200	11/6/2011
3001538532	COPPERHEAD 31 FEDERAL COM #001H	O	A	COG PRODUCTION, LLC	6781	32.0014305000	-104.016845700	5/2/2011
3001539791	COPPERHEAD 31 FEDERAL COM #002H	O	A	COG PRODUCTION, LLC	8302	32.0014229000	-104.022201500	3/6/2012
3001542379	COPPERHEAD 31 FEDERAL COM #003H	O	N	COG PRODUCTION, LLC	13701	32.0006599000	104.016357400	-
3001542391	RIDGE NOSE FEDERAL COM #001H	O	A	COG PRODUCTION, LLC	6377	32.0006523000	-104.022750900	2/10/2015
3001543924	COPPERHEAD 31 FEDERAL COM #003H	O	A	COG PRODUCTION, LLC	10736	37.0197870000	-104.017210000	11/3/2016
3001544118	COPPERHEAD 31 FEDERAL COM #021H	G	A	COG PRODUCTION, LLC	10759	32.0201850000	-104.020036000	5/5/2017
3001544192	SIDEWINDER FEDERAL COM #004H	G	A	COG OPERATING LLC	10757	32.0007825000	-104.012251500	6/7/2017
3001545163	LITTLEFIELD 33 FEDERAL COM #706H	G	N	COG OPERATING LLC	16944	32.0009380000	103.990531000	-
3001545164	LITTLEFIELD 33 FEDERAL COM #707H	G	N	COG OPERATING LLC	17216	32.0008030000	-103.995580000	-
3001545165	LITTLEFIELD 33 FEDERAL COM #708H	G	N	COG OPERATING LLC	17252	32.0008030000	-103.995774000	-
3001545167	LITTLEFIELD 33 FEDERAL COM #806H	G	N	COG OPERATING LLC	16944	32.0009264000	-103.990433800	-
3001545168	LITTLEFIELD 33 FEDERAL COM #807H	G	N	COG OPERATING LLC	18053	32.0008030000	-103.995483000	-
3001545169	LITTLEFIELD 33 FEDERAL COM #808H	O	N	COG OPERATING LLC	18036	32.0007979000	-103.995677000	-
4238900030	RAMSEY, G. E. JR. "6" #1	O	D	CONTINENTAL OIL COMPANY	2825	31.9938138808	104.008225707	NR
4238932958	JOHNNIE WALKER STATE #601H	G	S	COG OPERATING LLC	7012	31.9938081672	104.007615325	9/3/2011
4238933213	JOHNNIE WALKER STATE #602H	G	A	CONOCOPHILLIPS COMPANY	7516	31.9904226274	104.007722043	3/24/2012
4238933216	SCHMITT STATE #603H	G	A	CONOCOPHILLIPS COMPANY	10726	31.9988149490	-104.007699397	6/14/2012
4238933459	SCHMITT STATE #15W	S	A	COG OPERATING LLC	4600	31.9918913637	-104.001816636	8/12/2013
4238933715	RAMSEY AA 1 #1H	O	C	CONOCOPHILLIPS COMPANY	7200	31.9843553178	-104.010865335	-
4238933923	ALL IN BS #102H	O	A	CONOCOPHILLIPS COMPANY	8333	31.9991372474	-104.010835248	11/18/2013
4238934671	ALL IN BS #103H	O	X	CONOCOPHILLIPS COMPANY	9900	31.9991619757	-104.015741200	-
4238934672	ALL IN BS #104H	O	X	CONOCOPHILLIPS COMPANY	9900	31.9991752611	-104.020502186	-
4238936558	SCHMITT STATE #628H	G	N	COG OPERATING LLC	10900	31.9989828118	-104.006539675	-
4238936560	SCHMITT STATE #621H	G	N	COG OPERATING LLC	11000	31.9982752720	-103.993027387	-
4238937014	HEAD HONCHO STATE #1H	G	N	CONOCOPHILLIPS COMPANY	9900	31.9726480860	104.006523652	-
4238937015	HEAD HONCHO STATE #2H	G	N	CONOCOPHILLIPS COMPANY	10000	31.9726480874	-104.006416836	-





22

Whitt 32 SWD #1: Offsetting Produced Water Analysis														
wellname	api	county	formation	ph	tds_mgl	sodium_m	calcium_m	iron_mgl	magnesium	manganese	chloride_m	bicarbonat	sulfate_mg	co2_mgl
SNAPPING 2 STATE #013H	3001542113	EDDY	BONE SPRING 3RD SAND	6.5	94965.6	31352.7	3678.6	31.7	483.6	0.83	57489.5	244	0	200
SNAPPING 2 STATE #013H	3001542113	EDDY	BONE SPRING 3RD SAND	7	94518.2	30031.5	3402.8	19.9	438.9		58782.2		355.2	200
SNAPPING 2 STATE #013H	3001542113	EDDY	BONE SPRING 3RD SAND	7.2	94863.9	30224.8	3424	14.8	444		59015.2		365	200
SNAPPING 2 STATE #014H	3001542688	EDDY	WOLFCAMP	7.3	81366.4	26319.4	2687.4	26.1	326.7		50281.2		399.7	100
SNAPPING 2 STATE #013H	3001542113	EDDY	BONE SPRING 3RD SAND	6.8	91289.1	28721.3	3440.7	16.3	437.4		56957.4		327.9	150
FED J #001	3001522471	EDDY	DELAWARE	5.7	255599						160000	24	330	
USA #001	3001504776	EDDY	DELAWARE		176882						108700	139	1332	
SNAPPING 10 FEDERAL #005H	3001540994	EDDY	BONE SPRING 2ND SAND	6.6	138161.9	44458.5	6280.8	29.7	781.3	0	84470	122	0	20
SNAPPING 10 FEDERAL #005H	3001540994	EDDY	BONE SPRING 2ND SAND	6.6	138376	44458.5	6280.8	29.7	781.3	0	84470	122	618	20
SNAPPING 10 FEDERAL #001H	3001537899	EDDY	AVALON UPPER	6.5	199638.8	68948.2	7560.4	111.2	1522.8	2.19	118195	732	0	500
SNAPPING 11 FEDERAL #001H	3001538193	EDDY	AVALON UPPER	6.1	225189.8	77010.7	8743.8	636.1	1649.2	6.75	134075	366	0	300
SNAPPING 2 STATE #003H	3001539036	EDDY	AVALON UPPER	6.1	223019	76001.7	10437.8	209.9	1922.4	4.5	131072	366	632	1100
SNAPPING 2 STATE #006H	3001539162	EDDY	AVALON UPPER	6.5	179788.5	71575.7	617.4	21.8	109.6	0	101374	3660	0	500
SNAPPING 2 STATE #006H	3001539162	EDDY	AVALON UPPER	6.5	179938	71575.7	617.4	21.8	109.6	0	101374	3660	844	500
SNAPPING 10 FEDERAL #003H	3001539866	EDDY	BONE SPRING 2ND SAND	6.5	152439.2	48495.7	6731.3	29.1	801.4	1.06	94055	244	0	100
USA #001	3001504776	EDDY	DELAWARE		156733						98120	137	616	
USA #001	3001504776	EDDY	DELAWARE		159967						97900	137	1100	
E D WHITE FEDERAL NCT 1 #003	3001505886	EDDY	DELAWARE		212112						132100	195	425	
FED J #001	3001522471	EDDY	DELAWARE	7.4	265727						158000	37	3600	
FED J #001	3001522471	EDDY	DELAWARE	7.6	255336						156000	76	790	
FED J #001	3001522471	EDDY	DELAWARE	8.5	263830						157000	78	3700	
SNAPPING 10 FEDERAL #001H	3001537899	EDDY	AVALON UPPER	7.1	209352.4	70089.5	7327	203	1557	2.5	127230	146.4	600	600
SNAPPING 11 FEDERAL #001H	3001538193	EDDY	AVALON UPPER	7	196576.7	68797.3	5059	12	1066	0.9	118943	122	872	380
SNAPPING 11 FEDERAL #001H	3001538193	EDDY	AVALON UPPER	7	203078.9	72261.4	4407	112	904	1.5	122172	1098	658	80
SNAPPING 2 STATE #001Y	3001539104	EDDY	AVALON UPPER	7	162560.1	57137	3886	42	776	0.6	97161	1403	756	70

Exhibits of Scott Wilson
On Behalf of NGL Water Solutions Permian, LLC

**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. 20475
(WHITT 32)**

AFFIDAVIT OF SCOTT J. WILSON

STATE OF NEW MEXICO)
) ss.
COUNTY OF BERNALILLO)

I, Scott J. Wilson, make the following affidavit based upon my own personal knowledge.

1. I am over eighteen (18) years of age and am otherwise competent to make the statements contained herein.

2. I am the Senior Vice President for Ryder Scott Company in Denver, Colorado. My responsibilities at Ryder Scott Company include the performance of reserve appraisals, technical evaluations, and reservoir analysis.

3. I have obtained a bachelor's degree in petroleum engineering from the Colorado School of Mines, and a master's degree business from the University of Colorado. I have worked as a petroleum engineer since 1983.

4. I am familiar with the amended application that NGL Water Solutions Permian, LLC ("NGL") has filed in this matter, and I have conducted a nodal analysis and reservoir study related to the area which is the subject matter of the application. A copy of my study is attached hereto as Exhibit A.



5. The applicant, NGL (OGRID No. 372338), seeks an order approving the Whitt 32 SWD #1 well, which is a salt water disposal well.

6. The approved injection zone for the well is located below the base of the Woodford Shale formation and above the Ordovician formation, which consists of significant shale deposits.

7. I have reviewed step rate tests for similar disposal wells drilled within the area and conducted a nodal analysis. It is my opinion that a large percentage of surface pressure it was encountering using smaller diameter tubing was a result of friction pressure. In Case No. 15720 evidence had been presented to the Division showing that up to 85% of this surface pressure was due to friction. Increasing the tubing size would reduce friction and would conserve pump horsepower, fuel, and reduce emissions.

8. My nodal analysis indicates that increasing the tubing size to 7" by 5 ½" would not significantly increase reservoir pressures over a twenty-year time period. The injection zone is located within a reservoir with significant thickness which consists of high permeability rocks, which results in only very small pressure increases even when injection is increased to a rate of 40,000 barrels per day over a 20 year period.

9. It is my opinion that increasing the tubing size will not cause fractures in the formation. Wellhead pressures are set at a maximum that is below the formation fracture pressure and, as a result, it is impossible to get above the formation fracture pressure while honoring wellhead pressure constraints. Consequently, it is highly unlikely that increasing the tubing size in the well would result in fractures to the formation.

10. I have also studied the potential impact on pore pressures and put together a simulation of the radial influence that the well would have if larger tubing is used for a period of time. A copy of this study is included within Exhibit A to this affidavit. This study shows that it

is anticipated that there will be a minimal impact on reservoir pressures and that the majority of fluids will not travel greater than 1 mile in 20 years.

11. My studies further indicate that additional injection wells located one mile away from the well will not create any materially adverse pressures in the formation.

12. I attest that the information provided herein is correct and complete to the best of my knowledge and belief.

[Signature page follows]

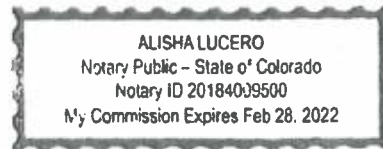
Scott J. Wilson
Scott J. Wilson

Very Sw.

SUBSCRIBED AND SWORN to before me this 19th day of June, 2019 by Scott J. Wilson.

Alisha Lucero
Notary Public

My commission expires: Feb 22, 2022



**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. 20475
(WHITT 32)**

SUPPLEMENTAL AFFIDAVIT OF SCOTT J. WILSON

STATE OF NEW MEXICO)
) ss.
COUNTY OF BERNALILLO)

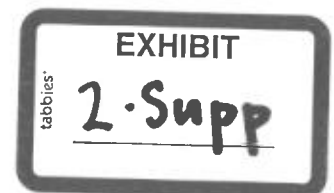
I, Scott J. Wilson, make the following affidavit based upon my own personal knowledge.

1. I am over eighteen (18) years of age and am otherwise competent to make the statements contained herein.

2. I am the Senior Vice President for Ryder Scott Company in Denver, Colorado. My responsibilities at Ryder Scott Company include the performance of reserve appraisals, technical evaluations, and reservoir analysis.

3. I am familiar with the application that NGL Water Solutions Permian, LLC ("NGL") has filed in this matter, and I conducted a nodal analysis and reservoir study related to the area which is the subject matter of the application. A copy of my study is attached to my affidavit that was submitted at the hearing on this matter on July 25, 2019.

4. At the July 25, 2019 hearing, a question was asked regarding the injection rate I used for my study.



5. I used a constant injection rate of 25,000 barrels of water per day for wells that were modelled prior to 2019, and 40,000 barrels of water per day for all of the remaining wells in the study area.

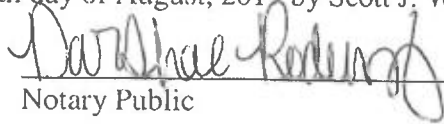
6. Slide A-18 of my study identifies the injection rate as 40,000 barrels per day for Concho's Littlefield 33 Federal SWD #1, NGL's Whitt 31 SWD #1, and NGL's Whitt 32 SWD #1, held constant over time until maximum injection pressure is reached.

7. I attest that the information provided herein is correct and complete to the best of my knowledge and belief.

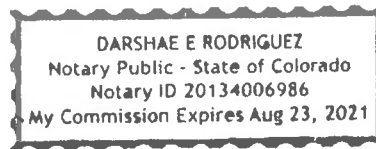
[Signature page follows]


Scott J. Wilson

SUBSCRIBED AND SWORN to before me this 6th day of August, 2019 by Scott J. Wilson.


Notary Public

My commission expires: 8/23/21





NGL Water Solutions, LLC

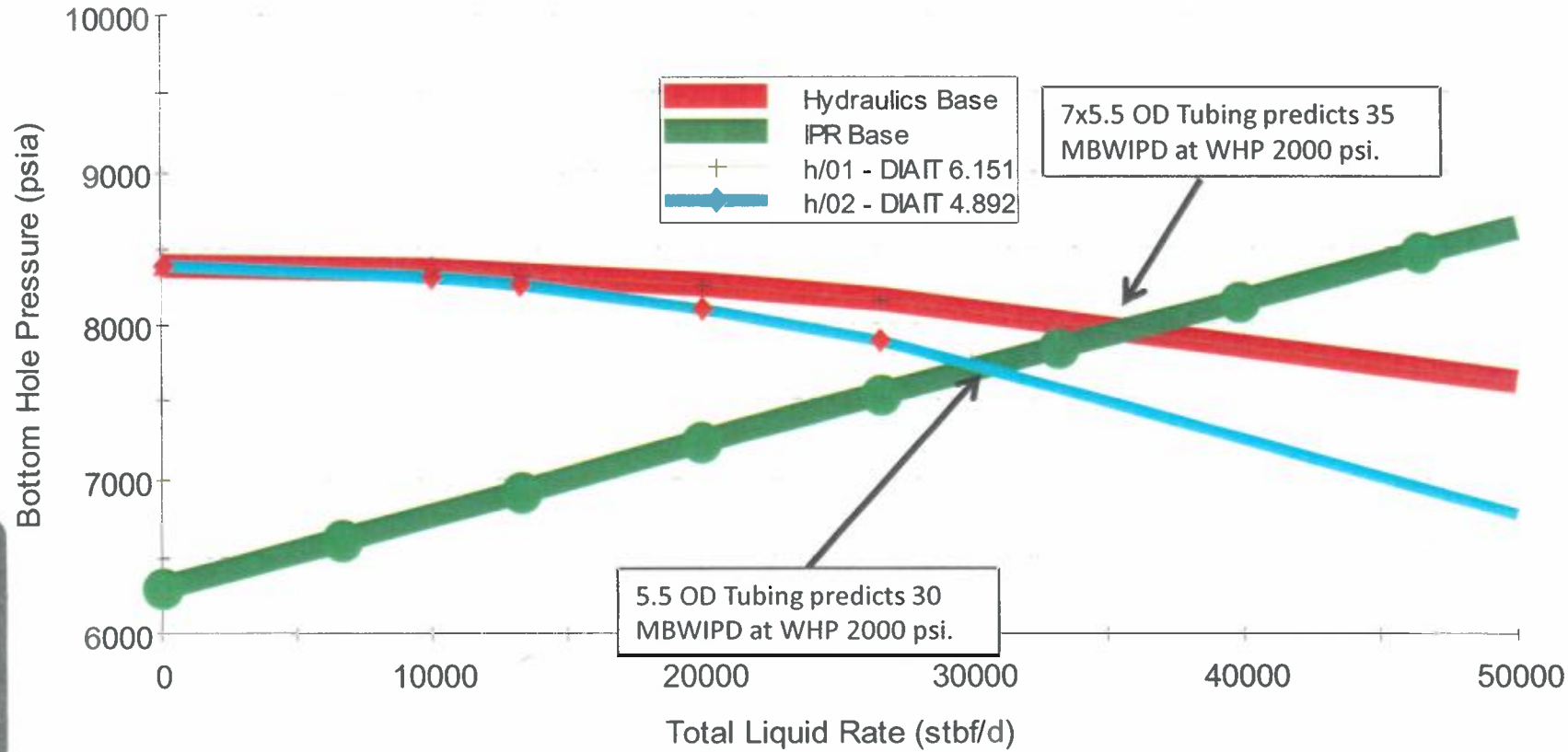
Exh. A1

Typical Wellbore Hydraulics Models predict a 30% increase in maximum injection rate between 5.5 tubing and 7x5.5 tubing.

Whitt 32 SWD1
Reservoir Data
Pressure = 6300.00 psia
kh = 13560.0
Skin = 0.00

Whitt32 SWD1.snp

Rate vs. Pressure 19-Jul-19 14:30:44
WB Depth (MD ft) = 14000
WHPres (psia) = 2000.00
Tubing I.D. = 6.151 (s1)



tabbies

EXHIBIT
2-A

7/23/2019

28



NGL Water Solutions, LLC

Exh. A2

Increased injection rate per well equates to fewer injectors.

Whitt 32 SWD1

Reservoir Data

Pressure = 6300.00 psia

kh = 13560.0

Skin = 0.00

Whitt32 SWD1.snp

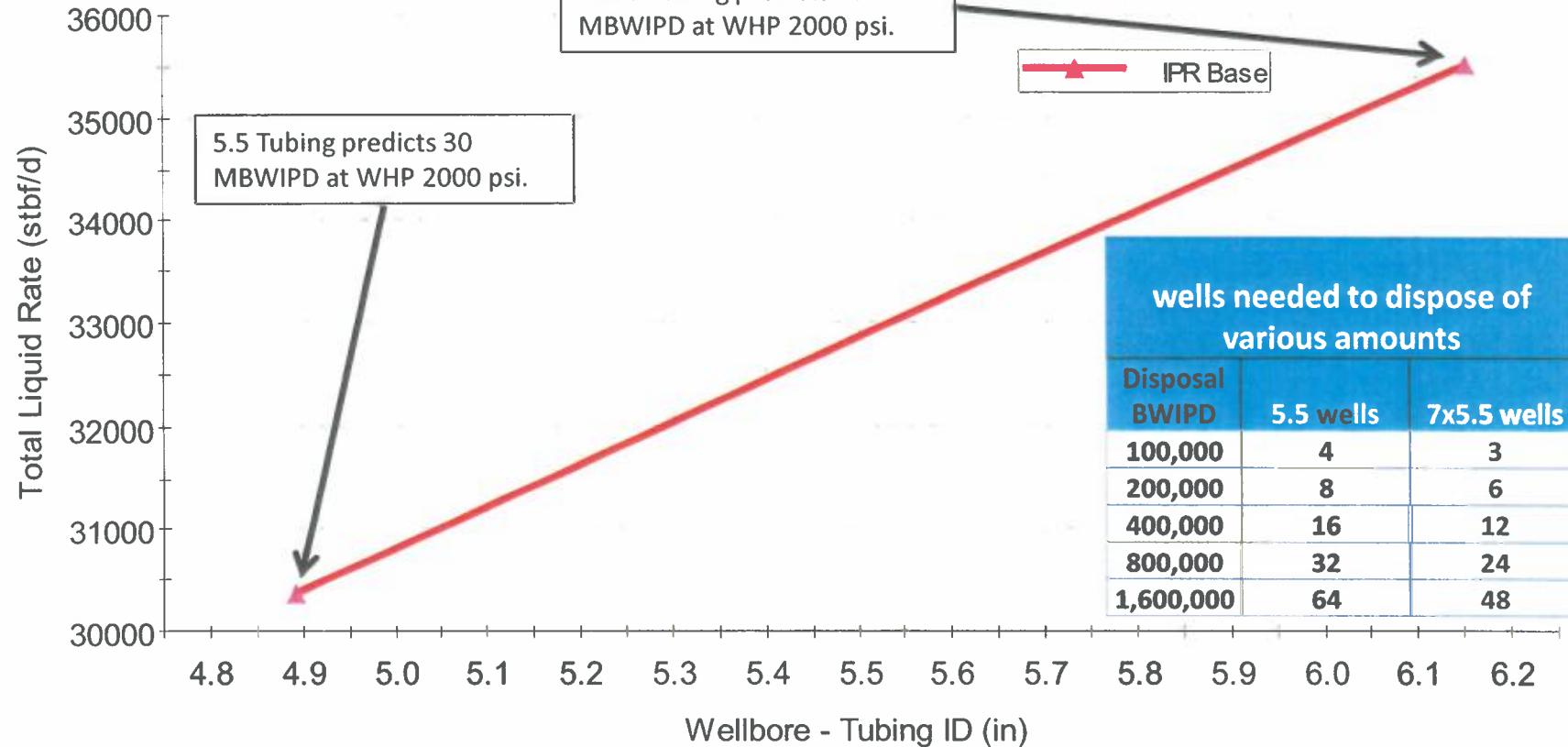
Rate vs. Wellbore - Tubing ID (in)

19-Jul-19 14:32:56

WB Depth (MD ft)= 14000

WHPres (psia) = 2000.00

Tubing I.D. = 6.151 (s1)



7/23/2019

24

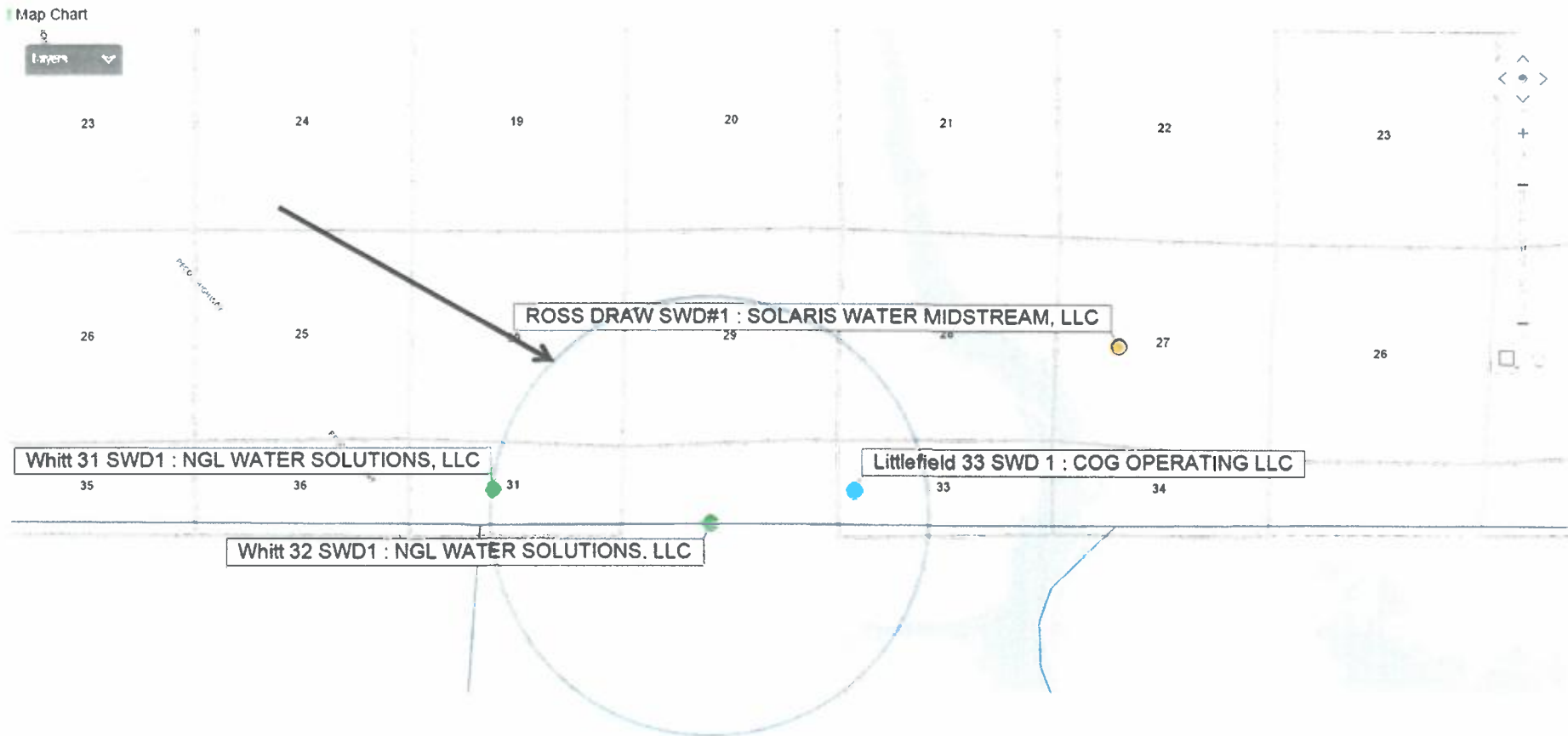


NGL Water Solutions, LLC

Exh. A3

Wells injecting water into the Devonian formation in the area.
Area is roughly 20 miles (E-W) by 15 miles (N-S)

