# 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

**Applicant** 

Case No. 20575

# 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**

Attorney

rppneum	Actorney	
NGL Water Solutions Permian, LLC	Lara Katz Darin C. Savage Abadie & Schill, P.C. 214 McKenzie Street Santa Fe, New Mexico 87501 (970) 385-4401	
Interested Parties	Attorney	
Commissioner of Public Lands, New Mexico State Land Office	Andrea Antillon New Mexico State Land Office P.O. Box 1148 310 Old Santa Fe Trail Santa Fe, NM 87504 (505) 827-5752	

#### APPLICANT'S STATEMENT OF THE CASE

In Case No. 20575, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Ghost Rider SWD #1 well. NGL proposes to drill this well at a surface location 1,585 feet from the South line and 270 feet from the East line of Section 30, Township 26 South, Range 35 East, NMPM, Lea County, New Mexico. The target injection interval is the Silurian-Devonian formation at a depth of 18,953' – 20,729'. NGL further seeks approval of the use of 7 inch tubing inside the surface and immediate casings, and 5½ 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.

### APPLICANT'S PROPOSED EVIDENCE

WITNESS	ESTIMATED TIME	EXHIBITS
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

#### 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

lara@abadieschill.com

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  $6^{th}$  day of June, 2019:

Andrea Antillon
New Mexico State Land Office
P.O. Box 1148
310 Old Santa Fe Trail
Santa Fe, NM 87504
(505) 827-5752
aantillon@slo.state.nm.us
Attorneys for the Commissioner of Public
Lands, New Mexico State Land Office

Lara Katz