

**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. 20896
[Original Case No. 16507]

**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

Applicant

NGL Water Solutions Permian, LLC

Attorney

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Interested Parties

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APPLICANT'S STATEMENT OF THE CASE

In Case No. 20856, NGL seeks an order approving disposal into the Silurian-Devonian formation through the Moab SWD #1 well. NGL proposes to drill this well at a surface location 892 feet from the North line and 150 feet from the West line of Section 25, Township 24 South, Range 33 East, NMPM, Lea County. The target injection interval is the Silurian-Devonian formation at a depth of 16,400' - 18,004'. 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

| <u>WITNESS</u> | <u>ESTIMATED TIME</u> | <u>EXHIBITS</u> |
|-----------------------------|-----------------------|-----------------|
| 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 originally submitted its application proposing to drill the Moab SWD #1 in October of 2018. The original application was assigned OCD Case No. 16507. This amended application

is submitted to update the proposed location for drilling the well to accommodate the operations of an offset oil and gas operator. NGL requests that this amended application be consolidated with, and relate back to, the original application and pleadings in Case No. 16507.

Additionally, NGL intends to present evidence via affidavit in this matter.

Respectfully submitted,

ABADIE & SCHILL, P.C.

/s/ Lara Katz

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading was served upon the following counsel via email on this 7th day of November, 2019:

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