Whitt 32 SWD1
With 1 Mile Radii



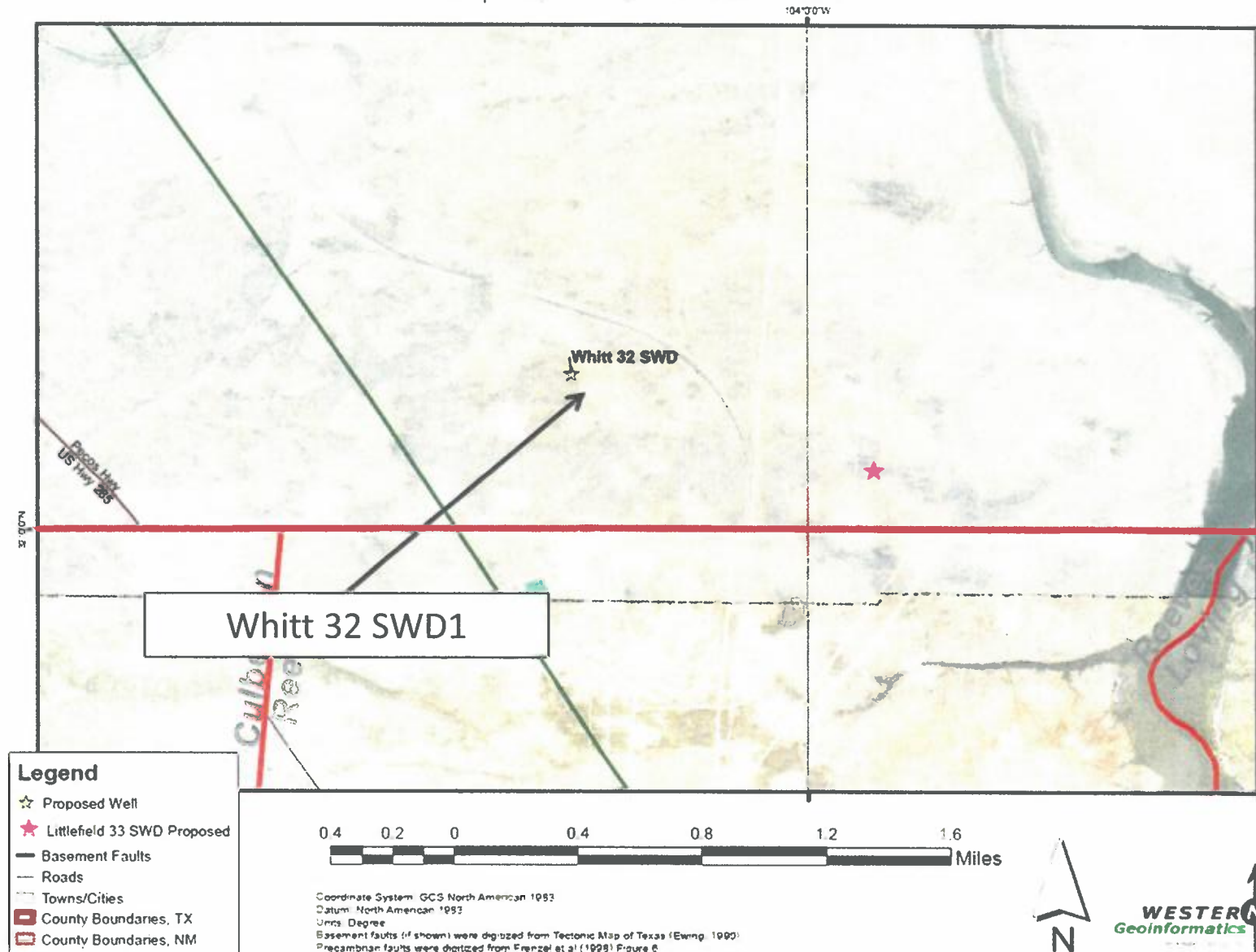


NGL Water Solutions, LLC

Sil/Dev Thickness at Whitt 32 is 1100 feet

Exh. A4

Isopach, Faults, and Well Locations

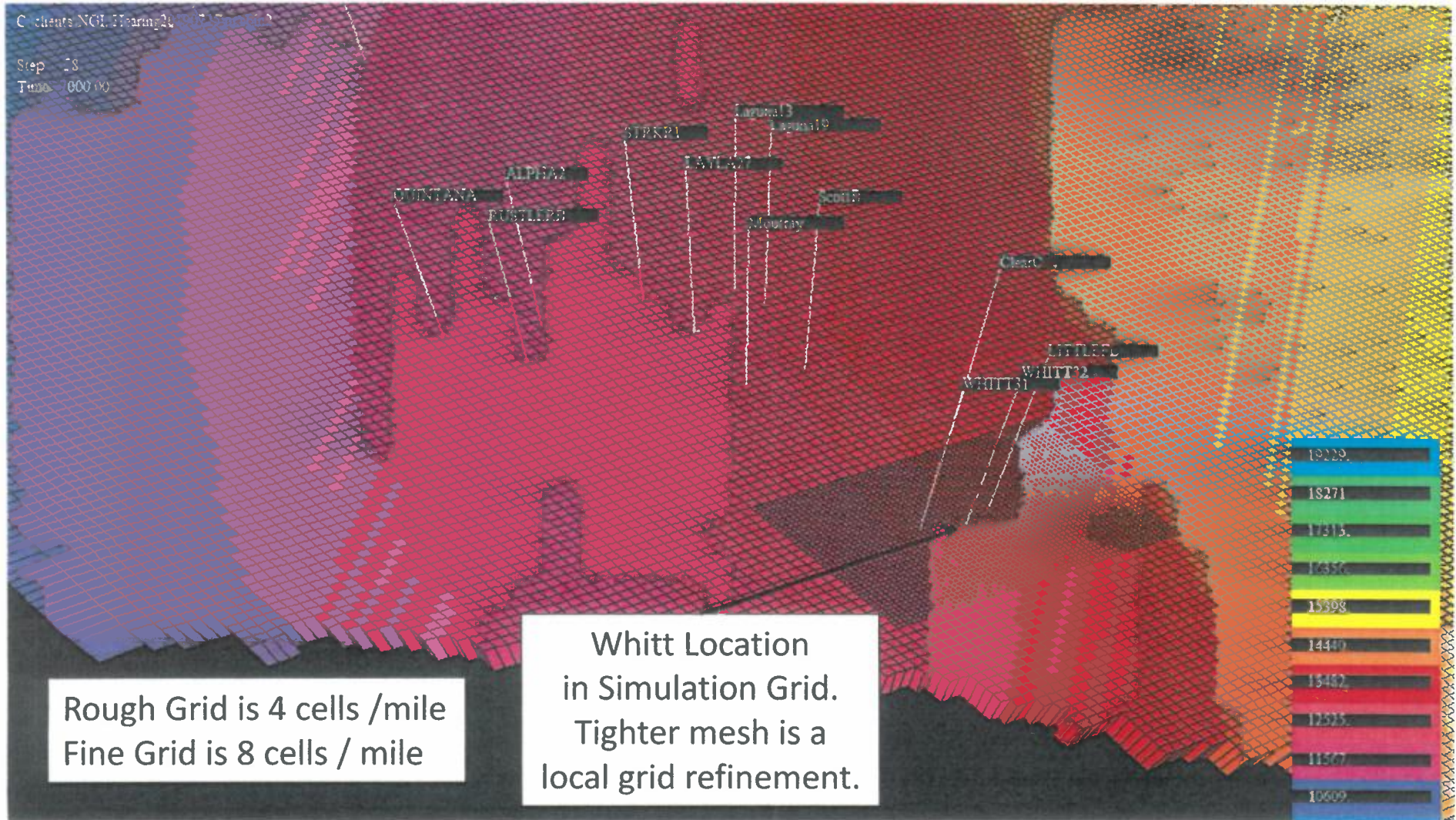




NGL Water Solutions, LLC

Simulation Grid matches Structure and Thickness

Reservoir Simulation grid incorporates the NGL proposed wells and the close offsets. Observation wells are placed in grid corners to monitor the large scale pressure distribution.

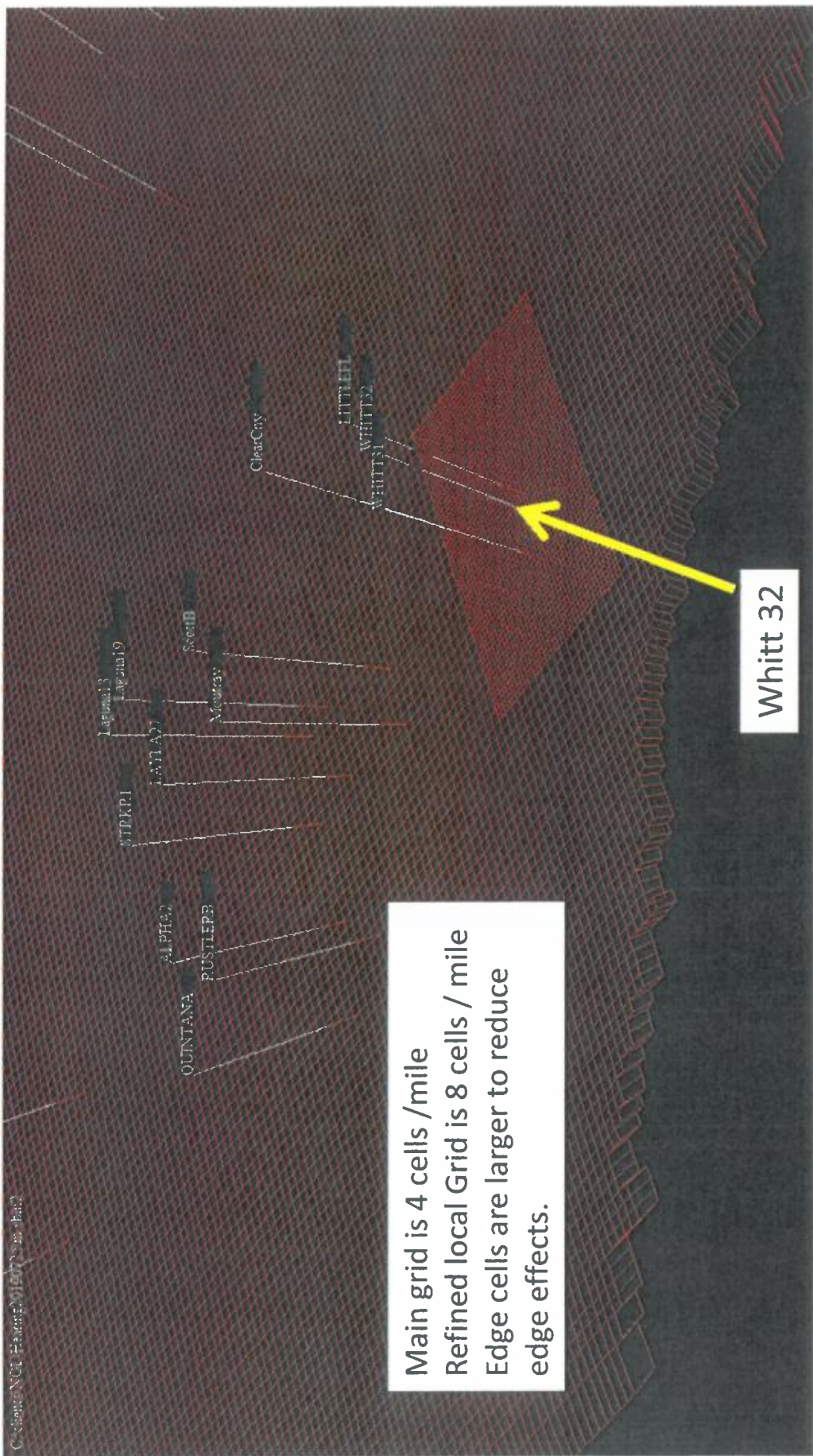




NGL Water Solutions, LLC

3D view of grid shows Structural Relief.

Thickness is accurate but not easy to see at this aspect ratio.

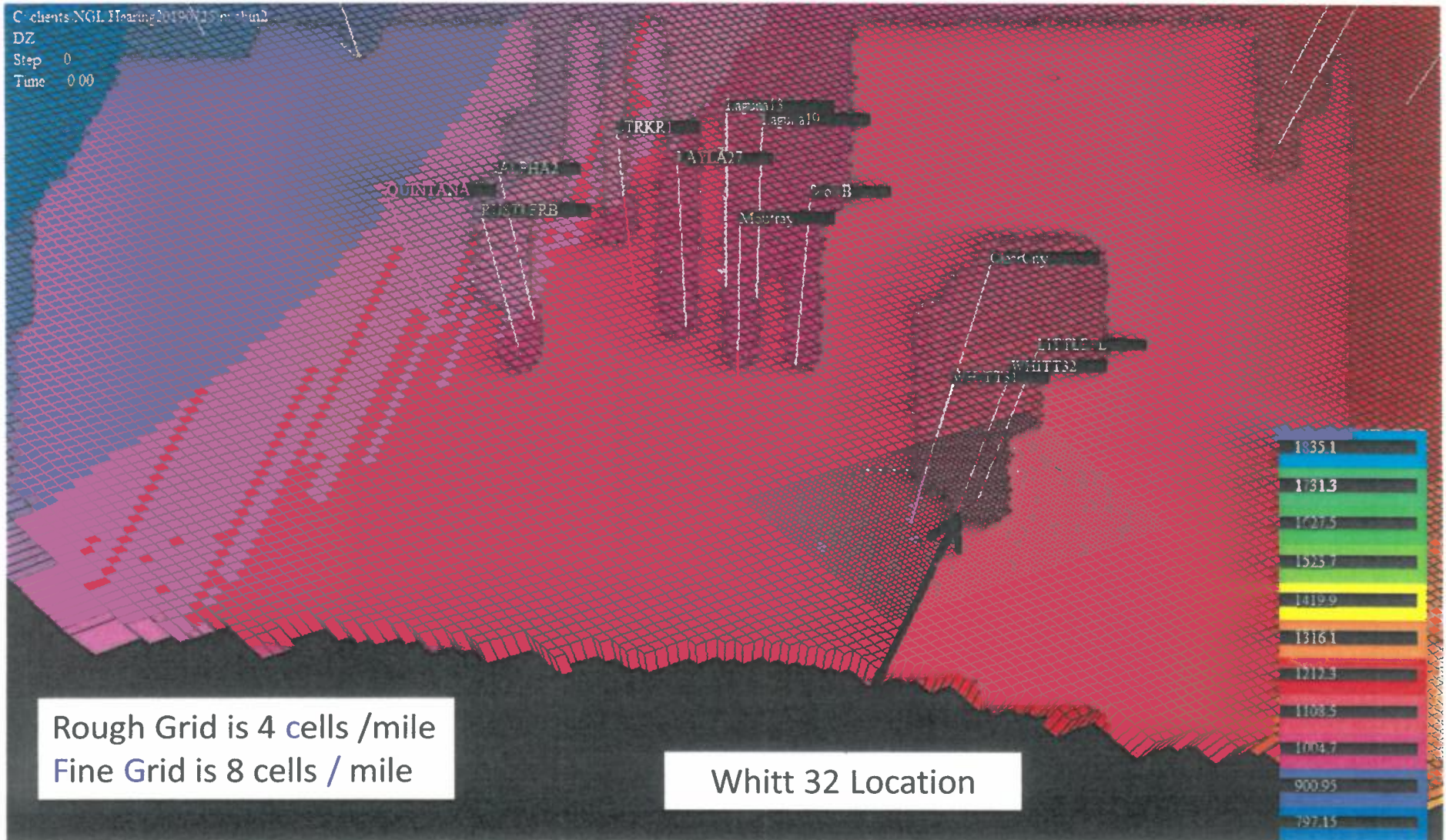




NGL Water Solutions, LLC

Exh. A7

Light Blue color to the North East is the thickest Sil/Dev.



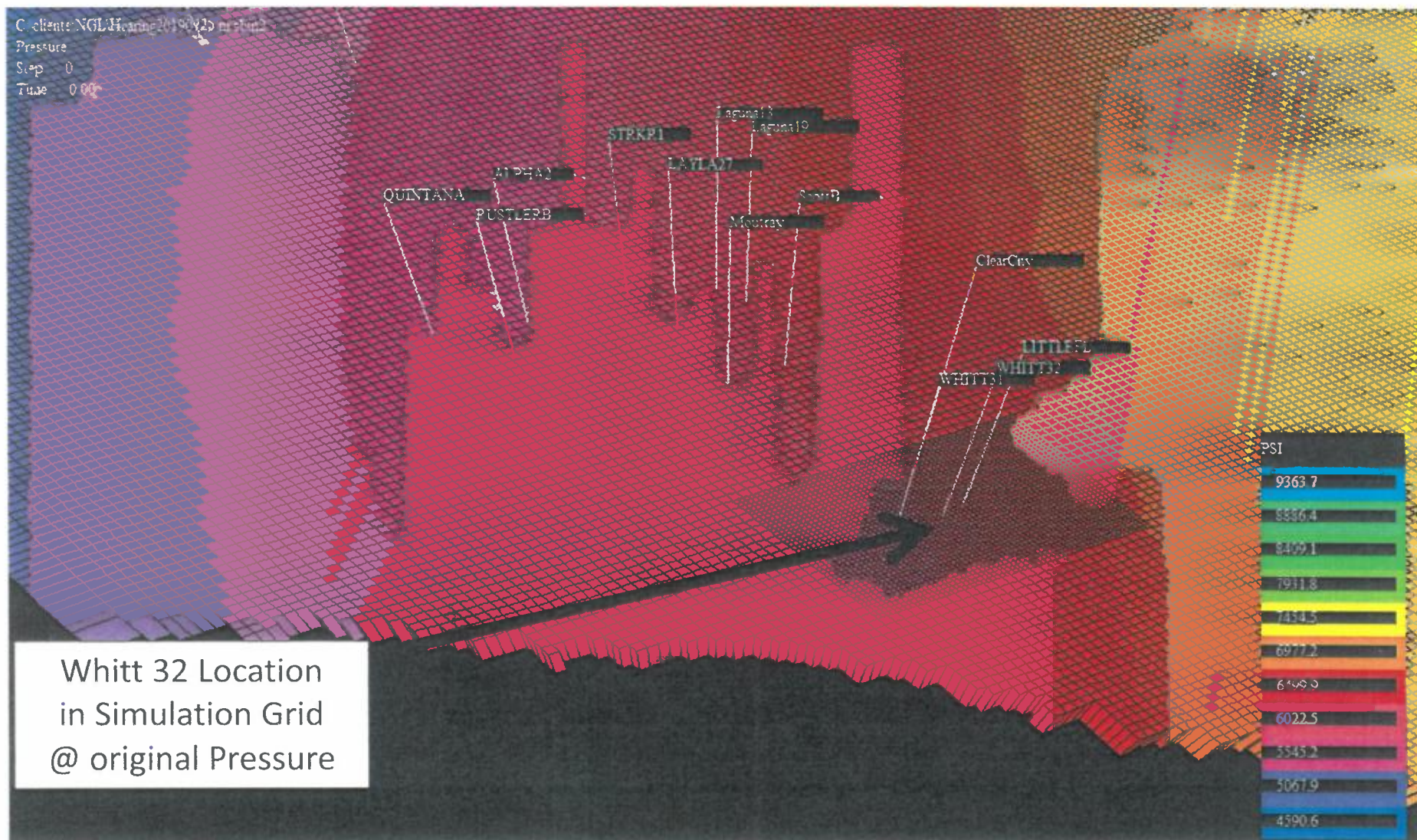
44



NGL Water Solutions, LLC

Exh. A8

Initial pressure is equilibrated by the model based on grid cell depth, fluids(water) and capillary pressure.

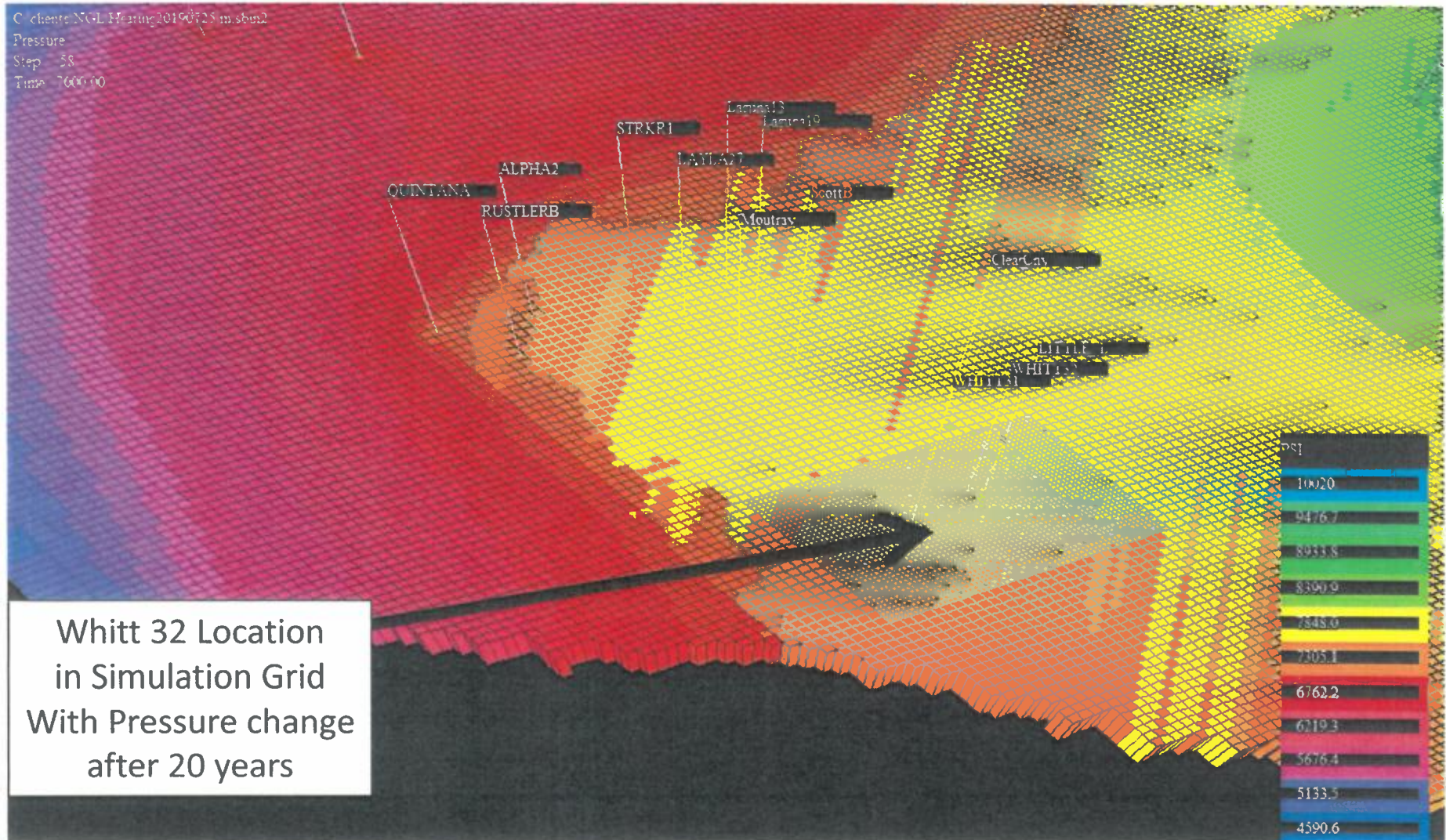




NGL Water Solutions, LLC

Exh. A9

Pressure at 20 years is affected by original pressure, injected volumes, and the ability of the reservoir to dissipate pressure.

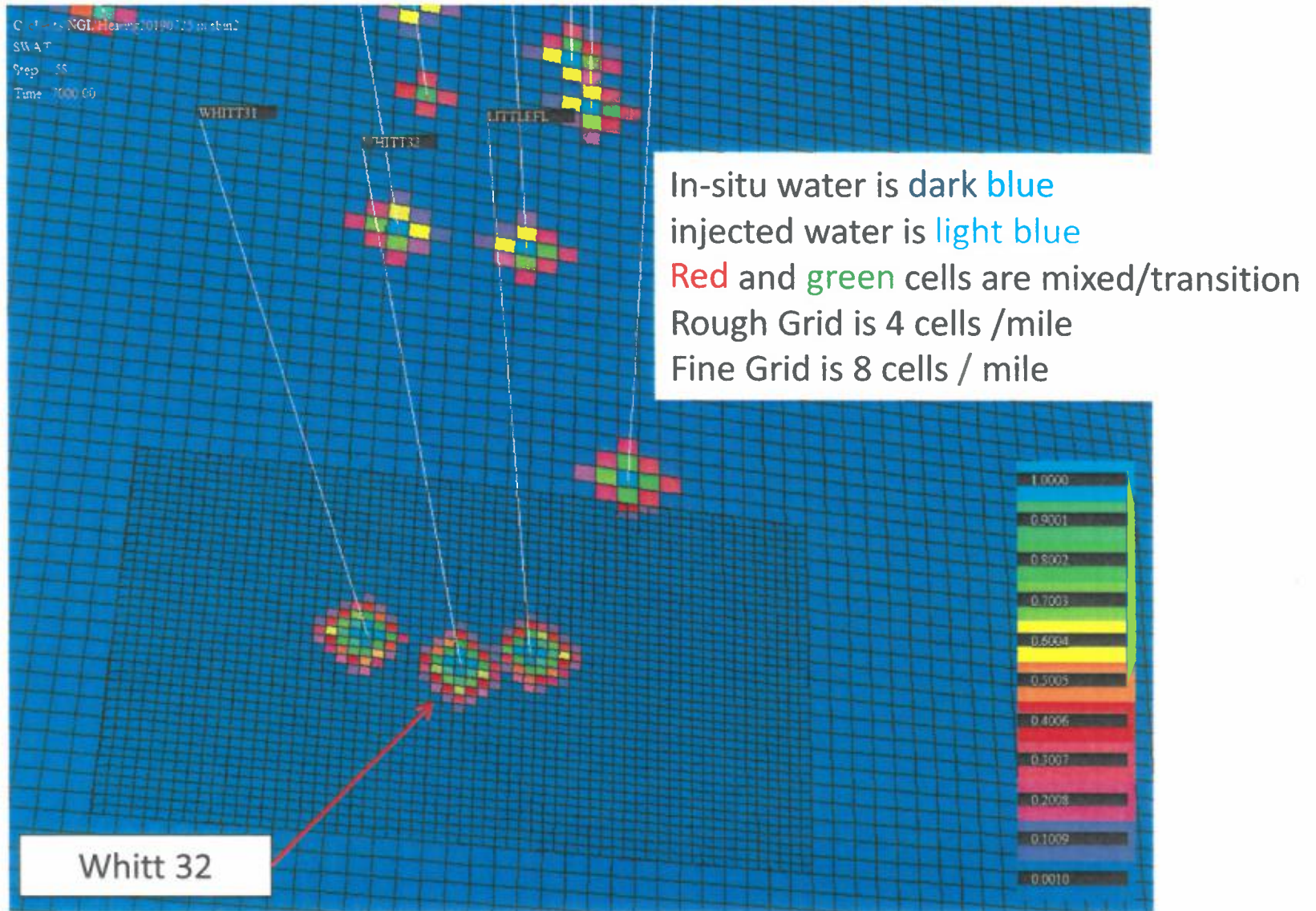




Exh. A10

NGL Water Solutions, LLC

Large scale saturation profiles after 20 years of injection.



