

**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, LEA COUNTY,
NEW MEXICO.**

OCT 25 2018 AM 10:57

CASE NO. 16443

**MOTION FOR CONTINUANCE AND
OBJECTION TO PRESENTING CASE BY AFFIDAVIT**

Santo Operating, LLC ("Santo") moves the Division to continue the above-referenced case which is currently set for hearing on the November 1, 2018 docket until the December 6, 2018 docket. Additionally, Santo objects to presentation of this case by affidavit. In support of this Motion, Santo states,

1. NGL Water Solutions Permian, LLC ("NGL") has filed an application for an order approving disposal into the Devonian and Silurian formations through the Sidewinder SWD No. 1 Well.
2. Santo is the operator of a horizontal well in the adjacent Section 15 (Ocotillo Sunrise 15 WA AP Fee No. 002H (API No. 30-025-44294)). Said well is within the half-mile notice requirement of 19.15.26.8(A) NMAC.
3. Contrary to 19.15.26.8(A) NMAC, Santo did not receive notice of this application of hearing.
4. Santo objects to this application on the basis that the proposed injection well will interfere with its existing well and future development.
5. Santo further objects to the presentation of this case by affidavit because it will be prevented from cross-examining witnesses.

6. NGL's case should be continued until December 6, 2018, to allow the parties time to review and discuss potential solutions.

7. NGL's attorneys have been contacted and do not agree to this motion.

WHEREFORE, for the reasons stated above, Santo Operating, LLC respectfully requests that the Division continue the hearing in the above-referenced cases until the December 6, 2018, Examiner Docket.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2018, I served a copy of the foregoing document to the following counsel of record via Electronic Mail to:

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