

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

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

CASE NO. 16443

**RESPONSE TO MOTIONS FOR CONTINUANCES FILED
BY SOLARIS WATER MIDSTREAM, LLC AND SANTO OPERATING, LLC**

NGL Water Solutions Permian, LLC's ("NGL") submits this response to motions for continuance and objections to presenting Case No. 16443 by affidavit filed by Solaris Water Midstream, LLC ("Solaris") and Santo Operating, LLC ("Santo") filed on Friday, October 26, 2018 with the Division.

(1) In Case No. 16443, NGL proposes to drill the Sidewinder SWD #1 well (the "Well") at a surface location 1342 feet from the North line and 546 feet from East line of Section 15, Township 25 South, Range 34 East, NMPM, Lea County, New Mexico for the purpose of operating a salt water disposal well.

(2) NGL seeks authority to inject salt water into the Devonian and Silurian formations at a depth of 17,157' – 19,067'.

(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) The location for the Well was selected after NGL met with the Division during a

pre-hearing conference held in September of 2018. During that conference, the Division asked NGL to relocate the well in order to satisfy technical concerns raised by the Hearing Examiner. NGL then amended its application to address the Division's concerns.

(5) After amending the Well's location, Santo and Solaris entered an appearance in the case.

(6) NGL has since been in communication with Santo and the parties are close to finalizing an agreement which resolves Santo's concerns related to the location of the Well. The parties have exchanged redlines to a proposed agreement, and NGL anticipates that agreement will be executed during the week of October 29, 2018.

(7) Solaris is protesting NGL's application in 16443 because in or around October of 2018, it filled an administrative application for the approval of a salt water disposal well in the area where the Sidewinder SWD #1 well is proposed to be located.

(8) NGL has scheduled a drilling rig for the drilling on this Well beginning on February 1, 2019 and there are operators in the surrounding area that will be impacted if this well is not timely drilled. As a result, NGL needs this matter to be heard and decided in the near future.

(9) Due to Solaris' objection, NGL requests that this case be continued to a special docket.

(10) NGL's counsel has reached out to counsel for Solaris and requested special docket dates to provide to the Division.

(11) NGL asks that during the special docket hearing both parties present testimony so

that all witnesses may be cross-examined.

WHEREFORE, NGL requests that a special hearing docket be set by the Division.

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 29, 2018:

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