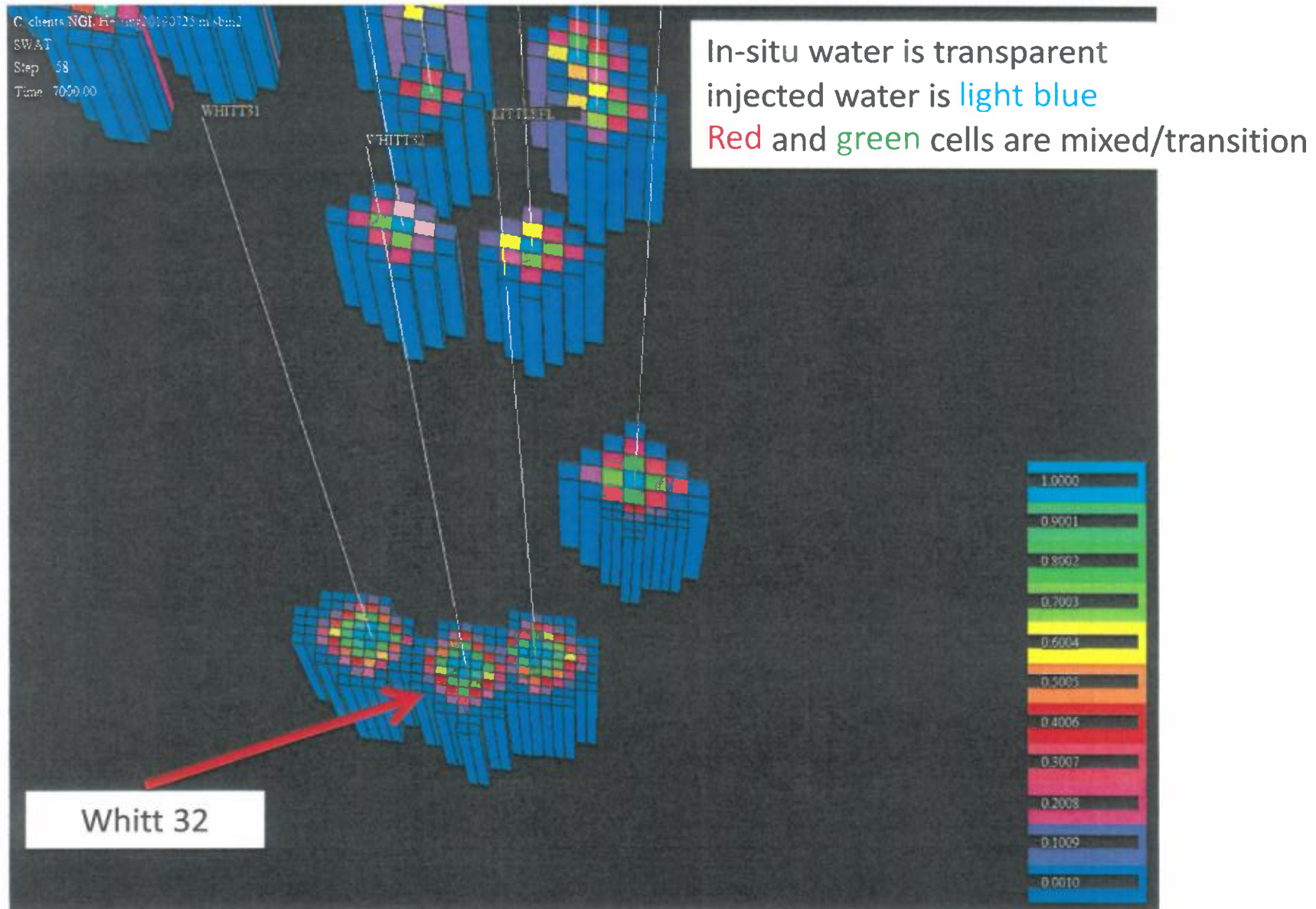
Whitt 32



NGL Water Solutions, LLC

Exh. A11

Detailed saturation profiles after 20 years of injection.

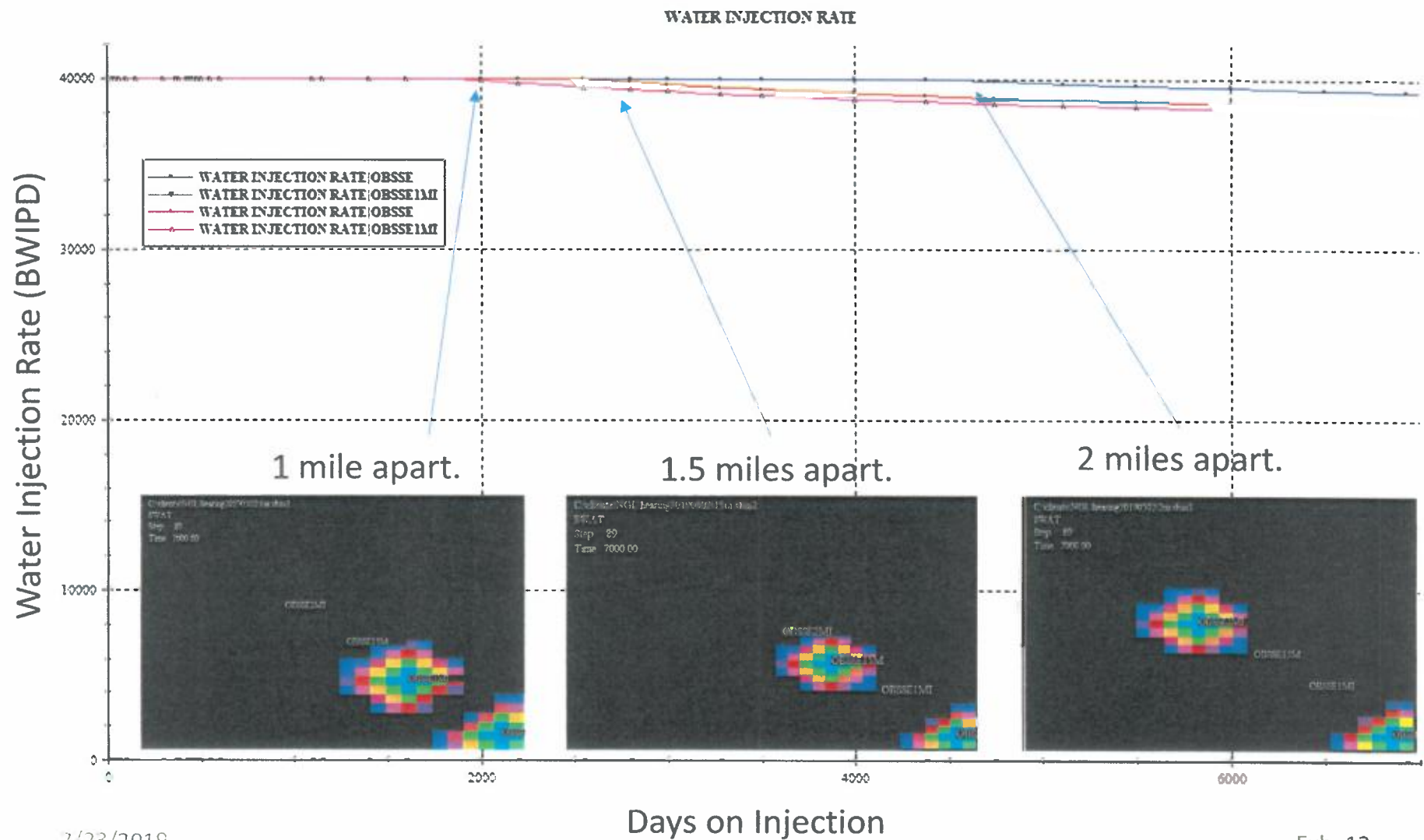




NGL Water Solutions, LLC

Exh. A12

Typical wells showing interference when spaced 1, 1.5, and 2 miles apart.
Closer spacing causes rates to fall, but not significantly.



