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

APR 11 2019 PM03:36

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

Case No. 20142

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

NGL Water Solutions Permian, LLC ("NGL") submits its Pre-Hearing Statement in this

matter, pursuant to Oil Conservation Division Rule 19.15.4.13 NMAC.

### APPEARANCES

## Applicant

NGL Water Solutions Permian, LLC

#### **Interested Parties**

Commissioner of Public Lands, New Mexico State Land Office

Invenergy, LLC

Lara Katz Darin C. Savage Abadie & Schill, P.C. 214 McKenzie Street Santa Fe, New Mexico 87501 (970) 385-4401

#### Attorney

Attorney

Andrea Antillon New Mexico State Land Office P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504

Michael H. Feldewert Adam G. Rankin Juila Broggi Holland & Hart, LLP P.O. Box 2208 Santa Fe, NM 87504 Kaiser-Francis Oil Company

James Bruce P.O. Box 1056 Santa Fe, NM 87504

Lucid Energy Group

Gary W. Larson Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068

# APPLICANT'S STATEMENT OF THE CASE

In Case No. 20142, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Trident SWD #1 well. NGL proposes to drill this well at a surface location 240 feet from the North line and 1120 feet from the West line of Section 13, Township 24 South, Range 33 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 16,320' - 18,093'. NGL further seeks approval of the use of 7 inch tubing inside the surface and immediate casings, and  $5\frac{1}{2}$  inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 20,000 bbls per day.

## **APPLICANT'S PROPOSED EVIDENCE**

WITNESS	ESTIMATED TIME	<b>EXHIBITS</b>
Neel Duncan – Operations	Approx. 15 mins.	Approx. 5
Kate Zeigler – Geologist	Approx. 15 mins.	Approx. 4
Scott Wilson – Engineer	Approx. 20 mins.	Approx. 11
Steve Taylor – Seismologist	Approx. 15 mins.	Approx. 5
Alan Barker	Approx. 15 mins.	Approx. 3

## **PROCEDURAL MATTERS**

NGL intends to present evidence via affidavit in this matter and would like to consolidate

this case at hearing with its pending applications, if possible.

Respectfully submitted,

# ABADIE & SCHILL, P.C.

Lara Katz

Darin C. Savage 214 McKenzie Street Santa Fe, New Mexico 87501 (970) 385-4401 <u>lara@abadieschill.com</u> darin@abadieschill.com

Attorneys for NGL Water Solutions Permian, LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served upon the following

counsel via email on this 11<sup>th</sup> day of April, 2019:

Andrea Antillon New Mexico State Land Office P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504 aantillon@slo.state.nm.us Attorneys for the Commissioner of Public Lands, New Mexico State Land Office

Michael H. Feldewert Adam G. Rankin Juila Broggi Holland & Hart, LLP P.O. Box 2208 Santa Fe, NM 87504 mfeldewert@hollandhart.com agrankin@hollandhart.com jbroggi@hollandhart.com Attorneys for Invenergy, LLC

Seth McMillan Sharon T. Shaheen Montgomery & Andrews, P.A. Post Office Box 2307 Santa Fe, New Mexicob 87504-2307 (505) 982-3873 smcmillan@montand.com sshaheen@montand.com James Bruce P.O. Box 1056 Santa Fe, NM 87504 jamesbruc@aol.com Attorney for Kaiser-Francis Oil Company

Gary W. Larson Hinkle Shanor LLP P.O. Box 2068 Santa Fe, NM 87504-2068 glarson@hinklelawfirm.com Attorneys for Lucid Energy Group

Lara Katz