

**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 EDDY COUNTY,  
NEW MEXICO**

**CASE NO. 20140**

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

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

**APPEARANCES**

**APPLICANT**

NGL

**ATTORNEY**

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

**OPPONENT**

New Mexico State Land Office

Andrea Antillon  
[aaantillon@slo.state.nm.us](mailto:aaantillon@slo.state.nm.us)  
310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148

**STATEMENT OF CASE**

**APPLICANT:**

In Case No. 20140, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Quintana SWD #1 well at a surface location 869 feet from the South line and 1730 feet from the East line of Section 36, Township 22 South,

Range 26 East, NMPM, Eddy County, New Mexico for the purpose of operating a salt water disposal well. NGL seeks authority to inject salt water into the Silurian-Devonian formation at a depth of 12,583'-13,656'. 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      |
| Dr. Steven Taylor- Seismologist | Approx. 15            | Approx. 7       |
| Stephen Nave – Fishing Expert   | Approx. 15            | Approx. 5       |

### **PROCEDURAL ISSUES**

NGL intends to put this case on by affidavit and has conferred with counsel for the State Land Office who does not oppose NGL putting this case on by affidavit.

Respectfully submitted,

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

By: Deana M. Bennett  
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 May 9, 2019:

New Mexico State Land Office  
Andrea Antillon  
[aaantillon@slo.state.nm.us](mailto:aaantillon@slo.state.nm.us)  
310 Old Santa Fe Trail  
P.O. Box 1148  
Santa Fe, NM 87504-1148

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