7/23/2019

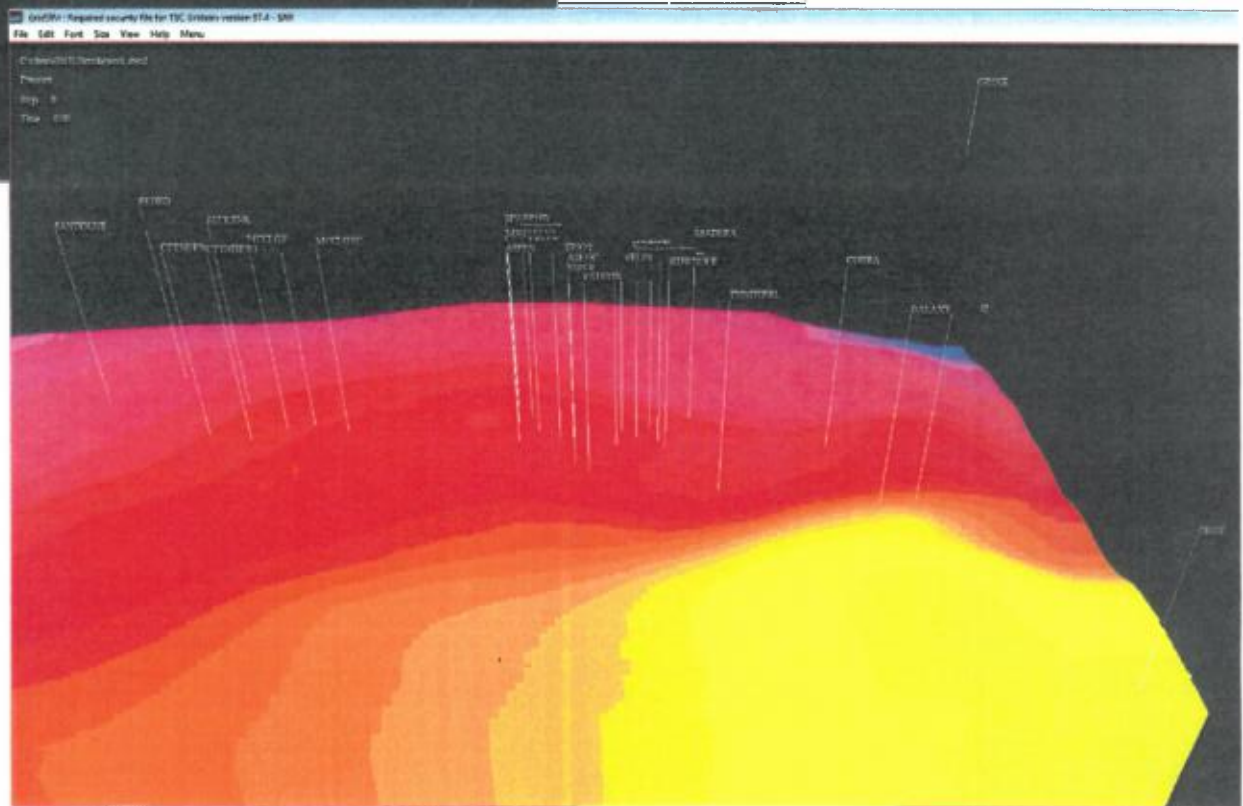
Exh. 12



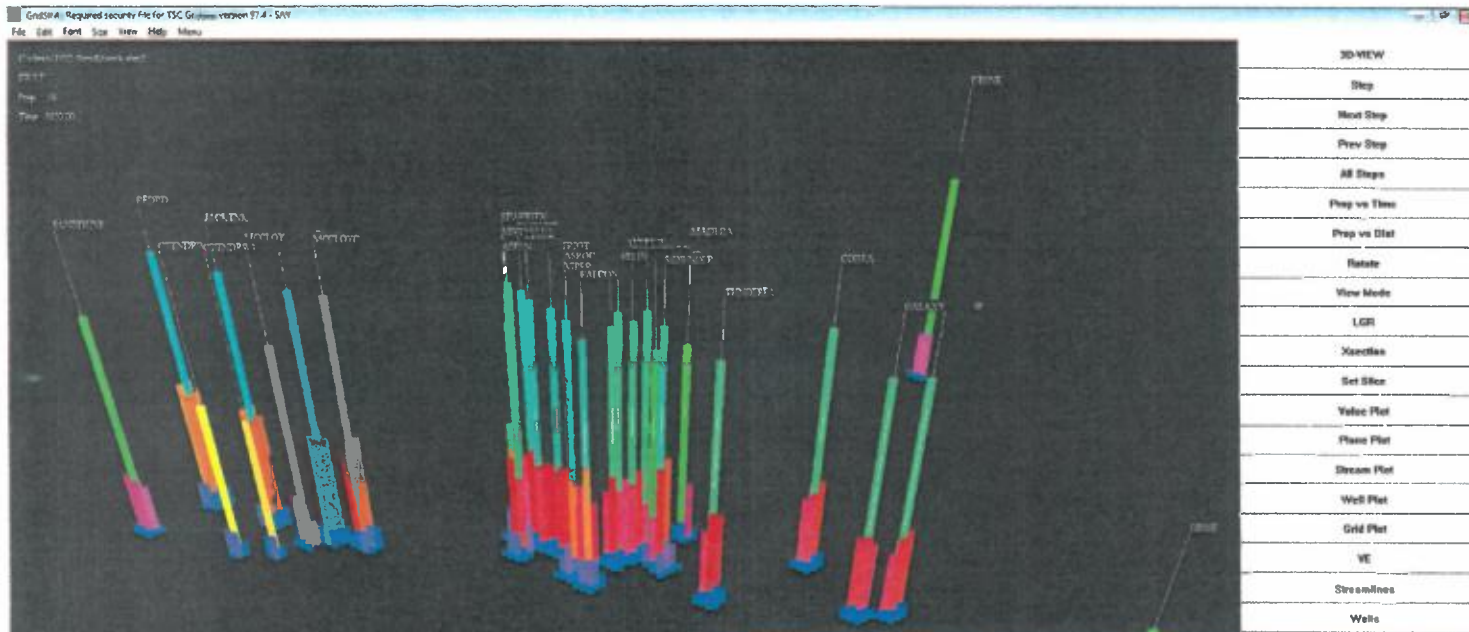
Exh. A13

**2019
(0 years)**

Typical Water movement & Pressure



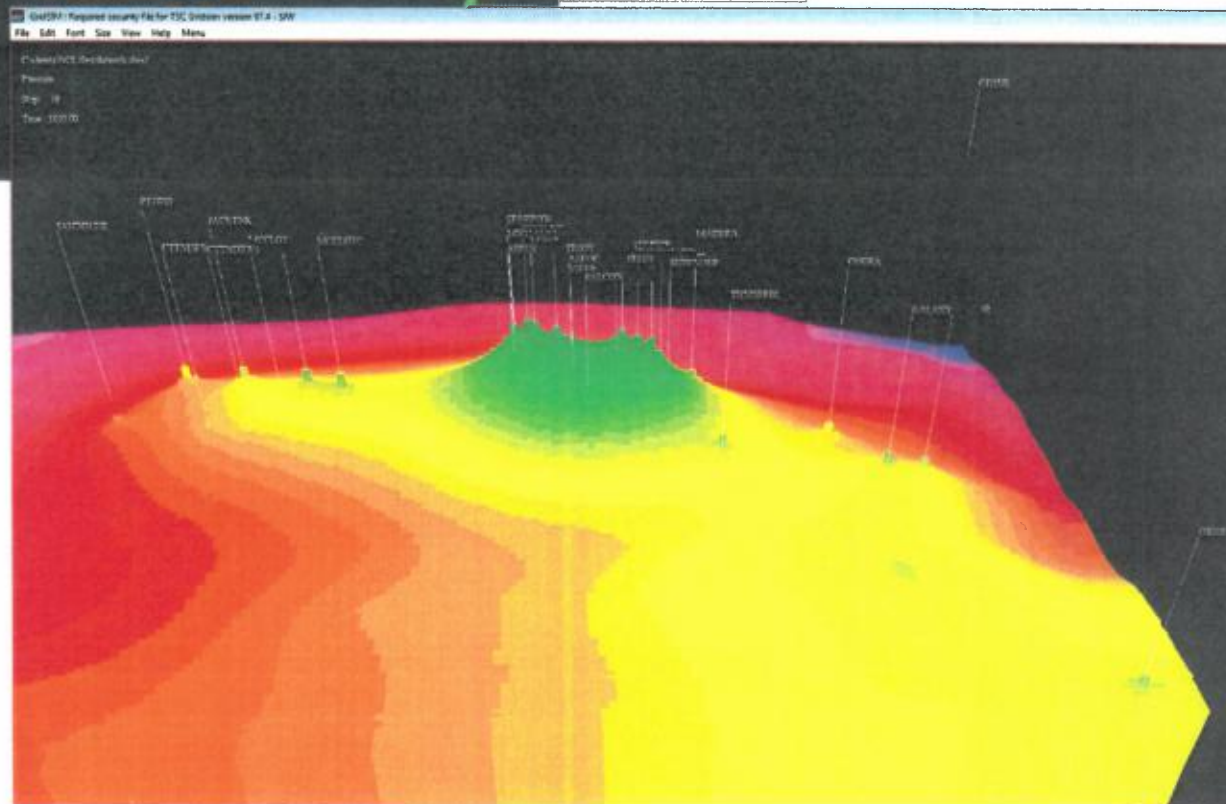
7/23/2019



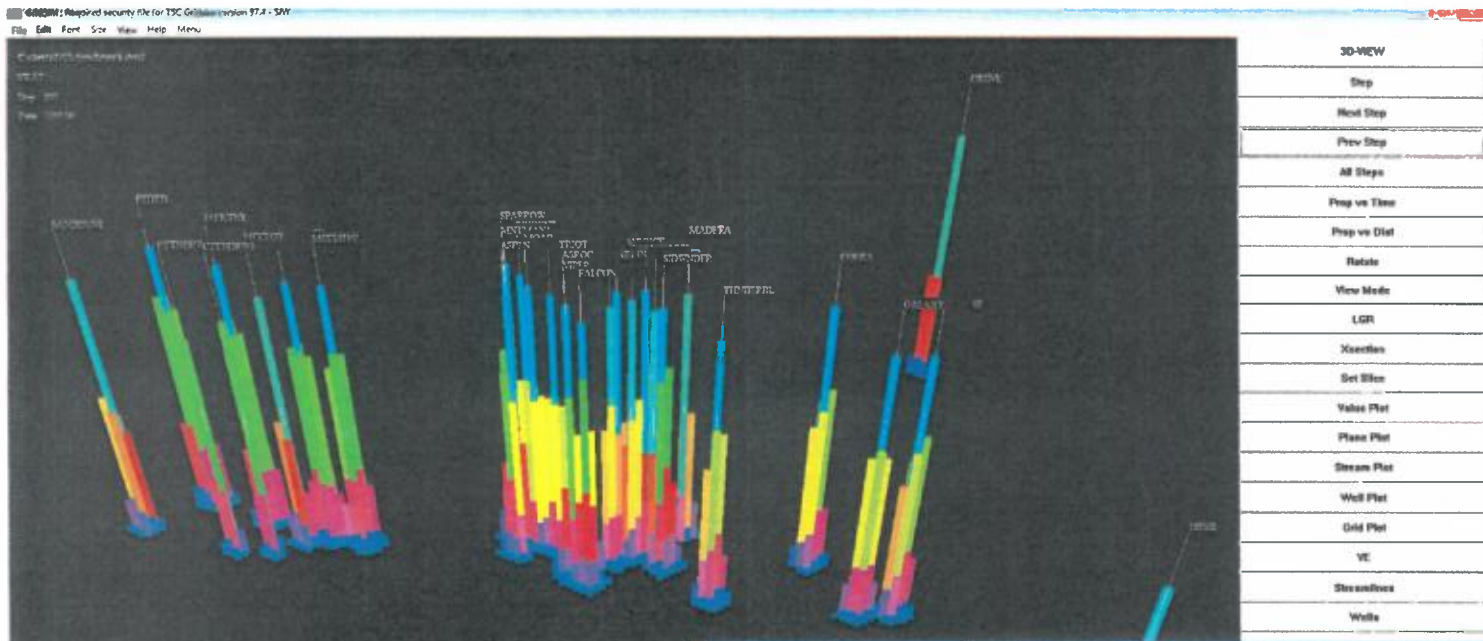
Exh. A14

**2029
(10 years)**

Typical Water movement & Pressure



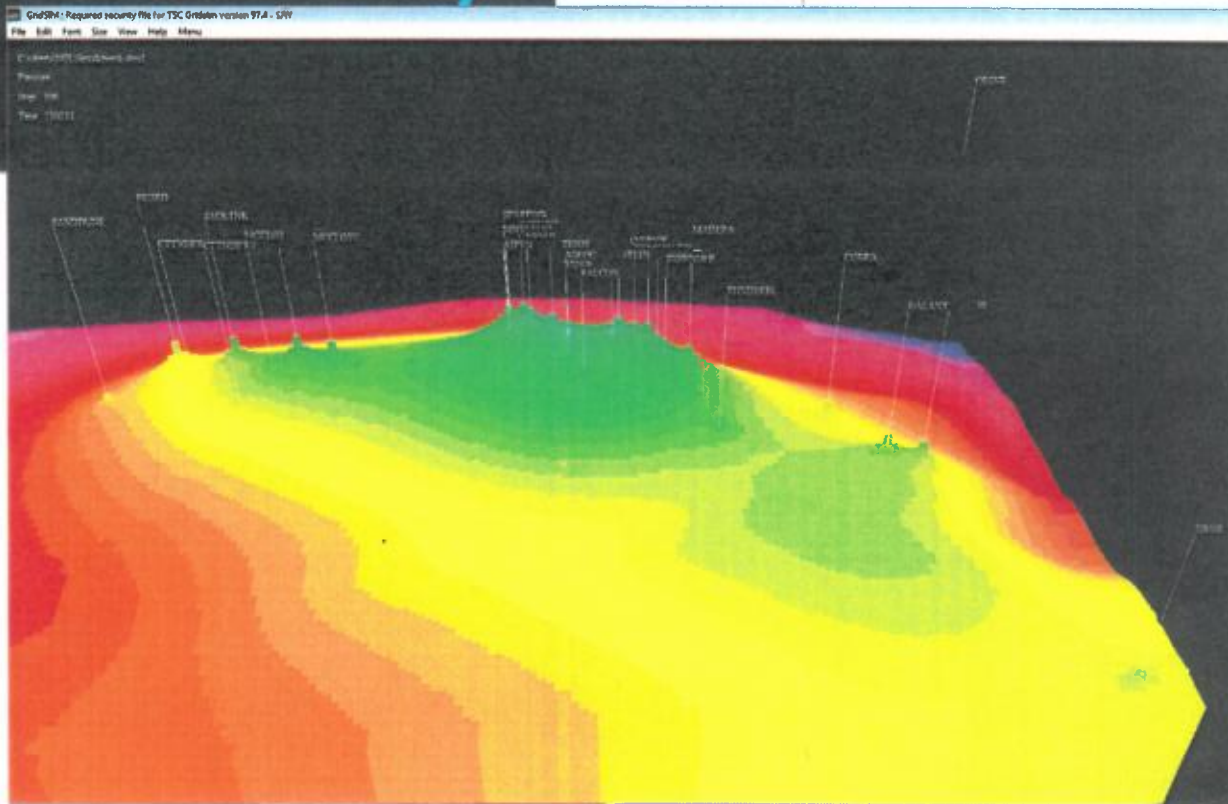
7/23/2019



Exh. A15

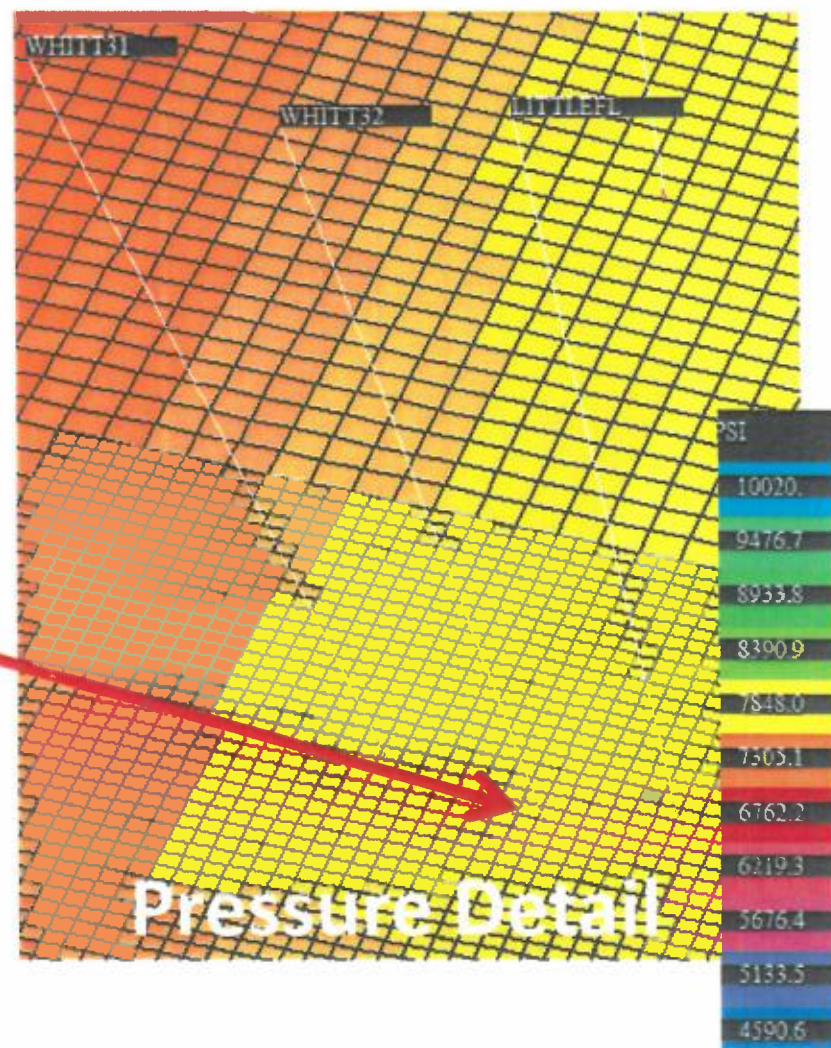
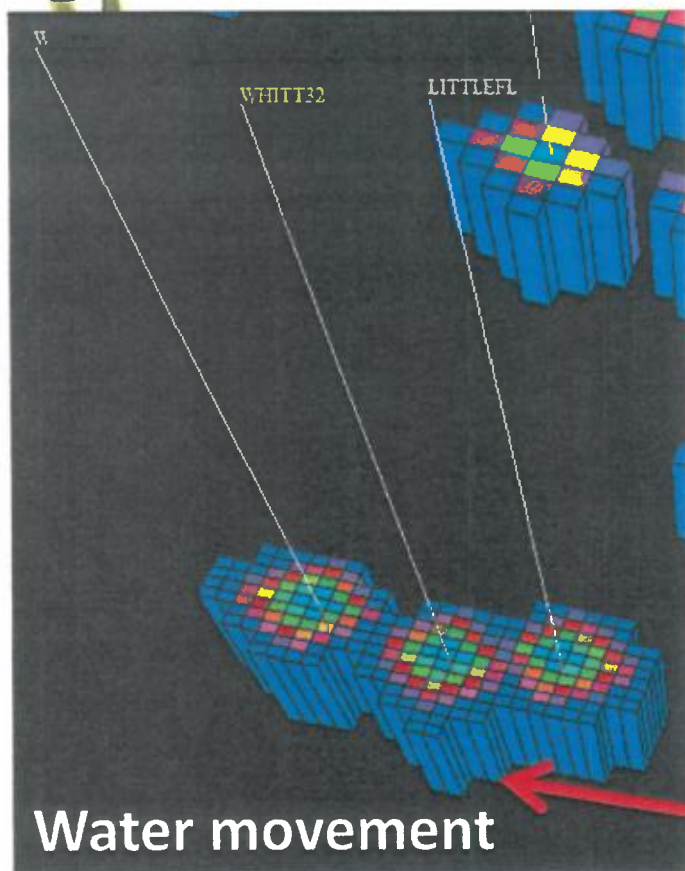
**2039
(20 years)**

Typical Water movement & Pressure



7/23/2019

Detail water saturation and pressure distributions at 2039 (20 years)



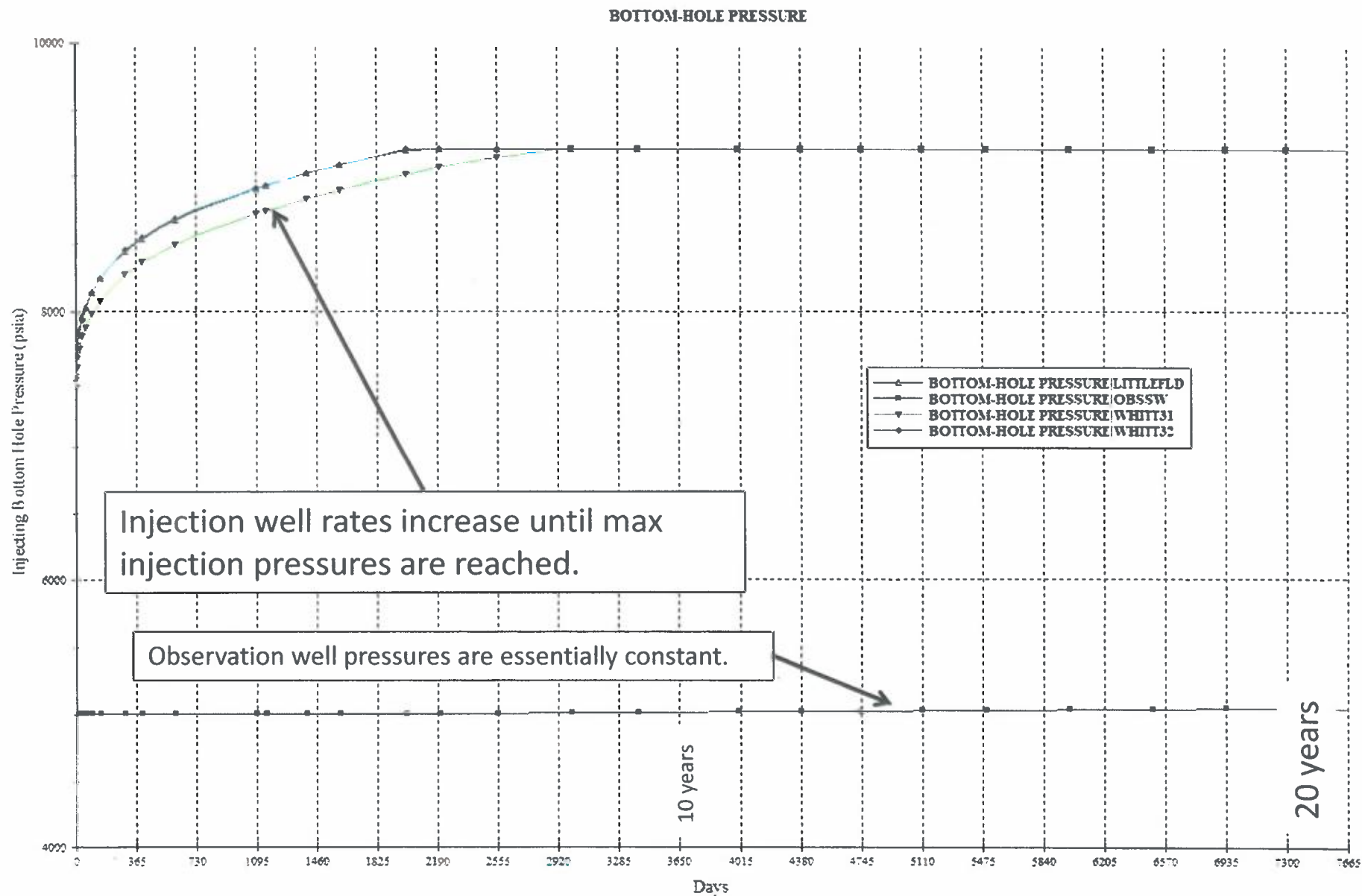
Whitt 32



NGL Water Solutions, LLC

Exh. A17

Simulation BHIP predictions for wells near Whitt 32



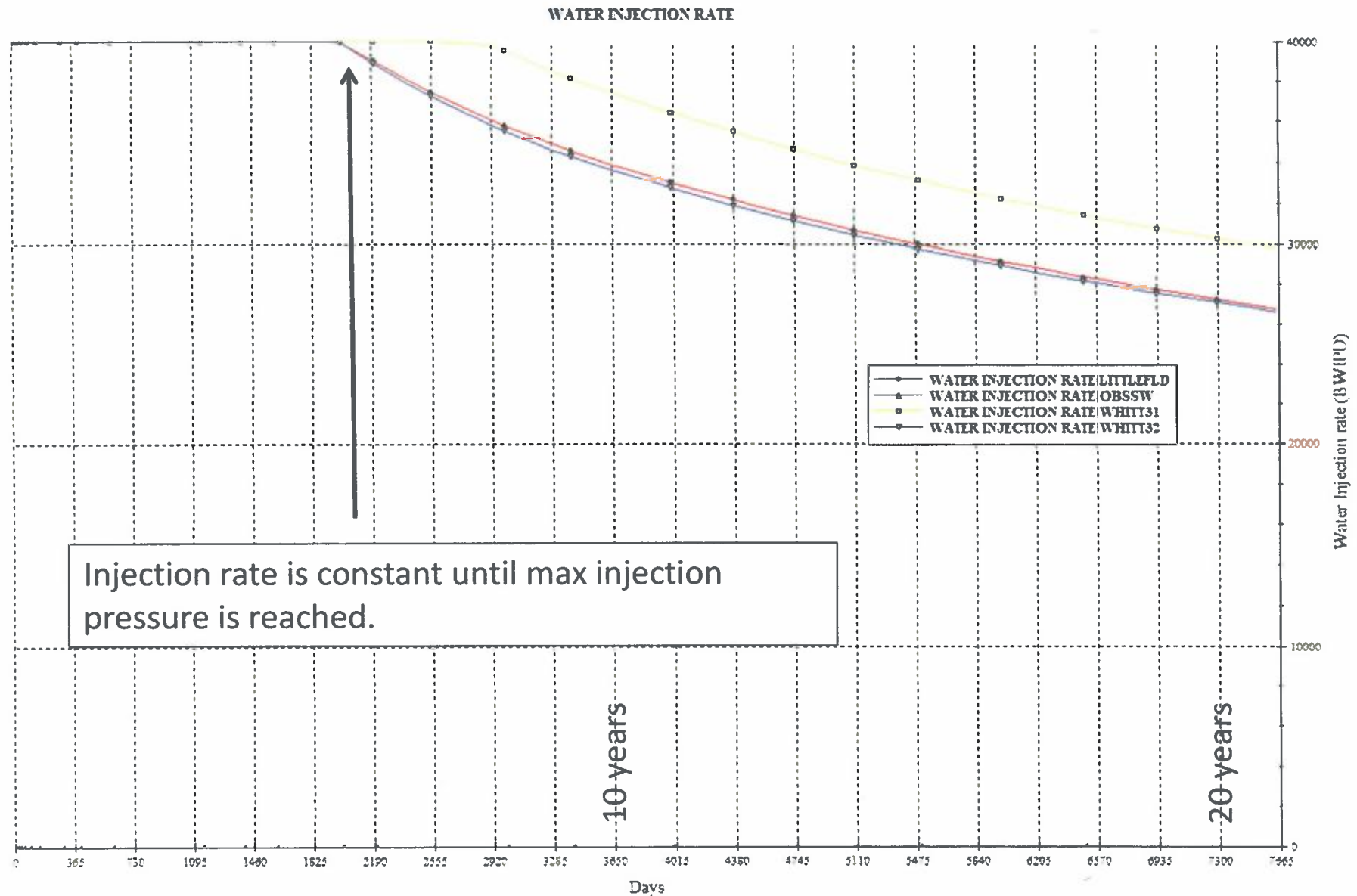
ht



NGL Water Solutions, LLC

Exh. A18

Simulation predictions for individual wells over 20 Years



Exhibits of Dr. Kate Zeigler
On Behalf of NGL Water Solutions Permian, LLC

Delaware Basin Stratigraphic Unit Descriptions

Lower Paleozoic

Woodford Shale (Upper Devonian)

The Woodford Shale is dominated by organic-rich mudstone interbedded with carbonate (limestone and/or dolostone) beds, chert beds and radiolarian laminae. This unit has been interpreted to include sedimentary gravity-flow deposits. Dominantly shale means lower porosity and permeability than the limestone/dolostone units above and below. The Woodford Shale is unconformable on the units below it. Locally this contact includes solution cavities and fissures down into the underlying carbonate unit(s), creating a complex boundary. It is up to 150' thick locally.

Thirtystone Formation (Lower Devonian)

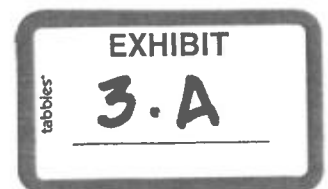
The Thirtystone Formation is part of a wedge of sedimentary rocks that thins to the north and the west where the wedge ends up truncated beneath the base of the overlying Woodford Shale. The Thirtystone Formation is only present in southeastern Lea County and consists of an upper coarsely crystalline dolostone unit and lower chert unit. This unit is not present in the area of concern.

Wristen Group (Middle-Upper Silurian)

The Wristen Group consists of interbedded limestone and dolostone that has a maximum thickness in Lea County, then thins to the north and the west. Thicknesses range from 0 to 1,400' thick. In the Delaware Basin, it occurs up to 19,000' below land surface, then rises to 10,000' to 12,000' subsurface to the north and west. It represents deposition in a shelf-margin environment and includes buildups of coral reefs, stromatoporoids and other invertebrate colonialists. The carbonate beds include boundstones, rudstones and oolitic grainstones with significant primary porosity. To the north, reservoirs targeted for production are dolomitic with vugular and fracture-related porosity.

Fusselman Formation (Late Ordovician-Lower Silurian)

The Fusselman Formation is almost entirely dolostone and can be up to 1,500' thick. As with the overlying Thirtystone Formation and Wristen Group, the Fusselman Formation thins to the north and west where it is truncated beneath the Woodford Shale to the north of where the Wristen Group pinches out. In Lea County, the Fusselman Formation can be 18,000' or more below land surface. It is primarily coarsely crystalline dolostone that is vugular, fractured and/or brecciated, with significant secondary porosity due to the fracturing and brecciation.



Montoya Group (Middle-Upper Ordovician)

The Montoya Formation includes three dolostone members overlying a sandstone unit. The three upper carbonate units include the Upham, Aleman and Cutter Members and the lower sandstone unit is the Cable Canyon Sandstone. The entire package can be up to 600' thick and depth to the top of the unit ranges from 5,500' near the northern pinchout in Chaves County to as much as 20,000' in southern Lea County. The Montoya Group was stripped from the higher parts of the Central Basin Platform by erosion in the Late Pennsylvanian and Early Permian.

Simpson Group (Middle-Upper Ordovician)

The Simpson Group is a heterogeneous unit with limestone, dolostone, sandstone and green shale horizons. Up to 1000' thick, it is dominated by the shale beds (55% of total thickness), followed by the dolostone and limestone beds (40%) and finally sandstone (5%). The shale horizons can serve as a permeability barrier between the underlying Precambrian basement rocks and overlying reservoirs where the Simpson Group is present and has sufficient thickness. Depths to the Simpson Group range from 6,700' on parts of the Central Basin Platform to up to 21,000' in the Delaware Basin.

Ellenburger Formation (Lower Ordovician)

The Ellenburger Formation is up to 1000' thick and composed of limestone and dolostone that represent cyclic deposition in waters of the inner platform with restricted circulation. Porosity in the Ellenburger Formation includes porosity in the matrix, vugs, major karst dissolution features, collapse karst breccias and fractures. Depths to the top of the unit range from 7,500' on the Central Basin Platform to up to 22,000' in the Delaware Basin.

References

Broadhead, R.F., 2017, Petroleum Geology: *in* V.T. McLemore, S. Timmons and M. Wilks (eds.), Energy and Mineral Resources of New Mexico, New Mexico Bureau of Geology and Mineral Resources Memoir 50, vol. A, 90 p.

Comer, J.B., 1991, Stratigraphic analysis of the Upper Devonian Woodford Formation, Permian Basin, West Texas and southeastern New Mexico: Bureau of Economic Geology, University of Texas at Austin, Report of Investigations no. 201, 63 p.

Hemmesch, N.T., Harris, N.B., Mnich, C.A. and Selby, D., 2014, A sequence-stratigraphic framework for the Upper Devonian Woodford Shale, Permian Basin, west Texas: American Association of Petroleum Geologists Bulletin, v. 98, no. 1, p. 23-47, doi:10.1306/05221312077

Texas Bureau of Economic Geology, 2009, Integrated Synthesis of the Permian Basin: Data and Models for Recovering Existing and Undiscovered Oil Resources from the Largest Oil-Bearing Basin in the U.S.: Department of Energy Final Technical Report, Award No: DE-FC26-04NT15509, 964 p.

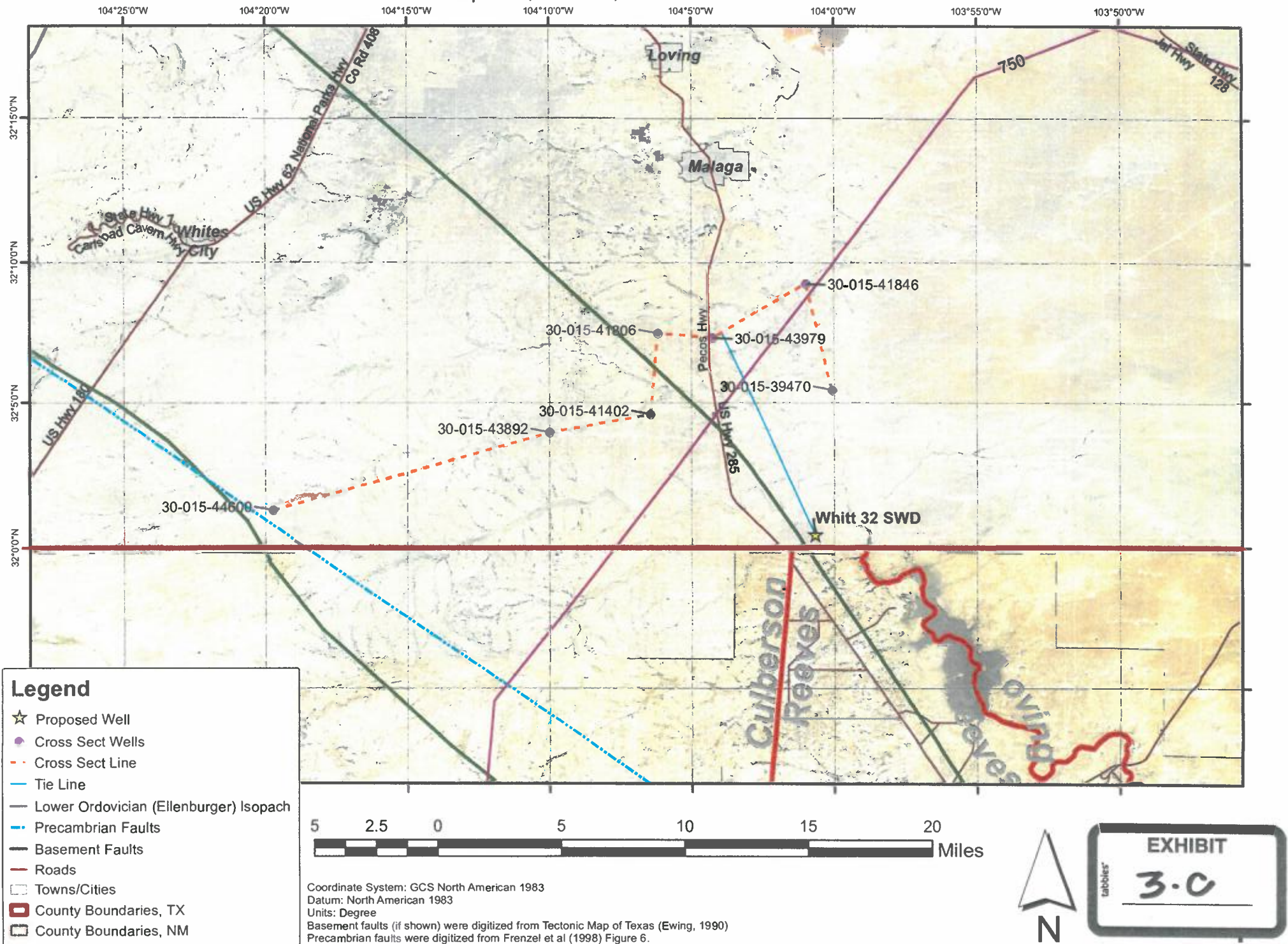
Age		Stratigraphic Unit		Key Feature	Estimated Depth BLS*
Triassic		Chinle		Freshwater resources	
		Santa Rosa			
Permian	Ochoan	Dewey Lake			
		Rustler			
		Salado			
		Castile			
		Guadalupian	Delaware Mtn. Grp.	Bell Canyon	
	Cherry Canyon				
	Brushy Canyon				
	Leonardian	Bone Spring			
		Wolfcampian	Wolfcamp		
	Pennsylvanian	Virgilian	Cisco		
		Missourian	Canyon		
Des Moinesian		Strawn			
Atokan		Atoka			
Morrowan		Morrow			
Mississ.	Upper	Barnett			
	Lower	limestones			
Devon.	Upper	Woodford	Shale: permeability barrier	-14,500'	
	Middle		Target injection interval	-14,700'***	
	Lower	Thirtyone			
Silur.	Upper	Wristen			
	Middle		-15,100'		
	Lower	Fusselman			
Ordov.	Upper	Montoya	Shale: permeability barrier	-16,200'	
	Middle	Simpson	-16,800'		
	Lower	Ellenburger			
Cambrian		Bliss			
Precambrian		basement			

Stratigraphic chart for the Delaware Basin from Broadhead (2017).

