

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

**AMENDED APPLICATION OF NGL WATER
SOLUTIONS PERMIAN, LLC
TO APPROVE SALT WATER
DISPOSAL WELL IN LEA
COUNTY, NEW MEXICO.**

**CASE NO. 20151
(TOMAHAWK)**

**NGL WATER SOLUTIONS PERMIAN, LLC'S
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
Susan Bisong
MODRALL, SPERLING,
ROEHL, HARRIS & SISK,
P.A.
P. O. Box 2168
Albuquerque, New Mexico
87103-2168
(505) 848-1800

OPPONENT

Solaris Water Midstream, LLC

ATTORNEY

James Bruce
P.O. Box 1056
Santa Fe, New Mexico
87504
505-982-2043
jamesbruc@aol.com

INTERESTED PARTY

EOG Resources, Inc.

ATTORNEY

Michael Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn Luck
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504

STATEMENT OF CASE

APPLICANT:

NGL seeks an order approving disposal into the Silurian-Devonian formation through the Tomahawk SWD #1 well at a surface location 900 feet from the North line and 151 feet from the East line of Section 4, Township 25 South, Range 34 East, NMPM, Lea 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 16,805' to 18,475'. 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.

OPPONENT:

See Solaris' prehearing statement.

PROPOSED EVIDENCE

APPLICANT:

WITNESS

Neel Duncan– Operations

ESTIMATED TIME

Approx. 25

EXHIBITS

Approx. 7

PROCEDURAL ISSUES

NGL intends to put this case on by affidavits as presented by Mr. Neel Duncan. NGL has coordinated with counsel for Solaris and EOG who do not oppose the case being presented by Mr. Duncan.

Respectfully submitted,

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

By: Deana M. Bennett

Deana M. Bennett
Susan Bisong
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 August 15, 2019:

James Bruce
P.O. Box 1056
Santa Fe, New Mexico 87504
505-982-2043
jamesbruc@aol.com

Michael Feldewert
Adam G. Rankin
Julia Broggi
Kaitlyn Luck
Holland & Hart, LLP
P.O. Box 2208
Santa Fe, NM 87504
Mfeldewert@hollandhart.com
agrarkin@hollandhart.com
jbroggi@hollandhart.com
kaluck@hollandhart.com

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