

**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. 16505

**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
Deana M. Bennett
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P. O. Box 2168
Albuquerque, New Mexico 87103-2168
(505) 848-1800

INTERESTED PARTIES

Fulfer Oil & Cattle, LLC

ATTORNEY

Ernest L. Padilla
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalaw@questoffice.net

STATEMENT OF CASE

APPLICANT:

In Case No. 16505, Applicant seeks an order approving disposal into the Silurian-Devonian formation through the Galaxy SWD #1 well. NGL proposes to drill this well at a surface location 345 feet from the North line and 336 feet from East line of Section 29, Township 26 South, Range 36 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 18,743' – 20,088'. 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.**

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

Telephone: 505.848.1800

CERTIFICATE OF SERVICE

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

Ernest L. Padilla
P.O. Box 2523
Santa Fe, New Mexico 87504
(505) 988-7577
padillalaw@questoffice.net

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