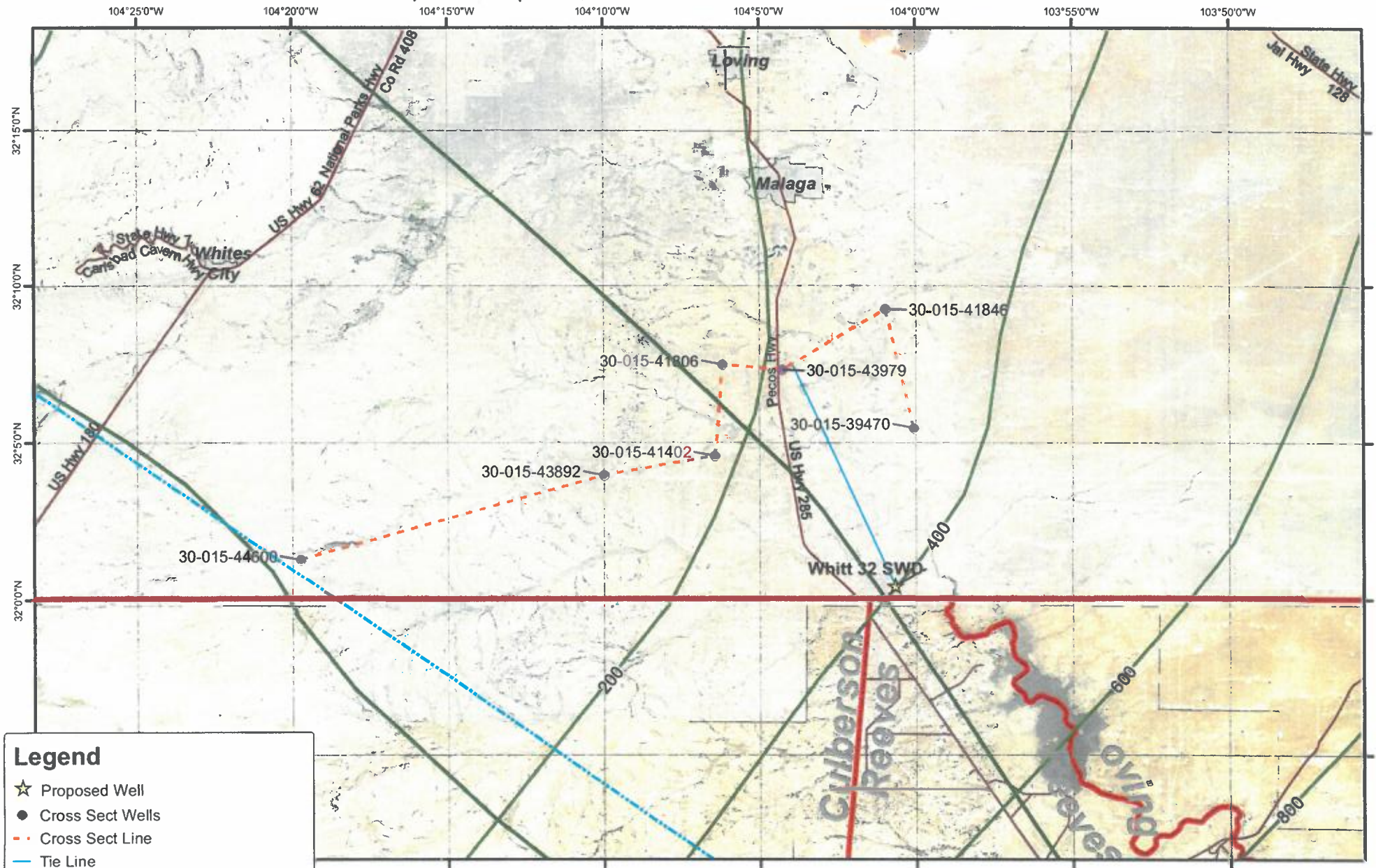
* Based on data from 30-015-41846 Goldenchild 6 SWD #1 (06-255-29E)



Ellenburger Isopach, Faults, and Well Locations



Simpson Isopach, Faults, and Well Locations



Legend

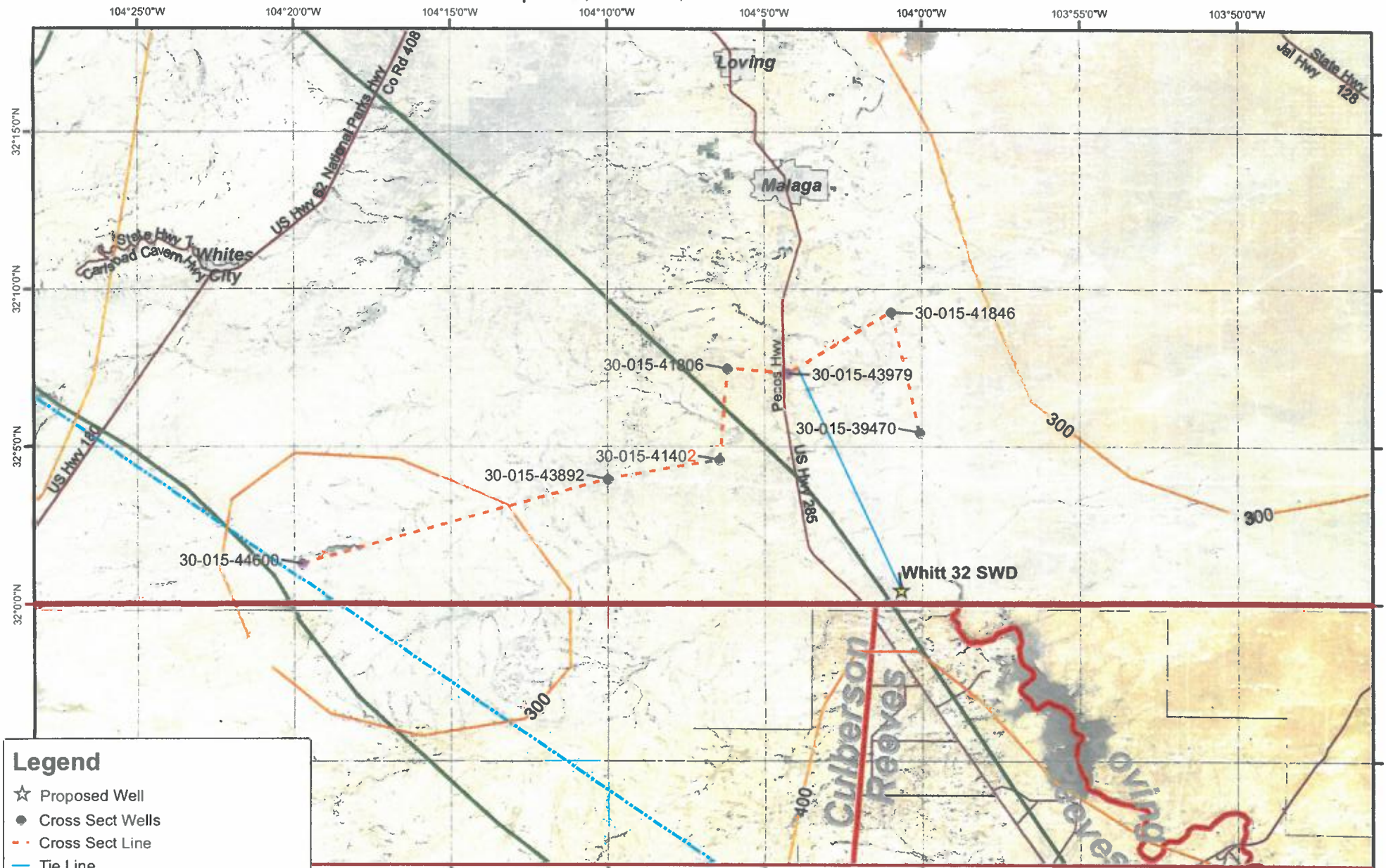
- ★ Proposed Well
- Cross Sect Wells
- - - Cross Sect Line
- Tie Line
- Middle Ordovician (Simpson) Isopach
- Precambrian Faults
- Basement Faults
- Roads
- Towns/Cities
- ▭ County Boundaries, TX
- ▭ County Boundaries, NM



Coordinate System: GCS North American 1983
 Datum: North American 1983
 Units: Degree
 Basement faults (if shown) were digitized from Tectonic Map of Texas (Ewing, 1990)
 Precambrian faults were digitized from Frenzel et al (1998) Figure 6.



Montoya Isopach, Faults, and Well Locations



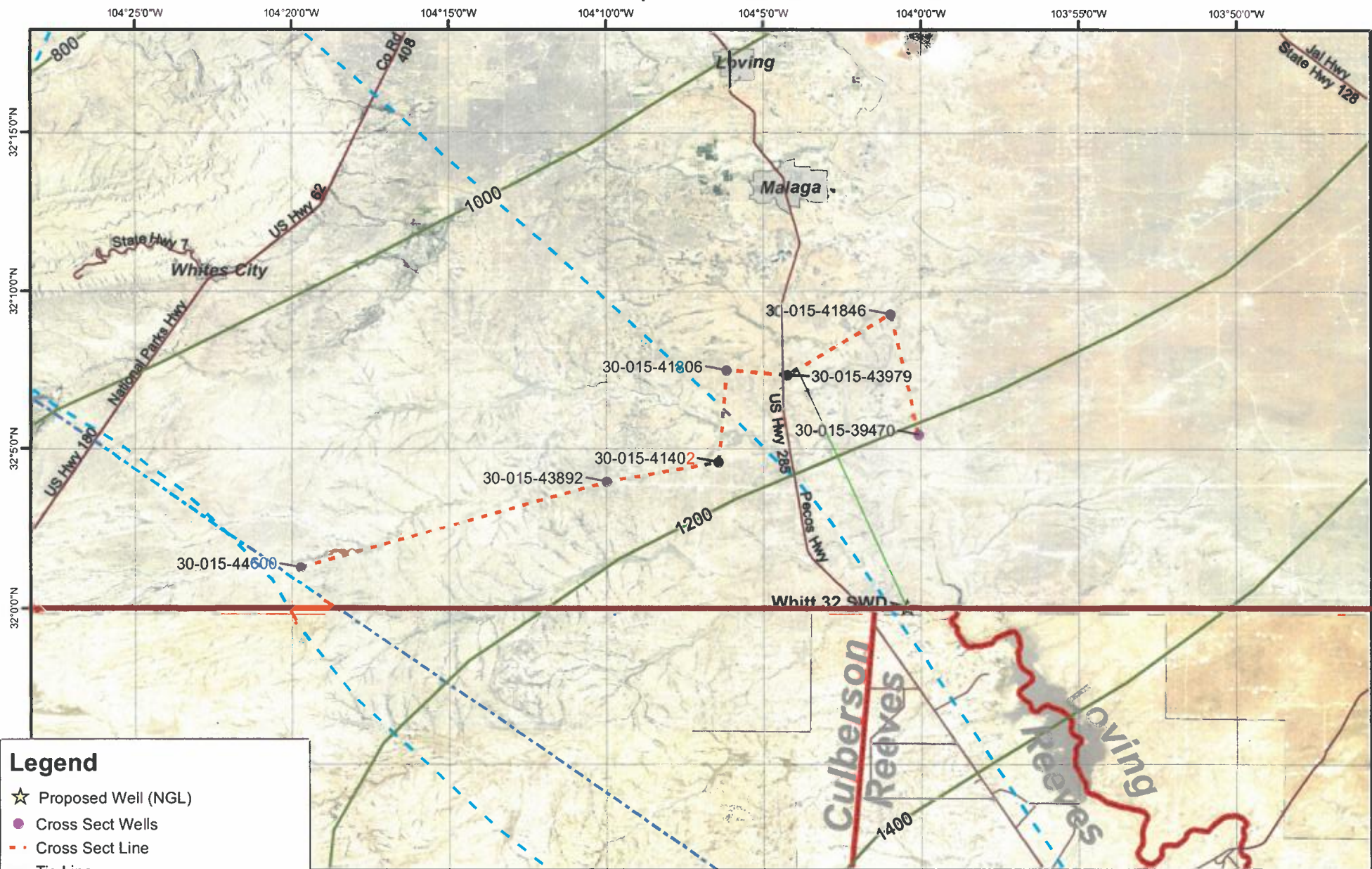
Coordinate System: GCS North American 1983
 Datum: North American 1983
 Units: Degree
 Basement faults (if shown) were digitized from Tectonic Map of Texas (Ewing, 1990)
 Precambrian faults were digitized from Frenzel et al (1998) Figure 6.



Legend

- ☆ Proposed Well
- Cross Sect Wells
- - - Cross Sect Line
- - - Tie Line
- - - Upper Ordovician (Montoya) Isopach
- - - Precambrian Faults
- - - Basement Faults
- - - Roads
- Towns/Cities
- ▭ County Boundaries, TX
- ▭ County Boundaries, NM

Wristen/Fusselman Isopach, Faults, and Well Locations



Legend

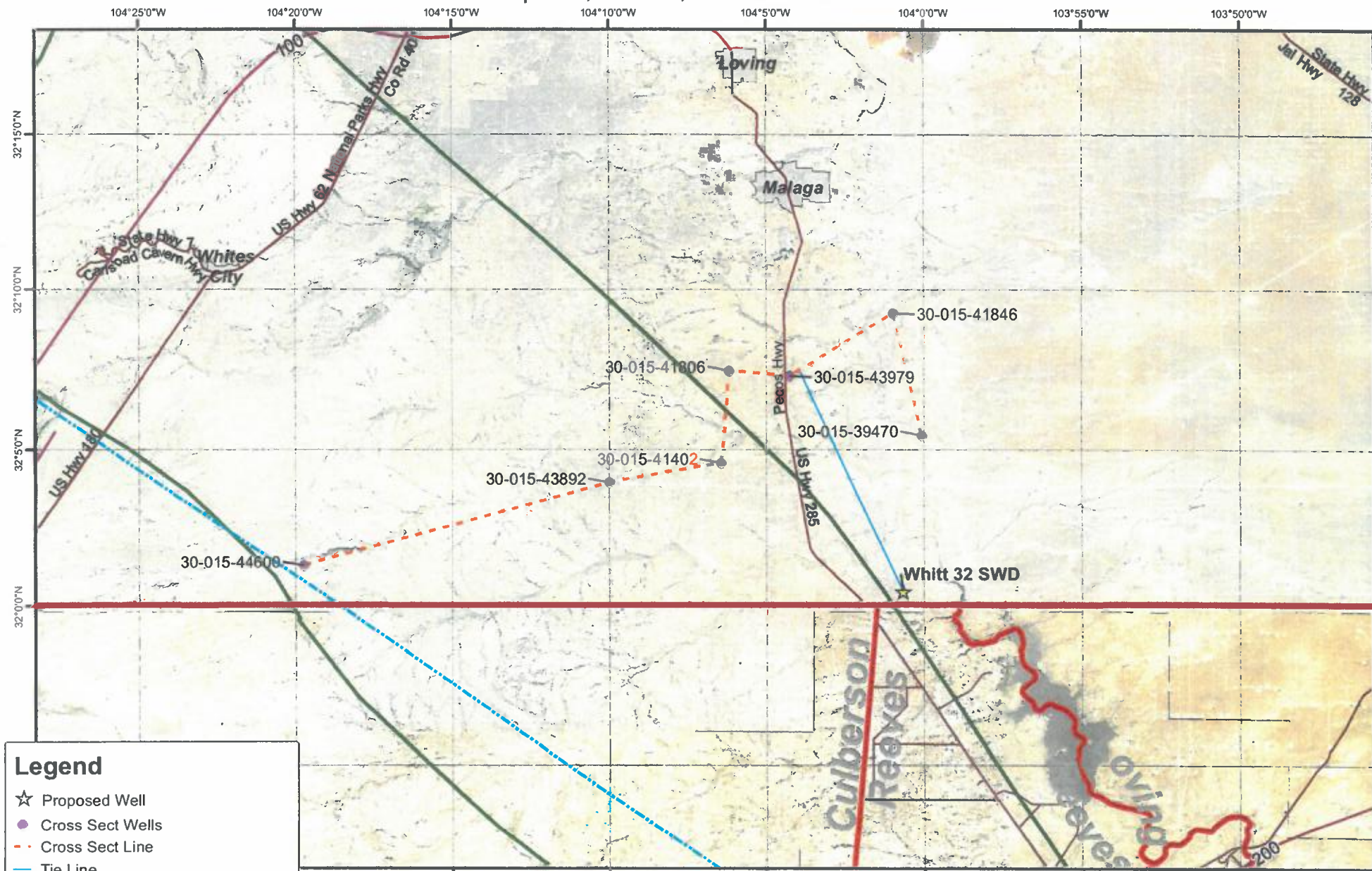
- ☆ Proposed Well (NGL)
- Cross Section Wells
- - - Cross Section Line
- Tie Line
- Sil/Dev (Wristen/Fusselman) Isopach
- Precambrian Faults
- Basement Faults
- Roads
- Towns/Cities
- ▭ County Boundaries, TX
- ▭ County Boundaries, NM



Coordinate System: GCS North American 1983
 Datum: North American 1983
 Units: Degree
 Basement faults (if shown) were digitized from Tectonic Map of Texas (Ewing, 1990)
 Precambrian faults were digitized from Frenzel et al (1998) Figure 6.



Woodford Isopach, Faults, and Well Locations



Legend

- ☆ Proposed Well
- Cross Sect Wells
- - - Cross Sect Line
- - - Tie Line
- Late Devonian (Woodford) Isopach
- Precambrian Faults
- Basement Faults
- Roads
- Towns/Cities
- ▭ County Boundaries, TX
- ▭ County Boundaries, NM



Coordinate System: GCS North American 1983
 Datum: North American 1983
 Units: Degree
 Basement faults (if shown) were digitized from Tectonic Map of Texas (Ewing, 1990)
 Precambrian faults were digitized from Frenzel et al (1998) Figure 6.



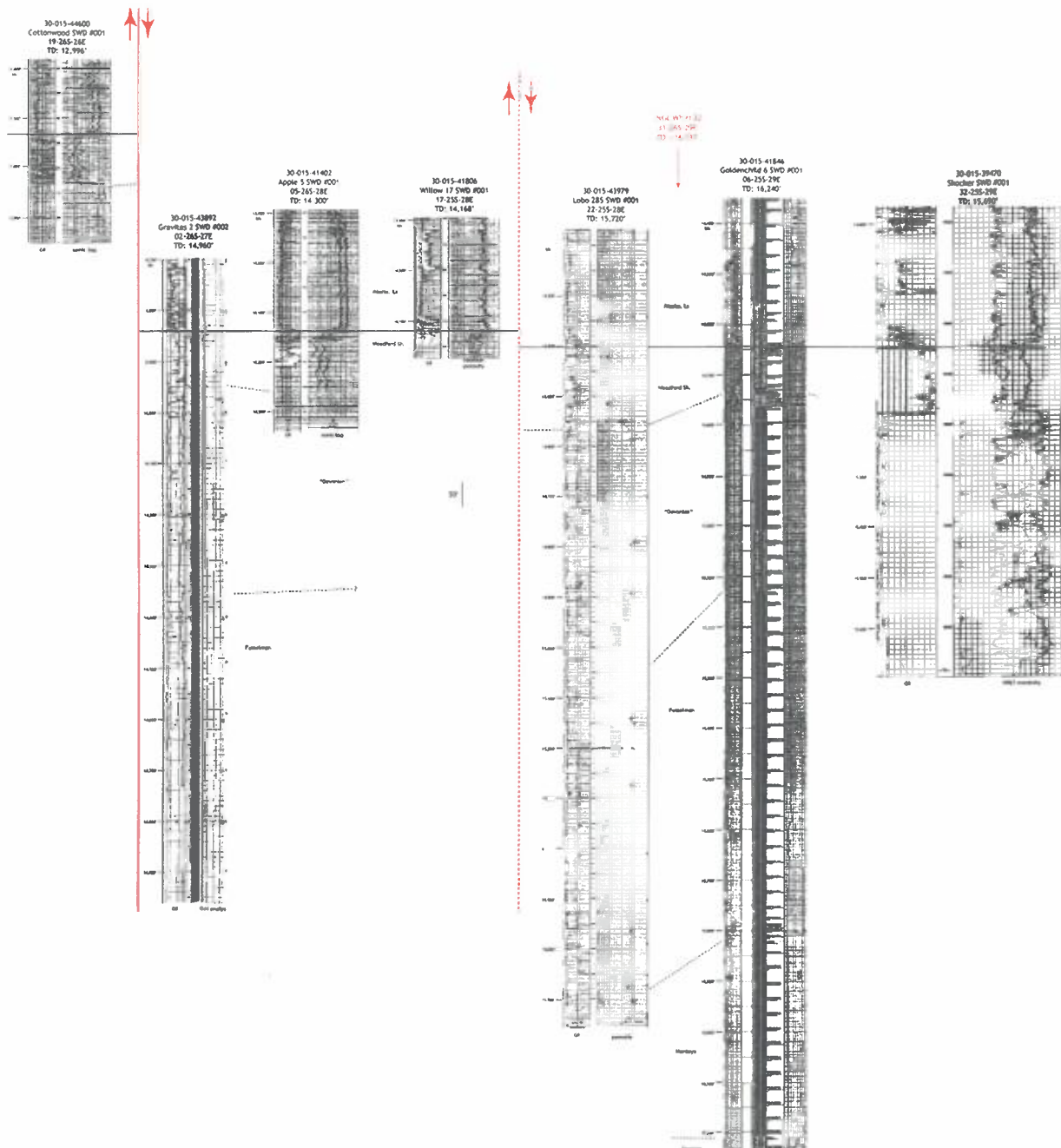


EXHIBIT
3-D

Exhibits of Dr. Steven Taylor
On Behalf of NGL Water Solutions Permian, LLC

**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. 20475 (WHITT 32)

AFFIDAVIT OF DR. STEVEN TAYLOR

STATE OF NEW MEXICO)
) ss.
COUNTY OF BERNALILLO)

I, Dr. Steven Taylor, make the following affidavit based upon my own personal knowledge.

1. I am over eighteen (18) years of age and am otherwise competent to make the statements contained herein.

2. I have worked at the Los Alamos National Labs from 1991 to 2006. I currently am the secretary of GeoEnergy Monitoring Systems, Inc., a company that builds and conducts seismic monitoring.

3. I have obtained a Bachelor of Science degree in geology at Ohio University (1975) and a Ph.D. in Geophysics at the Massachusetts Institute of Technology (1980).

4. I am familiar with the amended application that NGL Water Solutions Permian, LLC ("NGL") filed in this matter and I have conducted a study related to the areas which is the subject matter of the application.



5. The applicant, NGL (OGRID No. 372338), seeks an order approving the Whitt 32 SWD #1 well, which is a salt water disposal well.

6. The injection zone for the well is located below the base of the Woodford Shale formation and above the Ordovician formation, which consists of significant shale deposits.

7. The closest known fault line is located approximately 2 to 20 miles away from where the well is proposed to be located.

8. I have studied seismic catalogs, unpublished catalogs and USGS catalogs for the time period of 2010 – 2017 selective events within 50 km of one the Striker SWD wells. Attached as Exhibit A is a copy of my study, which I prepared in May 2019 when this case was originally set for hearing. My study concludes that there is very little seismic activity in the areas where the well is proposed to be located. My conclusions have not changed since I prepared my study.

9. I have also reviewed information provided by FTI Platt Sparks involving several different fault slip probability analysis conducted, using a tool created by Stanford University. These fault slip potential models showed low probability of slip or earthquakes to known mapped faults located closest to the well. A copy of the studies are attached hereto as Exhibit B.

10. I attest that the information provided herein is correct and complete to the best of my knowledge and belief.

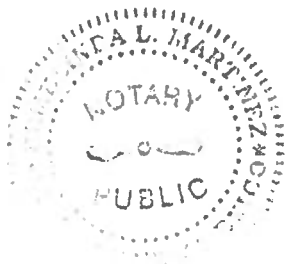
[Signature page follows]

Steven Taylor
Dr. Steven Taylor

SUBSCRIBED AND SWORN to before me this 19 th day of July, 2019 by Dr. Steven Taylor.

Camelinda Gutierrez
Notary Public

My commission expires: 02-18-22



Seismic Catalog Analysis Within 50 km of Whitt 32 SWD #1 Well

Prepared for NGL-Permian
by
GeoEnergy Monitoring Systems
May 22, 2019

Analysis is based on NMT seismic catalogs, unpublished catalogs and USGS catalogs for the time period 2010-2017 selecting events within 50 km of the Striker 2 SWD well. Additionally, seismic monitoring through April 30, 2019 from the three NGL seismic stations installed at Striker 2, Striker 3 and Striker 6 SWD wells installed on September 6, 2018. NGL/GeoEMS installed a seismic monitor at the Salty Dog SWD well (SDOG) in Texas just across New Mexico border on March 28, 2019 that will help constrain locations in southeastern NM.

Striker Two (STR2), Sand Dunes well, Lat/Long: 32.2072820/-103.7557370
Striker Three (STR3), Gossett well, Lat/Long: 32.2551110/-104.0868610
Striker Six (STR6), Madera well, Lat/Long: 32.2091150/-103.5359570
Salty Dog (SDOG), Salty Dog well, Lat/Long: 32.22531/-103.045212

Figure 1 shows seismic station locations with estimated detection levels for M 1.0 (green circles) and M 1.5 (red circles) along with NGL-Permian stations (yellow pushpins). **Figure 2** shows seismicity listed in Table 1 shown as red circles and additional regional stations from TexNet and NMT (green pushpins). These regional stations are used along with the 3 Striker SWD seismic stations for regional monitoring.

The USGS reports no events in the vicinity since 2010. New Mexico Tech runs a seismic network (SC) north of the wells for the DOE Waste Isolation Plant (only short-period vertical components). There are a total of seven seismic events in this time period ranging in magnitude from 1.0 to 3.1. Since the seismic deployment, there have been event detections listed in Table 2 and having preliminary locations using available regional data (**Figure 3**). Due to the small magnitudes, the signal-to-noise levels are low so the locations have large uncertainty and there is little constraint on depth.

Table 1: Seismicity Within 50 km of Striker SWD Wells 2010-2017

Date	Origin Time GMT	Latitude	Longitude	Depth (km)	Magnitude
20111227	23:10:37	32.37	-103.95	NaN	1.6
20120318	10:57:22	32.281	-103.892	5.0	3.1
20170211	14:34:27	32.29	-103.92	NaN	1.5
20170302	11:38:53	32.37	-103.88	NaN	1.7
20170325	22:46:01	32.13	-103.77	NaN	1
20170503	17:47:21	32.082	-103.023	5.0	2.6
20170814	01:09:56	32.39	-103.56	NaN	1.2

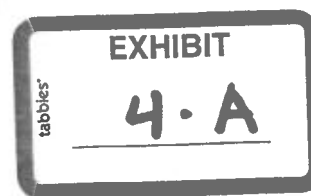


Table 2. New Mexico Area Reporting Period Seismicity (km units)

Date	Origin Time (GMT)	Lat	Long	Depth	Loc Error	M	(+/-)
09/10/18	23:35:43.942	32.1793	-103.5283	1	5.58	1.25	0.23
09/14/18	06:57:47.614	32.1540	-103.5030	1	5.58	1.11	0.41
09/15/18	16:48:21.041	32.1630	-103.5211	1	5.37	1.50	0.00
10/13/18	22:07:22.259	32.0998	-103.4560	6	5.64	1.60	0.12
11/18/18	09:04:52.707	32.2526	-103.7853	5	3.77	1.75	0.20
12/09/18	18:51:00.805	32.3634	-103.8510	1	2.09	1.44	0.08
01/03/19	09:15:48.809	32.2761	-103.6732	6	5.64	1.63	0.00
01/03/19	23:05:33.122	32.2599	-103.7654	4	5.51	1.60	0.25
01/04/19	09:45:38.943	32.2346	-103.7798	4	4.34	1.98	0.38
01/09/19	10:18:54.389	32.2255	-103.7166	5	2.80	1.47	0.41
01/27/19	07:33:47.127	32.2219	-103.7220	5	3.53	1.72	0.31
02/19/19	09:35:15.109	32.2443	-103.6898	1	4.17	1.20	0.00



Figure 1. NGL-Permian seismic stations (yellow pushpins). Green and red circles around stations show approximate detection levels for ML 1.0 and 1.5, respectively.

