

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

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

**CASE NO. 16504**

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

NGL Water Solutions Permian, LLC's ("NGL") submits this Pre-Hearing Statement for the above-referenced case pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

NGL

**ATTORNEY**

Jennifer L. Bradfute  
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**INTERESTED PARTY**

BC&D Operating

**ATTORNEY**

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**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 16504, Applicant seeks an order approving disposal into the Silurian-Devonian formation through the Cobra SWD #1 well. NGL proposes to drill this well at a surface location 326 feet from the North line and 718 feet from East line of Section 19, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 15,600' – 17,261'. NGL further seeks approval of the use of 7-inch tubing inside the surface and intermediate casings and 5 ½-inch tubing inside the liner and requests that the Division approve a maximum daily injection rate for the well of 50,000 bbls per day.

**PROPOSED EVIDENCE**

**APPLICANT:**

<u>WITNESS</u>	<u>ESTIMATED TIME</u>	<u>EXHIBITS</u>
Neel Duncan– Operations	Approx. 15	Approx. 5
Kate Zeigler - Geologist	Approx. 15	Approx. 4
Scott Wilson - Engineer	Approx. 20	Approx. 11
Steve Taylor- Seismologist	Approx. 15	Approx. 7
Stephen Nave – Fishing Expert	Approx. 15	Approx. 5

**PROCEDURAL MATTERS**

NGL intends to present evidence via affidavit in these matters and would like to consolidate this case with its other pending cases at hearing, if possible.

Respectfully submitted,

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

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on counsel of record by electronic mail on October 25, 2018:

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