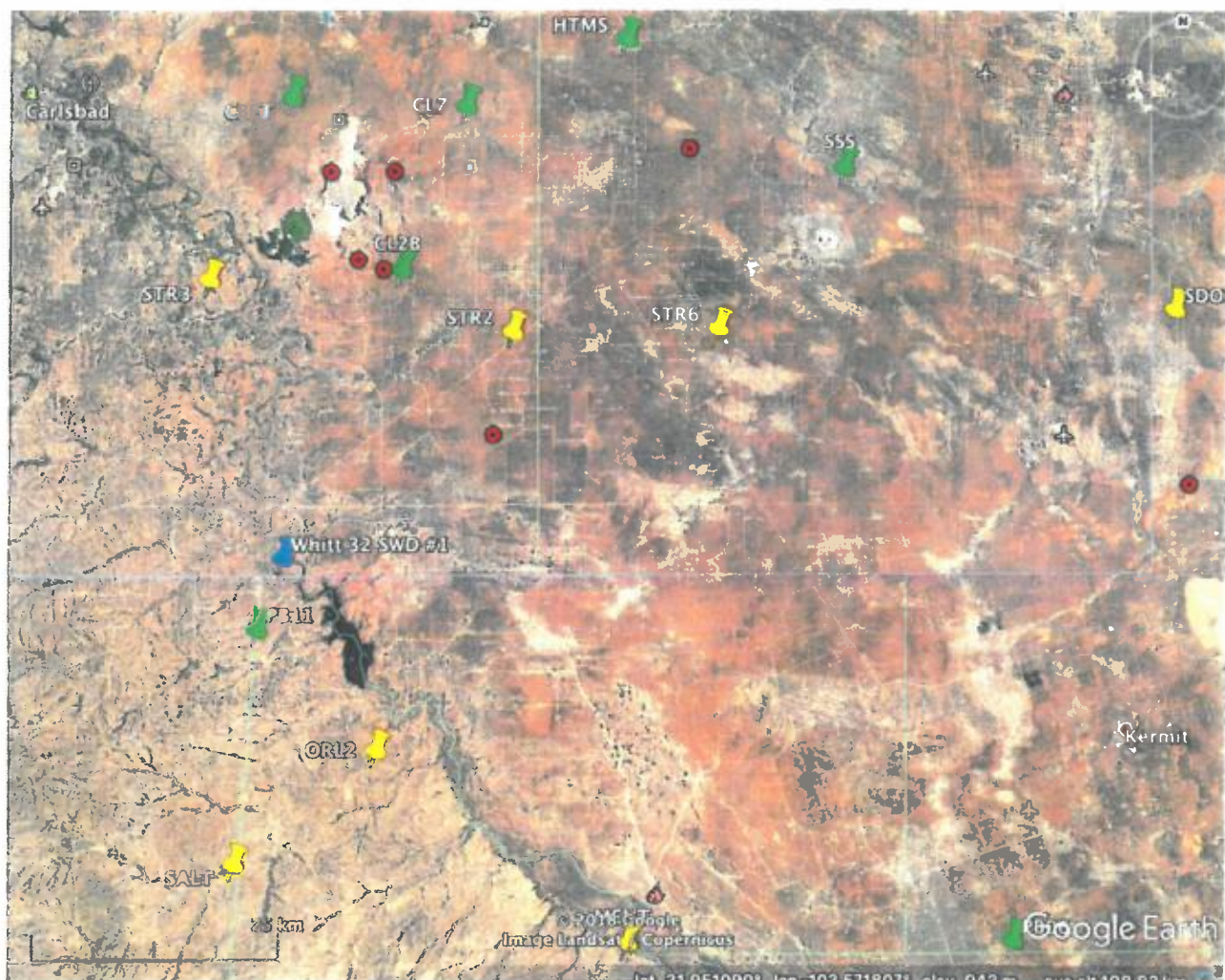


Figure 2. Striker SWD wells seismic station locations (yellow push pins) and existing NGL-Permian seismic stations (yellow pushpins). Other regional seismic stations run by TexNet and New Mexico Tech are shown as green pushpins. Historic seismicity listed in Table 1 shown as red circles. Whitt 32 SWD #1 well is shown as blue pushpin.

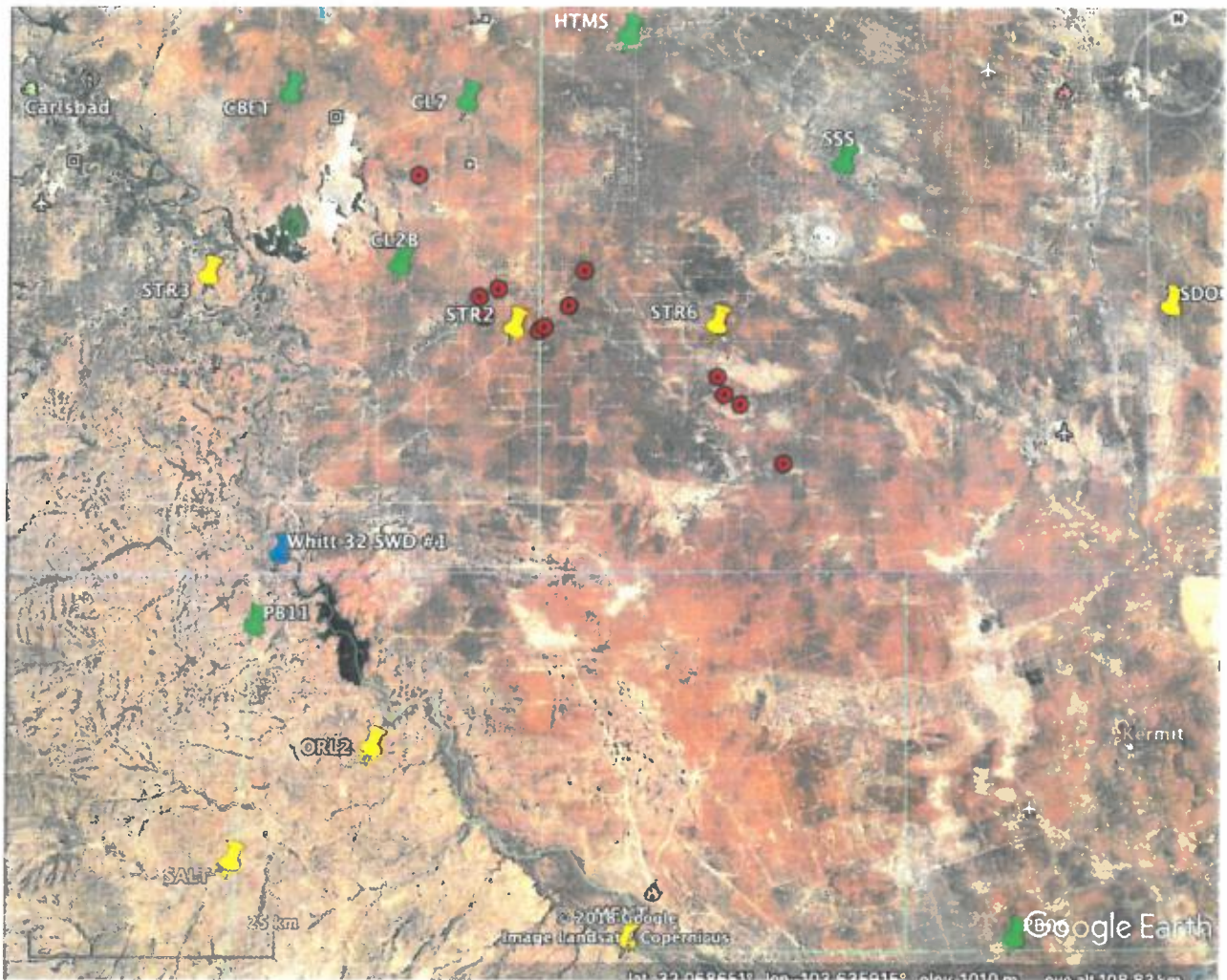


Figure 3. Seismic events in between September 6 and April 30, 2019 as red circles (Table 2). Whitt 32 SWD #1 well shown as blue pushpin. Seismic stations as yellow (NGL) or green (NMT and TexNet) pushpins.



Texas Registered Engineering Firm No F - 16381

July 22, 2019

RE: FSP Analysis

NGL Water Solutions Permian, LLC (Whitt 32 SWD #1)

Eddy County, New Mexico

FSP Analysis

The FSP software used for this analysis was jointly developed by Stanford University, Exxon Mobil and XTO Energy as a tool for estimating fault slip potential resulting from fluid injection.

I have reviewed the geology, seismic activity, injection history and future proposed injection in the Subject Area and I would conclude that the Proposed **Whitt 32 SWD #1** well does not pose a risk of increasing seismicity in the area. The primary risk reduction factor is that the faults are not optimally oriented to slip, and significant pressure increases would be necessary to initiate slip on the faults analyzed.

Fault slip potential (FSP) was analyzed in the area of review shown on **Exhibit No. 1**. The analysis integrates the proposed well location as well as any existing injection wells in order to fully assess the pressure implications of injection in the area and the potential for slip along existing faults. There are no historical USGS earthquake locations within the review area. (see **Exhibit No. 1**)

Exhibit No. 2 shows the FSP input parameters for the local stress, average reservoir depth, pressure gradients and reservoir characteristics. Depths and reservoir characteristics were derived from nearby well logs and stress values were derived from the Lund Snee and Zoback (2018) paper related to Stress in the Permian Basin.

Exhibit No. 3 shows the location of existing wells and locations of the Proposed SWD well relative to the faults documented in this area. The faults are sourced from the Texas Bureau of Economic Geology



and these are also the fault traces shown in the referenced Snee/Zoback paper (Figure 3 in the paper) and shown as **Exhibit No. 4** in my report. The Snee/Zoback paper only considers fault orientation relative to the stress orientation in determination of fault slip potential. Based on their limited analysis of the area they concluded the faults have low slip potential based on orientation/azimuth.

In my own independent subsurface mapping of the area I did not find evidence for the BEG fault in this area. Also, Geomap structure maps on the top of the Siluro-Devonian do not show any faults in this area. In my opinion this area is unfaulted, however I did honor the BEG faults in the FSP model.

The FSP analysis further incorporates the injection history and future injection projections and the injection reservoir characteristics to fully assess the potential for slip along these faults. Existing wells were incorporated into the analysis using their injection volume histories and holding them constant into the future at their last reported monthly injection volume. The Subject well was modelled at 50,000 bbls/day and held constant for the life of the analysis (+25 years). The proposed Whitt 31 SWD is also included in the model at 50,000 bbls/day and held constant for the life of the analysis (+25 years).

The Concho Littlefield 33 Federal SWD #1 was included in the model at 40,000 bbls/day.

(Only wells within the 10 km radius are used in the model)

The wells in the model: (**Exhibit No. 3 and Exhibit No. 1**)

- 8 – Whitt 31 SWD
- 9 – Whitt 32 SWD (proposed)
- 10 – Littlefield 33 Federal SWD #1
- 1 – 3001523615
- 2 – 3001525530
- 3 – 3001539470
- 4 – 3001543630
- 5 – 3001544001
- 6 – 4210932853
- 7 – 4210933166

Exhibit No. 5 illustrates the geomechanical properties of the fault segments in the area of review. It should be noted that the FSP software only calculates a single pressure change along a fault (at the fault mid-point) so it is critical that faults are broken into multiple segments to get a true evaluation of the pressure increases associated with injection. **Exhibit No. 5** also shows the direction of max hor. stress as denoted by the grey arrows outside the circle on the stereonet in the lower right portion of this exhibit. Faults that align parallel or closer to this orientation will have the highest potential for slip or lowest ΔP to slip. Faults 1-9 have very low potential for slip.

Exhibit No. 6 shows that the input stress and fault values were varied by +/-10% to allow for uncertainty in the input parameters. Even considering the variability of the inputs the model results show low probability for slip on the faults in the area of review. An increase of 2,800 psi still only results in a 10% probability of fault slip.

Exhibit No. 7 takes a closer look at fault 1. The sensitivity analysis is highlighted in the lower right portion of this exhibit and shows that without any variability of inputs the ΔP needed to slip is 5,383 psi along this fault. A 10% change in the azimuth of the fault could lower ΔP needed to slip to 3,250psi. The analysis is essentially the same for segments F1-F9, with the fault segments F2-F9 requiring slightly higher ΔP needed to slip. (See table 1)

Exhibit No. 8 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2020. This map indicates ΔP pressure increase of 192 psi at F6.

Exhibit No. 9 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2025. This map indicates ΔP pressure increase of 1,303 psi at F6.

Exhibit No. 10 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2030. This map indicates ΔP pressure increase of 1,671 psi at F6.

Exhibit No. 11 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2035. This map indicates ΔP pressure increase of 1,916 psi at F6.. Note that this pressure is still well below the pressure that could initiate fault slip, which takes +3,650 psi.

Exhibit No. 12 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2040. This map indicates ΔP pressure increase of 2,106 psi at F6. Note that this pressure is still well below the pressure that could initiate fault slip, which takes +3,650 psi.

Exhibit No. 13 illustrates the ΔP pressure in a “heat map” and shows ΔP pressure increases at the faults as of 1/1/2045. This map indicates ΔP pressure increase of 2,262 psi at F6. Note that this pressure is still well below the pressure that could initiate fault slip, which takes +3,650 psi.

The pressure analysis over time shows that pressure is expected to increase along the faults however pressures remain below critical levels. The table below shows the ΔP pressure increases needed to imitate fault slip along each fault segment and the corresponding ΔP pressure increases as of 2045:

Fault Segment	ΔP to slip (fixed inputs)	ΔP to slip (10% varied inputs)	ΔP at 2045
F1	5,383	3,250	199
F2	5,901	3,850	447
F3	5,901	3,850	525
F4	6,246	3,800	730
F5	6,246	3,800	1,282
F6	6,232	3,650	2,262
F7	6,190	3,450	2,017
F8	6,244	3,700	934
F9	6,242	3,700	246

TABLE 1

This analysis demonstrates that there is a low likelihood of injection induced seismicity in the Subject Area.

Conclusion

The BEG faults and fault trends in the area of review are not optimally oriented to slip. The orientation of the faults requires significant pressure changes (ΔP +5,383 psi) based on the fixed input parameters and the ΔP increase at the faults only reaches 2,262 psi by 2045. This model assumes constant injection rates over the next +25 years which is not a typical scenario as SWD wells tend to decrease injection volumes over time as the well ages and disposal demand decreases in the area. If injection volumes are lower over time than the model represents, then the risk for fault slip is lowered also.

In the event seismicity should occur in the future, the wells closest to the faults (proposed and existing) should be the wells considered for modification or reduction of injection rates. At this time there is no evidence to support rate reduction for any of the existing or proposed wells.

Should you have any questions, please do not hesitate to call me at (512) 327-6930 or email me at todd.reynolds@ftiplattsparks.com.

Regards,

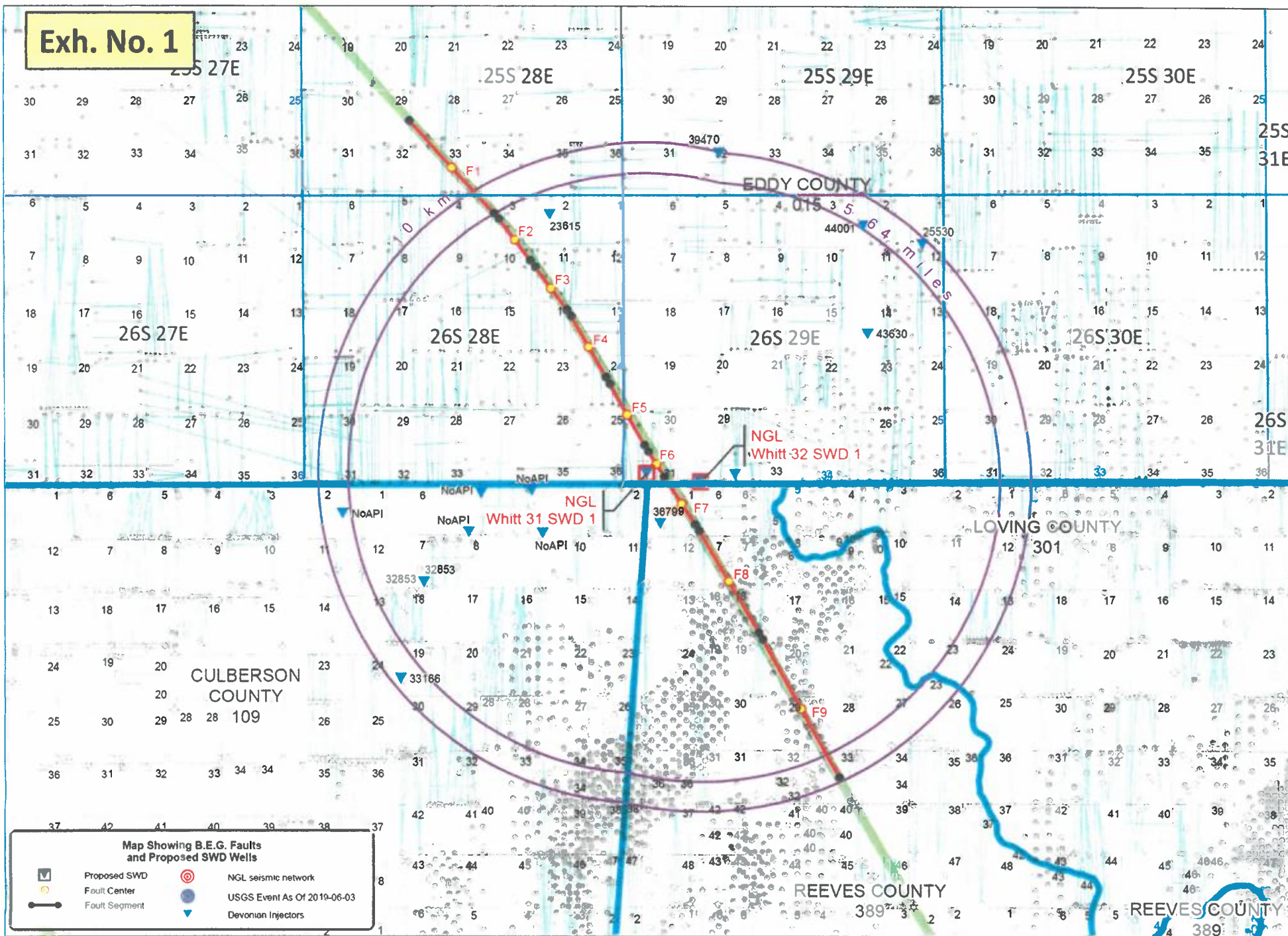
Todd W. Reynolds – Geologist/Geophysicist
Managing Director, Economics/FTI Platt Sparks



Todd W. Reynolds

FTI Platt Sparks
512.327.6930 office

Exh. No. 1



Date Saved: 2019-07-22 11:43:52 AM

Path: P:\COMMON_FSP\c\FaultSeg\01_FaultSeg_NM.mxd



FTI
PLATT SPARKS

Texas Registered Engineering Firm No F - 16381

Exh. No. 2

FSP INPUT PARAMETERS

Stress Data

Vertical Stress Gradient [psi/ft]	1.1
Max Hor Stress Direction [deg N CW]	60
Reference Depth for Calculations [ft]	15741
Initial Res. Pressure Gradient [psi/ft]	0.465
Min Horiz. Stress Gradient [psi/ft]	0.66856
Max Horiz. Stress Gradient [psi/ft]	0.91017
A Phi Parameter	0.56
Reference Friction Coefficient mu	0.6

OK

Hydrology Data

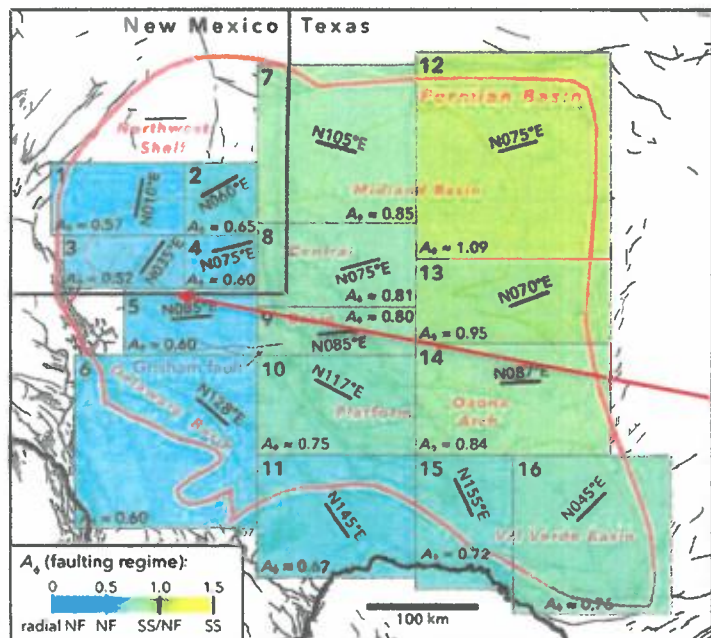
Enter Hydrologic Parameters

Load External Hydrologic Model

Aquifer Thickness [ft]	570
Porosity [%]	4.5
Permeability [mD]	25

Fault dips assumed – 80 deg

OK



Input Parameter Comments

Hydrologic Parameters – Derived from nearby logs

Stress Gradients – Derived from A Phi parameter from Snee/Zoback paper (.56)

Max Hor. Stress Direction - Derived from Snee/Zoback paper (N60E)

Exh. No. 3

Fault Slip Potential

MODEL INPUT...

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

PROB. HYDRO

INTEGRATED

Fault Selector:

All Faults

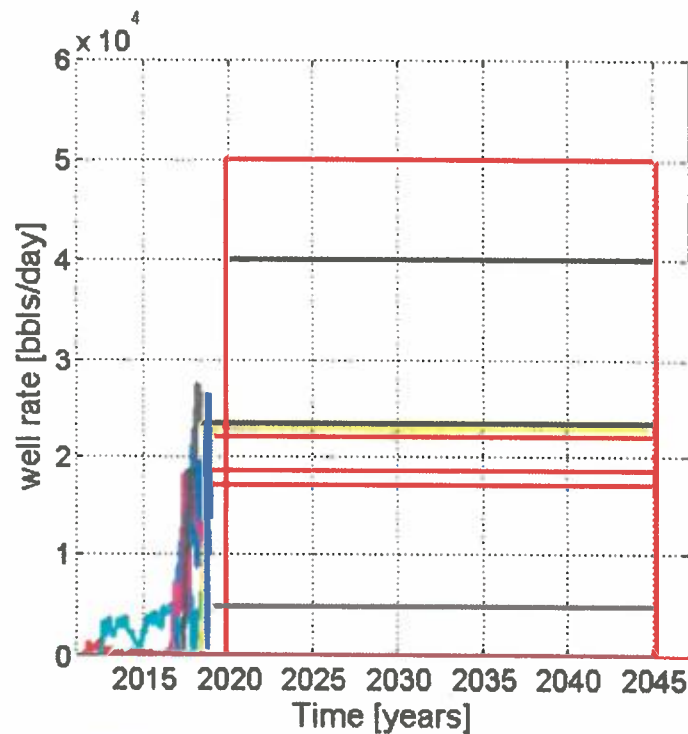
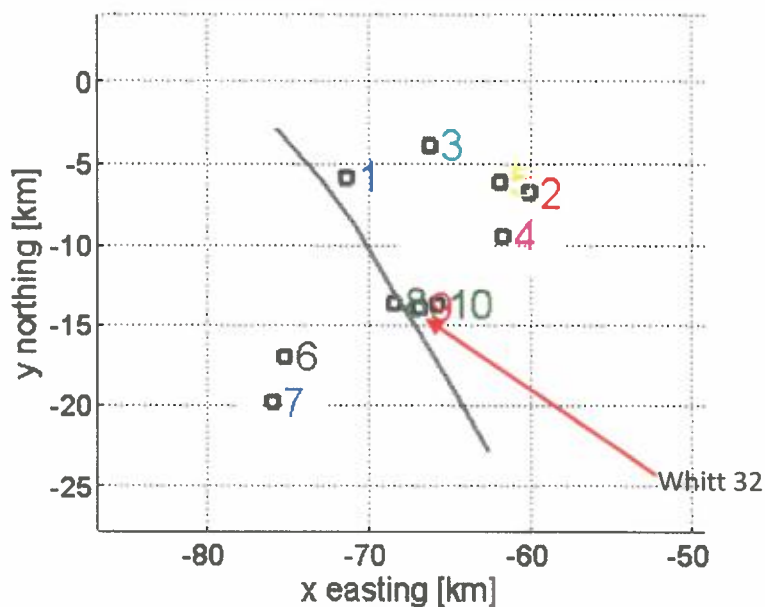
- Fault #1
- Fault #2
- Fault #3
- Fault #4
- Fault #5
- Fault #6
- Fault #7
- Fault #8
- Fault #9

Stress Regime: Normal Faulting

Select Well:

All

FSP INPUT Fault and well locations



FSP INPUT Injection history and projected future injection

Calculate

02

Exh. No. 4

Area of Review

Low slip potential based on fault orientation (green faults)

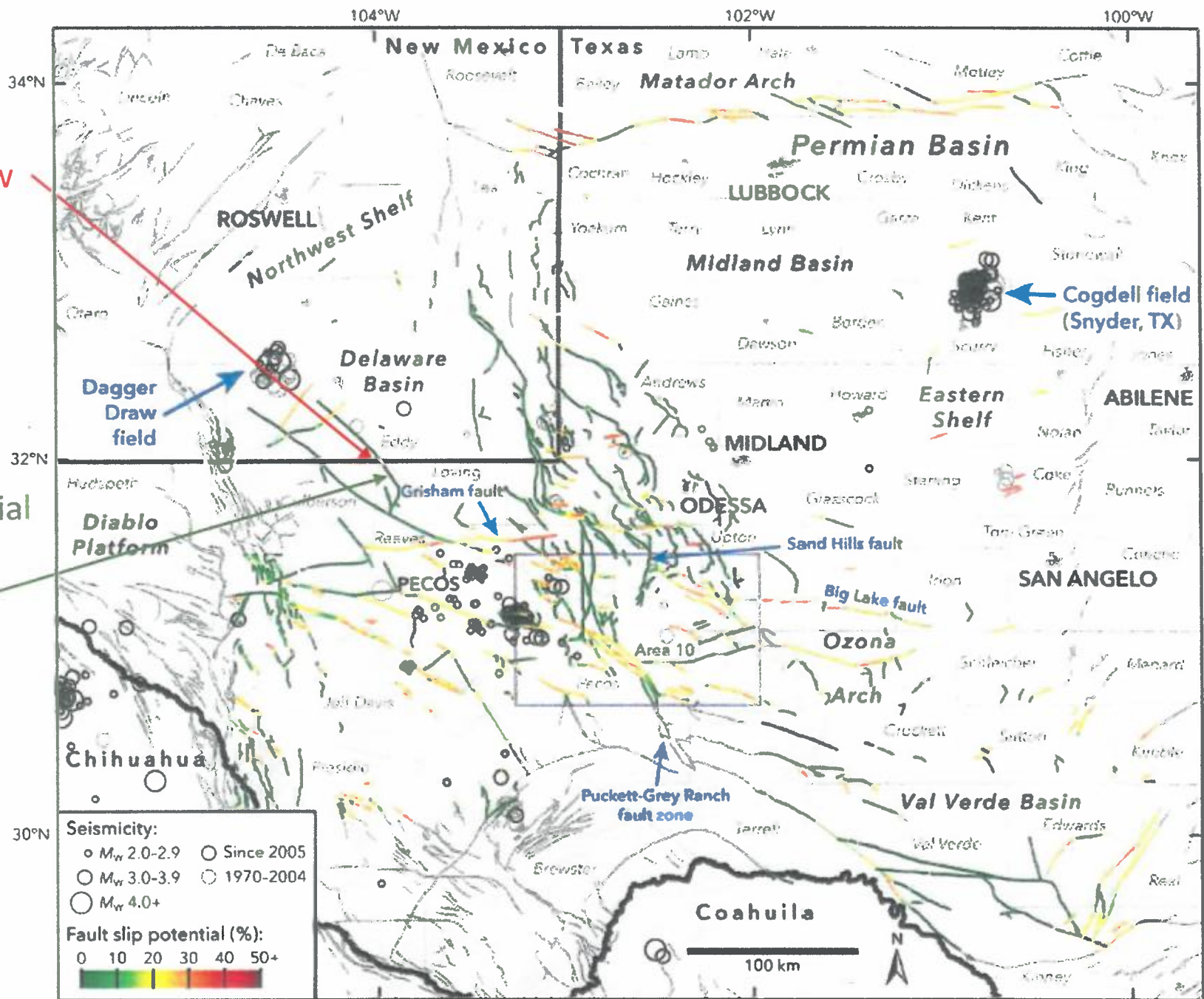


Figure 3. Results of our probabilistic FSP analysis across the Permian Basin. Data sources are as in Figures 1 and 2.

From Lund Snee and Zoback (2018)

Exh. No. 5

Zoom

Fault Slip Potential

MODEL INPUTS

GEOMECHA...

PROB. GEOMECH

HYDROLOGY

PROB. HYDRO

INTEGRATED

Fault Selector:

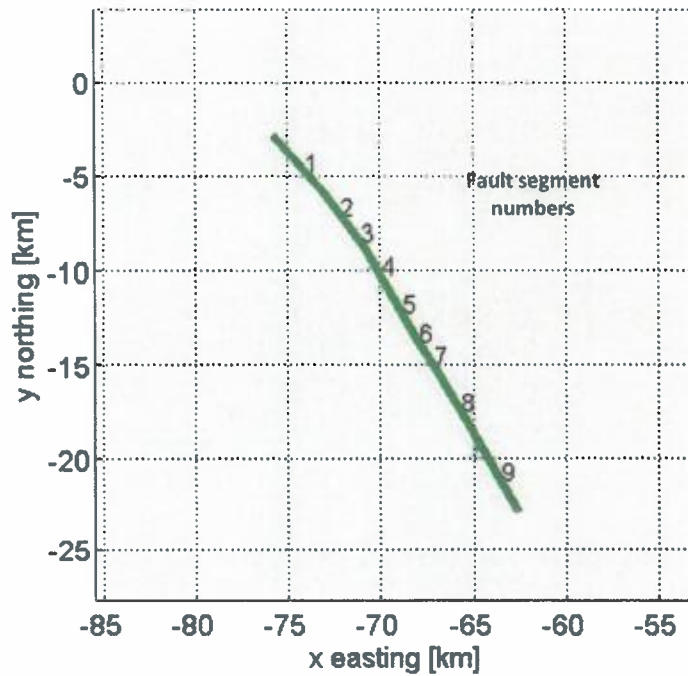
All Faults

Fault #1
Fault #2
Fault #3
Fault #4
Fault #5
Fault #6
Fault #7
Fault #8
Fault #9

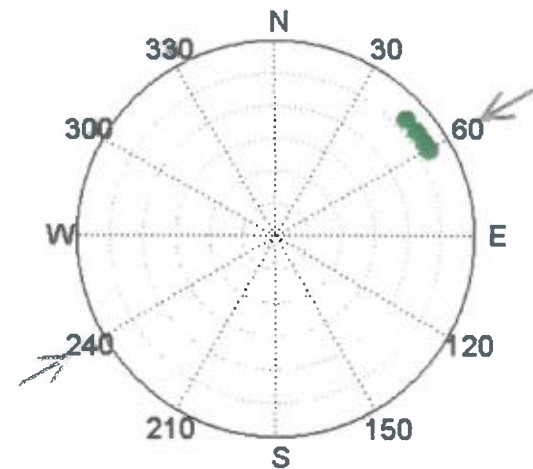
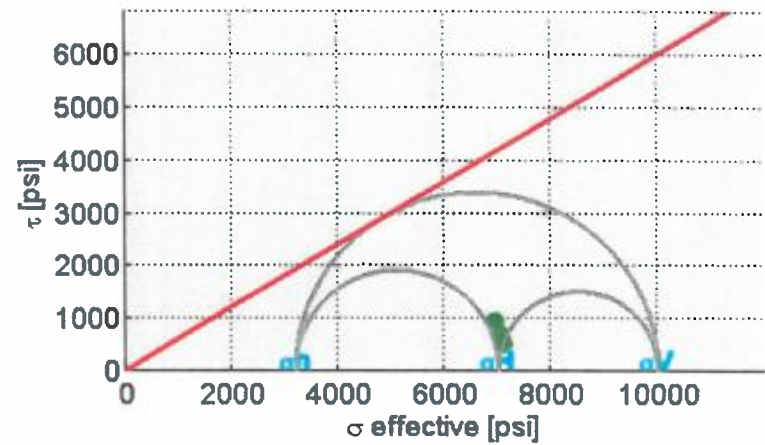
Calculate

a) Fault Number

Help



Stress Regime: Normal Faulting



Stereonet Show:

Fault Normals

Exh. No. 6

Zoom

Fault Slip Potential

Fault Selector:

All Faults

Fault #1
Fault #2
Fault #3
Fault #4
Fault #5
Fault #6
Fault #7
Fault #8
Fault #9

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOM...

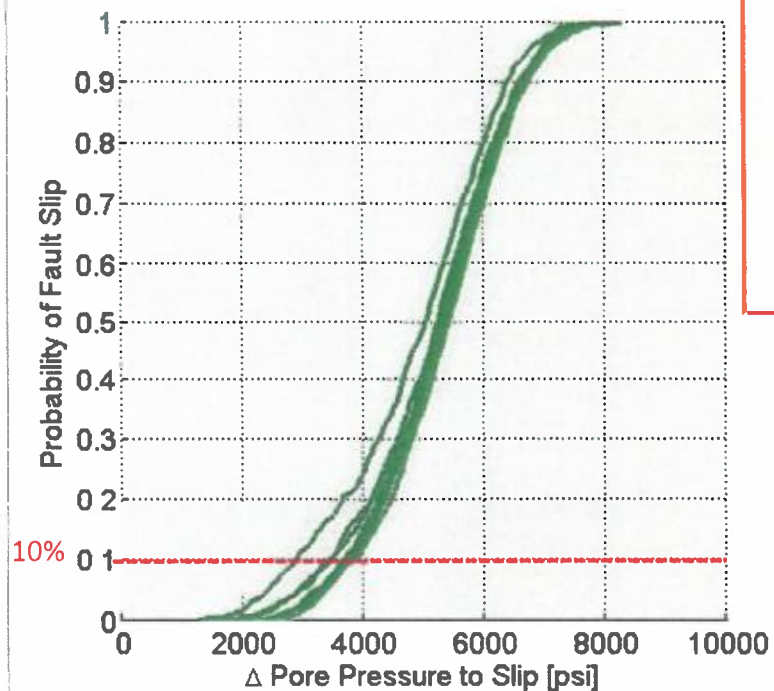
HYDROLOGY

PROB. HYDRO

INTEGRATED

Load Distributions

Run Analysis



Max Delta PP [psi]:

10000

Export CDF data

Show Input Distributions

Variability in Inputs

Reference Friction

aPhi

Fault Friction Coeff

SHmax Azimuth

Dip of fault

Strike of fault

Pore Press Grad

Vert Stress Grad

-10 -5 0 5 10
Percent Deviation [%]

Choose a fault to see sensitivity analysis

Vert Stress Grad

SHmax Azimuth

Strike of fault

Dip of fault

Pore Press Grad

Fault Friction Coeff

Reference Friction

aPhi

-1 -0.5 0 0.5 1
 Δ Pore Pressure to Slip [psi]

Exh. No. 7

Fault Slip Potential

MODEL INPUTS

GEOMECHANICS

PROB. GEOM...

HYDROLOGY

PROB. HYDRO

INTEGRATED

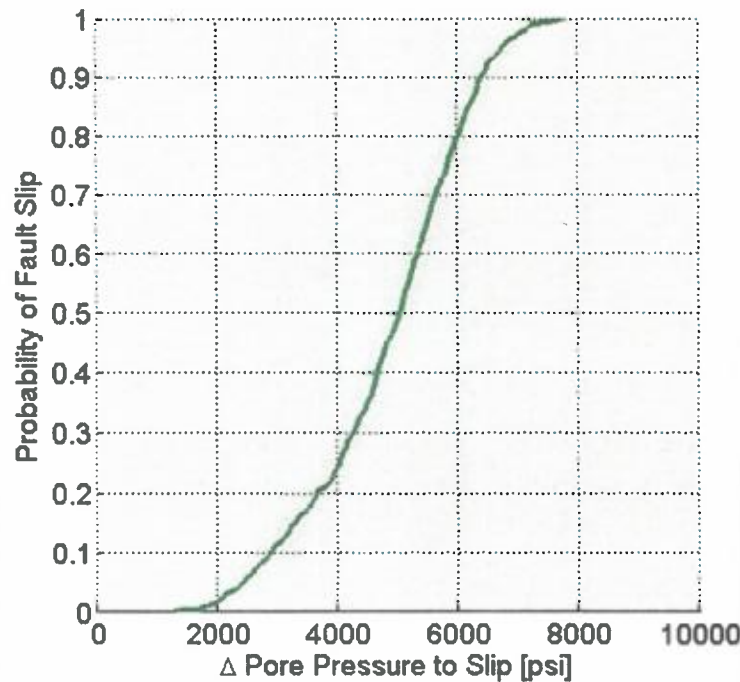
Fault Selector:

All Faults

Fault #1
Fault #2
Fault #3
Fault #4
Fault #5
Fault #6
Fault #7
Fault #8
Fault #9

Load Distributions

Run Analysis



Max Delta PP [psi]:

10000

Calculate

Export CDF data

Show Input Distributions

Variability in Inputs

Reference Friction

aPhi

Fault Friction Coeff

SHmax Azimuth

Dip of fault

Strike of fault

Pore Press Grad

Vert Stress Grad

Percent Deviation [%]

Sensitivity Analysis for Fault #1

SHmax Azimuth

Strike of fault

Vert Stress Grad

Pore Press Grad

Dip of fault

Fault Friction Coeff

Reference Friction

aPhi

Δ Pore Pressure to Slip [psi]

Exh. No. 8

Fault Slip Potential

Fault Selector:

All Faults
Fault #1, 0.00 FSP
Fault #2, 0.00 FSP
Fault #3, 0.00 FSP
Fault #4, 0.00 FSP
Fault #5, 0.00 FSP
Fault #6, 0.00 FSP
Fault #7, 0.00 FSP
Fault #8, 0.00 FSP
Fault #9, 0.00 FSP

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

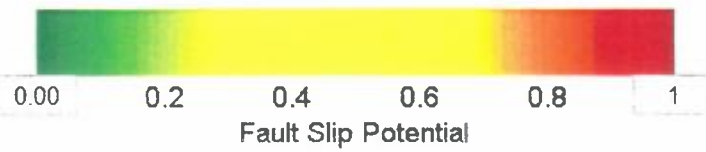
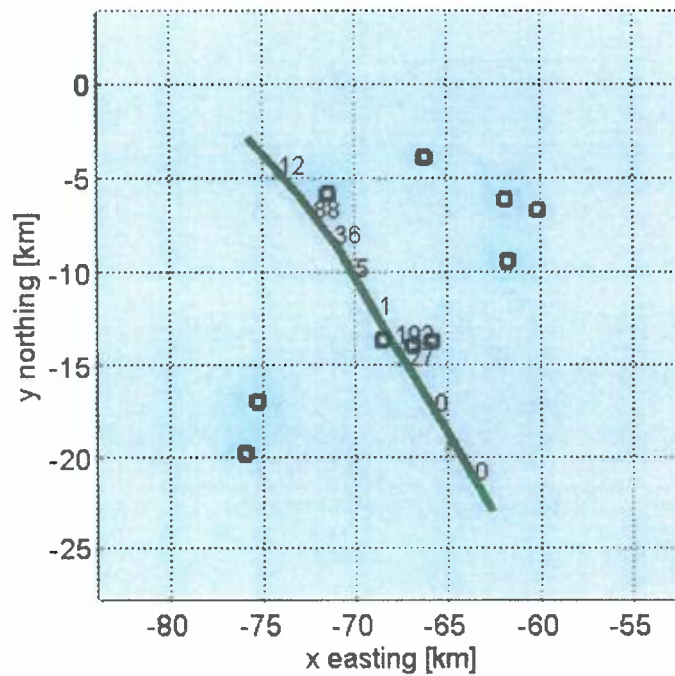
PROB. HYDRO

INTEGRATED

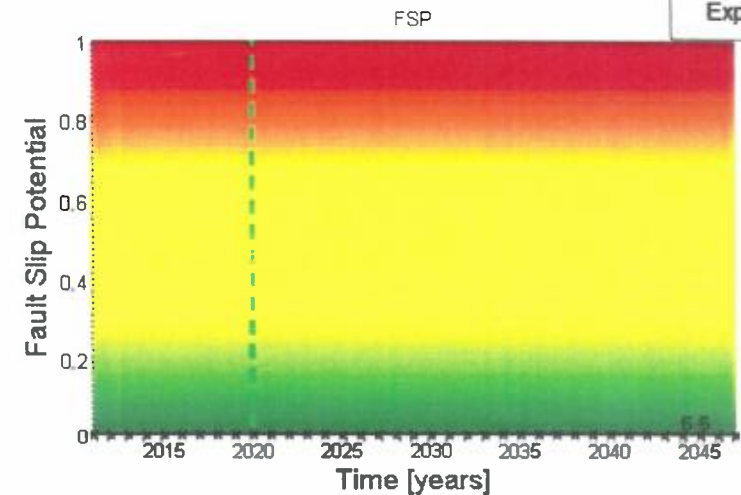
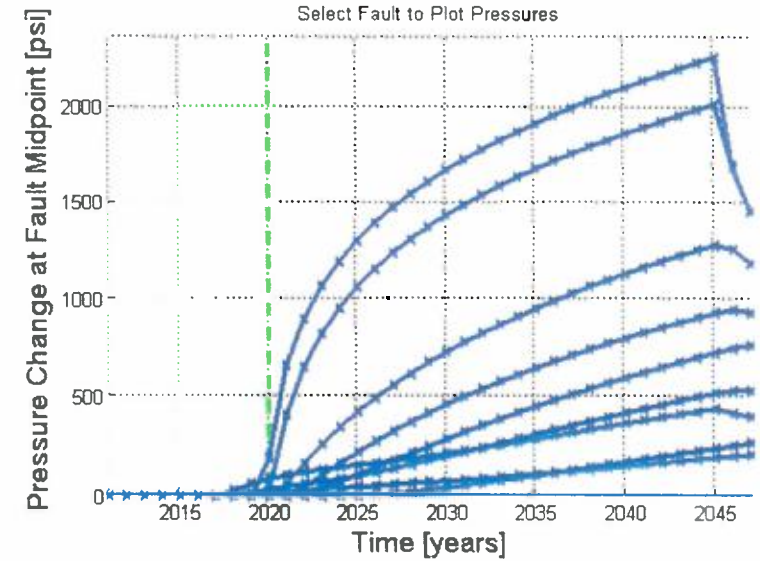
Export

b) PP Change at fault [psi]

Summary Plots



Year: 2020



Exh. No. 9

Zoom

Fault Slip Potential

Fault Selector:

All Faults
Fault #1, 0.00 FSP
Fault #2, 0.00 FSP
Fault #3, 0.00 FSP
Fault #4, 0.00 FSP
Fault #5, 0.00 FSP
Fault #6, 0.00 FSP
Fault #7, 0.00 FSP
Fault #8, 0.00 FSP
Fault #9, 0.00 FSP

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

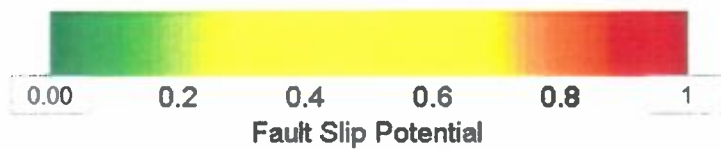
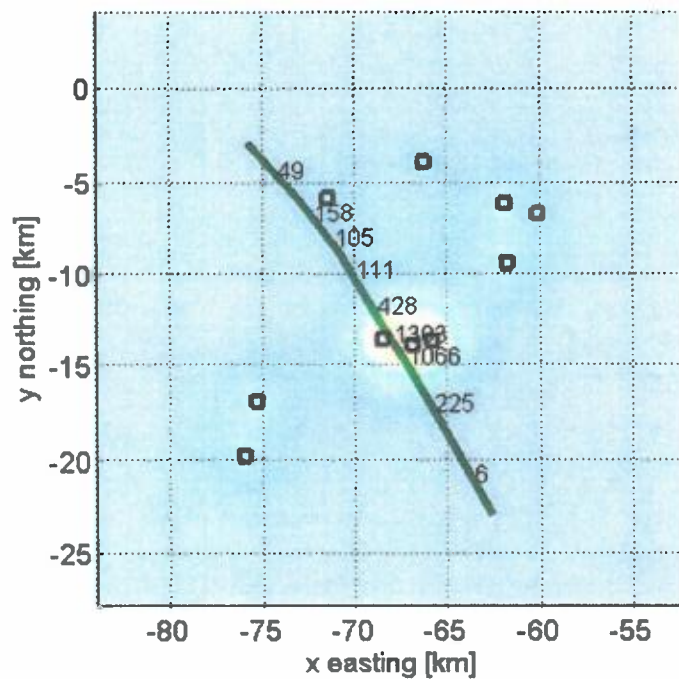
PROB. HYDRO

INTEGRATED

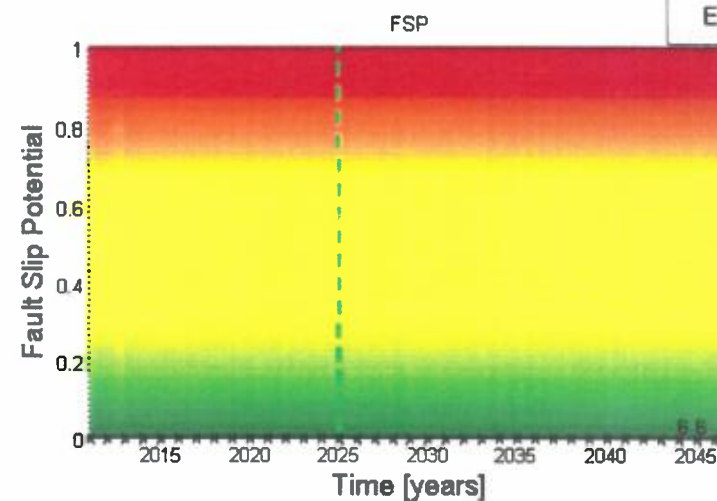
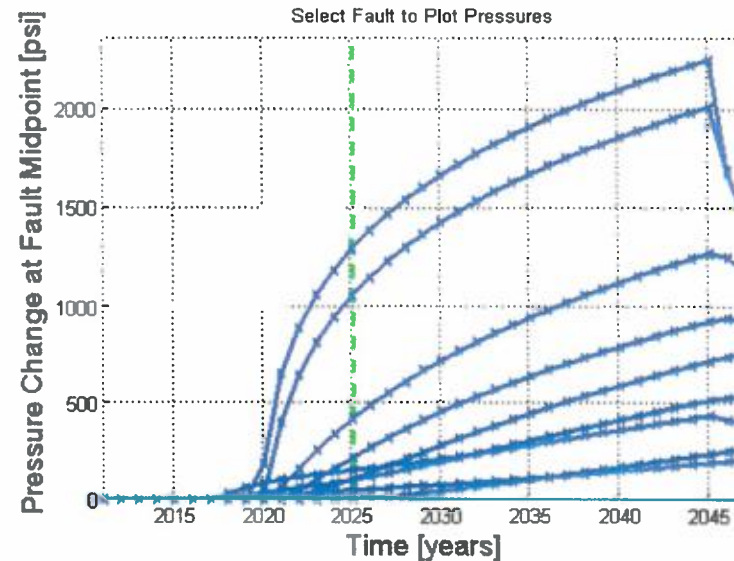
Export

b) PP Change at fault [psi]

Summary Plots



Year: 2025



Exh. No. 10

Fault Slip Potential

Fault Selector:

- All Faults
- Fault #1, 0.00 FSP
- Fault #2, 0.00 FSP
- Fault #3, 0.00 FSP
- Fault #4, 0.00 FSP
- Fault #5, 0.00 FSP
- Fault #6, 0.00 FSP
- Fault #7, 0.00 FSP
- Fault #8, 0.00 FSP
- Fault #9, 0.00 FSP

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

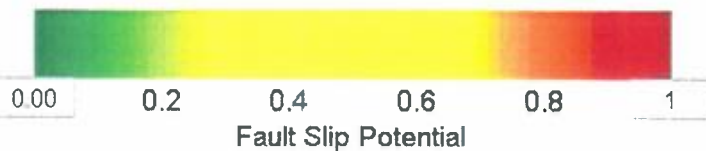
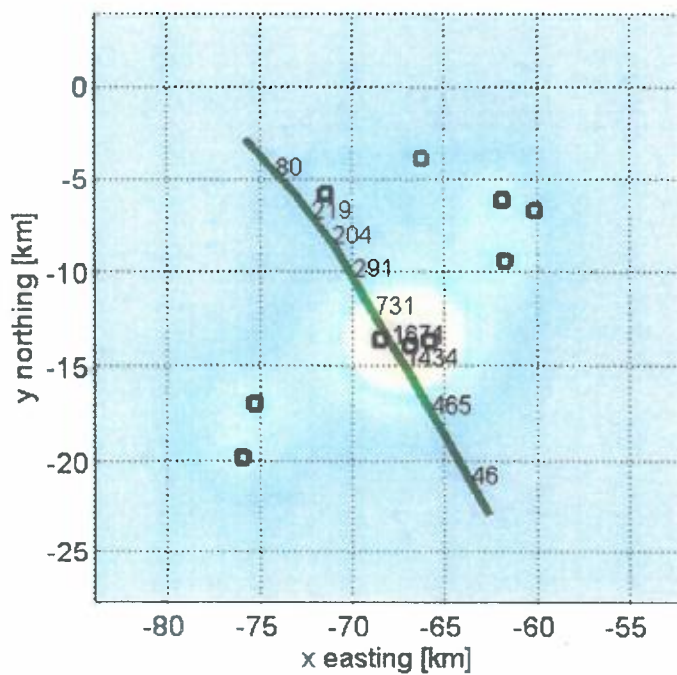
PROB. HYDRO

INTEGRATED

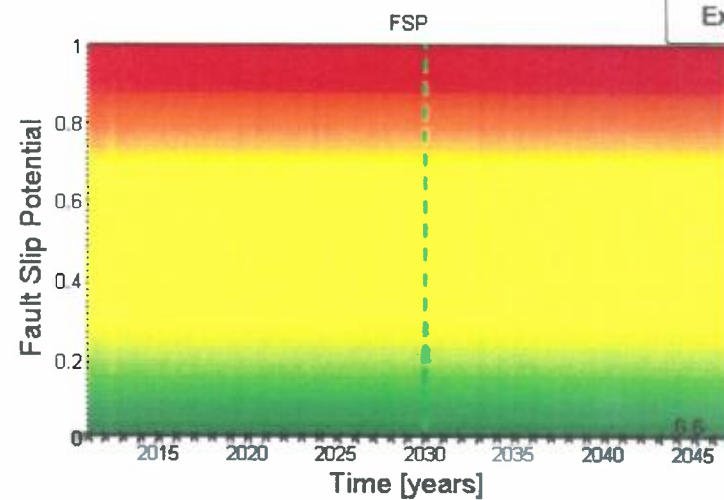
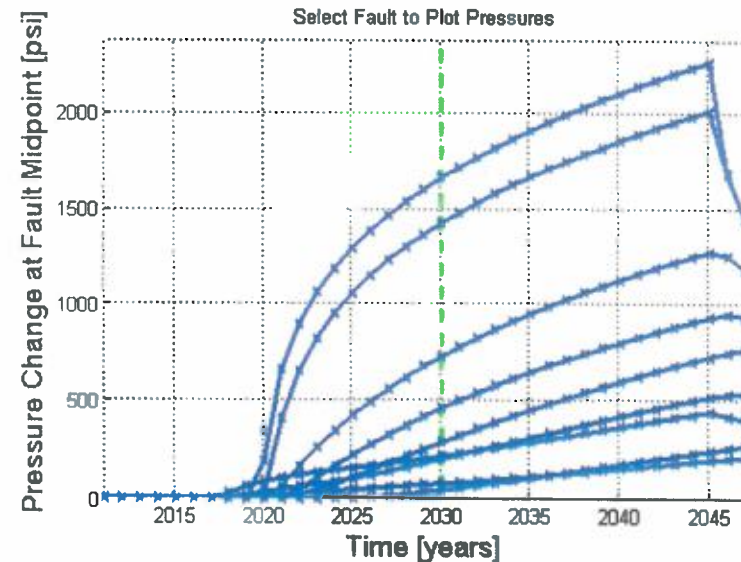
Export

b) PP Change at fault [psi]

Summary Plots



Year: 2030



Exh. No. 11

Fault Slip Potential

Fault Selector:

All Faults
Fault #1, 0.00 FSP
Fault #2, 0.00 FSP
Fault #3, 0.00 FSP
Fault #4, 0.00 FSP
Fault #5, 0.00 FSP
Fault #6, 0.00 FSP
Fault #7, 0.00 FSP
Fault #8, 0.00 FSP
Fault #9, 0.00 FSP

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

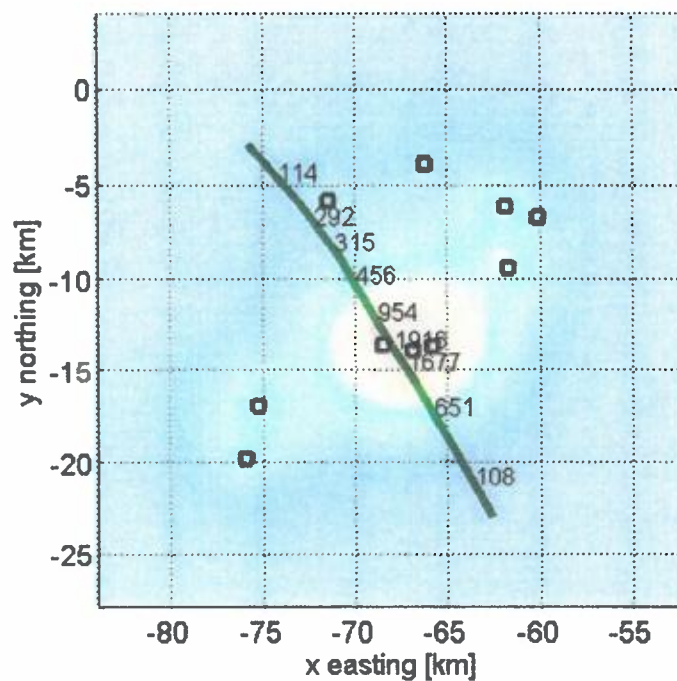
PROB. HYDRO

INTEGRATED

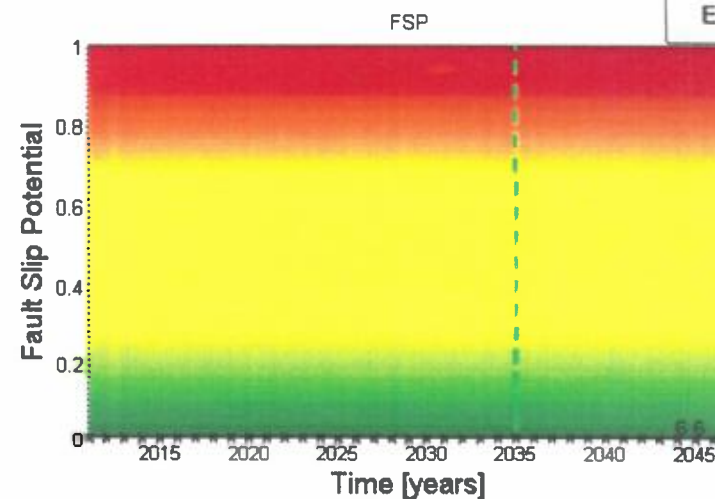
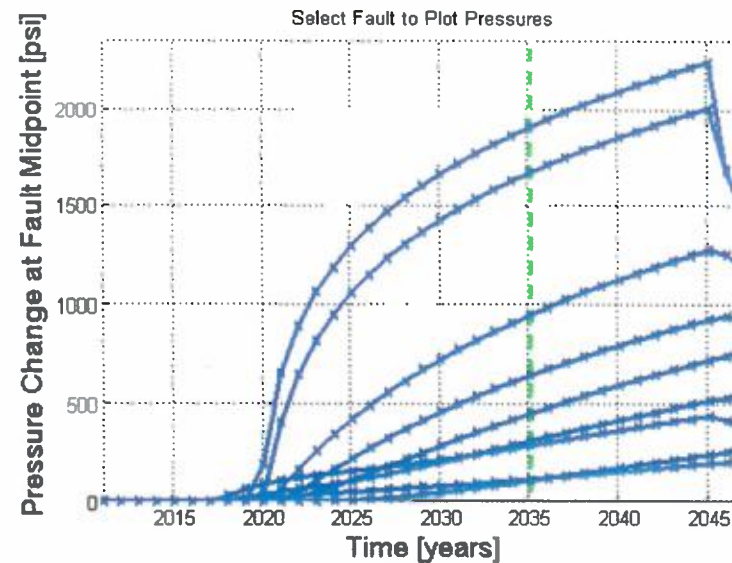
Export

b) PP Change at fault [psi]

Summary Plots



Year: 2035



Exh. No. 12

Fault Slip Potential

Fault Selector:

All Faults
Fault #1 0.00 FSP
Fault #2 0.00 FSP
Fault #3 0.00 FSP
Fault #4 0.00 FSP
Fault #5 0.00 FSP
Fault #6 0.00 FSP
Fault #7 0.00 FSP
Fault #8 0.00 FSP
Fault #9 0.00 FSP

Calculate

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

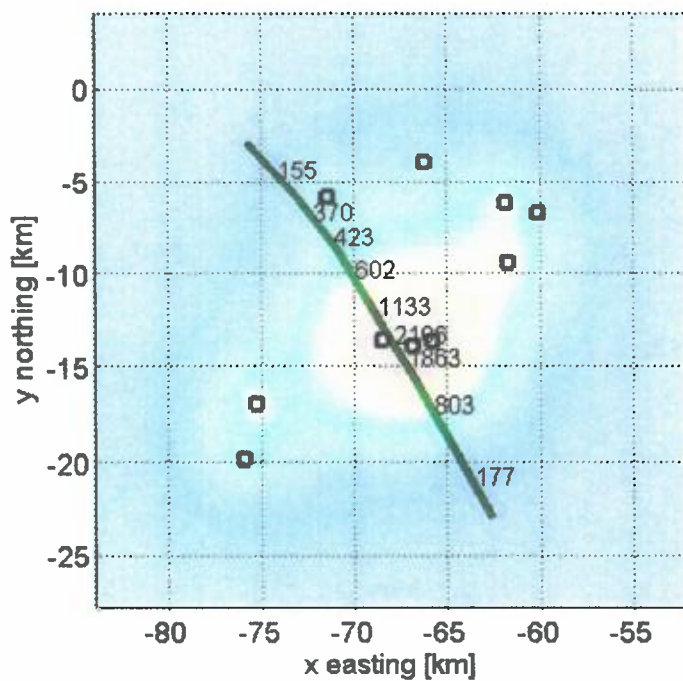
PROB. HYDRO

INTEGRATED

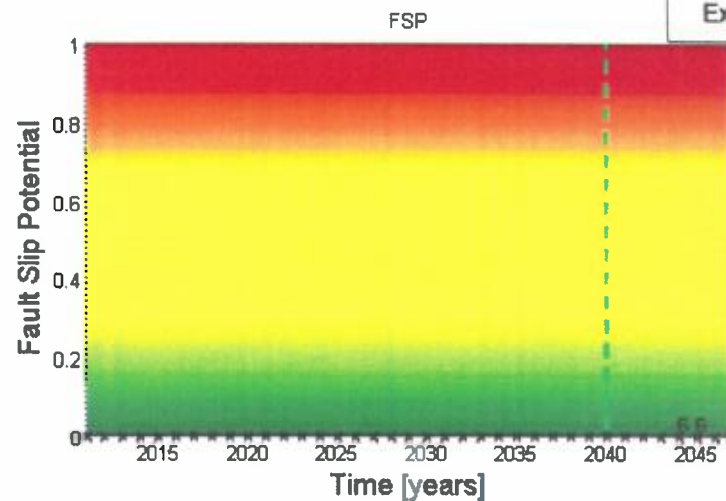
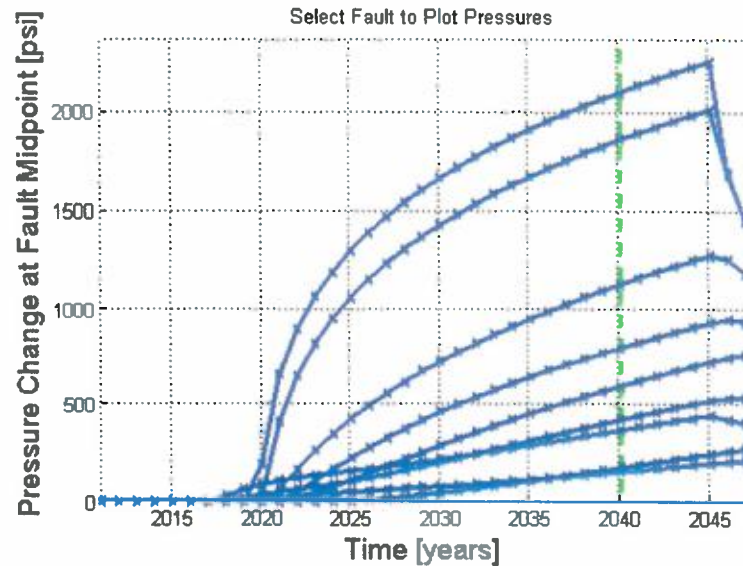
Export

b) PP Change at fault [psi]

Summary Plots



Year: 2040



Exh. No. 13

Fault Slip Potential

MODEL INPUTS

GEOMECHANICS

PROB. GEOMECH

HYDROLOGY

PROB. HYDRO

INTEGRATED

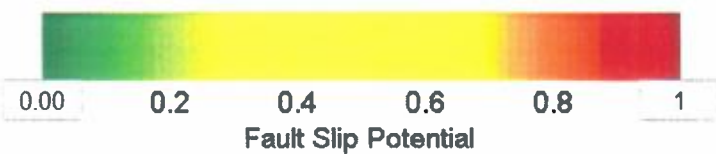
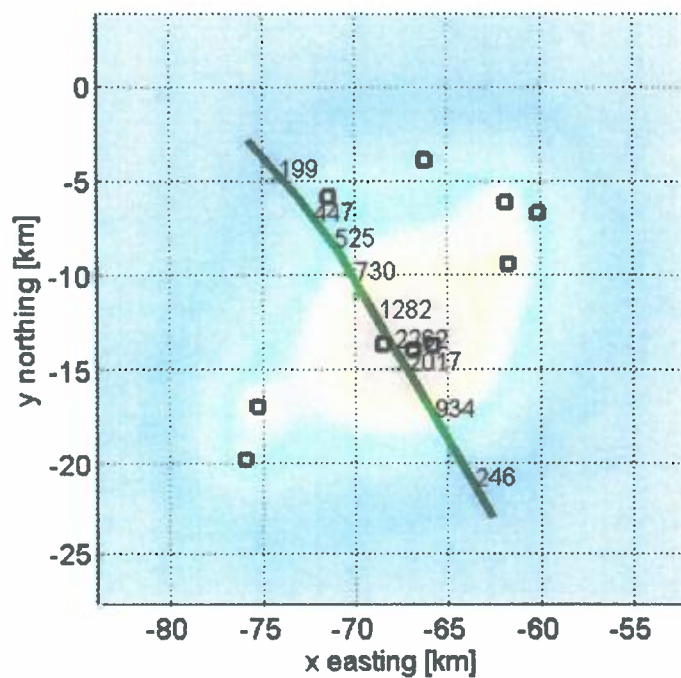
Fault Selector:

All Faults
Fault #1, 0.00 FSP
Fault #2, 0.00 FSP
Fault #3, 0.00 FSP
Fault #4, 0.00 FSP
Fault #5, 0.00 FSP
Fault #6, 0.00 FSP
Fault #7, 0.00 FSP
Fault #8, 0.00 FSP
Fault #9, 0.00 FSP

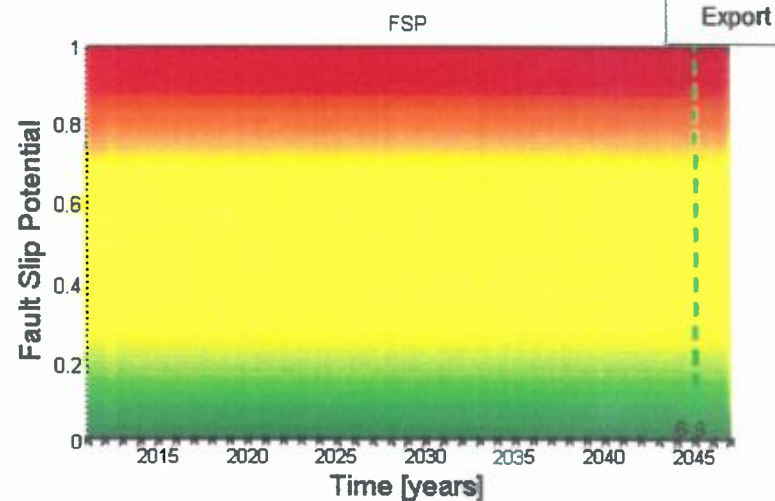
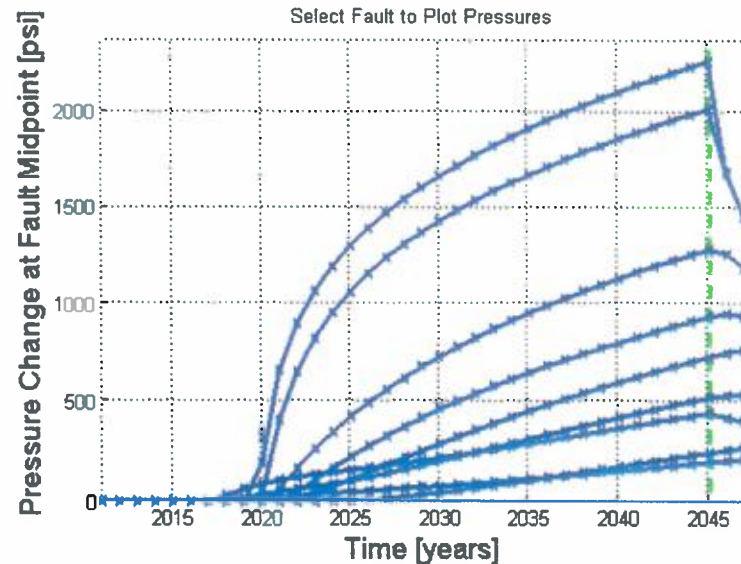
Calculate

b) PP Change at fault [psi]

Summary Plots



Year: 2045



Notice Affidavit

**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. 20475

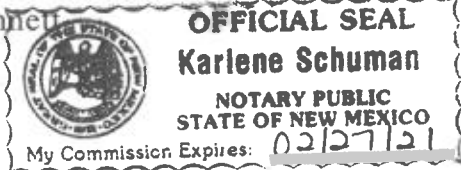
AFFIDAVIT

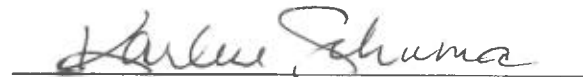
STATE OF NEW MEXICO)
) ss.
COUNTY OF BERNALILLO)

Deana M. Bennett, attorney in fact and authorized representative of NGL Water Solutions Permian LLC, the Applicant herein, being first duly sworn, upon oath, states that the above-referenced Application was provided under a notice letter and that proof of receipt is attached hereto.

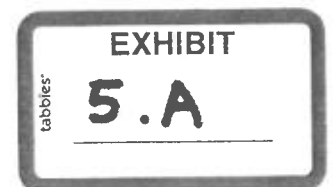

Deana M. Bennett

SUBSCRIBED AND SWORN to before me this 19th day of July, 2019 by Deana M. Bennett




Notary Public

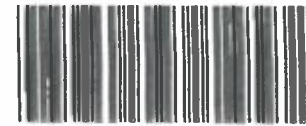
My commission expires: 02/27/21



Karlene Schuman
Modrall Sperling Roehl Harris & Sisk P.A.
500 Fourth Street, Suite 1000
Albuquerque NM 87102

PS Form 3877

Type of Mailing: CERTIFIED MAIL
04/12/2019



Firm Mailing Book ID: 165101

Line	USPS Article Number	Name, Street, City, State, Zip	Postage	Service Fee	RR Fee	Rest.Del.Fee	Reference Contents
1	9314 8699 0430 0058 0396 74	Oil Conservation Division District IV 1220 South St. Francis Drive Santa Fe NM 87505	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
2	9314 8699 0430 0058 0396 81	Oil Conservation Division District II - Artesia 811 S. First Street Artesia NM 88210	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
3	9314 8699 0430 0058 0396 98	NGL WATER SOLUTIONS PERMIAN, LLC 1509 W Wall St., Ste. 306 Midland TX 79701	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
4	9314 8699 0430 0058 0397 04	Ramsey Minerals 500 W 5TH ST STE 1210 Austin TX 78701	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
5	9314 8699 0430 0058 0397 11	BUREAU OF LAND MGMT 301 Dinosaur Trail Santa Fe NM 87508	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
6	9314 8699 0430 0058 0397 28	COG OPERATING LLC 600 W Illinois Ave Midland TX 79701	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
7	9314 8699 0430 0058 0397 35	OCCIDENTAL PERMIAN LP 5 Greenway Plaza Houston TX 77046	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
8	9314 8699 0430 0058 0397 42	COG PRODUCTION LLC PO Box 2064, Midland, TX 79702 Midland TX 79702	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
9	9314 8699 0430 0058 0397 59	CONOCOPHILLIPS COMPANY ATTN Charlene Winston PO BOX 2197 Houston TX 77252	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
10	9314 8699 0430 0058 0397 66	CM TX PRODUCTION LLC PMB 513 12081 W Alameda Pkwy Lakewood CO 80228	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
11	9314 8699 0430 0058 0397 73	Tap Rock Resources, LLC 602 Point Park Dr. Suite 200 Golden CO 80401	\$1.45	\$3.50	\$1.60	\$0.00	87806.007 Whitt32 Notice
Totals:			\$15.95	\$38.50	\$17.60	\$0.00	
				Grand Total:		\$72.05	

List Number of Pieces
Listed by Sender

Total Number of Pieces
Received at Post Office

Postmaster:
Name of receiving employee

Dated:

11

Transaction Report Details - CertifiedPro.net
 Firm Mail Book ID= 165101
 Generated: 7/18/2019 3:06:24 PM

Transaction Report Details - CertifiedPro.net	Date Created	Reference Number	Name 1	Name 2	Address	City	State	Zip	Mailing Status	Service Options	Mail Delivery Date
9314869904 00058039773	2019-04-12 9:14 AM	87806.007 Whitt32	Tap Rock Resources, LLC		602 Point Park Dr. Suite 200	Golden	CO	80401	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019
9314869904300058039766	2019-04-12 9:14 AM	87806.007 Whitt32	CM TX PRODUCTION LLC		PMB 513 12081 W Alameda Pkwy	Lakewood	CO	80228	Delivered	Return Receipt - Electronic, Certified Mail	04-16-2019
9314869904300058039759	2019-04-12 9:14 AM	87806.007 Whitt32	CONOCOPHILLIPS COMPANY	ATTN Charlene Winston	PO BOX 12197	Houston	TX	77252	Delivered	Return Receipt - Electronic, Certified Mail	04-16-2019
9314869904300058039742	2019-04-12 9:14 AM	87806.007 Whitt32	COG PRODUCTION LLC		PO Box 2064, Midland, TX 79702	Midland	TX	79702	To be Returned	Return Receipt - Electronic, Certified Mail	
9314869904300058039735	2019-04-12 9:14 AM	87806.007 Whitt32	OCCIDENTAL PERMIAN LP		5 Greenway Plaza	Houston	TX	77046	Delivered	Return Receipt - Electronic, Certified Mail	04-16-2019
9314869904300058039728	2019-04-12 9:14 AM	87806.007 Whitt32	COG OPERATING LLC		600 W Illinois Ave	Midland	TX	79701	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019
9314869904300058039711	2019-04-12 9:14 AM	87806.007 Whitt32	BUREAU OF LAND MGMT		301 Dinosaur Trail	Santa Fe	NM	87508	To be Mailed	Return Receipt - Electronic, Certified Mail	
9314869904300058039704	2019-04-12 9:14 AM	87806.007 Whitt32	Ramsey Minerals		500 W 5TH ST STE 1210	Austin	TX	78701	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019
9314869904300058039698	2019-04-12 9:14 AM	87806.007 Whitt32	NGL WATER SOLUTIONS PERMIAN, LLC		1509 W Wall St., Ste. 306	Midland	TX	79701	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019
9314869904300058039681	2019-04-12 9:14 AM	87806.007 Whitt32	Oil Conservation Division District II - Artesia		811 S. First Street	Artesia	NM	88210	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019
9314869904300058039674	2019-04-12 9:14 AM	87806.007 Whitt32	Oil Conservation Division District IV		1220 South St. Francis Drive	Santa Fe	NM	87505	Delivered	Return Receipt - Electronic, Certified Mail	04-15-2019

CARLSBAD
CURRENT-ARGUS

AFFIDAVIT OF PUBLICATION

Ad No.
0001283504

MODRALL SPERLING
PO BOX 2168

ALBUQUERQUE NM 87103

I, a legal clerk of the **Carlsbad Current-Argus**,
a newspaper published daily at the City of
Carlsbad, in said county of Eddy, state of New
Mexico and of general paid circulation in said
county; that the same is a duly qualified
newspaper under the laws of the State wherein
legal notices and advertisements may be
published; that the printed notice attached
hereto was published in the regular and entire
edition of said newspaper and not in supplement
thereof on the date as follows, to wit:

04/18/19

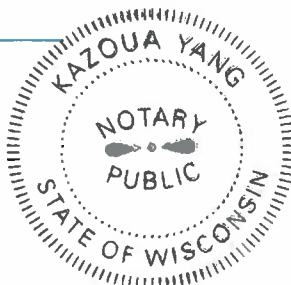
[Signature]

Legal Clerk

Subscribed and sworn before me this
18th of April 2019.

[Signature]
State of WI, County of Brown
NOTARY PUBLIC

11/9/22
My Commission Expires



CASE NO. 20475: Notice to all affected parties, as well as the heirs and devisees of RAMSEY MINERALS; BUREAU OF LAND MGMT; COG OPERATINGLLC; OCCIDENTALPERMIAN LP; COG PRODUCTIONLLC; CONOCOPHILLIP COMPANYATTN CHARLEBWINSTON; CM TX PRODUCTION LLC; TAP ROCK RESOURCES LLC that NGL Water Solutions Permian, LLC, 1509 W. Wall Street. Suite 306, Midland, Texas 79701 has filed an application for hearing along with a C-108 (Application for Authorization to Inject) with the New Mexico Oil Conservation Division for approval of salt water disposal well in Eddy County, New Mexico. The State of New Mexico, through its Oil Conservation Division, hereby gives notice that the Division will conduct a public hearing at 8:15 a.m. on May 2, 2019, to consider this application. Applicant seeks an order approving disposal into the Silurian-Devonian formation through the Whitt 32 SWD #1 well at a surface location 219 feet from the South line and 2,395 feet from the West line of Section 32, 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 15,170' to 16,312'. 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. Said location is 15.8 miles South of Malaga, New Mexico. Pub: April 18, 2019 #1283504

**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. 20475 (WHITT 32)

AFFIDAVIT OF CHRIS WEYAND

STATE OF TEXAS)
) ss.
COUNTY OF TRAVIS)

I, Chris Weyand, make the following affidavit based upon my own personal knowledge.

1. I am over eighteen (18) years of age and am otherwise competent to make the statements contained herein.

2. I am a Staff Engineer at Lonquist & Co., LLC. My responsibilities at Lonquist & Co., LLC include saltwater disposal well permitting efforts in New Mexico as well as other states and jurisdictions.

3. I graduated from Texas A&M University in 2010 with an engineering degree.

4. I am familiar with the application that NGL Water Solutions Permian, LLC ("NGL") has filed in this matter.

5. In this case, NGL (OGRID No. 372338) seeks an order approving the Whitt 32 SWD #1 well, which is a salt water disposal well.

6. I compiled a list of all parties entitled to notice within a one-mile area of review. I reviewed County and Division records to determine the parties entitled to notice, including the



owner of the surface (NGL) and leasehold operators or other affected person. With respect to affected parties, I determined whether there was an operator, as shown in the Division records, or a designated unit operator, and if not, whether there were any working interests whose interest is evidenced by a written conveyance document either of record; and as to any tract or interest not subject to an existing oil and gas lease, whether there were mineral interest owner whose interest is evidenced by a written conveyance document either of record; and whether the United States or state of New Mexico owns the mineral estate in the spacing unit or identified tract or any part thereof, the BLM or state land office, as applicable.

7. The area of review was evaluated for offset wellbores penetrating the injection formation and to determine notice parties as part of the C-108 Application.

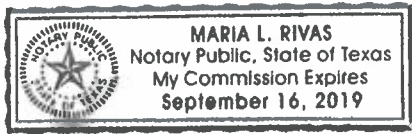
8. In my review, I identified Ramsey Minerals as an adjacent landowner in Texas and I provided that information, along with the other notice information, to NGL's counsel.

9. I attest that the information provided herein is correct and complete to the best of my knowledge and belief.

[Signature page follows]


Chris Weyand

SUBSCRIBED AND SWORN to before me this 23 th day of July, 2019 by Chris Weyand.




Notary Public

My commission expires: 9/16/2019